Department of Energy

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

FREEDOM OF INFORMATION ACT PROGRAM

July 28, 2015

In reply refer to: FOIA# BPA-2015-01544-F

Richard Till
Friends of the Columbia Gorge
522 SW Fifth Ave, Suite 720
Portland, OR 97204

Mr. Till:

This is a final response to your request for Bonneville Power Administration (BPA) records under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. Your request was received in our office on June 29, 2015, with an acknowledgement letter sent to you on July 2, 2015.

You have requested:

"... all records in the following categories added to BPA's files during the following time period: **January 24, 2015 through June 30, 2015.**

[...] the following categories of records:

- Any materials submitted by Whistling Ridge Energy LLC ("WRE") regarding its pending generation interconnection request;
- Any Transmission Service Requests or similar documents submitted to BPA regarding the WREP;
- Any communications between the BPA and the following persons and entities regarding the WREP:
  - Washington Energy Facility Site Evaluation Council ("EFSEC");
  - state agencies or officials (including elected officials);
  - other federal agencies or officials (including elected officials);
  - Whistling Ridge Energy LLC ("WRE"), including all related entities such as the SDS Lumber Company, Broughton Lumber Company, and Stevenson Land Company, as well as WRE's attorneys and other representatives; and
  - WRE's consultants, including but not limited to URS Corp. and West Inc.
- Any meeting notes, agendas, or other related records generated from meetings between BPA, EFSEC, WRE, and consultants."

Response:

We conducted a search of the electronic records of Transmission Services. We have located 115 pages of material responsive to your request, which we are releasing in full. Please note that the pagination on the collection of responsive records (121) is the result of removing and referencing duplicate attachments.

In addition, we have located 42 pages of material, 30 pages of which include names and addresses. The addresses would be withheld under Exemption 6.

The Freedom of Information Act generally requires the release of all government records upon request. However, FOIA permits withholding certain, limited information that falls under one or more of nine statutory exemptions (5 U.S.C. §§ 552(b)(1-9)).

Exemption 6 protects information in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy" (5 U.S.C. § 552(b)(6)). Exemption 6 requires balancing the public interest in the information against the individual privacy interest at issue. Here, we assert this exemption to redact individuals' physical and email addresses. We find no public interest in this information and therefore redact it under Exemption 6.

Information that falls under Exemption 6 cannot be discretionarily released; the right of privacy belongs to the individual, not to the agency. Therefore, we did not analyze this information under the discretionary release guidelines in Attorney General Holder's March 19, 2009, FOIA Memorandum.

In responding to this request, instead of providing the 30 pages with redactions under Exemption 6, we have been able to provide 12 pages of the same material that have been made available publicly, but do not include the addresses that are subject to Exemption 6. These are therefore are not included in this response, but are noted within the responsive documents. For your reference, the website where these responsive records are available is: http://efw.bpa.gov/environmental_services/Document_Library/Whistling_Ridge/2015Jan_FOG_Post_FEIS_Comment_print.pdf.

Fees:

There are no fees associated with this request.

Appeal:

Pursuant to Department of Energy FOIA regulations at 10 C.F.R. § 1004.8, you may administratively appeal this response in writing within 30 calendar days. If you choose to appeal, please include the following:

(1) The nature of your appeal - denial of records, partial denial of records, adequacy of search, or denial of fee waiver;
(2) Any legal authorities relied upon to support the appeal; and
(3) A copy of the determination letter.

Clearly mark both your letter and envelope with the words "FOIA Appeal," and direct it to the following address:

Director, Office of Hearings and Appeals
Department of Energy
1000 Independence Avenue SW
Washington DC 20585-1615

I appreciate the opportunity to assist you. If you have any questions about this letter, please contact Colleen Cushnie, FOIA Case Coordinator (BPA Contractor, ACS), at (503) 230-5986 or email at cacushnie@bpa.gov.

Sincerely,

C. M. Frost
Freedom of Information/Privacy Act Officer

From: DeClerck,Angela (BPA) - TSE-TPP-2
To: "Jason Spadaro (jasons@sdslumber.com)"
Subject: Whistling Ridge Energy Project
Date: Monday, February 09, 2015 1:34:05 PM
Attachments: image001.jpg
image002.jpg
image003.jpg
Letter to Administrator Mainzer - signed.pdf
Whistling Ridge Petition & Signatures.pdf

Hi Jason,

Just letting you know about the correspondence we received. Also, if you have a chance would you get back to Hub on the question he had about the projects. E is trying to address the question in the NEPA ROD.

Take Care,

Angela

From: Grange,Katey C (BPA) - KEC-4
Sent: Friday, January 30, 2015 3:06 PM
To: Adams,Hub V (BPA) - LN-7
Cc: Mason,Stacy L (BPA) - KEC-4; Lynard,Gene P (BPA) - KEC-4
Subject: FW: Whistling Ridge Energy Project

From: Ryan Rittenhouse [mailto:ryan@gorgefriends.org]
Sent: Friday, January 30, 2015 3:04 PM
To: Mainzer,Elliot E (BPA) - A-7; Gardner,Amy M (BPA) - TEP-TPP-1; Grange,Katey C (BPA) - KEC-4
Subject: Whistling Ridge Energy Project

Dear Mr. Mainzer, Ms. Gardner, and Ms. Grange:

Please find enclosed a letter, petition, and petition signatures regarding the Whistling Ridge Energy Project, proposed in Skamania County, Washington. Thank you for your attention to this important matter.

Ryan Rittenhouse
Conservation Organizer, Friends of the Columbia Gorge
522 SW Fifth Ave, Suite 720
Office: (503) 241-3762 x110
Mobile: (440) 796-9695
logosmaller

f1

Pages 15-01544-F_0002 – 15-01544-F_0042

is a public document and can be seen at

http://efw.bpa.gov/environmental_services/Document_Library/Whistling_Ridge/2015Jan_FOG_Post_FEIS_Comment_print.pdf

From:	Jason Spadaro
To:	DeClerck,Angela (BPA) - TSE-TPP-2
Cc:	Adams,Hub V (BPA) - LN-7
Subject:	Re: FOtG Inquiry about WREP that BPA needs to address in the ROD
Date:	Tuesday, February 10, 2015 11:46:10 AM

Hi Angela
Sorry for delay. Have Board meeting today. Will reply with full answer later this afternoon.

On Tuesday, February 10, 2015, DeClerck,Angela (BPA) - TSE-TPP-2 <ardeclerck@bpa.gov> wrote:

> Hi Jason,
>
> I was wondering if you had a chance to follow up with Hub on this question.
>
> Thanks so much
>
> Angela
>
> **From:** Jason Spadaro [mailto:jasons@sdslumber.com]
> **Sent:** Tuesday, December 09, 2014 9:21 AM
> **To:** DeClerck,Angela (BPA) - TSE-TPP-2
> **Cc:** Adams,Hub V (BPA) - LN-7
> **Subject:** Re: FOtG Inquiry about WREP that BPA needs to address in the ROD
>
> Hi Angela,
>
> Will do.
>
> Jason
>
> On Tue, Dec 9, 2014 at 9:15 AM, DeClerck,Angela (BPA) - TSE-TPP-2 <ardeclerck@bpa.gov> wrote:
>
> Hello Jason,
>
> We are putting together responses to a comment letter we received in July from Friends of the Columbia Gorge concerning the Whistling Ridge wind project. There is one comment they raise that we need your help on. It is their comment #4, which says the wind project is

not economically viable. Since it seems to me that you as the developer are the most logical person to respond to such a comment, could you please provide me with your response to that comment? I have attached a copy of the comment for your convenience. If you could provide me with your response sometime in the next couple of weeks or so, I would really appreciate it.

Let me know if you have any questions.

Thanks so much,

Angela

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Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
541-490-5013 (cell)
jasons@sdslumber.com

--
Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
541-490-5013 (cell)
jasons@sdslumber.com

From:	Jason Spadaro
To:	DeClerck,Angela (BPA) - TSE-TPP-2; Adams,Hub V (BPA) - LN-7
Cc:	Tim McMahan
Subject:	Fwd:
Date:	Thursday, February 12, 2015 12:54:40 PM
Attachments:	WREP response.pdf

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Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
541-490-5013 (cell)
jasons@sdslumber.com

SDS Lumber Company
P.O. Box 266
Bingen, WA 98605

Office: 509-493-2155
Fax: 509-493-2535

February 11, 2015

Angela DeClerk
Bonneville Power Administration
PO Box 61409
Vancouver, WA 98666-1409
ardeclerck@bpa.gov

Dear Ms. DeClerk;

As project developer of the Whistling Ridge Wind Energy Project, you have asked me to provide you an update and answer questions raised by Friends of the Gorge related to the economic viability of the project as they continue their opposition to this clean, renewable energy project.

As you are aware, Washington state voters through Initiative 937, and the Oregon Legislature through the Oregon Renewable Portfolio Standard, have required utilities to increase the use of clean, renewable energy resources in their portfolios while displacing carbon polluting electricity generated through combustion of non-renewable fossil fuels such as coal and oil.

It is relevant to note that environmental and human health interest groups, which Friends of the Gorge hollowly claim to be, vehemently oppose the utilization, transport and combustion of fossil fuels, and favor rapid, drastic reductions in the use of these fuel resources in favor of rapid utilization of clean, renewable energy alternatives. However, the region's renewable energy requirements call for a more gradual transition with periodic increases in the use of renewable energy resources. In Oregon, the renewable energy standard starts at 5% in 2011, increases to 15% in 2015, 20% in 2020 and 25% in 2025. In Washington, the renewable energy standard starts at 3% in 2012, increases to 9% in 2016 and 15% in 2020.

Even now, bills are pending before both the Washington and Oregon legislatures that would cause the further curtailment of fossil fuel energy sources, such as the curtailment and elimination of coal generation transported "on the wires" from locations outside of Washington and Oregon. And, since the conclusion of the Whistling Ridge Energy Project's EFSEC proceedings and the Washington Supreme Court's unanimous decision denying the Friends of the Gorge's appeal (strongly rejecting every legal argument they made), the EPA issued its "111d Rule" (the proposed "Clean Power Plan Rule") which, if adopted, will cause a very significant and rapid transition toward clean, renewable energy sources like the Whistling Ridge Wind Energy Project. Moreover, the California appetite for renewable energy is likely to grow even stronger, with Governor Brown calling for 50 percent renewable power supplying California's power needs within 15 years.

Governor Brown calling for 50 percent renewable power supplying California's power needs within 15 years.

As a result of these periodic, phased in, milestones to achieve the region's clean, renewable energy requirements, project development occurs in periodic waves. Currently, regional utilities subject to the renewable energy requirement have met their short term (2015 and 2016) renewable energy requirements and consequently the demand for new renewable energy project is in a temporary lull. With renewable energy demand increasing by 5% in Oregon and 6% in Washington by 2020, as required by respective State laws, the demand for renewable energy projects will increase significantly. Further, likely new legislation from California, Oregon and Washington (and strongly supported by all three Governors), and the likely enactment of the EPA Clean Power Plan 111d Rule later this year will certainly cause a huge shift toward even greater renewable energy resources, with an strong market response. My October 22, 2012 Declaration before the State of Washington Thurston County Superior Court in response to arguments presented by Friends of the Gorge in their appeal of the project's approval by Washington Governor Christine Gregoire, answers all questions about economic viability of the Whistling Ridge Wind Energy Project. And, the case for the Project is even stronger given the evolution of new policy and laws at the state and federal levels. Environmental groups that are genuinely committed to addressing climate change will continue to relentlessly advocate for a transformation of the regional and national power system. The case for renewable generation at energetic sites located in close proximity to urban power loads will become increasingly powerful. Please review my attached Declaration with this letter.

In summary, at any given time, the viability of a wind energy project is the function of multiple variables including the demand for renewable electricity and the costs and economics of project development at that moment in time. In January 2011, while testifying before Washington EFSEC, I commented on the impacts to economic viability of a reduction in project size based on economic conditions prevalent at that moment in time. Despite numerous statements to the contrary, Friends of the Gorge have repeatedly, egregiously and intentionally misrepresented my comments by claiming my testimony states that the Whistling Ridge Wind Energy Project is not an economically viable project.

To the contrary, Whistling Ridge Wind Energy Project is an economically viable project and we are looking forward to years of increased demand for clean, renewable, wind energy as the carbon emissions from non-renewable energy resource continue to be offset and displaced.

Sincerely,

Jason S. Spadaro
President
Whistling Ridge Wind Energy
SDS Lumber Company

cc: Hub Adams, BPA
Elliot Mainzer, BPA
Timothy L. McMahan, Stoel Rives LLP

☐ EXPEDITE
☐ No Hearing Set
☑ Hearing is Set
Date: October 26, 2012
Time: 11:00 a.m.
The Honorable Judge James J. Dixon

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

FRIENDS OF THE COLUMBIA GORGE, INC., and SAVE OUR SCENIC AREA, Petitioners, v. STATE ENERGY FACILITY SITE EVALUATION COUNCIL (EFSEC) and CHRISTINE O. GREGOIRE, Governor of the STATE OF WASHINGTON, Respondents, and WHISTLING RIDGE ENERGY LLC, SKAMANIA COUNTY, and KLICKITAT COUNTY PUBLIC ECONOMIC DEVELOPMENT AUTHORITY, Intervenors-Respondents.	NO. 12-2-00692-7 DECLARATION OF JASON SPADARO

I, JASON SPADARO, am competent to testify to the matters set forth herein and make this declaration:

1. I am President of SDS Lumber Company and Whistling Ridge Energy LLC ("Whistling Ridge"), which is an Intervenor-Respondent in the above captioned proceeding and the applicant for the Whistling Ridge Energy Project ("Project").

STOEL RIVES LLP
ATTORNEYS
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Telephone (503) 224-3380

2. I make this declaration in support of Respondents' Joint Reply to Petitioners' Response to Motion to Certify Petitioner for Review to Supreme Court pursuant to RCW 80.50.140 ("Response").

3. Whistling Ridge did not appeal the Governor's approval of the Site Certification Agreement for the Project because, even with the very significant cost to the Project attending the denial of wind turbines in certain turbine corridors, it is absolutely critical for Whistling Ridge, like other EFSEC applicants, to have certainty and finality in planning energy facility investments. Whistling Ridge has respect for the Governor's role and decision, and appreciates her thoughtful weighing of the evidence in the record, including the mitigation of Project scenic and environmental impacts, energy policy and legal arguments. Moreover, an appeal means delay and significant uncertainty, and even if Whistling Ridge had appealed the Governor's decision and prevailed in that appeal, the result would likely have been a remand to EFSEC with yet more extremely expensive adjudicative hearings and a new opening for a repeat of the obstructive and litigious conduct of the opponents. A "successful" appeal regarding the denial of wind turbines in certain turbine corridors would mean more delay, more costs, and continued uncertainty.

4. Any statements attributed to me in the media regarding economic viability, such as those referenced by Petitioners and relied upon in their Response, are condensed and simplified portrayals of my comments. Any statements or testimony I provided regarding the economic viability of the Project were made with regard to specific circumstances at the point in time the statement or testimony was given. As I also testified, economic viability is the result of many factors, all of which are variable. Construction costs, wind turbine and other

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equipment costs, electricity rates, the state of the regional, national and global economies, financial markets, renewable energy market prices, and many other factors influence economic viability of a project. Renewable energy market prices are, in part, tied to natural gas prices, federal and state renewable energy requirements and incentives, climate change impacts and awareness, carbon emissions regulation, coal development (and its phasing down to address global climate concerns), and other opportunities and constraints. All of these factors influence the economics of a renewable energy project.

5. Washington's Initiative-937 Renewable Energy Portfolio Standards mandate three percent renewable energy in 2012. In 2016, qualifying utilities must increase their renewable energy supply from three percent to nine percent. In 2020, renewable energy requirements must be increased to fifteen percent. Energy projects (wind in particular) take years to develop. Projects must be permitted and under construction in 2013 or 2014 to be available for utilities to comply with the 2016 renewable energy requirements. The "need" for this renewable energy is legally mandated and certain, and this review and approval is urgent and of statewide significance to afford qualifying utilities the opportunity to supply their renewable energy requirements from local resources as compared to out-of-region resources at higher cost of transmission for ratepayers. Additionally, Skamania PUD's need for system upgrades to improve energy reliability, which this Project will provide, is a real and urgent issue of statewide importance. Significant outages have occurred, threatening life and property, which can be relieved by this Project. See testimony of Robert Wittenberg, Jr., Manager of Skamania County Public Utility District No. 1 (AR 15319-25, 18739-42, 18746-47, 18774). In fact, earlier this year the eastern part of Skamania County lost

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electricity for four days due to these system vulnerabilities. Further, Skamania County's economic and fiscal crisis is real, urgent and of statewide importance and this Project can assist in relieving this crisis. See testimony of Skamania County Commissioner Paul Pearce (AR 18823-25, 18970, 18991-93).

6. Today's energy market is dynamic and volatile. The demand for additional energy resources is temporarily low given the current economic environment and continued availability of fossil fuels. As the national and state economy recovers from the current recession, and fossil fuels are relied upon less, energy demand will increase and supplying that demand with new, clean energy resources is a matter of statewide importance, voted upon by the citizens of Washington. The demand for renewable energy in Washington is temporarily low given that qualifying utilities have already complied with their 2012 renewable energy requirements. Other temporary factors include uncertainty concerning the extension of the federal renewable energy production tax credit and lack of a coherent federal climate change policy. All of these factors, though, are temporary, and new renewable energy supplies must be permitted and developed for Washington utilities to comply with state law in 2016 and beyond. The demand is strong for energetic sites, nearby to energy demanding areas and in close proximity to transmission interconnections. This Project is such a site, and even with the reduction in the number of wind turbines and certain turbine corridors, we believe there will be a market for the Project, and we continue to actively work to move the Project forward.

7. It is incredibly difficult to engage in meaningful opportunities to advance the Project and its power in this setting with permitting uncertainty and highly litigious opponents who are prepared to sue and appeal at every step. For

this reason, it is essential that the EFSEC system fulfill its statutory objectives of expeditious processing of applications and expeditious resolution of appeals. Cyclical and serial remands, opportunities to repeatedly adjudicate and litigate claims, and endless appeals all work to destroy our ability to complete and market a clean energy project. For example, Petitioners seek in this appeal the right to participate in EFSEC's future reviews of the Project and even its components. If Petitioners' prevail, and mindful of Petitioners' litigious history with the Project to date, the Project will be unreasonably burdened with additional uncertainty.

8. Systemically, the heavy litigation and appeal of this Project, and how the judicial system treats it, is of statewide significance as it has a significant bearing on any developer's willingness to seek energy facility permitting in the state of Washington and/or through EFSEC. Given the uncertainty, we are unable to make significant investments in development of the Project, such as procurement of equipment, until this appeal is resolved and certainty is established. In a regional energy market, this is true of any developer weighing comparable opportunities at the county level, and in Oregon (where energy facility permitting through the Oregon Energy Facility Siting Council is extremely busy). The Petitioners in this case have exposed fault lines in the EFSEC system that empower dedicated, single-issue opponents to use their lawsuits to raise funds to sustain their efforts to grind down economic development and destroy projects of statewide significance.

9. Certification to, and review by, the Washington Supreme Court provides certainty, finality, and an expeditious conclusion to what has been a multi-year case of litigious and obstructive opposition.

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900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Telephone (503) 224-3380

10. Whistling Ridge has not yet signed the Site Certification Agreement. Our decision not to sign this document in no way reflects our lack of commitment to the Project. To the contrary, we are now engaged in yet another expensive phase of this litigation, and we are committed to working with the Governor and Skamania County to defend the Project and the State of Washington's energy facility siting process, notwithstanding the difficulties imposed on the Project by the Site Certification Agreement.

11. By its terms, and depending on the outcome of this appeal, the duration of the rights secured by the Site Certification Agreement could commence running upon the applicant's date of signature. In this appeal, Petitioners seek to shorten the duration of the Site Certification Agreement and then draw out the litigation to diminish the life of our approvals. They have raised issues on appeal calculated at requiring constant legal review of EFSEC ongoing work—even purely ministerial work with no consequence to EFSEC's approval authority. We cannot sign the Site Certification Agreement until it is finalized and legally upheld, and we cannot afford to give Petitioners the license to "run the clock" on the Site Certification Agreement through continued, serial litigation, thereby fundamentally undermining the rights granted in the Site Certification Agreement. Signing would be self-destructive and in disregard of Petitioners' obvious litigation tactics. It is absolutely essential that we have a final, expeditious conclusion to the ambiguity concerning the commencement and duration of the Site Certification Agreement. Petitioners raised this issue in the appeal, and it is absolutely essential that it be addressed and resolved.

12. As the Applicant, it is illogical to sign a Site Certification Agreement that is subject to legal challenge and could potentially change as a consequence of

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ATTORNEYS
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Telephone (503) 224-3380

this litigation (*e.g.*, due to a remand). After litigation is complete and the Site Certification Agreement is upheld, we intend to sign the Site Certification Agreement. We are, in fact, actively continuing the development of this Project. To be clear: Whistling Ridge is committed to this Project and we seek its expeditious review by the Washington Supreme Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, and belief.

Executed in Bingen, Washington this 22nd day of October, 2012.

Jason Spadaro

STOEL RIVES LLP
ATTORNEYS
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Telephone (503) 224-3380

☐ EXPEDITE
☐ No Hearing Set
☑ Hearing is Set
Date: October 26, 2012
Time: 11:00 a.m.
The Honorable Judge James J. Dixon

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

FRIENDS OF THE COLUMBIA GORGE, INC., and SAVE OUR SCENIC AREA, Petitioners, v. STATE ENERGY FACILITY SITE EVALUATION COUNCIL (EFSEC) and CHRISTINE O. GREGOIRE, Governor of the STATE OF WASHINGTON, Respondents, and WHISTLING RIDGE ENERGY LLC, SKAMANIA COUNTY, and KLICKITAT COUNTY PUBLIC ECONOMIC DEVELOPMENT AUTHORITY, Intervenors-Respondents.	NO. 12-2-00692-7 DECLARATION OF FACSIMILE TRANSMISSION

I, Keely Tafoya, of the Washington State Attorney General's Office, do hereby declare and state as follows:

1. I am a legal assistant to the attorney for the Respondents, Energy Facility Site Evaluation Council and Governor Gregoire, in the above-referenced matter.

2. I have examined the Declaration of Jason Spadaro transmitted on October 23, 2012, to

ATTORNEY GENERAL OF WASHINGTON
Government Operations Division
7141 Cleanwater Drive SW
PO Box 40108
Olympia, WA 98504-0108
(360) 586-3636

which this page is attached, and it consists of 9 pages, including the signature page and this declaration.

3. The foregoing document is a complete and legible facsimile transmitted original signed by Jason Spadaro.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed this 23rd day of October, 2012 at Olympia, Washington.

KEELY TAFOYA
Legal Assistant

ATTORNEY GENERAL OF WASHINGTON
Government Operations Division
7141 Cleanwater Drive SW
PO Box 40108
Olympia, WA 98504-0108
(360) 586-3636

From: McMahan, Tim
To: Adams,Hub V (BPA) - LN-7
Cc: Jason Spadaro [jasons@sdslumber.com]; Martin, Eric
Subject: EFSEC Site Certificate Condition
Date: Wednesday, March 04, 2015 11:44:57 AM
Attachments: image003.png

Timothy L. McMahan | Partner
STOEL RIVES LLP | 900 SW Fifth Avenue, Suite 2600 | Portland, OR 97204-1268
Direct: (503) 294-9517 | Mobile: (503) 504-8693 | Fax: (503) 220-2480
tlmcmahan@stoel.com | www.stoel.com | Bio | vCard | LinkedIn

D. Post-Construction Bald Eagle – Golden Eagle Plan

In consultation with WDFW and USFWS, the Certificate Holder shall develop a plan describing actions taken to comply with the Bald and Golden Eagle Protection Act (16U.S.C. 668-668c). This plan shall be submitted to EFSEC for approval no later than 60 days prior to commencing Commercial Operation.

From: Grange,Katey C (BPA) - KEC-4
To: "tim_romanski@fws.gov"
Subject: Whistling Ridge No Effect Follow Up
Date: Friday, April 10, 2015 8:50:00 AM
Attachments: WREP_No Effect Memo_08July2014.pdf

Hi Tim,

Thanks for chatting with me a few mins ago about the appropriateness of a no effect determination for the species listed in Skamania County (with the exception of the NSO for which we completed Section 7 informal consultation). As discussed, based on BPA's assessment of the habitat in the project area, scope of project activities, and the current occurrences of the species, we believe that the project would have no effect on the listed species. For your information, I am attaching the project's No Effect determination memo.

Please let me know if you have any concerns or additional thoughts.

Thanks!
Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: July 8, 2014

REPLY TO ATTN OF: Katey Grange - KEC-4

SUBJECT: Whistling Ridge Energy Project
ESA No Effect Memo

TO: File

Introduction

The Bonneville Power Administration (BPA) proposes to interconnect the Whistling Ridge Energy Project, which consists of up to 35 wind turbines in Skamania County, Washington. Because BPA is a federal agency, it is required to analyze the effects of its actions on species listed under the Endangered Species Act (ESA) of 1973 as amended. Making a No Effect Determination is the appropriate conclusion when the action would not affect a listed species or designated critical habitat.

Species List

We obtained a species list for Skamania County, Washington from the US Fish and Wildlife Service (FWS; FWS 2013). Table 1 contains a list of all species listed by FWS in Skamania County, Washington and summarizes the project effect on these species.

Table 1. Skamania County, Washington Species List

Species *(Scientific Name)*	**ESA Status & Critical Habitat Designation**	**Effect of the Project**
Gray wolf *(Canis lupus)*	Endangered	No Effect – Not present in project work areas.
Canada lynx (*Lynx canadensis)*	Threatened	No Effect – Not present in project work areas.
Bull trout (*Salvelinus confluentus*)	Threatened	No Effect – Not present in project work areas.
Northern spotted owl *(Strix occidentalis)*	Threatened	Not Likely to Adversely Affect (NLAA) – addressed during project's informal consultation.
North American wolverine *(Gulo gulo luscus)*	Proposed Threatened	No Effect – Not present in project work areas.
Yellow-billed cuckoo *(Coccyzus americanus)*	Proposed Threatened	No Effect – Not present in project work areas.
Oregon spotted frog *(Rana pretiosa)*	Proposed Threatened	No Effect – Not present in project work areas.

Source: FWS 2013

BPA initiated informal Section 7 consultation with the FWS for potential project-related impacts to Northern spotted owl on June 8, 2010. The FWS concurred with BPA's NLAA determination in letters dated July 19, 2010 and February 15, 2012. BPA contacted the FWS in 2014 to determine if any changes in the environmental conditions or status of Northern spotted owl warranted new surveys or a reinitiation of consultation. The FWS confirmed via an email dated May 19, 2014 that reinitiation of consultation nor new surveys would be required. Because the project is not likely to adversely affect Northern spotted

owl and BPA has informally consulted with FWS, this species will not be addressed further in this memo.

ESA-listed anadromous fish under the jurisdiction of NOAA Fisheries potentially occurring within the project area are listed in Table 2.

Table 2. ESA-Listed Anadromous Fish Species Potentially Occurring in Project Area

Species ***(Scientific Name)***	**ESA Status & Critical Habitat Designation**	**Effect of the Project**
Lower Columbia River Chinook (*Oncorhynchus tshawytscha*)	Threatened; Critical Habitat	No Effect- No disturbance to waterbodies
Middle Columbia River steelhead (*O. mykiss*)	Threatened; Critical Habitat	No Effect- No disturbance to waterbodies
Columbia River chum (*O. keta)*	Threatened; Critical Habitat	No Effect- No disturbance to waterbodies

Source: BPA eGIS 2014

Project Description

The Project would consist of up to 35 wind turbines that could each range in size from 1.2 to 2.5 megawatts (MW) and would include an operations and maintenance facility, underground collector lines and systems, substations, and other ancillary facilities. Turbine towers would be approximately 221 to 265 feet tall at turbine hub height, and about 426 feet tall including blades.

The operations and maintenance facility would be on a 5-acre area and would be built and located off of West Pit Road. To collect power generated by the individual wind turbines, a network of about 8.5 miles of underground 34.5-kilovolt (kV) power cables would be installed. In areas where there are environmental, geologic, or cultural constraints, minor above ground placement of collector cables may occur. The collector cables would route the power to a Whistling Ridge Energy Project collector substation that would transform the power from 34.5-kV to 230-kV. The power would then be directed to the adjacent BPA substation which would then connect to BPA's existing North Bonneville-Midway line.

Additional project description can be found in the project's Environmental Impact Statement, which is available at: http://efw.bpa.gov/environmental_services/Document_Library/Whistling_Ridge/.

Project Location and Site Characteristics

The project location is depicted in Attachment 1. The project area is located in the Southern Washington Cascades Province, within the grand fir (*Abies grandis*) and Douglas fir (*Pseudotsuga menziesii*) major vegetation zones. Lands within the project area are privately owned, and have been actively-managed for timber over the last century. As a result of ongoing timber harvest, forests within the project area are now characterized by a mosaic of stand ages; however, average stand age has declined as a result of relatively short stand rotations. Changes in stand structure and complexity, patch size, and species distribution also have occurred. Forest management practices have resulted in a shift in species dominance to the commercially valuable Douglas fir. Few large, old-growth conifers exist in the project vicinity, and there are no late-successional stands or old forest habitats (using Washington Forest Practices habitat definition) within or adjacent to the site.

Topography in the area is characterized by generally accordant ridge crests, separated by steep, deeply dissected valleys. The Project would be located on north-trending ridges that range in elevation from about 2,100 to 2,300 feet above mean sea level (msl).

Major drainages in the vicinity of the project area include the White Salmon Basin to the east and the Little White Salmon River Basin to the west, both of which drain to the Columbia River, which is located south of the project area. Several drainages located within the project area boundaries are typed as seasonal, non-fish habitat streams or perennial, non-fish habitat streams. One unnamed perennial stream is crossed by West Pit Road, a proposed project access road. This stream occurs in the Little White Salmon watershed. Flow was observed through an existing culvert under West Pit Road at the time of the July 2009 field visit. However, the surface flow and the channel disappear downstream of the culvert. There is no surface water connection to any other stream or waterbody.

Four major BPA high voltage transmission lines, located in two corridors, cross the project site. Canopy species within these two corridors have been removed, and areas are managed to be limit the growth of shrub and tree species. The project area contains a network of roads ranging in width from approximately 8 to 20 feet. These roads are currently used to support logging activity and to access BPA transmission lines.

A Williams Northwest Pipeline natural gas pipeline is located on the northern edge of the project site and a Williams Northwest Pipeline natural gas compressor station is located to the west. Further, cellular towers and communications facilities are also located nearby. Past resource mining in the area has left rock pits in places.

Additional description of the project's location and site characteristics can be found in the project's Environmental Impact Statement, which is available at: http://efw.bpa.gov/environmental_services/Document_Library/Whistling_Ridge/.

Effects Determinations

Project work areas were surveyed for sensitive vegetation and wildlife resources between 2003 and 2009. Field reports are available in Appendix C of the project's Environmental Impact Statement, which is available at: http://efw.bpa.gov/environmental_services/Document_Library/Whistling_Ridge/.

Gray Wolf

Gray wolves inhabit a variety of habitats that can include temperate forests, mountains, tundra, taiga, and grasslands (FWS 2014a). This species is typically a habitat generalist and are found in areas with ungulate prey and an absence of excessive human-caused mortality. Packs typically consist of one or more family groups (family groups typically are comprised of 2 to 8 members [Natureserve 2013]). Wolf pack territories can range from 25 to 1,500 square miles and largely depends on prey density (FWS 2011b). Lone wolves may move through territories of established packs (Natureserve 2013).

The project area is located in the Southern Cascades and Northwest Coast Wolf Recovery Region (WDFW 2013a). The first fully documented breeding by a wolf pack, the Lookout Pack, in Washington State was confirmed in 2008 in Okanogan County (WDFW 2013b). Currently, there are 13 confirmed wolf packs in the state, but there are no confirmed wolf packs or breeding pairs documented in the Southern Cascades and Northwest Coast Wolf Recovery Region (WDFW 2013a). The Washington State Element Occurrence database does not have any records of species occurrence within 10 miles of the project area (BPA eGIS 2014). Due to the lack of identified wolves within close proximity to project area, the Whistling Ridge Energy Project would have ***no effect*** on gray wolves.

Canada Lynx

Habitat for the Canada lynx is montane and subalpine coniferous forest, such as lodgepole pine or Engelmann spruce-subalpine fir, typically above 4,000 feet in elevation (IDFG 2005, WDNR 2011). The

species rarely occurs in dry lowland forests (WDNR 2011). Foraging occurs in young, dense stands of lodgepole pine that supports large numbers of snowshoe hares, the lynx primary food source (WDNR 2011). Food availability (i.e. hares) may be the most important criterion in the determination of lynx home range size (Stinson 2001). Lynx have large home ranges of fairly contiguous forest habitat. Barriers that inhibit or prevent movements between habitat patches may effectively prevent resident lynx from using an area (Stinson 2001). The major factors affecting habitat and the lynx population include forest management, fire and fire suppression, insect epidemics, and management of lynx harvest and habitats (Stinson 2001).

The Washington State Element Occurrence database does not have any records of species occurrence within 10 miles of the project area (BPA eGIS 2014). The project area is situated on a series of north-trending ridges that range in elevation from approximately 2,100 to 2,300 feet above msl. The land west of the project area drops sharply to a narrow river terrace and then to an elevation of less than 800 feet above msl in the Little White Salmon River valley. The topography northeast of the site drops gradually toward the White Salmon River or climbs gently up the northeast flank of Underwood Mountain at 2,728 feet above msl. Based on the project area's low elevation and the lack of documented species occurrences near the project area, it is unlikely that lynx inhabit the project area. Therefore, the project would have ***no effect*** on Canada lynx.

North American Wolverine

The North American wolverine is a carnivore that occupies a variety of habitats, primarly arctic, alpine and subalpine habitats in the northern portions of the northern hemisphere (WDFW 2013b, FWS 2014b). This species typically avoids people and developed areas and prefers cold and remote mountainous areas (WDFW 2013b). Wolverines do not appear to specialize on specific vegetation or geological habitat aspects, but instead select areas that are cold and receive enough winter precipitation to reliably maintain deep persistent snow late into the warm season (FWS 2014b). The requirement of cold, snowy conditions means that, in the southern portion of the species' range where ambient temperatures are warmest, wolverine distribution is restricted to high elevations, while at more northerly latitudes; wolverines are present at lower elevations and even at sea level in the far north. Deep, persistent, and reliable spring snow cover (April 15 to May 14) is the best overall predictor of wolverine occurrence in the contiguous United States.

In Washington, the wolverine historically occurred in the alpine and subalpine habitats of the Cascades, Blue Mountains, and Rocky Mountains (WDFW 2013b). Wolverines did not historically occur on the Olympic Peninsula or in southwest Washington, but in 2009 and 2010, wolverines were detected at seven sites near Mt. Adams in the southern Washington Cascades. The Washington State Element Occurrence database does not have any records of species occurrence within 10 miles of the project area (BPA eGIS 2014). The project site is relatively low elevation, not subject to large quantities of snow in the winter and spring, and is close to the population centers of Underwood and White Salmon. Due to the lack of suitable habitat for North American wolverine in the project area and its proximity to populated areas, wolverine are not likely to be present within the project area. Based on the lack of potential species presence, the project would have ***no effect*** on North Americna Wolverine.

Yellow-billed Cuckoo

The yellow-billed cuckoo resides in open woodland (especially where undergrowth is thick), parks, deciduous riparian woodland, and in the West, it nests in tall cottonwood and willow riparian woodland (Harrison 1979). This species commonly requires a large area (approximately 25 acres) of dense riparian forest with a canopy cover of at least 50 percent in both the understory and overstory (Biosystems Analysis 1989).

Yellow-billed cuckoos have only rarely been seen in Washington – only about 12 reports of individual cuckoos in Washington have been made between 1950 and 2000 (four in western Washington, eight in

eastern Washington; WDFW 2013b). Mirroring its decline throughout the West, this species is considered extirpated as a Washington state breeder (WDFW 2013b). Based on the small number of observations in the state and the general lack of water features with significant riparian habitat in the project area, evidence suggests that it is very unlikely for yellow-billed cuckoos to be present in the general project area. The project would not require riparian clearing along any of the waterbodies in the project area. Due to the lack of riparian tree clearing for project construction and the lack of observations of this species in the general project area, the project's construction and operation would have ***no effect*** on yellow-billed cuckoo.

Oregon Spotted Frog

The Oregon spotted frog is almost always found in or near a perennial body of water that includes zones of shallow water and abundant emergent or floating aquatic plants, which the frogs use for basking and escape cover (FWS 2014c). Oregon spotted frogs seem to prefer fairly large, warm marshes (approximate minimum size of 9 acres).

In Washington, the Oregon spotted frog was historically found in the Puget Trough from the Canadian border to the Columbia River and east into the southern Washington Cascades (WDFW 1997). Only one historically known population and two recently discovered populations are known to remain in Washington. One population is in the south Puget Sound lowlands in Thurston County (Dempsey Creek) and two populations are found in the Cascade Mountain range in Klickitat County (Trout Lake and Conboy Lake). The identified populations in Klickitat County are located over 17 miles from the project area. The project would maintain buffers on all identified waterbodies in the project area and, based on current species distribution, it would be unlikely that any Oregon spotted frog would be present. Therefore, project would have ***no effect*** on Oregon spotted frog.

Bull Trout, Chinook, Steelhead and Chum and Critical Habitat

Two waterbodies are identified in the project area; neither waterbody has been identified as a fish-bearing stream. An unnamed, non-fish bearing tributary to Little Buck Creek is located in the northeast portion of the project area. The waterbody flows approximately 1.7 miles downstream until its confluence with Little Buck Creek, which flows approximately 2 miles before its confluence with the White Salmon River. No special status fish species are present in Little Buck Creek; however, steelhead, coho, Chinook and bull trout use in the White Salmon River have been identified (BPA eGIS 2014). In 2011, the Condit Dam, which formed Northwest Lake, was breached. As a result, habitat upstream of the dam is now available to salmonids. While upstream mainstem and tributary habitat is now available above the dam, the mouth of Little Buck Creek now has an impassable barrier that prohibits salmonid use in the Little Buck Creek watershed (Allen 2014).

Within the Little White Salmon River basin, West Pit Road crosses an unnamed drainage via a culvert. The surface flow and channel from this drainage disappear downstream of the culvert. As such, there is no surface water connection to Lapham Creek, the closest tributary to the Little White Salmon River, nor the Little White Salmon River. The Little White Salmon River only contains salmon species downstream of the Little Salmon River National Fish Hatchery (Streamnet 2014), which is located approximately 3.5 miles downstream of the confluence of the Lapham Creek with the Little White River. No bull trout or designated critical habitat have been identified in the Little White Salmon River (BPA eGIS 2014).

All streams and stream buffers would be avoided during the project's micrositing process. Further, the project would implement construction BMPs to would mitigate surface runoff and erosion from any land clearing to a minor level. Due to the avoidance of waterbodies, the lack of ESA-listed fish bearing waterbodies within close proximity to the project area, and the implementation of BMPs to limit erosion, the project would have ***no effect*** on bull trout, Chinook, steelhead, or chum individuals or their designated critical habitat.

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Ecc:
H. Adams – LN-7
A. Gardner – TEP-TPP-1
C. McClory – KEC-4
Official File – KEC (EQ-23)

KCGrange:KCG:4047:08July2014:
http://bpaweb/orgs/orgsmain/efw/epa/fandw/FWPROJ/2014_WREP_No Effect Memo_08July2014.docx

Attachment 1: Project location map

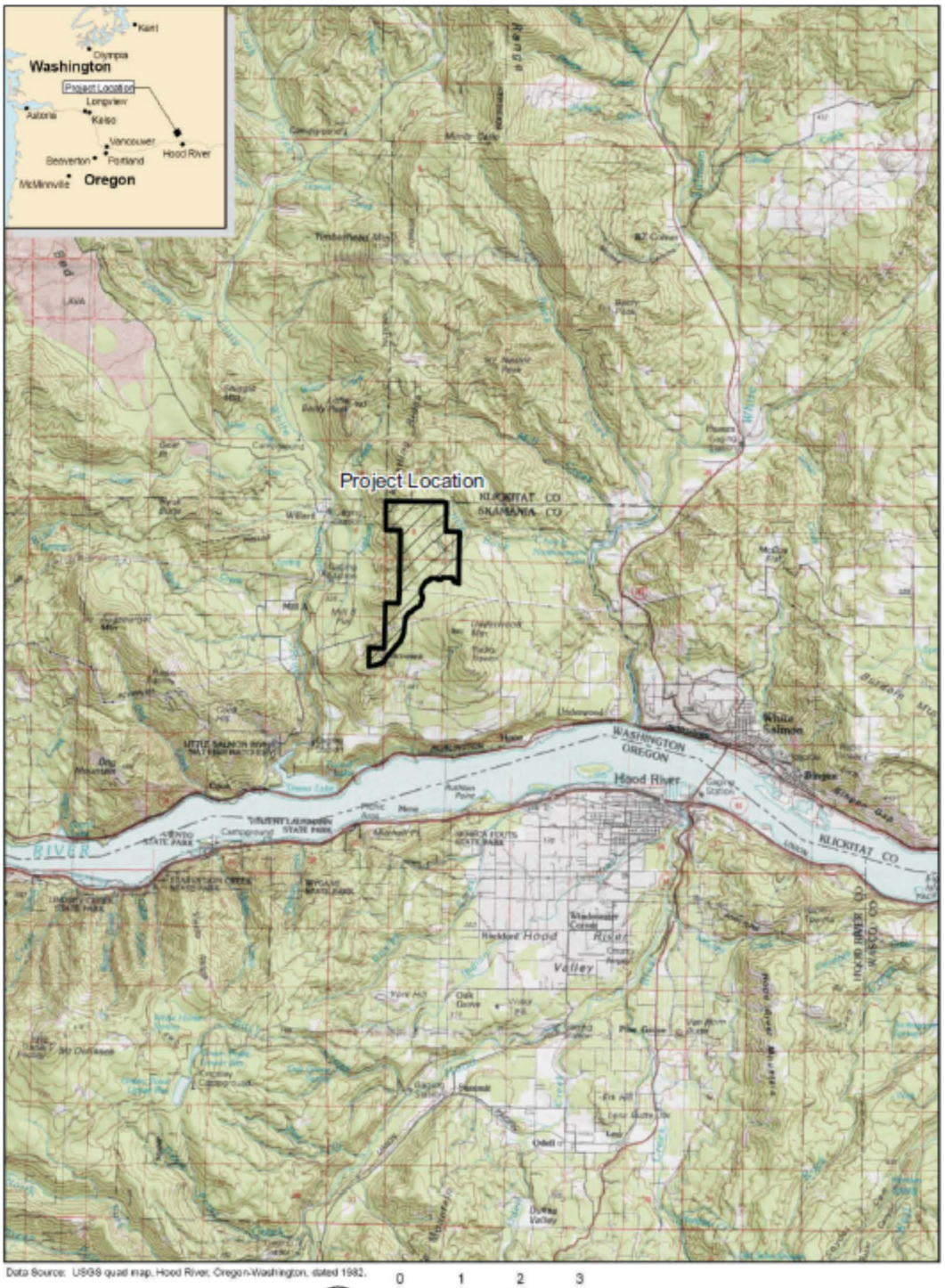

Figure 1-1

Location of Proposed Whistling Ridge Energy Project

From:	Grange,Katey C (BPA) - KEC-4
To:	"Romanski, Tim"
Subject:	RE: Whistling Ridge No Effect Follow Up
Date:	Monday, April 13, 2015 7:48:00 AM

Thank you, Tim.

Have a good one.

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

From: Romanski, Tim [mailto:tim_romanski@fws.gov]
Sent: Monday, April 13, 2015 7:42 AM
To: Grange,Katey C (BPA) - KEC-4
Subject: Re: Whistling Ridge No Effect Follow Up

Katey,

Yes this is accurate, I am unawar of any thing that has changed in the project site or project description that would warrant re-initiation on your part. Thanks.

Tim Romanski
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
Branch Manager of Conservation and Hydropower Planning
510 Desmond Drive SE, Lacey, WA 98503
360.753.5823 (phone) 360.753.9518 (fax)

On Fri, Apr 10, 2015 at 8:50 AM, Grange,Katey C (BPA) - KEC-4 <kcgrange@bpa.gov> wrote:
Hi Tim,

Thanks for chatting with me a few mins ago about the appropriateness of a no effect determination for the species listed in Skamania County (with the exception of the NSO for which we completed Section 7 informal consultation). As discussed, based on BPA's assessment of the habitat in the project area, scope of project activities, and the current occurrences of the species, we believe that the project would have no effect on the listed species. For your information, I am attaching the project's No Effect determination memo.

Please let me know if you have any concerns or additional thoughts.

Thanks!
Katey

Katey Grange

Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

From: Jason Spadaro
To: DeClerck,Angela (BPA) - TSE-TPP-2
Subject: Re: WREP NEPA
Date: Wednesday, May 06, 2015 7:34:23 PM

Hi Angela,
I understand BPA has exhausted the deposited funds to complete the WREP NEPA documents. This email acknowledges that and the need to invoice for additional funds for the remaining work by BPA to complete the documents, estimated not to exceed $5,000.
Thank you
Jason Spadaro

--
Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
541-490-5013 (cell)
jasons@sdslumber.com

From: Grange,Katey C (BPA) - KEC-4
To: "sposner@utc.wa.gov"
Subject: Voicemail follow up - Whistling Ridge
Date: Monday, June 08, 2015 11:28:00 AM

Hi Stephen-

I hope all is well up in Olympia. To follow up on my voicemail from last week- I wanted to touch base with you on the status of BPA's NEPA evaluation of the Whistling Ridge Project interconnection. Do you have a free moment this week to chat? I am in and out of meetings this week, but will generally be around if you know of a good time when you will be available.

Thanks,
Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
PO Box 3621 - KEC-4
Portland, OR 97208-3621
503.230.4047
kcgrange@bpa.gov

From:	Klumpp,Elizabeth C (BPA) - DIR-WSGL
To:	"keith.phillips@gov.wa.gov"; "bilynch@utc.wa.gov"
Subject:	Keith and Bill - Whistling Ridge ROD signed by BPA
Date:	Wednesday, June 24, 2015 11:18:15 AM

BPA's Administrator signed the Whistling Ridge Interconnection ROD this morning.

The Project's NEPA webpage should be updated later today or tomorrow to reflect the decision and can be accessed at: www.bpa.gov/go/whistling.

We are anticipating a mail out (or email) notification date of June 30.

I'm in a meeting, but will call and leave you each a quick voice mail today to ensure you got the message.

Liz
C. 360-485-2392

From: Posner, Stephen (UTC)
To: Grange,Katey C (BPA) - KEC-4
Subject: RE: Whistling Ridge ROD signed by BPA
Date: Wednesday, June 24, 2015 12:20:42 PM

Thanks.

-----Original Message-----
From: Grange,Katey C (BPA) - KEC-4 [mailto:kcgrange@bpa.gov]
Sent: Wednesday, June 24, 2015 12:10 PM
To: Posner, Stephen (UTC)
Subject: Whistling Ridge ROD signed by BPA

Hi Stephen,

I wanted to let you know that BPA's Administrator signed the Whistling Ridge Interconnection ROD this morning.

The Project's NEPA webpage should be updated later today or tomorrow to reflect the decision and can be accessed at: www.bpa.gov/go/whistling.

We are anticipating a mail out (or email) notification date of June 30.

Please don't hesitate to contact me with any questions or if you would like additional information.

-Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
PO Box 3621 - KEC-4
Portland, OR 97208-3621
503.230.4047
kcgrange@bpa.gov

From: Klumpp,Elizabeth C (BPA) - DIR-WSGL
To: Keith Phillips; Bill Lynch; Posner, Stephen (UTC)
Subject: BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date: Wednesday, June 24, 2015 5:49:00 PM
Attachments: WHISTLING_4G_ROD_Supplement_Analysis.pdf
WHISTLING_4H_ROD_Notice_of_ROD_submitted_to_FR.PDF
WHISTLING_4I_ROD_Mitigation_Action_Plan.pdf

We post the attached to our external website Thursday afternoon, www.bpa.gov/go/whistling. We will mail a letter to the public on June 30.

Stephen knows how to reach our NEPA lead, otherwise, let me know if you have questions.

Hope you are well!

Thanks.

Liz

Liz Klumpp
Western Washington Liaison | Bonneville Power Administration | 360-943-0157 | c. 360-485-2392

_____

BPA has prepared a Record of Decision and Supplement Analysis for the electrical interconnection of the Whistling Ridge Energy Project to our transmission system. The planned Project, a wind energy facility of up to 75 megawatts that has been approved by the state of Washington and will be constructed in Skamania County (see map). This interconnection will occur at a new 230-kilovolt substation that BPA will construct along its existing North Bonneville-Midway 230kV transmission line, which passes through the southern portion of the wind project site.

The Record of Decision, Supplement Analysis and Mitigation Action Plan will be posted to the project website on the afternoon of Thursday, June 25.

DOE F 1325.8 e Electronic Form Approved by CGIR - 01/20/95
(8-89)

United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: June 15, 2015

REPLY TO ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Whistling Ridge Energy Project Final EIS (DOE/EIS-0419/SA-1)

TO : Amy Gardner
Project Manager, TEP-TPP-1

Proposed Action: Review for substantial project changes and significant new circumstances or information

Proposed by: Bonneville Power Administration (BPA)

Location: Skamania County, Washington

Background: In August 2011, BPA and the Washington Energy Facility Site Evaluation Council (EFSEC) completed the Whistling Ridge Energy Project Final Environmental Impact Statement (EIS) (DOE/EIS-0419). This Final EIS was prepared jointly by BPA and Washington EFSEC to meet each agency's respective obligations under the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA) for certain requests for agency action related to the proposed Whistling Ridge Energy Project (Wind Project). These requests were made to each agency by Whistling Ridge Energy LLC (WRE), the Wind Project proponent.

The action before Washington EFSEC, the siting authority for the Wind Project, was a decision on whether or not to recommend approval of WRE's Application for Site Certification for the Wind Project to the Governor of the State of Washington. After completing the Final EIS, EFSEC recommended approval to the Governor. The Governor then granted approval to construct and operate the Wind Project and issued an executed Final Site Certificate Agreement (SCA) to WRE for the Wind Project.

The action before BPA is a decision on whether or not to approve WRE's request to interconnect the state-approved Wind Project to the Federal Columbia River Transmission System (FCRTS), which is the high-voltage electric transmission system that is owned and operated by BPA. BPA is in the process of making a decision concerning this request. BPA has prepared this Supplement Analysis pursuant to its NEPA Regulations at 10 CFR 1021.314(c) to determine, prior to making a decision, whether there have been substantial changes to the proposal or significant new circumstances or information relevant to environmental concerns since completion of the Final EIS for the Project. [1]

Analysis: BPA is aware that in approving the Wind Project subsequent to issuance of the Final EIS, the State of Washington decided to limit the maximum number of allowed wind turbines for the Wind Project. In addition, information about changed circumstances and additional environmental information that has arisen subsequent to issuance of the Final EIS has been brought to the attention of BPA. The following assesses the significance of these post-Final EIS developments in relation to environmental concerns.

[1] Throughout this Supplement Analysis, the term "Wind Project" is generally used to refer to all aspects of WRE's proposal except for the BPA interconnection facilities, while the term "Project" is used to refer to both the Wind Project and the BPA interconnection facilities.

Project Developments

In its Application for Site Certification, WRE proposed developing up to 50 wind turbines at the Wind Project site. Accordingly, in order to provide an analysis of the maximum potential development, a maximum 50-turbine wind project was what was described and evaluated in the Final EIS for the Project. The State of Washington's approval of the Wind Project, however, denied two "strings" of turbines – string A-1 through A-7 and string C-1 through C-8 – thereby not approving 15 turbine sites out of the original 50 potential sites originally proposed. These two turbine strings were not approved primarily due to concerns about their impacts on the aesthetic and cultural heritage of the area due to the prominent visibility of these turbines from the Columbia River Gorge National Scenic Area (Scenic Area) as well as other portions of the Columbia River Gorge. By authorizing up to 35 turbines, the Final SCA executed by the Washington Governor reflects the denial of the two turbine strings.

As an initial matter, BPA believes that the State of Washington's decision to approve 35 wind turbine sites for the Wind Project does not actually constitute a change in the Project. As the Final EIS expressly states, the Wind Project would involve "up to" 50 wind turbines, meaning that it was envisioned from the outset that fewer than 50 turbines could potentially be authorized by the State of Washington for development. Furthermore, the Final EIS describes that the wind turbines for the Wind Project could range from 1.2 to 2.5 megawatts (MW) in generating capacity. For up to 75 MW of total installed capacity (the amount considered in the Final EIS and authorized by the State of Washington), a variety of combinations of turbine size and numbers thus were under consideration. At one end, 50 1.2-MW turbines (generating 60 MW) or 50 1.5-MW turbines (generating 75 MW) were envisioned. At the other end, 30 2.5-MW turbines (generating 75 MW) were possible. Ultimate approval by the State of Washington of an up to 35-turbine wind project generating up to 75 MW thus was within the spectrum of alternatives considered in the Final EIS.

The prospect of fewer than 50 turbines ultimately being approved and developed is also reflected in the analysis of impacts contained in the Final EIS. For example, the analysis of visual resources in Section 3.9 of the Final EIS explains that the impact analysis and associated visual simulations were based on using 50 of the largest turbines – the 2.5-MW Clipper Liberty model C93 turbines – for the Project as a conservative approach. This section goes on to acknowledge, however, that:

> the Applicant [WRE] has applied for EFSEC certification for a maximum of 75 MW. If 2.5 MW turbines were to be used, only 30 turbines could be built, and overall visual impact would be less.

Nonetheless, even if the State of Washington's decision to approve 35 wind turbine sites is viewed as a change in the Wind Project, this change does not result in substantially different impacts from those described in the Final EIS. The types of impacts that would occur would be the same, although the level of some impacts would likely be reduced without development of turbine strings A-1 through A-7 and C-1 through C-8. For instance, while elements of the Wind Project would still be visible from surrounding areas, not developing these turbines strings would decrease the overall Project visibility from key viewing areas within the Scenic Area. Fewer turbines would also result in an incremental decrease in the needed Project work areas and associated ground disturbance and vegetation clearing, as well as an incremental increase in distance from Project turbines to the nearest residence.

In addition, while the State of Washington has decided to deny two of the proposed turbine strings, all other aspects of the Wind Project remain the same. The locations and footprints of all other Project facilities have not changed from what was described in the Final EIS, and the amounts of temporary and permanent disturbance from these other facilities remain the same. As discussed above, the State of Washington's approval of the Wind Project did not change the total installed capacity (up to 75 MW) authorized for the Wind Project. With use of turbines on the higher end of generating capacity, it thus is still possible for WRE to develop a 75-MW facility even with the modified maximum number of allowed

wind turbines. Accordingly, the amount of energy being interconnected to the FCRTS is not expected to differ from what was considered in the Final EIS.

Overall, the up to 35-turbine Wind Project ultimately approved by the State of Washington after the Final EIS was completed is within the scope of the Final EIS, does not result in a seriously different picture of environmental impacts from what was considered in the Final EIS, and does not represent a substantial change in the Project relevant to environmental concerns within the meaning of NEPA.

New Circumstances and Information

The following analyzes the significance of changes in conditions relevant to environmental concerns and bearing on the Project and its impacts that have occurred since the issuance of the Final EIS in 2011. New or additional information potentially relevant to environmental concerns and bearing on the Project and its impacts that has been made available since that time also are analyzed.

- 2012 **air quality** monitoring data for particulate matter 2.5 micrometers diameter and smaller (PM2.5) at the Dalles Air Monitoring Station show an increase in the number of good air quality days (350) and a decrease in the number of moderate air quality days (15) (ODEQ 2013), compared to the 2008 monitoring data reported in the Final EIS. No other changes in air quality have been documented since publication of the Final EIS. Because the air quality has improved in the general area, the incremental addition of Project emissions would be less likely to contribute to violations to the National Ambient Air Quality Standards (NAAQS).

- **Water resources** in the general area have changed as a result of the 2011 removal of the Condit Dam, which previously formed Northwestern Lake and blocked anadromous fish migration in the White Salmon River. Due to the dam removal, no **fish** migration blockage now exists downstream of the confluence of Little Buck Creek and the White Salmon River. Anadromous fish migration is now hindered at the mouth of Little Buck Creek due to an elevation difference between the creek and the White Salmon River channel (Allen 2014). As a result of the continued migration barrier at the mouth of Little Buck Creek, migrating salmonids would still not have access to the Project site and there are no fish bearing streams in the Project site. Accordingly, effects on fish from the Project would be the same as those identified in the Final EIS.

- Although there have been some small areas of forest harvest within the Project site since 2011, the majority of **forest vegetation** within the Project site has not been harvested. This non-harvested vegetation thus has had approximately four years of growth beyond what was reported in the Final EIS, but the vegetation types and general composition are largely still the same. In addition, vegetation at the Project site is still heavily managed native habitat that is permanently committed to use by commercial forestry operations and utility infrastructure. Because the vegetation type and management within the Project area have not significantly changed since 2011, the Project impacts to vegetation would be consistent with those discussed in the Final EIS.

- BPA conducted a **wetland** determination for the BPA interconnection facilities in August 2014 and did not identify any additional wetlands. In addition, no new potential wetlands have been identified at any other Wind Project facility sites.

- The Final EIS identified Cedar Swamp, a **wetland** in the general vicinity of turbines C-1 through C-4, as being classified as a Category II wetland according to the 2004 Washington State Wetland Rating System. In 2014, the Washington State Department of Ecology updated this rating system. However, since Cedar Swamp had already been rated prior to 2014, the updated rating system does not apply (Ecology 2014). In addition, because the Final EIS found that this

wetland and its buffers would not be affected by the Project, any change in the rating system is not relevant to the Project or its impacts. This conclusion is even more true since the State of Washington decided not to approve turbine string C-1 through C-8.

- BPA conducted a follow up **sensitive plant species** evaluation for the BPA interconnection facility in August 2014 and found no potential sensitive vegetation species habitat. In addition, review of Washington State Natural Heritage data (BPA eGIS 2014) showed that no new sensitive plant species occurrences have been identified within a mile of the Project site.

- As discussed in the Final EIS, BPA conducted consultation with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act (ESA) for the Project and through this consultation, the USFWS issued a concurrence letter in July 2010 that the Project "may affect, but is not likely to adversely affect" **Northern spotted owl (NSO)**. Additional correspondence concerning information about NSO occurred after the Final EIS was issued.

  In October 2011, the Seattle Audubon sent a letter on behalf of itself and other groups requesting that BPA and the USFWS reinitiate Section 7 consultation for the NSO because: (a) the USFWS's concurrence letter was based on inaccurate NSO information; (b) the concurrence letter failed to evaluate key NSO information; and (c) the USFWS's June 2011 Revised Recovery Plan for the NSO needed to be evaluated. In November 2011, BPA provided a response letter that explained why reinitiating consultation was not necessary. In December 2011, the USFWS also provided a response letter that agreed with BPA and concluded that, based on a review of the additional information provided by Seattle Audubon as well as the Revised Recovery Plan, reinitiation of Section 7 consultation was not recommended for the Project.

  In February 2012, USFWS sent a letter to BPA that provided further clarifications and explanation of NSO issues that had been raised. In the 2012 letter, USFWS clarified that the Moss Creek Campground and Mill Creek NSO sites were potentially occupied habitat, instead of historically occupied sites, as the sites have not been decertified and NSO were detected as recently as 2010. USFWS confirmed that the Project's habitat conversion from managed forest land to open land would still have an insignificant effect relative to the overall amount of NSO potentially occupied habitat. The USFWS also analyzed the effects of the Project construction and operational noise on NSO and determined that any potential exposure to elevated sounds would have an insignificant effect on individuals present in the Project area. As a result, the USFWS concluded that it did not need to change their previous concurrence with the determination that the Project is not likely to adversely affect NSO.

  In May 2014 and April 2015, BPA contacted the USFWS to determine if there had been a change since 2012 in the status of NSO populations, habitat, or new studies that would alter the Project impacts on the species. The USFWS did not indicate any NSO status changes or new information for the Project area that would result in the need to reinitiate ESA consultation or alter the range of potential Project impacts as previously discussed (Romanski 2014; Romanski 2015).

  Based on the foregoing, there has been no significant change in circumstances or new or additional information concerning NSO relevant to the Project and its impacts that have occurred since the issuance of the Final EIS.

- The USFWS has proposed to list three **wildlife species** as threatened under the ESA in Skamania County: North American wolverine, yellow-billed cuckoo, and Oregon spotted frog (USFWS 2013a). Suitable habitat for these species is not present in the Project area, as confirmed by the USFWS. There would be no effect on these species from the construction and operation of the

Project. In addition, the USFWS did not indicate any species status changes or new information for the Project area for other species that would result in the need to initiate ESA consultation or alter the range of potential Project impacts as previously discussed (Romanski 2015).

- Additional information concerning noise impacts to **wildlife species** was provided to BPA after issuance of the Final EIS. BPA reviewed this information to determine whether it presents a significantly different picture of potential impacts to wildlife from what was described in the Final EIS. Concerning noise impacts in general, the additional information is consistent with the Final EIS's consideration of impacts to wildlife. As discussed in the Final EIS, wildlife species in general may be disturbed by Project construction, including through changes to the noise environment. A more detailed discussion of potential effects to wildlife from Project construction and its associated noise is contained in Appendix C of the Final EIS. The behavioral and/or physiological effects on some wildlife species and/or individuals from noise are confirmed by the more recent information that has been provided to BPA (see e.g., NPS 2011, USFWS 2011, Francis and Barber 2013, and USFWS 2012).

  Concerning operational noise impacts, there has been limited studies on the direct effects from wind turbine operational noise on wildlife. However, the potential for operational noise from wind turbines to impact bird species is acknowledged in Appendix C of the Final EIS, and is considered one of the reasons for potential displacement of birds and other wildlife during Wind Project operations that is discussed in Section 3.4.2 of the Final EIS. Supporting this conclusion is the theory that wind turbine operations can result in subtle yet detectable changes to the noise environment that may lead to wildlife behavioral and/or physiological effects, such as damage to hearing from acoustic over-exposure or masking of communication signals and other biologically relevant sounds (USFWS 2012). Species' responses to operational noise disturbance differ based on species type, life history stage, and even amongst individuals (Francis and Barber 2013). For those species affected by wind facility noise, operational noise could decrease wildlife habitat quality and result in long term displacement (Mockrin and Gravenmier 2012). The extent of wildlife displacement is difficult to predict for most species or life stages and the response severity to noise would likely vary from species to species and individuals of the same species (Francis and Barber 2013). After initial avoidance, some wildlife species may acclimate to the operational noise and begin to use areas previously avoided. Some returning wildlife may have a decrease in fitness due to the noise, while others may fully acclimate without any adverse effects.

  Regardless, as discussed in Final EIS, all of the existing vegetation communities at the Project site are part of a mosaic of habitat that comprise an existing, ongoing commercial forest operation. These conditions result in frequent and repeated disturbance and fragmented habitat, and the quality and value of the forest habitat is generally considered lower quality than non-commercial forest lands. While the Wind Project's operational noise may result in a long-term degradation of habitat for those species most sensitive to noise, similar to that discussed in the Final EIS, these impacts would take place in landscape of managed timber land that would continue to be a fragmented environment with ongoing disturbance. Accordingly, impacts to wildlife during Project operation would be expected to be generally no different from those described in the Final EIS, even in light of the additional information concerning wind turbine operational noise that has been provided to BPA.

- In 2012, the U.S. Forest Service released a report that summarized available scientific literature on potential wind energy facility impacts to wildlife, with a focus on the Pacific Northwest, and current best management practices recommended in federal and state guidelines for wind energy development (Mockrin and Gravenmier 2012). The report includes a statement that wind energy facilities can lead to alterations of wildfire regimes that can lead to longer-term impacts to **wildlife habitat**. While this may be generally true, the Project site is managed for forest harvest where wildfires are relatively rare, and these lands have been (and would continue to be)

protected by Washington Department of Natural Resources, WRE, and local fire authorities. Because of this, it is not anticipated that there would be a significant change in wildfire risk from the Project (Section 3.12.2.1) because wildfires would continue to be managed at the Project site as it is currently. Therefore, changes in wildlife habitat from suppression of wildfires at the Project site would continue regardless of the presence of the proposed wind Project.

The 2012 Forest Service report also includes discussions of how birds' responses to topography may include soaring along ridges or lowering flight height when crossing a ridge, and placing wind facilities in these areas is thought to increase **raptor collisions** and mortalities (Mockrin and Gravenmier 2012). As discussed in Section 3.4 and Appendix C of the Final EIS, raptor surveys indicated a low use of the Project area and it is estimated that Project operation would result in 0 to 0.25 raptor fatalities/MW/year. Bird use of the area was determined through pre-Project surveys and would be subject to post-construction monitoring and review by a Technical Advisory Committee (TAC). As such, the Final EIS inherently considers raptor and other bird use in response to the various ecological features of the Project site in the Section 3.4 and Appendix C analysis.

The 2012 Forest Service report also indicates that forest clearing for wind facilities can create habitat conditions, such as new forest edge, that may result in increased **bat usage**, which in turn could lead to increased collisions (Mockrin and Gravenmier 2012). As discussed in Section 3.4 and Appendix C of the Final EIS, bat surveys were conducted for the Project in a variety of habitats throughout the Project area, including areas with edge habitat such as recent clear cuts and young reforested areas. As described in Section 3.4 of the Final EIS, the turbines would not be constructed near wetlands or ponds which are typically associated with elevated bat use and areas cleared around turbine strings would closely mimic the clear cuts and young reforested areas that were monitored during Project planning. These areas had the lowest recorded bat activity in the Project area; therefore, it is not anticipated that the creation of additional edge habitat would result in localized areas with elevated bat use. Post-construction mortality monitoring for bats is planned for at least two years after construction and, if elevated mortality or mortality of protected species occurs, the monitoring would be extended and operational changes may be recommended. Anticipated effects to bats from turbine collisions, even with the potential creation of edge habitat, are anticipated to remain consistent with those described in the Final EIS.

The 2012 Forest Service report also cites a 2007 study suggesting that **bat mortalities** increase with turbine heights, with the highest mortalities experienced with turbines taller than 65 meters (approximately 213 feet) (Mockrin and Gravenmier 2012). As reported in the Final EIS, Project field surveys evaluated bat abundance at both ground level and rotor heights using survey protocols that were consistent with Washington Department of Fish and Wildlife (WDFW) guidelines (WDFW 2009). Bat mortality at wind developments is generally correlated with pre-construction bat pass density, though bat mortality was difficult to predict at the Project site due to variable levels of recorded use by bats across years and habitats. Fall presence monitoring (typically the period of highest bat mortality) indicated low levels of bat use for the Project site relative to other wind developments; therefore, it is possible that wind development at the Project site would result in low mortality. Post-construction mortality monitoring for bats is planned. The TAC would be involved in the development of the monitoring plan. If elevated mortality or mortality of protected species occurs, the study would be extended and operational changes may be recommended. Despite information that bat mortality can be increased with elevated turbine heights, the bat mortality discussion in the Final EIS accounts for this by comparing mortality to other wind projects that have turbines taller than 213 feet and by using bat use data at a variety of potential rotor heights in the analysis. Accordingly, the information from the 2012 Forest Service report does not significantly alter the analysis or conclusions in the Final EIS concerning the potential for bat mortality.

- In 2013, a report was issued that compiled **bird and bat mortality** data from various studies and provided estimates of collision mortality at wind facilities throughout the United States (Loss et al 2013). The literature synthesis conducted by Loss et al (2013) found that bird mortality rates appeared to differ by region. Within the regions, ecoregions contain different species, habitat features, and topography. Thus, even though additional operational mortality data has become available for wind projects in forested areas, including the Sheffield Wind Project in Vermont (Martin et al 2013), it would not be accurate to apply forest mortality data from other ecoregions directly to mortality estimates for the Wind Project.

  While new wind projects have been brought online in the Columbia River Plateau since 2011, no new wind facilities have been constructed in forested habitat in Western Oregon or Washington. Without operational data from wind facilities in a similar ecoregion, there is no new operational data that would contribute to the understanding or quantification of potential operational bird and bat mortality in forested areas within the Wind Project site.

  Loss et al. (2013) state that 2.83 birds/MW/year are killed in the Western study region, but the synthesis, as does other resource such as the Wind Wildlife Interactions Fact Sheet (AWWI 2014), goes on to indicate that specific site conditions should be considered when evaluating a facility. The baseline avian use study for the Project was conducted in a manner consistent with the WDFW Wind Energy Guidelines (WDFW 2009) and did not identify any areas within the Project site that were considered a bird or bat high use area that required avoidance. Based on the information obtained during the pre-Project surveys combined with the mitigation measures for the Project, as described in Section 3.4.3 of the Final EIS and the SCA, particularly the implementation of post-construction avian and bat mortality studies and the use of a TAC, the effects of the Project on birds and bats are still consistent with those disclosed in the Final EIS.

- Information concerning **sensitive bird** population estimates for Washington state was provided to BPA after issuance of the Final EIS (Ruth 2006). While BPA has reviewed this information, it notes that for the Project, bird surveys were developed in coordination with WDFW and USFWS consistent with WDFW wind development guidelines (WDFW 2009). The purpose of the surveys was not to count the absolute number of birds, but to obtain an index of use that could be used to assess risk at the site. This was a reasonable approach to analyzing potential Project impacts on bird species that may be present. The information concerning statewide bird estimates provides more generalized bird data and does not substantially contribute to data used for the evaluation of avian risk for the Project. Even if the statewide data is considered, and it was found that sensitive status avian use at the Project site differed substantially (e.g., higher or lower) from avian use in similar environments elsewhere, the comparisons would not help with a risk assessment because generally there is a low correlation between non-raptor avian abundance measured during preconstruction studies and post construction avian fatality rates (AWWI 2014).

- After issuance of the Final EIS, information from bird studies for other wind projects was provided to BPA as a comparison of **avian use** at the Project site to avian use at other wind facilities. Single year bird observation data from the proposed Radar Ridge (West 2009) and Coyote Crest (Tetra Tech 2009) Wind Projects showed no olive-sided flycatchers observed during field surveys. Surveys for the Whistling Ridge Energy Project recorded 27 observations of this species. However, simply because there were 27 observations does not mean that this is the number of individuals in the survey area. For example, it is not known if the 27 observations of olive-sided flycatchers represent 27 observations of the same individual or single observations of 27 different individuals. This uncertainty is common in almost all bird surveys since birds are not individually marked. As stated in the Final EIS, the number of olive-sided flycatchers observed at the Project site does not suggest that there is an elevated concentration of this

species. Therefore, the olive-sided flycatcher data at the other proposed wind sites does not change the conclusions in the Final EIS regarding the Wind Project.

Northern goshawks and Vaux's swifts were observed more frequently at the Wind Project site compared to Kittitas Valley, Desert Claim, and Wild Horse wind facilities (West 2003). The observation of five northern goshawks over two years during avian point count surveys indicates incidental presence at the Whistling Ridge Energy Project site, but the intensive three-year survey in suitable habitat for goshawks established the absence of nesting or breeding goshawks in the surveyed areas. Thirty observations of Vaux's swift between 2004 and 2009 were observed at the Whistling Ridge Energy Project site, with higher numbers of Vaux's swifts being recorded during fall migration. The Kittitas Valley, Desert Claim, and Wild Horse wind facilities all are located in the Columbia Plateau Ecoregion which contains different habitat and associated species assemblages compared to the forested Wind Project site. While Vaux's swifts and Northern goshawks may have been observed more frequently at the Wind Project site as compared to wind sites in the Columbia Plateau Ecoregion, this difference in observation frequency does not alter the Final EIS's conclusions that took into account the Project's site-specific field survey results.

- After issuance of the Final EIS, the USFWS published *Land-Based Wind Energy Guidelines* (USFWS 2012), which contains a set of voluntary guidelines to help assess wind project impacts to **sensitive wildlife species** and **habitats**. Per the guidance, projects with planning underway when the guidelines were published should implement those portions of the guidelines relevant to the current project phase. The project operator is not expected to revisit previously-completed phases of project planning to meet the guidelines. The mitigation measures for the Project, as described in Section 3.4.3 of the Final EIS and the SCA, particularly the implementation of post-construction avian and bat mortality studies and the use of a TAC to evaluate the mitigation and monitoring program and to determine the need for further studies or mitigation measures, are consistent with the post-project construction phase recommendations under the Land-Based Wind Energy Guidelines. Therefore, the Project would generally be compliant with the voluntary applicable guidelines relevant to projects in the late planning stages.

- In 2013, the USFWS published *Eagle Conservation Plan Guidance Module 1 – Land-based Wind Energy* (USFWS 2013b). Similar to the *Land-Based Wind Energy Guidelines*, the USFWS indicated that it did not expect project developers or operators to retroactively redo analyses or surveys using the new approaches outlined in the Eagle Conservation Plan Guidance. Implementation of the avian mitigation measures described in Section 3.4.3 of the Final EIS combined with the very low potential for Project-related impacts to bald and golden eagles would meet the intent of the guidelines.

- In 2013, a report was issued that reviewed **golden eagle** and **bald eagle** mortalities at wind energy facilities in the United States (Pagel et al 2013). The report found that between 1997 and 2012, five golden eagle and no bald eagle mortalities due to wind facilities were reported in Washington State. In addition, there has been recent information concerning an enforcement action under the Migratory Bird Treaty Act (MBTA) for deaths of golden eagles and other birds at wind projects in Wyoming, as well as information about deaths of golden eagles at the Wild Horse Wind Project in central Washington State. As discussed in the Final EIS, surveys of the Project site show that bald and golden eagles are uncommon visitors. Because of the rare occurrence of bald and golden eagles at the Project site, the potential for bald or golden eagle fatalities as a result of turbine collisions is considered to be extremely low. In addition, as discussed in the Final EIS and pursuant to the Final SCA, a variety of actions will be taken to minimize or avoid the potential for golden and bald eagle mortalities. Pre-construction raptor nest surveys will be conducted during the nesting season immediately prior to beginning site preparation, a TAC will be convened to assist with developing measures to ensure that risks to

migratory birds and eagles are minimized as much as possible, and a golden eagle and bald eagle plan that addresses Project operation will be completed before the Project begins operations. This plan will be completed in consultation with the USFWS and WDFW, which BPA expects will ensure that these agencies are in agreement with the approach being taken. Accordingly, the additional information concerning eagle mortality and the Wyoming enforcement action does not significantly change the analysis or conclusions concerning golden eagle, bald eagle, or other birds in the Final EIS.[2]

- A search of Washington State Historic Preservation Office records indicates that no new **cultural resource** studies or sites have been identified since the publication of the Final EIS. Although not specifically discussed in the Final EIS, an archaeological object was identified in May 2011 on Chemawa Hill within the Wind Project site. Nonetheless, the Final EIS addressed the cultural significance of Chemawa Hill and its culturally sensitive nature. Furthermore, the State of Washington's approval of the Wind Project did not approve the turbine strings that would have been located on Chemawa Hill, thereby eliminating the potential for impacts to any cultural resources at Chemawa Hill. WRE also has committed to continued collaboration with the Yakama Nation regarding construction activities in potential culturally sensitive areas. The conclusions in the Final EIS concerning potential impacts to cultural resources therefore remain the same.

- Studies and literature reviews that examine the effects of turbine **noise** and **infrasound** on **human health** have been completed by various entities since issuance of the Final EIS (Oregon Health Authority 2013, Salt and Lichtenhan 2014, Hanning 2012). Further, Health Canada (2013) has initiated a study evaluating the noise effects of turbine operation. These studies note that environmental noise in community settings can be linked to sleep disturbance, annoyance, stress, and decreased cognitive performance, but the perception of sound as noise is a subjective response that is influenced by factors related to the noise, the person, and the social/environmental setting (Oregon Health Authority 2013). The extent of that impact depends on many site-specific variables, such as distance from the facility, local topography and waterbodies, weather patterns, background noise levels. Hanning (2012) recommends a setback distance of approximately 0.87 mile of turbines from residences to minimize potential noise-related annoyance from operation.

  For the Wind Project as approved by the State of Washington, the nearest residence would be approximately 0.8 mile away from the Project turbines. As identified in the Final EIS, operation of the Project is anticipated to result in a 5 dBA increase in nighttime noise and a 3 dBA increase in daytime noise at this location. In their literature review, Oregon Health Authority (2013) found that a 10 dBA increase in noise could result in a noticeable change in outdoor noise levels at impacted residences. The Project's noise increase at the closest residences would be well below this level and the predicted noise levels would be within the applicable Washington State Environmental Noise Levels (WAC 173-60). While elevated noise levels, particularly during the night may be noticeable to nearby residences, the Wind Project would meet the Washington State

[2] On May 26, 2015, the USFWS published a Notice of Intent in the Federal Register for a programmatic EIS that the FWS intends to prepare for a proposal to authorize incidental take of migratory birds under the MBTA (see 80 FR 30032). The programmatic EIS will consider various alternatives for authorizing incidental take that each would require the USFWS to promulgate new regulations under the MBTA, as well as an alternative involving development of voluntary guidance for industry sectors regarding operational techniques or technologies that can avoid or minimize incidental take. At this time, it is unknown which alternative – or combination of alternatives – may ultimately be selected for implementation by the USFWS. In addition, although the Federal Register Notice does not identify a timeframe for completing the programmatic EIS and any associated rulemaking, it is reasonable to expect that this process could take at least two years given its subject, scope, and potential sensitivities. Accordingly, any consideration of how the USFWS's process could affect the Project would be highly speculative at this time. Nonetheless, whatever the ultimate future outcome of the USFWS's process, BPA would comply with any new requirements relevant to its action to the extent applicable, and it is reasonable to expect that WRE also would comply with any such requirements applicable to the Wind Project.

Environmental Noise Levels, which have been designed to protect against adverse effects of noise on human health. Because the predicted noise levels and state standards have not changed from those disclosed in the Final EIS, the conclusions of the EIS have not changed.

Salt and Lichtenhan (2014) discuss infrasound's potential effect on human health. The discussed potential effects of infrasound are generally consistent with the Final EIS's evaluation in Section 3.7.2.2. For the Project as approved by the State of Washington, the distance of Project wind turbines from the nearest residence has increased; therefore, the infrasound impacts discussed in the EIS would likely be reduced.

- Since issuance of the Final EIS, there have been additional developments concerning wind projects in the **cumulative impact** study area for the Project. Some wind projects that were proposed or under construction at the time the Final EIS was issued have now been completed and are operational, and other wind projects have been proposed. Wind projects that have been completed and are operational include the Shepherds Flat South (Horseshoe Bend), Shepherds Flat North (North Hurlburt), and Shepherds Flat Central (South Hurlburt) wind projects in Gilliam and Morrow Counties, Oregon (ODOE 2014a, 2014b, 2014c; USGS 2015). In Oregon, wind projects that have been proposed and are currently still proposed include the Baseline Wind Energy Facility in Gilliam County and the Saddle Butte Wind Park in Gilliam and Morrow Counties (ODOE 2015). One other project in Oregon – the Rock Creek Wind Facility in Gilliam County – was proposed but appears to have been withdrawn (ODOE 2015; Gilliam County 2015). In Washington, wind projects that have been proposed include the Lund Hill Wind Project in Klickitat County, the Goodnoe Hills II Wind Project in Klickitat County, the Imrie Wind Project in Klickitat County, and the School Section Wind Project in Klickitat County (Klickitat County 2015). Some of these proposed projects have also been approved but are not yet under construction.

  Concerning the increase in the total amount of installed wind energy capacity that may occur if all of the proposed wind projects in the cumulative impact study area are ultimately built out, that increase– whatever it ultimately may be – by itself does not have an impact on the environment. In other words, the number of megawatts of wind energy in the cumulative impact area, by itself, is not relevant to environmental concerns. Instead, as indicated in the Final EIS, it is the extent to which proposed wind energy development could contribute to cumulative impacts to the various environmental resources described in Section 3.14 of the Final EIS that is relevant for the purposes of NEPA analysis.

  Nonetheless, to the extent that the total amount of installed wind energy capacity could potentially contribute to indirect cumulative impacts to fish species due to the relationship among wind projects interconnected to BPA's transmission system, Columbia River hydro operations, and operation of this hydroelectric generation system to meet Clean Water Act (CWA) and ESA requirements for listed fish species, this potential indirect cumulative impact is discussed in Section 3.14.3.5 of the Final EIS. As discussed in this section, BPA has put in place measures to ensure that wind power on its transmission system does not cumulatively impact Columbia River hydro operations necessary for listed fish species. These measures and their successors apply to all potentially contributing wind projects regardless of the amount of wind power on BPA's transmission system to ensure there is no indirect cumulative impact.

  Concerning the potential contribution to cumulative environmental impacts from the additional proposed and completed wind projects, the addition of these projects would not be expected to result in cumulative impacts significantly different from what is described in Section 3.14 of the Final EIS. For cumulative visual impacts in particular, while the additional proposed and completed wind projects would increase the overall number of wind turbines and associated facilities in the study area, they would occur in a landscape that already includes several existing

wind projects as well as various other human development and ongoing timber harvests, as discussed in Section 3.14.3.10 of the Final EIS. Any incremental increase in cumulative visual impacts from these wind projects would be within the scope of cumulative impacts already discussed in the Final EIS. In addition, the significance of impacts to visual quality from these projects would still be highly individualized as described in the Final EIS. Furthermore, any incremental increase in visual impact on local residents and frequent visitors from repetitive views of wind turbines would be consistent with the analysis included in the Final EIS.

For views from Interstate 84 (I-84), only one of the completed wind projects – the Shepherds Flat North wind project – would be visible. None of the additional proposed wind projects would be located within close enough proximity to I-84 to be visible so would not contribute to cumulative visual impacts beyond what is disclosed in the Final EIS. For the Shepherds Flat North wind project, this project was already considered as a reasonable foreseeable future project in the Final EIS, and thus was already included in the analysis cumulative impacts to visual resources in the Final EIS. In addition, Figure 3.13-2 in the Final EIS shows the segment of I-84 near the location of the Shepherds Flat North wind project as an area where existing wind facilities are currently visible, and the completion of that project is consistent with that determination. Finally, even with additional completed and proposed wind projects, the visual impact of the Whistling Ridge Energy Project along I-84 would constitute a small cumulative impact when considered in combination with views of the Shepherd's Flat Project and other wind projects located from 35 to 70 miles to the east.

Accordingly, the additional developments concerning wind projects in the cumulative impact study area since issuance of the Final EIS do not present a significantly different picture of potential cumulative impacts from what was described in the Final EIS.

- Since issuance of the Final EIS, there also have been additional developments non-wind-related projects in the **cumulative impact** study area for the Project. For non-wind projects, the cumulative impact analysis in the Final EIS considered reasonably foreseeable future projects within a 20-mile radius of the Whistling Ridge Energy Project. Additional non-wind projects that have been proposed by BPA include the Ross-John Day Transmission Line Fiber Replacement Project, the North Bonneville-Midway Transmission Line Insulator Replacement Project, the Wautoma-Ostrander Transmission Line Impairment Project, and Bonneville-Hood River Rebuild Project. The Oregon Department of Transportation has proposed extending the Historic Columbia River Highway State Trail south of I-84. The USFWS has proposed demolishing two existing houses at the Little Salmon River National Fish Hatchery. Skamania County Public Utility District has proposed rebuilding approximately 790 feet of an existing underground utility line near Oregon View Lane.

  The proposed BPA projects are largely maintenance projects that involve few to any infrastructure additions. Each of the BPA projects would undergo the appropriate NEPA analysis, ESA consultation, wetland permitting, and consultation under the National Historic Preservation Act and would have appropriate mitigation to reduce environmental impacts (as appropriate). As the BPA projects would largely not change the nature of the existing facilities and would generally not occur within the same timeframe as the Project (thus reducing overlap of potential construction-related cumulative impacts), cumulative impacts from these projects would be low and consistent with those disclosed in the Final EIS.

  BPA also in the process of constructing its Big Eddy-Knight Transmission Project, which is a new 500-kilovolt (kV) transmission line and ancillary facilities extending from BPA's existing Big Eddy Substation in The Dalles, Oregon, to a new Knight Substation near Goldendale, Washington. Although this new line is located approximately 30 miles from the Whistling Ridge Energy Project at its closest point and thus is outside of the cumulative impact

study area for the Project, BPA has considered it in this Supplement Analysis to determine if it represents significant new information or circumstances for the Final EIS's cumulative impact analysis. The Big Eddy-Knight Transmission Project was analyzed in its own Final EIS (DOE/EIS-0332), completed in 2011, which is available at: http://efw.bpa.gov/environmental_services/Document_Library/Big_Eddy-Knight/. As described in that Final EIS, the Big Eddy-Knight Transmission Project would result in various environmental impacts, such as impacts to visual resources, geology and soils, and noise during construction. These impacts are taking place in the context of the many existing transmission lines throughout the general area where the Big Eddy-Knight Transmission Project is being built, as well as The Dalles Dam and other existing and proposed development. In addition, BPA is implementing various mitigation measures for the Big Eddy-Knight Transmission Project to minimize or avoid its environmental impacts. These impacts thus are within the scope of cumulative impacts already considered in the Final EIS for the Whistling Ridge Energy Project, and construction of the Big Eddy-Knight Transmission Project does not present a significantly different picture of cumulative impacts from what was described in the Final EIS for the Whistling Ridge Energy Project. Furthermore, the cumulative impacts of the Big Eddy-Knight Transmission Project with the Whistling Ridge Energy Project, other wind projects, and other past, present, and reasonably foreseeable future projects have already been considered in the Final EIS for the Big Eddy-Knight Transmission Project (see Chapter 4 of that EIS).

For those non-BPA projects being constructed or undergoing restoration over a similar timeline as the Project, these projects and their effects are similar to what is already considered and described in the Final EIS. Furthermore, the implementation of the various best management practices would minimize the potential contribution of these projects to cumulative impacts. As such, the non-BPA projects when considered with the Whistling Ridge Energy Project would not result in cumulative impacts to resources beyond those disclosed in the Final EIS.

Findings: This Supplement Analysis finds that (1) the changes in the Whistling Ridge Energy Project since the Final EIS was completed in 2011 are within the scope of the Final EIS and do not represent a substantial change in the Project relevant to environmental concerns within the meaning of NEPA, and (2) there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts within the meaning of NEPA. Therefore, no further NEPA documentation is required.

/s/ Katey Grange
Katey Grange
Environmental Project Manager

Concur:
/s/ Stacy Mason Date: June 15, 2015

Stacy Mason
NEPA Compliance Officer

Attachment:
References

cc:
Whistling Ridge Energy Project Final EIS mail list

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6450-01-P

DEPARTMENT OF ENERGY

Bonneville Power Administration

Record of Decision

Electrical Interconnection of the Whistling Ridge Energy Project

AGENCY: Bonneville Power Administration (BPA), Department of Energy (DOE).

ACTION: Record of Decision (ROD)

SUMMARY: The Bonneville Power Administration (BPA) has decided to implement its part of the Proposed Action identified in the Whistling Ridge Energy Project Final Environmental Impact Statement (EIS) (DOE/EIS-0419, August 2011). Under the Proposed Action, BPA will offer Whistling Ridge Energy LLC (WRE) contract terms for interconnection of WRE's planned Whistling Ridge Energy Project (Wind Project) with the FCRTS. WRE's Wind Project will be an up to 75-megawatt (MW) wind energy facility located in Skamania County, Washington. WRE has received approval to construct and operate the Wind Project from the Governor of the State of Washington, based on the recommendation of the Washington Energy Facility Site Evaluation Council (EFSEC), which is the siting authority for the Wind Project.

To allow the interconnection of WRE's Wind Project to the FCRTS, BPA will construct and operate a new 230-kilovolt (kV) substation and associated facilities that will connect the Wind Project to BPA's existing North Bonneville-Midway 230-kV transmission line, which passes through the southern portion of the Wind Project site.[1] These interconnection facilities will be located entirely within the boundaries of the Wind

[1] This Record of Decision generally uses the term "Wind Project" to refer to all aspects of WRE's proposal except for the BPA interconnection facilities, and uses the term "Project" in referring to both the Wind Project and the BPA interconnection facilities. In this Record of Decision, "Interconnection facilities" may include any network upgrades or transmission provider interconnection facilities that are necessary to support the interconnection of the Wind Project.

Project site. BPA also will execute a Large Generation Interconnection Agreement (LGIA) with WRE to provide interconnection services for the Wind Project.

ADDRESS: This Record of Decision will be available to all interested parties and affected persons and agencies and is being sent to all stakeholders who requested a copy. Copies of the Whistling Ridge Energy Project Draft and Final EISs, the Supplement Analysis that has been prepared, and additional copies of this document can be obtained from BPA's Public Information Center, P.O. Box 3621, Portland, Oregon, 97208-3621. Copies of these documents may also be obtained by calling BPA's nationwide toll-free request line at 1-800-622-4520, or by accessing BPA's Project website at *www.bpa.gov/go/whistling*.

FOR FURTHER INFORMATION, CONTACT: Amy Gardner, Transmission Project Manager, Bonneville Power Administration – TEP-TPP-1, P.O. Box 61409, Vancouver, WA 98666-1409; toll-free telephone number 1-800-622-4519; or e-mail *amgardner@bpa.gov* or Katey Grange, Environmental Protection Specialist, Bonneville Power Administration – KEC-4, P.O. Box 3621, Portland, Oregon, 97208-3621; toll-free telephone number 1-800-622-4519; or e-mail *kcgrange@bpa.gov.*

SUPPLEMENTARY INFORMATION:

Background

BPA and FCRTS Interconnection Requests

BPA is a federal agency that owns and operates the majority of the high-voltage electric transmission system in the Pacific Northwest. This system is known as the FCRTS. BPA has adopted an Open Access Transmission Tariff (tariff) for transmission

and interconnection services on the FCRTS, generally consistent with the Federal Energy Regulatory Commission's (FERC) *pro forma* open access tariff.[2]

BPA's tariff establishes processes for accepting requests to interconnect to the FCRTS, conducting interconnection studies and environmental reviews for these requests, and offering LGIAs on a first-come, first served basis in response to the requests. For all requests for interconnection of generating facilities that exceed 20 MW, BPA has adopted processes that are generally consistent with FERC's Order No. 2003, Standardization of Large Generator Interconnection Agreement and Procedures, and Order No. 661, Interconnection for Wind Energy. Orders No. 2003 and 661 provide a uniform process and agreement for studying and offering interconnection to wind generating facilities exceeding 20 MW. In its Order No. 2003 compliance filing, BPA included provisions in its Large Generator Interconnection Procedures (LGIP) that reflect BPA's obligation to complete environmental review under the National Environmental Policy Act (NEPA) of a proposed large generation interconnection before deciding whether to offer a LGIA to the party requesting interconnection.

Although BPA accepts requests for interconnection of proposed and existing generating facilities to the FCRTS, BPA does not have siting authority or regulatory jurisdiction over these facilities. That is the purview of appropriate state and local entities, and BPA acknowledges and respects the authority and jurisdiction of these entities on generation facility siting matters.

[2] Although BPA is not subject to FERC's jurisdiction, BPA follows the open access tariff as a matter of national policy. This course of action ensures that BPA will receive reciprocal and non-discriminatory access to the transmission systems of utilities that are subject to FERC's jurisdiction.

WRE's Application and EIS Process

In 2009, WRE[3] submitted an Application for Site Certification to Washington EFSEC to construct and operate the Whistling Ridge Energy Project in Skamania County, Washington. EFSEC is a Washington state agency that was created to provide a "one-stop" state licensing agency for certain energy facilities in Washington. As such, EFSEC has siting authority over these energy facilities, and parties proposing to construct and operate any such facility must apply to EFSEC for siting review. In addition, energy facilities that exclusively use alternative energy resources (such as wind, solar, geothermal, landfill gas, wave or tidal action, or biomass energy) can "opt-in" to the EFSEC review and certification process. In the case of the Wind Project, WRE elected to opt in to the EFSEC process through submittal of its application.[4] WRE's application identified a proposed wind energy facility consisting of up to 50 wind turbines that could each range in size from 1.2 to 2.5 MW, with a total installed capacity of up to approximately 75 MW. The proposal also included an Operations and Maintenance (O&M) facility, an electrical collector substation, underground collector lines and systems, and other ancillary facilities.

In addition to applying to EFSEC for siting of its Wind Project, WRE submitted a request to BPA to interconnect the Wind Project to the FCRTS. BPA processed the request under its LGIP, including conducting interconnection studies and environmental review of the proposed interconnection.

To meet respective obligations under the State Environmental Policy Act (SEPA) and NEPA, Washington EFSEC and BPA decided to conduct a joint environmental

[3] WRE is a limited liability company created by SDS Lumber Company.
[4] More information about Washington EFSEC's siting review process for the Whistling Ridge Energy Project is available at the EFSEC website at: *http://www.efsec.wa.gov/whistling%20ridge.shtml*.

review and prepare a joint EIS under SEPA and NEPA for the Wind Project and proposed interconnection. BPA formally initiated the NEPA EIS process by publishing a Notice of Intent to prepare an EIS in the *Federal Register* (74 FR 18213) in April 2009. The Notice of Intent described the proposal and the respective roles of Washington EFSEC and BPA, and explained the environmental process and how to submit scoping comments for the Draft EIS. At the same time, BPA also sent a letter that also provided this information to approximately 250 individuals. During the EIS scoping period, BPA and EFSEC jointly conducted two public informational and EIS scoping meetings in Stevenson, Washington, and Underwood, Washington. BPA also established a website (*www.bpa.gov/go/whistling*) with information about the project and the EIS process. Comments received during scoping are described in more detail in Chapter 1 of the Final EIS and in the EIS Scoping Report (August 2009) prepared by EFSEC in consultation with BPA.[5]

In May 2010, BPA and EFSEC issued the Draft EIS for public review and comment. In addition to distributing the Draft EIS to individuals, organizations, and agencies who had previously requested it, BPA posted the Draft EIS at the BPA project website and sent letters announcing its availability to potentially interested parties. A Notice of Availability of the Draft EIS also was published in the *Federal Register* (75 FR 30023) on May 28, 2010. BPA and EFSEC initially established a 45-day review and comment period for the Draft EIS, but later extended the comment period for an additional 39 days (for a total 84-day Draft EIS comment period) based on public requests. During the Draft EIS comment period, BPA and EFSEC held two public

[5] The EIS Scoping Report is available at the Washington EFSEC website at: *http://www.efsec.wa.gov/Whistling%20Ridge/SEPA/WR%20Environmental.shtml*.

meetings in Stevenson and Underwood, Washington to help explain the Draft EIS and to accept public comments.

BPA and EFSEC received a total of 608 comment letters on the Draft EIS. From these letters and the two Draft EIS public meetings, BPA and EFSEC identified approximately 2,100 individual comments. After careful consideration of all of these comments, BPA and EFSEC issued the Final EIS for the Project in August 2011. The Final EIS responded to all comments received on the Draft EIS and made necessary corrections and revisions to the EIS text. As with the Draft EIS, BPA distributed the Final EIS to individuals, organizations, and agencies who had previously requested it, posted it at the BPA project website, and sent out letters announcing its availability to potentially interested parties. A Notice of Availability of the Final EIS also was published in the *Federal Register* (76 FR 54767) on September 2, 2011.

EFSEC's Adjudicative Proceeding

Concurrent with preparation of the EIS for the Project, EFSEC also held an adjudicative proceeding for WRE's application under Chapter 34.05 of the Revised Code of Washington (RCW) as part of its siting review process for the Wind Project. EFSEC's adjudicatory proceedings are a formal hearing process similar to a courtroom proceeding, in which the applicant and opponents are allowed the opportunity to present information to support their cases concerning the applicant's proposed project.

As an initial step, EFSEC held a land use hearing for the Wind Project in May 2009. This hearing was held to determine whether the Wind Project was consistent with applicable local and regional land use plans and zoning ordinances. In addition to taking evidence at this hearing, 16 witnesses testified at the hearing concerning the Wind

Project. EFSEC also received almost 400 comment letters and evidentiary submissions regarding land use consistency.

EFSEC then conducted its adjudicative proceeding for the Wind Project. After issuing a notice of intent to hold the proceeding, several prehearing conferences were held between July 2009 and December 2010. The formal adjudicative hearing was then held over several days in January 2011. In addition to receiving testimony from 17 parties and 65 witnesses on the adjudication hearing record, EFSEC also received almost 400 written submissions regarding the adjudication.

In October 2011, Washington EFSEC issued its Final Adjudicative Order for the Wind Project that presented its conclusions and findings concerning both the land use hearing and the adjudicative proceeding.[6] Regarding land use consistency, EFSEC noted that the Wind Project site is located in an area within Skamania County that is designated as "Conservancy" by the County's Comprehensive Plan and that is unmapped under the County's Zoning Ordinance. After considering several factors, EFSEC determined that the Wind Project is consistent with the Conservancy designation in the Comprehensive Plan, and that the Wind Project is compliant with current zoning in the unmapped zone because wind generation has not been found to be a nuisance by a court.

Regarding the adjudicative proceeding, EFSEC found that need existed for the Wind Project, especially considering RCW 80.50.010's recognition of the "pressing need for increased energy facilities" and legislation that required sustainable energy to account for 15 percent of the State's energy supply by 2020. *See* RCW 19.285.010. EFSEC then turned to the issue of whether the Wind Project would create a net benefit after

[6] EFSEC's Final Adjudicative Order for the Wind Project is available at: *http://www.efsec.wa.gov/Whistling%20Ridge/Adjudication/Orders/WR%20Adj%20Order%20868%2010-7-2011.pdf*.

considering its impacts. EFSEC found that the "most hotly contested" impact was on the aesthetic and cultural heritage of the area, largely due to the visibility of some of the Wind Project's proposed wind turbines from the Columbia River Gorge National Scenic Area (Scenic Area) as well as other portions of the Columbia River Gorge. EFSEC noted that while the Wind Project is not the first development to occur in the area, as transmission lines, hydroelectric dams, highways, rail lines, and industrial, commercial, and residential development already exist, it nonetheless desires to preserve the views within the Columbia River Gorge as much as possible. EFSEC also noted that while most of the Wind Project's turbines would be only partially visible from only a few viewing locations, two "strings" of turbines – string A-1 through A-7 and string C-1 through C-8 – would be prominently visible from certain locations within the Columbia River Gorge. Based on these concerns, EFSEC concluded that these two turbine strings should not be approved.

EFSEC's Final Adjudicative Order also addressed concerns regarding the Wind Project's impact on wildlife and wildlife habitat. It recognized that although there was significant wildlife habitat in the general area, the Project site is a managed commercial/industrial timber operation and is not pristine natural land. The Washington Department of Fish and Wildlife (WDFW) acknowledged that with appropriate mitigation measures, the Project would comply with its guidelines. After considering various arguments and evidence, EFSEC determined that with appropriate mitigation measures and monitoring, the project should go forward. Finally, the Final Adjudicative Order addressed several other issues with the Wind Project, such as noise issues, geological challenges, access road issues, cultural and archeological concerns, health and safety planning, and site restoration planning. Based on its evaluation and balancing of

all of these considerations, EFSEC concluded that the Wind Project should be approved as proposed with the exception of turbine strings A-1 through A-7 and C-1 through C-8, which should be denied.

EFSEC's Recommendation and the Governor's Approval

In January 2012, Washington EFSEC transmitted its Recommendation Order for the Wind Project and associated relevant materials to the Washington State Governor.[7] Consistent with the Final Adjudicative Order, the Recommendation Order recommended that the Governor approve all aspects of the Wind Project except for turbine strings A-1 through A-7 and C-1 through C-8, which it recommended denying. The Recommendation Order also identified suggested conditions to be imposed if the Governor were to approve the Wind Project. A draft Site Certificate Agreement (SCA) was provided with the Recommendation Order that limited the total maximum number of allowed Wind Project turbines to up to 35 turbines (thereby reflecting the denial of turbine strings A-1 through A-7 and C-1 through C-8) and that included the suggested conditions of approval. However, neither the Recommendation Order nor the draft SCA limited the total installed capacity (up to 75 MW) of the Wind Project.

In March 2012, the Governor of Washington approved the Whistling Ridge Energy Project as recommended by EFSEC in its Recommendation Order. The Governor also executed the Final SCA at that time. In her approval letter to EFSEC, the Governor explained her agreement with EFSEC concerning the denial of the two turbine strings that would be prominently visible from certain locations within the Columbia River

[7] The Recommendation Order (EFSEC Order No. 869) and associated recommendation materials are available at the EFSEC website at: *http://www.efsec.wa.gov/whistling%20ridge.shtml*.

Gorge and the balancing of visual impacts with the public interest in approving sites for alternative energy facilities. [8]

Legal Challenge to the Governor's Approval

In April 2012, two environmental groups – Friends of the Columbia Gorge and Save Our Scenic Area (collectively Friends) – filed a petition in Washington state court for judicial review of the Governor's approval and execution of the SCA for the Whistling Ridge Energy Project. Friends had participated in EFSEC's adjudicatory proceedings and had submitted comments during the EIS process for the Wind Project. During both processes, Friends raised various concerns about the Wind Project and urged that approval of the Project be denied.

In its petition for judicial review, Friends primarily challenged the SCA and whether it, and the process leading up to it, complied with various statutory and regulatory requirements. Friends sought invalidation of the SCA and remand to EFSEC for further study and evaluation of the Wind Project. As provided for under RCW 80.50.140, Friends' petition was certified for review directly to the Washington Supreme Court.

In August 2013, the Washington Supreme Court issued its opinion in the Friends' legal challenge to the Wind Project.[9] After reviewing all of Friend's legal claims, the Court found no basis to reverse EFSEC's recommendation or the Governor's approval of the Wind Project. The Court first found that WRE's Application for Site Certification satisfied the requirements of the Washington Administrative Code (WAC) regarding application procedures, more particularly in the areas of assessing nighttime avian

[8] The Final SCA and the Governor's approval letter are also available at: *http://www.efsec.wa.gov/whistling%20ridge.shtml*.
[9] The Washington Supreme Court's opinion is available at: *http://www.efsec.wa.gov/Whistling%20Ridge/Appeal/88089-1%20opinion.pdf*.

collisions, considering wind power guidelines issued by the Washington Department of Fish and Wildlife, and identifying proposed mitigation measures. Next, the Court found that EFSEC had complied with the WAC's fish and wildlife requirements. More specifically, the Court found that EFSEC had not violated the WAC's "no net loss" requirement for wildlife habitat and had properly considered the results of wildlife surveys in determining that WAC requirements were met.

The Court then proceeded to reject Friends' remaining claims by finding no fault in how EFSEC had addressed a proposed mitigation parcel; mitigated for aesthetic, heritage, and recreational impacts; made a determination of consistency with Skamania County's zoning code; resolved Washington State Forest Practices Act compliance requirements; or treated Forest Practices Act compliance requirements in the SCA. As a result, the Washington Supreme Court affirmed EFSEC's recommendation and the Governor's approval of the Wind Project.

Alternatives Considered

The Final EIS prepared jointly by Washington EFSEC and BPA considered in detail the Proposed Action and the No Action Alternative. The Final EIS also discussed other alternatives that were considered but eliminated from detailed study in the EIS. The following summarizes the alternatives that were considered in detail in the EIS.

Proposed Action

The Proposed Action involves the State of Washington's approval of WRE's Wind Project and BPA's grant of an interconnection of the Wind Project to the FCRTS. Under the Proposed Action, the Wind Project facilities and the BPA interconnection facilities will be constructed and operated within an approximately 1,150-acre site about 7 miles northwest of the City of White Salmon in Skamania County, Washington. This

site is private commercial forestland in an unincorporated area of Skamania County, outside of the Scenic Area. Although the Wind Project site is relatively large, only a small portion of the site will actually be developed with Project facilities. About 56 acres would be permanently developed with these facilities, and another approximately 52 acres would be subject to temporary disturbance primarily from construction activities. [10] As a longstanding commercial forestry site, no old growth forests exist in areas where the Project will be developed.

The Wind Project will have a total installed capacity of up to 75 MW and includes wind turbines, an electrical collector system, other components, and access roads as described below. The BPA interconnection facilities, including a substation and transmission lines, that will be constructed to interconnect the Wind Project are also described below. [11]

Wind Turbines

Up to 35 wind turbines, each ranging from 1.2 to 2.5 MW in generating capacity, will be installed in "strings" generally along ridgelines within the Project site. Turbine towers will be approximately 221 to 265 feet tall at turbine hub height, and up to 426 feet tall including blades. The turbines will all be the same model, although height may vary in response to terrain. The turbine towers will be tapered, hollow tubular structures, approximately 14 feet in diameter at the base and mounted on a concrete foundation with a diameter up to approximately 60 feet. The towers will likely be

[10] The acreages described in this section represent the maximum amounts identified in the Whistling Ridge Energy Project Final EIS; actual acreages for the Project as approved by the State of Washington will be less.

[11] A more detailed discussion of the Proposed Action and the components of the Project is contained in Chapter 2 of the Whistling Ridge Energy Project Final EIS.

painted a flat neutral gray or white color. Some of the towers will be furnished with blinking lights visible to aircraft.

In each turbine string, individual turbines will be spaced approximately 350 to 800 feet from the next (or approximately 1.5 to 2.5 times the diameter of the turbine rotor). Specific turbine strings have been identified and approved by the State of Washington through its siting process for the Wind Project. The precise location of each turbine within these limited areas will be determined during EFSEC's "micro-siting" process, which is the final technical and engineering process by which WRE will provide EFSEC with the final exact location for each turbine.

The wind turbines will operate at wind speeds from 9 to 56 miles per hour, with a rotor speed range of 10 to 20 rotations per minute. The turbines operate on a variable pitch principal in which the rotor blades rotate to keep them at the optimum angle to maximize output for all wind speeds. At speeds exceeding 56 mph, the blades feather on their axis and the rotor stops turning. Each turbine is equipped with a wind vane that signals wind direction changes to the turbine's electronic controller. The electronic controller operates electric motors (the yaw mechanism), which turn the nacelle and rotor so that each turbine faces into the wind.

As described earlier in this Record of Decision, WRE originally had proposed developing up to 50 wind turbines at the Wind Project site. Accordingly, in order to provide an analysis of the maximum potential development, a maximum 50-turbine wind project was what was described and evaluated in the EIS for the Wind Project. The State of Washington's approval of the Wind Project, however, denied turbine strings A-1 through A-7 and C-1 through C-8, thereby not approving 15 turbine sites out of the original 50 potential sites originally proposed. By authorizing up to 35 turbines, the SCA

reflects this denial of these two turbine strings. In all other respects, including the maximum total installed capacity (up to 75 MW), the Wind Project remains the same as described and evaluated in the EIS.

Because the State of Washington's decision to deny turbine strings A-1 through A-7 and C-1 through C-8 occurred after the Final EIS had issued, BPA prepared a Supplement Analysis pursuant to its NEPA Regulations to review whether the resulting authorized turbine limitation constituted a "substantial change" in the Proposed Action within the meaning of NEPA. [12] In the Supplement Analysis, BPA determined that the denial of these turbines was not such a change. The Supplement Analysis that BPA has prepared is available at *www.bpa.gov/go/whistling.*

Electrical Collector System

In addition to wind turbines, the Wind Project includes an electrical collector system to collect and deliver the energy generated at Project turbines to the Project's collector substation. Each turbine will generate energy at approximately 575 volts (V). A 575 V to 34.5-kV transformer will be installed at each turbine, either on a transformer pad adjacent to the turbine or enclosed in the turbine's nacelle, depending on the turbine model. From there, the collected energy will be transmitted to the collector substation via underground 34.5-kV electric cables. Approximately 8.5 miles of underground collector cables will be installed. In areas where environmental constraints, geologic features, or cultural features necessitate, minor above ground placement of collector cables may occur.

[12] U.S. Department of Energy NEPA Regulations, which are applicable to BPA, allow for the preparation of a Supplement Analysis to determine whether a new or supplemental EIS is required for changes to a proposed action covered in an existing EIS, or whether no further NEPA documentation is required. *See* 10 CFR 1021.314.

All of the underground 34.5-kV electric cables will connect to the Wind Project's collector substation located in the southern portion of the Wind Project site immediately adjacent to the new BPA interconnection substation. The collector substation will include voltage transformers (non-polychlorinated biphenyl oil-filled types) to transform the collected Project energy from 34.5-kV to 230-kV so that it is suitable for delivery to the FCRTS at the new BPA substation. The collector substation will be a graveled, fenced area that would include the voltage transformers, switching equipment, other electrical equipment, and a parking area. A 50-foot cleared area will be maintained around this substation.

Other Wind Project Components

To support the Wind Project, an Operations and Maintenance (O&M) facility will be constructed. The O&M facility will be located on an approximately 5-acre area either adjacent to the Wind Project's collector substation or about one-half mile west of the Wind Project site along West Pit Road. This 5-acre area will be fenced and have a locked gate. The O&M facility will be constructed of sheet metal and be approximately 16 feet tall to the roof peak. The facility will have approximately 3,000 square feet of enclosed space, including office and workshop areas, a kitchen, bathroom, shower, and utility sink. Water for the facility will come from a new on-site well; anticipated water use at this facility is expected to be less than 5,000 gallons per day. Water used by the facility will drain into an on-site septic system. A graveled parking area for employees, visitors, and equipment will be located adjacent to the O&M facility.

In addition, a meteorological tower will be installed to collect and monitor wind speed and direction information as well as temperature, relative humidity and barometric pressure. The location for this tower will be determined during EFSEC's micro-siting

process, based on a meteorologist's recommendations for an on-site location that best represents the Wind Project site's meteorological conditions. Meteorological towers are typically un-guyed lattice towers with either three or four corners that taper in size up to the tower's top. These towers are constructed so that the top of the tower – and the meteorological monitoring equipment installed there – is at the same approximate height as the hub of nearby wind turbines (i.e., in the case of the Wind Project, approximately 221 to 262 feet high).

Access Roads

Much of the Wind Project site is accessible through an already existing network of logging roads at the site. Approximately 7.9 miles of existing logging roads at the site will be improved to allow use by Project construction vehicles. These improvements generally will involve road widening and providing a gravel all-weather surface. These roads currently are generally 8 to 12 feet wide, although some are as wide as 20 feet. Most of these roads will be widened to approximately 25 feet (width of finished road), with an additional 5 feet of shoulder on either side.

In portions of the Wind Project site where there are no existing logging roads, approximately 2.4 miles of new permanent access roads will be constructed. To construct these roads, a gravel surface will be installed, compacted to meet all equipment load requirements, and maintained to reduce wind erosion and dust. In addition, some temporary access may be required at some locations. Generally, equipment will be driven across open ground to access these locations, and some minor grading may be required to allow safe access. Any temporary access routes will be re-graded and reseeded as necessary to restore vegetation after construction is completed.

Off of the Wind Project site, access to the site will occur from SR 14 and County roads (Cook-Underwood Road to Willard Road) and then via a new connection to West Pit Road which connects to the Wind Project site. Approximately 2.5 miles of roadway improvements will occur on West Pit Road, which currently varies in width between 20 and 26 feet. To create a drivable surface of 25 feet with 5 feet of clearing on each side, portions of the roadway and some corners will be widened. In addition, an existing culvert that runs along a portion of this road may need some additional lengthening if the roadway is widened over the culvert.

BPA Interconnection Facilities

BPA will construct a new substation (currently referred to as the Little Buck Substation) to interconnect the Wind Project to the FCRTS. The new BPA substation will be located adjacent to the Wind Project's collector substation in the southern portion of the Wind Project site, near the southernmost BPA transmission line corridor that passes through the site. BPA's existing Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission line runs along the northern side of this corridor, while BPA's existing North Bonneville-Midway 230-kV transmission line runs along the southern side of the corridor.

Overhead lines will connect the Wind Project's collector substation to the BPA substation. The BPA substation will occupy an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area will be fenced, graded and rocked. 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. The graveled access roads described above will provide access to the BPA substation.

From the BPA substation, two new overhead 230-kV transmission lines will extend south for about 1,000 feet to the interconnection point on BPA's North Bonneville-Midway transmission line. These overhead lines will serve to "loop in" the new BPA substation to the North Bonneville-Midway transmission line. Ten transmission structures will be installed to provide this loop-in. Two of these structures will be installed along the North Bonneville-Midway transmission line to create a "break" in this line for the loop-in. One of these structures will direct the line north to the new substation and the other will connect it back into the existing alignment. Both structures will be steel lattice dead-end towers that will be installed entirely within the existing transmission line right-of-way. Due to topography, one of these structures will be 50 feet tall and the other will be 85 feet tall.

The other eight transmission structures will be wood pole structures installed in between the BPA substation and the interconnection point to support the two new overhead lines. Each of the two lines will have four structures installed. For each line, the structure closest to the BPA substation will be a three-pole H-frame structure as will the structure closest to the interconnection point. The remaining two structures for each line will be two-pole H-frame structures. The eight structures will be installed in a previously disturbed corridor running from the BPA substation to the interconnection point. The heights of the eight structures will range from 50 to 80 feet, depending on terrain.

In addition, because the loop-in will need to cross underneath the Underwood Tap to Bonneville Powerhouse 1-North Camas transmission line to reach the North Bonneville-Midway transmission line, a new steel lattice structure will be installed along the Underwood Tap to Bonneville Powerhouse 1-North Camas transmission line to raise

its conductors such that the loop-in can safely cross underneath. This tower will be approximately 80 feet tall and installed entirely within the existing transmission line right-of-way. This tower and all other BPA interconnection facilities will be located outside of the Scenic Area.

No Action Alternative

The No Action Alternative described in the Final EIS involved the State of Washington denying WRE's Application for Site Certification for the Wind Project and/or BPA not granting interconnection of the Project to the FCRTS. As a result, the Project and its various components would not be constructed or operated under the No Action Alternative, and the environmental effects associated with Project construction and operation would not occur.[13] Accordingly, under this alternative, the Wind Project's output would not be available to utilities seeking renewable energy resources in order to meet state renewable energy goals, or to meet the region's potential need for additional power in coming years.

While the Project would not be constructed or operated under the No Action Alternative, activities with environmental effects would still continue to occur on the Wind Project site. This site has been in commercial forestry use for the last century, during which the site has been logged over a series of approximately 50-year logging rotations. It is reasonable to expect that SDS Lumber and others will continue to use the site for commercial forestry production – which would include regular tree clearing,

[13] At this point in time, the conclusion that the Wind Project would not be constructed and operated if BPA were to deny interconnection may no longer be true, given that the State of Washington has approved the Wind Project and granted a SCA to WRE. This state approval allows WRE to build its Wind Project regardless of BPA's action on the interconnection request. Thus, it is conceivable that even if BPA denied interconnection, WRE could still build its Wind Project and seek interconnection of the Wind Project to the transmission lines of another transmission provider, such as Klickitat or Skamania PUD. Nonetheless, for the purposes of this Record of Decision and the NEPA analysis, BPA continues to presume that the Wind Project would not be constructed and operated under the No Action Alternative, as is stated in the Final EIS.

harvesting, replanting, and development of additional logging roads as necessary – for the foreseeable future if the Project is not built.

On balance and overall, however, the development of a wind generation facility at the Project site likely will result in greater local environmental impacts than would occur from continued periodic commercial forestry production under the No Action Alternative. The No Action Alternative thus is the environmentally preferable alternative.

Public Comments Received Since Issuance of the Final EIS

Following issuance of the Final EIS, BPA received comments concerning the Project and EIS from various parties. These comments can be viewed on-line at: *www.bpa.gov/go/whistling*. BPA has reviewed and considered all of these comments in making its decision about interconnecting the Project to the FCRTS.

Although NEPA does not require written responses to comments received on a Final EIS, this section of the Record of Decision summarizes and addresses the comments about the Project and EIS that BPA received after issuing the Whistling Ridge Energy Project Final EIS. Some of the comments that BPA received identify post-Final EIS developments that the commenter believes warrant preparation of a supplemental EIS. These post-Final EIS developments include the State of Washington's decision to deny turbine strings A-1 through A-7 and C-1 through C-8, as well as additional environmental information potentially relevant to the Wind Project. As previously indicated in this Record of Decision, BPA has prepared a Supplement Analysis to address the state's denial of certain turbine strings; this Supplement Analysis also addresses additional environmental information potentially relevant to the Wind Project that has been raised by commenters, as well as other additional information and circumstances

that BPA has become aware of. For comments that identified post-Final EIS developments, a summary response to each of these comments is provided here, with a more detailed consideration and evaluation of the post-Final EIS developments and whether or not they warrant preparation of a supplemental EIS contained in the Supplement Analysis that BPA has prepared. As previously indicated, the Supplement Analysis is available at *www.bpa.gov/go/whistling*.

Comments were received from the following parties after the release of the Final EIS:

- U.S. Environmental Protection Agency (EPA)
- Skamania County Noxious Weed Control Board
- Confederated Tribes and Bands of the Yakama Nation (Yakama Nation)
- Seattle Audubon
- Friends of the Columbia Gorge (Friends)

EPA's letter stated that the Final EIS was responsive to and addressed the comments that they had submitted on the Draft EIS. The EPA expressed appreciation for additional clarifying environmental resource information provided in the Final EIS, other EIS changes in response to public comments, and BPA's commitment to continue to work with Tribes, state agencies, and other Federal agencies. BPA appreciates the EPA's feedback in these areas.

The Skamania County Noxious Weed Control Board sent an email to BPA that provided updated contact information and a corrected website link. BPA has revised its contact list for the Project to include the updated contact information, and acknowledges that the correct Board website link is *http://www.skamaniacounty.org/noxious-weeds/*.

The Yakama Nation's letter raised three main issues. BPA responded to these issues in an October 2011 letter to the Yakama Nation; the following summarizes the

issues raised and BPA's responses. First, the Yakama Nation raised concerns about potential impacts to an archaeological object found in May 2011 on Chemawa Hill within the Wind Project site that was not identified in the Final EIS. Although not specifically identified in the Final EIS, the Final EIS addressed the cultural significance of Chemawa Hill and BPA acknowledges and respects that cultural significance. Additionally, the State of Washington's approval of the Wind Project did not approve the turbine strings that would have been located on Chemawa Hill, thereby eliminating the potential for impacts to any cultural resources at Chemawa Hill. Furthermore, WRE has committed to continued collaboration with the Yakama Nation regarding construction activities in potential culturally sensitive areas.

Second, the Yakama Nation's letter reminded BPA of a tribal resolution specifying that only the Yakama Nation Cultural Resource Program is authorized to represent the Yakama Nation in discussions concerning placement of Wind Project turbines in culturally sensitive areas. BPA acknowledges and respects this tribal resolution. Accordingly, although BPA is not involved in the turbine siting, in carrying out its interconnection actions, BPA has and will continue to consult with the Yakama Nation Cultural Resource Program as the designated representative for the Tribe with respect to the Project.

Third, the Yakama Nation's letter stated views on the scope of BPA's review under NEPA and the National Historic Preservation Act (NHPA) for the Project. While BPA respects the Yakama Nation's views, BPA believes the Final EIS properly identifies the scope of BPA's action for the Whistling Ridge Energy Project and that BPA has appropriately considered its action under NEPA and the NHPA, as well as its federal trust responsibilities. BPA also notes that it fully participated in the preparation of the joint

NEPA/SEPA EIS that included analysis of the environmental impacts of the entire Project. Accordingly, in making a decision to allow interconnection of the Wind Project to the FCRTS, BPA considered all of the environmental information about the Project that is contained in the Final EIS.

The letter from the Seattle Audubon on behalf of itself and other groups requested that BPA and the U.S. Fish and Wildlife Service (FWS) reinitiate Section 7 consultation under the Endangered Species Act (ESA) for the Project. In its letter, Seattle Audubon stated that reinitiation of consultation was needed because conclusions made by the FWS in its July 2010 concurrence letter about the Project's effect on northern spotted owl (NSO) appeared to be based on inaccurate information, the FWS failed to evaluate key NSO information, and the FWS's June 2011 Revised Recovery Plan for the NSO needed to be evaluated.

BPA responded in a November 2011 letter in which BPA explained the standards for reinitiating consultation and found that any misstatements or possible omissions were not substantial enough to justify reinitiation of consultation, and that it was unlikely that further consideration of any corrections or omissions would change the outcome of the FWS's final determination. In a December 2011 letter, the FWS also responded to Seattle Audubon by agreeing with BPA and concluding that, based on a review of the additional information provided by Seattle Audubon as well as the Revised Recovery Plan, they were not recommending reinitiation of Section 7 consultation for the Project. In February 2012, the FWS sent BPA a letter under Section 7(a)(2) of the ESA to review and address potentially inaccurate information and possible omissions that had been identified. The FWS concluded its letter by reaffirming the determination made in its July 2010 concurrence letter that the Project is not likely to adversely affect the NSO.

Additional information concerning Section 7 consultation and coordination activities for the Project after issuance of the Final EIS is provided in the Supplemental Analysis that has been prepared for the EIS.

Finally, BPA received several letters from Friends after issuance of the Final EIS that raised a variety of issues about BPA's proposed interconnection of the Wind Project and the EIS. To begin with, Friends urged BPA to deny WRE's interconnection request because Friends believes WRE has not sufficiently defined the details of the Wind Project, as approved by the State of Washington, and thus has not satisfied the BPA's information requirements for interconnections. BPA notes that it considers the information it received from WRE as part of the initial interconnection request by WRE as sufficient and at an appropriate level of detail to assess the impacts of the interconnection and complete the study phase of the interconnection process. In addition, the decision by the State of Washington to not approve certain turbines strings did not materially alter the sufficiency of this information for the purposes of interconnection studies, given that the Wind Project's maximum total installed capacity did not change, and neither did the plan of service for interconnecting the Wind Project to the FCRTS. The information requirements cited by Friends describe typical information that BPA requires, to the extent that it is applicable and necessary, at various points in the interconnection process. Consistent with BPA's normal process, BPA will obtain the more detailed technical information about Wind Project components relevant to its interconnection requirements as it refines the technical design for the BPA interconnection facilities, but it is fully expected that these refinements will not alter the basic plan of service that has already been developed. Accordingly, BPA has sufficient certainty about the Wind Project and its details to grant WRE's interconnection request.

Friends also urged BPA to not act on WRE's interconnection request until BPA updates a 2008 system impact study with Wind Project details and changes in system conditions since the study was completed. To clarify, BPA performed the 2008 system impact study in response to requests for transmission service, not a request for interconnection. Transmission service requests are handled separately and independently from interconnection requests such as the one being granted as a result of this ROD. Moreover, the 2008 system impact study was performed for transmission service requests that were effectively withdrawn from consideration soon after the 2008 study was completed. When WRE submits a transmission service request, BPA will conduct a new system impact study specific to whatever that request entails. The results of that study are not necessary for making a decision concerning the requested interconnection, and BPA believes it has a sufficient understanding at this time of potential system impacts from interconnecting the Wind Project. In addition, in recent years BPA has built new transmission facilities and made other infrastructure improvements that have helped address previously identified transmission constraints in this portion of BPA's transmission system.

Friends also believes that BPA should not act on WRE's interconnection request until WRE signs the Final SCA for the Wind Project that the Washington Governor has already signed, to ensure acceptance of the Final SCA's term and conditions by WRE. BPA notes that WRE signed the Final SCA in November 2013. Accordingly, the terms and conditions in the Final SCA, including those that serve as environmental mitigation measures, are fully binding on WRE.

A final grounds urged by Friends for denying WRE's interconnection request is that the Wind Project, as approved by the State of Washington, is not economically viable

based on statements from WRE during the state's siting review process. BPA contacted WRE about this issue, and WRE recently provided BPA with a letter addressing it. In its letter, WRE affirms that the Wind Project continues to be an economically viable project for a variety of reasons. The letter points to Oregon and Washington state requirements for increasing use of renewable energy resources in utility portfolios in coming years, other state as well as federal proposals that likely would result in increased pressure to shift from fossil fuel energy sources to renewable energy, and the potential for increased demand from California for renewable energy. The letter notes that demand for renewables occurs in periodic waves, and these factors are expected to significantly increase renewable demand in coming years. WRE also attached a 2012 Declaration in Washington state court made by Jason Spadaro, President of WRE, that further elaborates on the reasons why the Wind Project is economically viable and affirms that WRE is committed to the Wind Project. This information from WRE sufficiently addresses the economic viability issue raised by Friends.

Regarding the EIS for the Project, Friends asserted in its letters that BPA should prepare a supplemental EIS for a variety of reasons. To begin with, Friends stated a supplemental EIS is necessary to address the limitation on the maximum number of wind turbines resulting from the State of Washington's approval of the Wind Project. As previously discussed in this Record of Decision, BPA reviewed this limitation through the Supplement Analysis it has prepared. In the Supplement Analysis, BPA determined that the turbine limitation did not constitute a "substantial change" in the Proposed Action within the meaning of NEPA, and that preparation of a supplemental EIS therefore was not required.

Another reason to supplement the EIS stated by Friends is that Friends believes the State of Washington's approval requires BPA to reexamine its need for action identified in the Final EIS, as well as the identified BPA purposes. As discussed in the EIS, BPA's need for action is a need to decide whether or not to grant the requested interconnection of the Wind Project to the FCRTS. This need has not changed. Furthermore, the identified BPA purposes remain the same for the state-approved Wind Project. These purposes are considered in detail below in the "BPA's Rationale for Decision" section of this Record of Decision.

Another reason stated by Friends is that increases in regional wind energy since the Final EIS was completed have affected BPA's need for action identified in the Final EIS, as well as the identified BPA purposes. As with the State of Washington's decision to limit the maximum number of turbines, the increase in regional wind energy has not changed the BPA need for action or its identified purposes. Consideration of the purposes in light of increased regional wind energy is provided in the "BPA's Rationale for Decision" section of this Record of Decision.

Another reason stated by Friends is that the summary in the Final EIS of the Applicant-identified needs for the Wind Project requires reevaluation for several reasons. To clarify, these Applicant-identified needs are not BPA's need. Nonetheless, the description of regional renewable energy needs – and more importantly for BPA's decision, project transmission needs – remains reasonably accurate today and helps provide useful context for why WRE has proposed its Wind Project. This includes the description of the Northwest Power and Conservation Council's draft Sixth Northwest Power Plan (Power Plan), which was subsequently finalized. BPA has reviewed the final

Power Plan and finds that portions of the draft Power Plan that are summarized in the Final EIS remained substantially similar in the final version of the Power Plan.

Another reason stated by Friends is that BPA and EFSEC need to review several aspects of the Project under NEPA and SEPA that Friends believes are unresolved or undecided. Friends states that these aspects include technical details, mitigation measures, and construction and operational plans that are yet to be resolved and approved. Current information about the Project is sufficient to analyze its environmental impacts and meet the requirements of NEPA. If there is a change in the Project or its potential impacts at some point in the future as a result of further Project refinement, BPA would conduct appropriate additional NEPA review at that time depending on the nature and scope of any change.

Another reason stated by Friends is that the Final EIS failed to adequately evaluate wildlife impacts in the areas of quantification of bird and bat mortality from blade strikes, evaluation of the relative abundance of sensitive-status species, inclusion of critical info on impacts to bats, and disclosure of mitigation measures for wildlife impacts. The Final EIS provides sufficient consideration and analyses of these areas to meet the requirements of NEPA.

Another reason stated by Friends is that the EIS should address the FWS's June 2011 Revised Recovery Plan for the NSO. As discussed above, BPA and the FWS have determined that reinitiation of Section 7(2)(a) consultation is not needed as a result of the Revised Recovery Plan. In addition, BPA has reviewed the Revised Recovery Plan, and any additional information concerning NSO provided by the Plan does not alter the conclusions made in the final EIS about potential impacts to NSO. Correspondingly, no additional analysis concerning the Revised Recovery Plan is needed in the EIS.

Another reason stated by Friends is that additional EIS analysis of impacts to bald and golden eagles is needed to comply with the FWS's "Land-Based Wind Energy Guidelines" issued in 2012 and "Eagle Conservation Plan Guidance" issued in 2013, both of which have been reviewed by BPA. The surveys that were conducted for the Wind Project generally comport with the FWS guidance in these documents and, regardless, are sufficient for the purposes of NEPA analysis. Furthermore, BPA notes that both of these documents are intended to be guidelines to be followed only voluntarily; in other words, they are not required or mandatory. Just as importantly, both of these FWS documents provide that projects for which planning is already underway should comply with the recommendations going forward rather than conducting restudies to apply the guidance retroactively. Accordingly, additional EIS restudy is not required to address these two guidance documents.

Another reason stated by Friends is that EIS review is needed of a 2012 report entitled "Synthesis of Wind Energy Development and Potential Impacts on Wildlife in the Pacific Northwest, Oregon and Washington" by the U.S. Department of Agriculture (USDA). BPA has reviewed this report, and the analysis of wildlife impacts contained in the Final EIS remains sufficient under NEPA in light of the report. In addition, additional information provided by the report does not alter the conclusions made in the Final EIS about potential wildlife impacts. Thus, preparation of a supplemental EIS on the basis of the USDA report is not necessary.

Another reason stated by Friends is that the Final EIS fails to consider the effects of noise impacts on wildlife. BPA notes first that the Final EIS does consider disturbance of wildlife by Project construction, including through changes to the noise environment. In addition, BPA has reviewed information sources cited by Friends concerning potential

operational noise impacts to wildlife and has determined that this information does not significantly alter the conclusions made in the Final EIS concerning potential operation impacts to wildlife. As discussed in the Supplement Analysis that has been prepared, the project's operational noise would occur in a landscape of managed timber land that is, and will continue to be, fragmented with ongoing disturbance. Any operational noise impacts to wildlife thus would fall within the bandwidth of overall degradation of wildlife habitat already discussed in the Final EIS.

Another reason stated by Friends is that EIS review is needed of a bibliography of noise impacts to wildlife that was published by the National Park Service in 2011. BPA has reviewed the sources included in this bibliography that are relevant to wind projects and has determined that the source reports do not alter the conclusions made in the Final EIS about potential wildlife impacts.

Another reason stated by Friends is that EIS review is needed to address recent studies on the effects of noise from operating wind turbines on human health and the human environment. BPA has reviewed these studies and determined that the analysis of potential impacts to human health from wind turbine noise that is contained in the Final EIS remains sufficient under NEPA. The studies cited by Friends largely are consistent with the discussion of potential noise impacts to humans from wind turbine operations that is contained in Section 3.7.2 of the EIS, and do not alter the conclusions made in the Final EIS about these impacts. BPA also notes EFSEC's findings that construction and operation of the Wind Project will comply with all applicable noise regulations in the State of Washington. Accordingly, a supplemental EIS is not needed to address these studies.

Another reason stated by Friends is that the EIS needs to address information from EFSEC's Final Adjudicative Order and Recommendation Order concerning the significance of impacts to scenic resources from the Wind Project. EFSEC provided a letter in December 2011 to Friends that largely addressed this issue. EFSEC's letter explained that EFSEC did not perform or use any new analysis or data for scenic impacts from what was considered in the Final EIS. EFSEC further explained that it simply duplicated the review process utilized in the EIS in making its determination concerning the significance of viewscape change for the Wind Project from various viewing sites. In so doing, EFSEC emphasized that it did not find any serious flaws in the Final EIS's analysis of scenic impacts, did not discredit any conclusions made in the EIS about these impacts, and found nothing that would violate state law. Accordingly, while EFSEC members may have developed their own opinion on scenic impacts, they did not alter or undermine the analysis of scenic impacts contained in the Final EIS. BPA concurs with EFSEC's response and believes that the Final EIS does not need to be supplemented on the basis of this issue.

Another reason stated by Friends is that the EIS understates the Project's likely scenic impacts. First, as Friends notes, the Final EIS acknowledges the scenic impacts of the Project. While Friends may disagree about the degree of those impacts, the Final EIS provides a reasonable analysis of potential scenic impacts and draws reasonable conclusions about their significance. Second, the denial by the State of Washington of turbine strings A-1 through A-7 and C-1 through C-8 served to substantially reduce the overall scenic impact of the Wind Project from various viewing points in the Columbia River Gorge, include those within the Scenic Area. The denial of these turbines thus further mitigated scenic impacts to ensure that potential levels of visual impacts would

not be higher than low to moderate at any of the viewpoints examined. As a result, the conclusions in the FEIS concerning the level of potential visual impacts at various viewpoints remains relatively accurate, and the Final EIS does not need to be supplemented on the basis of this issue.

Another reason stated by Friends is that the EIS needs to address the May 2011 discovery of an archaeological object on Chemawa Hill. As is discussed above, the Final EIS adequately addresses the cultural significance of Chemawa Hill and impacts to cultural resources at this location are being avoided.

Another reason stated by Friends is that the cumulative impacts analysis in the Final EIS is outdated and inadequate, because additional wind energy resources and other development have been completed or are proposed within the cumulative impact study area since the Final EIS was issued. BPA's Supplement Analysis discusses this additional development and concludes that it either has no cumulative impacts beyond those already described in the Final EIS or has resulted in only negligible increases in cumulative impacts within the scope of those already discussed in the Final EIS. For these reasons, a supplemental EIS to further consider cumulative impacts is not necessary.

In its letters, Friends also states that it believes BPA must obtain permits under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA) in order to approve the interconnection. As discussed in the Final EIS, the Wind Project would not involve intentional acts in wanton disregard of bald or golden eagles under the BGEPA and would not be expected to result in a take or killing of migratory bird species within the meaning of the MBTA. Moreover, the Final SCA between the State of Washington and WRE makes WRE responsible for completing a

plan to comply with requirements of these statutes. It is BPA's understanding that if a permit is required for the Wind Project under either statute, that will be the responsibility of WRE, as the owner and operator of the Wind Project, to obtain. Accordingly, it is not necessary for BPA to seek permits under the BGEPA and MBTA under these circumstances.

In addition, Friends asks BPA to consider evaluating recent information concerning an enforcement action under the MBTA related to wind projects in Wyoming and deaths of golden eagles at the Wild Horse Wind Project in central Washington State. BPA has reviewed available information concerning the Wyoming wind project enforcement action, including the U.S. Department of Justice (DOJ) press release regarding the enforcement. The Final EIS sufficiently addresses and analyzes the potential for impacts to migratory birds and eagles in a manner consistent with the recommendations of the FWS and DOJ concerning pre-construction evaluations. In addition, as discussed in the Final EIS and pursuant to the Final SCA, pre-construction raptor nest surveys will be conducted during the nesting season immediately prior to beginning site preparation, and a Technical Advisory Committee of agency professionals and other bird experts will be convened to assist with developing measures to ensure that risks to migratory birds and eagles are minimized as much as possible. Furthermore, as discussed above, the Final SCA requires that a golden eagle and bald eagle plan be completed before the Wind Project begins operations. The Final SCA also requires that this plan be completed in consultation with the FWS and WDFW, which BPA expects will ensure that these agencies are in agreement with the approach being taken. Accordingly, the information concerning the Wyoming enforcement action does not

significantly change the analysis or conclusions concerning migratory birds and eagles in the Final EIS.

BPA also has reviewed available information concerning the golden eagle deaths at the Wild Horse Wind Project. The analysis of potential impacts to golden eagles completed for the Whistling Ridge Energy Project Final EIS remains sufficiently accurate even in light of this information. Furthermore, the consultation that will occur with the FWS for the golden eagle and bald eagle plan for the Wind Project will ensure that all impacts to golden eagles are appropriately considered and addressed. As part of that consultation, it is expected that WRE and the FWS will coordinate as necessary concerning whether an eagle take permit is needed for the Wind Project.

Finally, Friends has provided BPA with a petition from citizens opposed to the Wind Project. On behalf of these citizens, Friends' letter transmitting the petition urges BPA to deny the requested interconnection for a variety of reasons, largely similar to those expressed in other letters from Friends and addressed above. BPA respects the viewpoints and opinions expressed in the petition and understands that there are some who are opposed to the Wind Project given its location. BPA has included consideration of the petition in making its decision (see "BPA's Rationale for Decision" section below).

BPA'S Rationale for Decision

In making its decision to implement its part of the Proposed Action, BPA has considered and balanced a variety of relevant factors. BPA considered how well each alternative under consideration – the Proposed Action alternative and the No Action alternative – would fit with BPA's statutory missions and relevant policies and procedures. BPA also considered the environmental impacts described in the Final EIS. In addition, BPA considered new environmental information and other circumstances,

including the State of Washington's denial of certain turbine strings, addressed in the Supplement Analysis. BPA also considered public comments received throughout the NEPA process for the Project, including those received on the Draft and Final EISs. Another consideration was the extent to which each alternative under consideration would meet the following BPA purposes (i.e., objectives) identified in the Final EIS:

- Maintain the electrical stability and reliability of the FCRTS;
- Continue to meet BPA's statutory and contractual obligations;
- Act consistently with BPA's environmental and social responsibilities; and
- Provide for cost and administrative efficiency.

Finally, BPA took into consideration the State of Washington's siting authority and regulatory jurisdiction over the Wind Project, the information from the state's lengthy and extremely thorough siting process for the Wind Project, and the unanimous Washington Supreme Court decision upholding the Governor's approval of the Wind Project. The entire record of EFSEC's administrative proceedings for the Wind Project – including the EIS process and the adjudication – was certified to the Washington Supreme Court. BPA has considered that record in making its decision.

After considering and balancing all of these factors, BPA has decided to grant the requested interconnection and offer an LGIA to WRE. Approving this interconnection is consistent with the policies embodied in BPA's transmission tariff, which is based on allowing open access to transmission and interconnection services on the FCRTS. BPA has adopted its tariff to be consistent with national policy promulgated by FERC that directs transmission providers to provide open access to their transmission systems. Because WRE has complied with the established tariff procedures for proposed

interconnections, BPA believes it is appropriate under its tariff to grant WRE's interconnection request.

Granting the requested interconnection will not interfere with or otherwise affect BPA's ability to maintain the stability and reliability of its transmission system. The physical interconnection of the Wind Project to the FCRTS will be designed and constructed to meet applicable reliability criteria and standards intended to maintain system stability, and the LGIA will include operating parameters and other provisions to ensure that operation of the Wind Project will not impair system reliability. Furthermore, BPA's implementation of its part of the Proposed Action will not interfere with BPA's ability to meet its statutory and contractual obligations. Although BPA has no express statutory or contractual obligation to construct the new substation that will be built for this interconnection, constructing the substation is consistent with BPA's statutory directive to make additions to the transmission system, as appropriate, in order to integrate and transmit electric power and maintain system stability and reliability.

BPA has adopted measures to ensure that granting the requested interconnection will not contribute to issues caused by generation oversupply conditions on BPA's transmission system at certain times of the year. To address these issues, BPA developed an Oversupply Management Protocol (Protocol) as an amendment to its transmission tariff. This Protocol provides a set of policies and operational practices that allow for the management of oversupply events while complying with environmental responsibilities as well as satisfying statutory and contractual obligations and maintaining reliability and stability. These Protocol goals align with BPA's purposes identified in the Final EIS. The Protocol was approved by FERC late last year, which has provided certainty with respect to BPA's approach to the management of oversupply events. Because the Wind

Project will be subject to the Protocol through its LGIA, the Wind Project will not exacerbate operational and reliability issues associated with future oversupply events that may occur.

Granting the requested interconnection will serve to integrate a new renewable generating resource. This will be consistent with certain FERC interconnection policies intended to help facilitate the integration of new renewable resources, which in turn are consistent with the Obama Administration's policies and action plan to address climate change by increasing reliance on renewable resources to reduce greenhouse gas emissions.

In planning and designing the Wind Project, it is clear that WRE attempted to minimize potential environmental impacts where possible. In addition, EFSEC and BPA have identified numerous mitigation measures in the Final EIS to further reduce, avoid, or compensate for Project impacts. These measures are also included as conditions in the Final SCA for the Wind Project that EFSEC has found will ensure that the Project will produce minimal adverse environmental impacts. Nonetheless, it is acknowledged that the Project will create a number of environmental impacts even with the implementation of mitigation. These impacts, which are fully disclosed in the Final EIS, primarily include disturbance of soils, conversion of habitat, direct mortality of birds, increases in noise and traffic in the vicinity, and – characterized by EFSEC as the "most hotly contested"– impacts to scenic resources.

BPA understands the sensitivities of many individuals to these impacts, and recognizes that the prospect of these impacts has led certain individuals – as well as some groups such as Friends – to oppose the Wind Project. BPA also appreciates that the Columbia River Gorge is a special place to many people and is one of the landscapes that

makes the Pacific Northwest great. However, with the extensive mitigation measures that have been identified and SCA conditions that have been imposed, BPA believes that the Project will be implemented in an environmentally responsible manner. In addition, in making a decision to grant the requested interconnection, BPA believes it has fully carried out its environmental responsibilities under NEPA, the ESA, and other applicable environmental laws.

Concerning impacts to scenic resources, BPA recognizes that the State of Washington's decision to deny turbine strings A-1 through A-7 and C-1 through C-8 served to mitigate the most significant visual impacts of the Wind Project. Accordingly, these impacts have been substantially reduced from those depicted in the visual simulations included in the Final EIS. BPA respects and appreciates the sentiments expressed by Governor Gregoire in her March 2012 approval letter concerning the evaluation of visual impacts that led to the state's decision to not approve the most visually prominent turbines associated with the Wind Project. BPA agrees that the Columbia River Gorge is a unique and beautiful landscape, and that proposed development within view of the Columbia River Gorge – even if outside of the Scenic Area as is the case with the Wind Project – warrants thoughtful and careful consideration of its potential to impact scenic resources. BPA believes that such consideration has been amply demonstrated in this case, and that definite and effective action has been taken by the State of Washington to reasonably help protect views as a result of this consideration. Furthermore, BPA agrees with the Governor that the state-approved Wind Project strikes an effective balance between minimizing visual impacts while still carrying out the public interest of the State of Washington in approving sites for alternative energy facilities.

The total cost of the BPA interconnection facilities is estimated at $12.6 million. All costs associated with these facilities will be advance funded by WRE and administration of contracts with WRE will follow normal, established procedures. In accordance with BPA's open access transmission tariff, WRE will be eligible to receive transmission credits for any portion of the interconnection facilities that constitute network upgrades. BPA believes that this approach provides for both cost and administrative efficiencies.

Finally, in deciding to grant the requested interconnection, BPA believes it is being appropriately respectful of state authorities concerning the siting of non-federal generation projects. As has been mentioned previously in this Record of Decision, BPA does not have siting authority or regulatory jurisdiction over these facilities. That is the purview of appropriate state and local entities, in this case Washington EFSEC and, ultimately, the Washington Governor. BPA notes that the siting process conducted by the State of Washington for the Wind Project was both lengthy and extremely thorough, and addressed many of the same environmental issues also considered in the Final EIS for the Project. BPA also notes that the State of Washington decided to approve construction and operation of the Wind Project on the basis of the siting process and Final EIS. Finally, BPA notes that this approval was upheld by the Washington Supreme Court in a legal challenge of the siting process brought against the State of Washington. In light of this, granting the requested interconnection provides the appropriate comity to the State of Washington's legally executed overall authorities concerning the siting of the Wind Project.

Mitigation

All the mitigation measures described in the Draft EIS and updated in the Final EIS have been adopted. A complete list of these measures can be found in the Mitigation Action Plan. WRE will be responsible for executing mitigation measures identified for the Wind Project, while BPA will be responsible for executing the mitigation measures associated with the BPA interconnection facilities.

In addition to identifying mitigation measures in the EIS, the State of Washington has included numerous conditions in the Final SCA for the Wind Project that are intended to ensure that the Wind Project is built and operated in a way that preserves and protects the quality of the environment. As environmental mitigation, Washington EFSEC has found that these conditions will ensure that the Project will produce minimal adverse environmental effects. WRE will be required to comply with these Final SCA conditions. As discussed above, the Final SCA is available at *http://www.efsec.wa.gov/whistling%20ridge.shtml*.

Issued in Portland, Oregon.

/s/ Elliot E. Mainzer June 24, 2015
Elliot E. Mainzer Date
Administrator and
Chief Executive Officer

Mitigation Action Plan
for the
Whistling Ridge Energy Project

Measure	Implementation Timeline	Implementation Responsibility
Earth (geology, soils, topography, and geologic hazards)		
Prior to Project construction, confirm subsurface soil and rock types and strength properties through a detailed geotechnical investigation of the specific locations of all wind Project elements, including wind turbines, access roads, underground trenching corridors, electrical grounding systems, and the substation and Operations and Maintenance facility locations.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
If detailed geotechnical investigations indicate potential for slope instability at Project facilities, ensure that design of these facilities included proper engineering to account for this risk or relocate the facilities on-site to avoid this risk.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), Erosion and Sedimentation Control Plan, and Environmental Protection Control Plan to lessen soil erosion and improve water quality of stormwater run-off through stabilization practices, structural practices, and stormwater management. For the Wind Project facilities, these Plans would be developed and approved by EFSEC prior to construction or modification of any roads or facilities. EFSEC may require the Applicant (WRE) to obtain coverage under Ecology's Construction Stormwater General Permit because the Project would disturb more than 1 acre of land.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Conduct a visual inspection of Project facilities following any abnormal seismic activity. These inspections would look for signs of incipient mass movement in areas identified as potentially susceptible to such failures.	Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement all stormwater pollution prevention activities prior to any clearing and site preparation. Measures would include installation of a stabilized construction entrance, wheel wash, silt fences, hay bales, temporary and/or permanent water conveyance systems, and installation of temporary and/or permanent retention ponds. Control dust as needed by spraying water on dry, exposed soil.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Limit clearing, excavation and grading to those areas of the Project Area absolutely necessary for construction of the Project. Areas outside the construction limits would be marked in the field and equipment would not be allowed to enter these areas or to disturb existing vegetation.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Inspect any installed run-off and erosion control structures at a frequency sufficient to provide adequate environmental protection. Such inspections would increase in frequency during rainfall periods.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)

<table>
<tr><th>Measure</th><th>Implementation Timeline</th><th>Implementation Responsibility</th></tr>
<tr><td>Build all structures on the site in accordance with the seismic design provisions of the 2006 version of the International Building Code, and the American Society of Civil Engineers 07-05 standard. Foundations and buildings would be designed for Seismic Zone 2, and the values listed in the table below would be used for seismic design of the Project in accordance with Section 1613.5.3 of the 2006 International Building Code. The occupancy category of the proposed structure is assumed III as per Section 1613.5.6 of the 2006 International Building Code.

2006 International Building Code Seismic Design Values
<table>
<tr><th>Parameter</th><th>Value</th><th>2006 IBC/ASCE 7-05 Reference</th></tr>
<tr><td>Soil Profile Site Class</td><td>C</td><td>Table 1613.5.2</td></tr>
<tr><td>0.2 Second Spectral Acceleration Ss</td><td>0.60 g</td><td>Figure 1613.5 (1)</td></tr>
<tr><td>1.0 Second Spectral Acceleration Sl</td><td>0.20 g</td><td>Figure 1613.5 (2)</td></tr>
<tr><td>Peak Ground Acceleration (0.4SDs)</td><td>0.186 g</td><td>ASCE 7-05 equation 11.4-5</td></tr>
<tr><td>Site Coefficient Fa</td><td>1.16</td><td>Table 1613.5.3 (1)</td></tr>
<tr><td>Site Coefficient Fv</td><td>1.6</td><td>Table 1613.5.3 (2)</td></tr>
<tr><td>Seismic Design Category[a]</td><td>D</td><td>Tables 1613.5.6 (1) & (2)</td></tr>
</table>
ASCE – American Society of Civil Engineers
IBC – International Building Code
[a] Assumes Seismic Use Group III</td><td>During construction</td><td>BPA (interconnection facilities) and WRE (Wind Project facilities)</td></tr>
<tr><td>Store additional erosion control supplies, including sandbags and channel-lining materials, on site for emergency use.</td><td>During construction</td><td>BPA (interconnection facilities) and WRE (Wind Project facilities)</td></tr>
<tr><td>Divert surface runoff around and away from cut and fill slopes using pipes and/or protected channels. If the runoff is from disturbed areas, it would be directed to a sediment trap prior to discharge.</td><td>During and after construction</td><td>BPA (interconnection facilities) and WRE (Wind Project facilities)</td></tr>
<tr><td>Construct all Project roads to be gravel surfaced with a low profile. Road construction would be performed in multiple passes starting with the rough grading and leveling of the roadway areas, if necessary. Once rough grade is achieved, a fabric layer would be installed, base rock would be trucked in, spread and compacted to create a road base. A capping rock would then be spread over the road base and roll-compacted to finished grade.</td><td>During construction</td><td>BPA (interconnection facilities) and WRE (Wind Project facilities)</td></tr>
<tr><td>Placement of all spoils piles would be regulated by the conditions of the stormwater permits.</td><td>During construction</td><td>BPA (interconnection facilities) and WRE (Wind Project facilities)</td></tr>
</table>

Measure	Implementation Timeline	Implementation Responsibility
Spread soil and rock that is excavated through grading across the site to the natural grade and reseed with native grasses or seeds to control erosion by water and wind.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Crush larger cobbles into smaller rock for use as backfill or road material or dispose of materials offsite. Those materials that cannot be reused on site would be disposed of in accordance with Skamania County and Ecology regulations for clean fill materials.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Air Quality		
Ensure that all vehicles used during construction comply with applicable Federal and state air quality regulations.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement operational measures, such as limiting engine idling time and shutting down equipment when not in use, to reduce air emissions.	Post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement active dust suppression on unpaved construction access roads, parking areas and staging areas, using water-based dust suppression materials in compliance with state and local regulations.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement a dust control program to minimize any potential disturbance from construction-related dust. Dust suppression would be accomplished through application of either water or a water-based, environmentally safe dust palliative such as lignin. The use of a dust palliative such as lignin (a non-toxic, non-hazardous compound derived from trees) would result in the use of substantially less water for dust suppression and therefore less traffic from water trucks to the construction site. The final decision regarding dust suppression techniques would be made by the Construction Contractor in consultation with local authorities.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Limit traffic speeds on unpaved Project roads to 25 mph to minimize dust.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Encourage carpooling among construction workers to minimize construction-related traffic and associated emissions.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Replant or gravel disturbed areas to reduce wind-blown dust.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement erosion control measures to limit deposition of silt to roadways.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Water Resources		
Prepare and implement a SWPPP prior to construction of the proposed Project to lessen soil erosion and improve water quality of stormwater run-off. The SWPPP would be developed to prevent movement of sediment off-site to adjacent water bodies during short term or temporary soil disturbance at construction sites. The plan addresses stabilization practices, structural practices and stormwater management (as outlined by Section 402(p) of the Federal Clean Water Act and Chapter 90.48 RCW of the State of Washington's Water Pollution Control Act).	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Identify all areas of potential chemical storage during construction, including any herbicides, and provide appropriate control measures within the SWPPP.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Control the sequence and methods of construction activities to limit erosion. Clearing, excavation, and grading would be limited to the minimum areas necessary for construction of the Project, and would not be performed far in advance of facility construction.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Design slopes to be graded no steeper than 3 feet horizontal (H) to 1 foot vertical (V).	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Protect slopes less than 3H:1V with silt fencing as appropriate. Silt fences would be installed in locations where they would trap silt eroded from slopes during construction and prior to reestablishing vegetation. The maximum flow path to each silt fence would be approximately 100 feet. No concentrated flows greater than 1 cubic foot per second would be directed toward any fence for the 25-year storm. Silt fences would be maintained throughout the construction period and beyond, until disturbed surfaces had been stabilized with vegetation. Silt fence construction would be determined by local construction conditions during final design of the facilities.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Design sediment control measures used during construction based on 10-year design storm specifications. Water quality measures (other than sediment removal) would be based on the 6-month, 24-hour design storm.	Prior to and during construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Utilize appropriately designed sediment traps to intercept stormwater runoff and allow sediment to settle, thereby minimizing the amount of sediment flowing off site. Sediment traps would be sized for the specific disturbed area, for bare soil conditions, and typically for 75 percent sediment removal efficiency.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement and emphasize erosion controls over sediment controls through non-quantitative construction activities such as: • Straw mulching and vegetating disturbed surfaces; • Retaining original vegetation wherever possible; • Timing grading operations to dry seasons; • Directing surface runoff away from denuded areas; • Keeping runoff velocities low through minimization of slope steepness and length; and • Providing and maintaining stabilized construction entrances.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Grade control structures, such as rock check dams, hay bale check dams, dikes, and swales, would be used where appropriate to reduce runoff velocity, as well as to direct surface runoff around and away from cut-and-fill slopes. Swales and dikes also would be used to direct surface water on top of the filled pad toward sediment traps and away from flowing over the bank.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Utilize the appropriate erosion control blankets designed for various weather conditions during the construction period, such as straw or jute matting or other suitable erosion control blankets, on any disturbed slopes to prevent erosion and control sediment migration.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Use quarry spall construction entrances to reduce migration of construction dirt to public roads. Placing the construction entrances is one of the first activities required at the site, but the rock bed also must be periodically replenished as it becomes dirty or migrates into the subgrade. All construction traffic would be directed to use the construction entrances.	During construction	WRE
Restore ground surfaces within fourteen days of the area's final disturbance. Interim surface protection measures, such as erosion control blankets or straw matting, also may be required prior to final disturbance and restoration if warranted by the potential for erosion.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Reduce potential for chemical pollution of surface waters during construction. Since source control is the most effective method of preventing chemical water pollution, careful control must be exercised over potentially polluting chemicals used on site during construction. Under the Spill Pollution, Control, and Countermeasure (SPCC) Plan, the general contractor would be responsible for planning, implementing, and maintaining Best Management Plans (BMPs) for: • Neat and orderly storage of construction chemicals and spent containers in lined, bermed areas; • Prompt cleanup of construction phase spills; and • Regular disposal of construction garbage and debris.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Train employees to utilize methods outlined by the SWPPP.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Dispose and contain garbage generated during construction properly.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Design and incorporate BMPs into final construction plans and specifications so that operational impacts to water resources would be minor.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Construct appropriate stormwater hydraulic and treatment facilities making sure that routine maintenance and chemical pollution prevention through source control are utilized for permanent stormwater management.	Post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Utilize the following constructed permanent stormwater BMPs: • Vegetated drainage ditches; • Culverts with stabilized inlets and outlets; • Permanent erosion and sedimentation control through site landscaping, grass, and other vegetative cover; and • Runoff treatment BMPs facilities would be designed to conform to the applicable Stormwater Management Manual.	During and post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Adopt operational BMPs to implement good housekeeping, preventive and corrective maintenance procedures, steps for spill prevention and emergency cleanup, employee training programs, and inspection and record keeping practices as necessary to prevent stormwater pollution. Examples include: • Neat and orderly storage of chemicals under cover in the Operations and Maintenance facilities; • Prompt cleanup and removal of spillage; • Regular pickup and disposal of garbage and rubbish; and • Prevention of accumulations of liquid or solid chemicals on the ground or the floor.	Post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Train facility operators annually to in spill response and in the applicable pollution control laws and regulations.	Post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Train staff to recognize areas that may be affected by a spill and potential drainage routes.	During and post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Train staff to report spills to appropriate individuals.	During and post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Train l staff on the appropriate material handling and storage procedures.	During and post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Train staff to implement spill response procedures.	During and post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)
Summarize in-house compliance inspections to be kept with the SWPPP, along with any notifications of non-compliance and reports on incidents such as spills. If the SWPPP for the Wind Project facilities has been followed but still proves inadequate to prevent stormwater pollution, Wind Project staff would amend the SWPPP and seek EFSEC concurrence with the improvements.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Utilize BMPs to include vegetated ditches or swales which would increase infiltration to protect groundwater.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Utilize a site development plan to protect groundwater from the on-site storage of chemicals (if any).	During and post construction and throughout Project operation	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Biological Resources		
Avoid and minimize the use of overhead collector lines, which create areas where birds may congregate and perch, thus decreasing the potential for turbine collisions.	During Project design	WRE
Use tubular turbine towers, avoiding the lattice type towers which creates areas where birds may congregate and perch, thus decreasing the potential for turbine collisions.	During Project design	WRE
Use un-guyed meteorological towers, reducing the potential for bird collision with wires.	During Project design	WRE
Minimize the use of turbine lighting in the Project Area, thereby reducing the potential for birds and bats to be disoriented by lights or attracted to turbines.	During Project design and throughout Project operations	WRE
Use newer generation up-wind turbines.	During Project design	WRE
Utilize certified "weed free" straw bales during construction to avoid introduction of noxious weeds.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Re-seed all temporarily disturbed areas with an appropriate mix of native plant species as soon as possible after construction is completed to accelerate the re-vegetation of these areas and to avoid the establishment and spread of noxious weed species.	Post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement a noxious weed control program, in coordination with the Skamania County Noxious Weed Control Board, to control the spread and prevent the introduction of noxious weed species.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Conduct raptor nest surveys prior to construction during the breeding season (approximately April to July) in order to avoid or minimize impacts to any raptors potentially nesting in or near the Project Area. Construction activities requiring the surveys would include those that would remove forested areas and/or require the use of heavy equipment substantial enough to potentially disturb nesting activities.	Prior to construction	WRE
Implement a two year minimum post-construction avian mortality study.	Post construction	WRE
Convene a Technical Advisory Committee to evaluate the mitigation and monitoring program and determine the need for further studies or mitigation measures. The Technical Advisory Committee would be composed of representatives from WDFW, USFWS, Skamania County, and the Applicant. The role of the Technical Advisory Committee would be to coordinate appropriate mitigation measures, monitor impacts to wildlife and habitat, and address issues that arise regarding wildlife impacts during construction and operation of the Project, including potential adaptive management opportunities. The post-construction monitoring plan would be developed in coordination with the Technical Advisory Committee.	Prior to, during, and post construction, and throughout Project operations	WRE
Coordinate with WDFW for potential impacts to big game species (deer and elk), if appropriate.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Prepare a SWPPP for both the construction and operation phases of the project and submit the SWPPP for the Wind Project facilities to EFSEC for approval.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Public Health and Safety		
Report conditions affecting the safety of the Project to EFSEC, including any condition, event, or action that might compromise the safety, stability, or integrity of any facility or the ability of any equipment to function safely; or that might otherwise adversely affect life, health, or property.	During and post construction, and throughout Project operations	WRE
Prepare Emergency Plans for the Project containing the following components: • *Fire Protection and Prevention Plan.* A Fire Protection and Prevention Plan would be developed by the Applicant for the Wind Project facilities for EFSEC approval and by BPA for the interconnection facilities. These plans would be implemented, in coordination with the Skamania County Fire Marshall and appropriate agencies. As part of the plan, the construction manager would be responsible for staying abreast of fire conditions in the Project Area by contacting DNR and implementing any necessary fire precautions. • *Personal Injury Response Plan.* Procedures would be developed for construction, operation and maintenance of the Project to describe procedures to be followed in the event of a personal injury, including who is to be alerted, contacting 911, how to alert others in the immediate vicinity, remaining with the employee, and administering first aid until medical assistance arrives. • *Safety Plan.* Prior to the commencement of any construction work, the construction contractor would be required to prepare a Safety Plan that would apply to all contractor and subcontractor personnel working at the site. The plan would be designed to ensure compliance with all laws, ordinances, regulations, and standards concerning health and safety. The contractor would assign a safety manager with the authority to issue a "stop work" notice when health and safety issues arise. • *SPCC Plan.* While storage of chemicals on site would be minimal, the Project could require an SPCC Plan that would protect groundwater. The SPCC Plan would apply to both construction and operation if hazardous materials were stored on site in quantities sufficient to trigger the plan requirement. • *Hazardous Waste Management Plan.* Hazardous materials to be used or stored on site would be limited to small quantities of materials used for maintenance (cleaning and painting), lubrication of equipment, and possibly fuel. During construction, the construction contractor would be required to prepare a Hazardous Waste Management Plan that complies with state and federal hazardous waste management laws for handling, storage, and disposal. A similar plan would be prepared and implemented for operation.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Develop agreements related to emergency planning with Skamania County Department of Emergency Management prior to Project construction. This agreement would be provided to EFSEC and attached to the Emergency Plan prior to implementation.	Prior to construction	WRE

Measure	Implementation Timeline	Implementation Responsibility
Comply with all applicable local, state, and federal safety, health, and environmental laws, ordinances, regulations, and standards. Some of the main laws, ordinances, regulations and standards that would be reflected in the design, construction, and operation of the Project are as follows: • Occupational Safety And Health Act of 1970 (29 USC 651, et seq.) and 29 CFR 1910, Occupational Safety and Health Standards; • Uniform Fire Code; • Americans with Disabilities Act; • Uniform Fire Code Standards; • Uniform Building Code; • National Fire Protection Association design standards for the requirements of fire protection systems; • National Institute For Occupational Safety And Health requirements that safety equipment carry markings, numbers, or certificates of approval for stated standards; • American Society of Mechanical Engineers plant design standards. American National Standards Institute plant design standards: • National Electric Safety Code; • American Concrete Institute Standards; • American Institute of Steel Construction Standards; • National Electric Code.	Prior to, during, and post construction, and throughout Project operations	BPA (interconnection facilities) and WRE (Wind Project facilities)
Utilize the following measures to mitigate the risk of fire or explosion: • The construction manager would be responsible for staying abreast of fire conditions in the Project Area by contacting DNR and implementing any necessary fire precautions; • A Fire Protection and Prevention Plan would be developed for the Wind Project facilities for EFSEC approval and implemented by the Applicant, in coordination with the Skamania County Fire Marshall and appropriate agencies; • Equip the wind turbine generators and the substation with lightning protection systems. The *Fire and Explosion Risk Mitigation Table* in Attachment 1 to this MAP lists sources of potential fire and explosion along with measures to mitigate the risk of either occurring.	Prior to, during, and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Require that all on-site operations employees would be responsible for contributing to ongoing fire prevention in the Project Area through the following programs: • Operational Safety Program; • Operations Written Safety Program; • Emergency Action Plan; • Fire Prevention Plan.	Post construction, and throughout Project operations	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Develop on-site emergency plans for the Project in case of a major natural disaster or accident relating to or affecting the Project. The plans would describe the emergency response procedures to be implemented during various emergency situations that may affect the Project or surrounding community or environment. In addition to the above measures, the Applicant would: • Provide detailed maps that show all access roads to the Project; • Provide keys to a master lock system that would enable emergency personnel to unlock access road gates that would otherwise limit access to the Project; • Use spark arresters on all power equipment, e.g., cutting torches and cutting tools; • Inform workers at the Project Area of emergency contact phone numbers and train them in emergency response procedures; • Carry fire extinguishers in all maintenance vehicles; • Coordinate with DNR when the fire danger is high; • Comply with equipment rules and regulations required by DNR for work conducted in wildland/forested lands.	Prior to construction, and throughout Project operations	BPA (interconnection facilities) and WRE (Wind Project facilities)
Prepare and implement the following traffic safety plans and measures: • Prepare a Transportation Management Plan (TMP) that would direct and obligate the contractor to implement procedures to minimize traffic impacts would be prepared in consultation with both WSDOT and Skamania County and submitted to EFSEC for approval. Include requirements for coordination of project-related construction traffic and WSDOT planned construction projects, along with requirements for coordination of project-related construction traffic and Skamania County, City of Bingen, and City of White Salmon summer recreational traffic. • Comply with State and County permitting requirements for over-size and over-weight vehicles. • Notify land owners in the Project vicinity prior to construction of transportation routes that would be used for construction equipment and labor. • Use approved State and/or County advanced warning construction signs prior to and during construction. • Use certified flaggers when necessary to direct traffic when over-size and over-weight trucks either enter or exit public roads, to minimize risk of accidents. • Employ pilot cars both in front of and behind all trucks transporting over-size or over-weight loads on all public roadways. • Restrict traffic flow for no more than 20 minutes during the construction phase. • Use three pilot cars, two in front and one in the rear, for all loads over 10 feet wide traveling on SR 14 traveling from east of the proposed Project Area between MP 76.77 and 76.91. Require the two front pilot cars to maintain a minimum 500-foot separation. The lead pilot car in front of the load would warn oncoming traffic of the over-size load, and the pilot car immediately in front of the over-size load would be responsible to stop all oncoming traffic.	Prior to and during construction	Generally only WRE, except where also applicable to BPA (see *Transportation* section of this MAP)
Noise		
Equip all noise-producing Project equipment and vehicles using internal combustion engines with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) would be equipped with shrouds and noise control features that are readily available for that type of equipment.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)

Measure	Implementation Timeline	Implementation Responsibility
Regulate all mobile or fixed noise-producing equipment used on the Project for noise output governed by local, state, or federal agency regulations, to comply with such regulations while in the course of Project activity.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Designate that the use of noise-producing signals, including horns, whistles, electronic alarms, sirens, and bells, would be for safety warning purposes only. Unless required for such safety purposes, and as allowable by applicable regulations, no construction-related public address, loudspeaker, or music system would be audible at any adjacent noise sensitive land use.	During and post construction and throughout Project operations	BPA (interconnection facilities) and WRE (Wind Project facilities)
Implement a noise complaint process and hotline number for the surrounding community. The Applicant would have the responsibility and authority to receive and resolve noise complaints.	During and post construction and throughout Project operations	WRE
Visual Resources		
Ensure that a non-reflective flat neutral gray or light color is used for the turbines so that visual impacts would be minimized. The primary mitigation measure available for visual impacts is the choice of color for the turbines. Although a brown turbine color would reduce visual contrast in views where the turbines are seen against the landscape, it would also accentuate the visibility of the turbines where they would be seen against the sky. In addition, the brown color would have a greater contrast when snow is on the ground. Because the turbines are most frequently seen against the sky, particularly in close-range views where visual concerns are the greatest, a non-reflective flat neutral gray or light color would be ideal.	Project design, during and post construction, and throughout Project operations	WRE
Comply with Federal Aviation Administration requirements for safety lighting. Lights typically used to meet Federal Aviation Administration requirements would to some extent be shielded from ground level view by using a constrained (3–5 degree) vertical beam. The Federal Aviation Administration would independently review the lighting of individual turbines during the micrositing process and consult on mitigation. However, the Project must comply with the safety lighting requirement.	Prior to construction	WRE
Cultural Resources		
Utilize BMPs to minimize impacts to any additional cultural or historic resources that may be encountered during construction of the proposed Project. These BMPs include preparation and use of an Inadvertent Discovery Plan, which would establish procedures to deal with unanticipated discovery of cultural resources before and during construction. The plan, among other provisions, would require immediate work stoppage and appropriate notification in the event of discovery of previously unknown cultural materials. The plan also would specify protocols for the treatment of human remains that fulfill the requirements of the Native American Graves Protection and Repatriation Act in the event that human remains and/or funerary items are encountered during construction or operation of the Project.	Prior to and during construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Design the locations of road, turbine, and transformer to avoid and minimize impacts during construction regular maintenance operations.	During Project design	WRE
Although Chemawa Hill was identified as a Traditional Cultural Property (TCP) within the Applicant's Area of Potential Effect (APE), the Applicant has worked with the Yakama Nation to site fewer towers on Chemawa Hill and is committed to working with the Yakama Nation during the proposed Project..	During and post construction and throughout Project operations	WRE

Measure	Implementation Timeline	Implementation Responsibility
Transportation		
Prepare and implement a Transportation Management Plan to direct and obligate the contractor to implement procedures to minimize traffic impacts in consultation with both Washington State Department of Transportation (WSDOT) and Skamania County. Submit plan to EFSEC for approval and include requirements for coordination of project-related construction traffic and WSDOT planned construction projects, along with requirements for coordination of project-related construction traffic and Skamania County, City of Bingen, and City of White Salmon summer recreational traffic.	Prior to construction	WRE
Comply with State and County permitting requirements for over-size and over-weight vehicles.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Notify land owners in the Project vicinity prior to construction of transportation routes that would be used for construction equipment and labor.	Prior to construction	WRE
Place approved State and/or County advanced warning construction signs prior to and during construction.	Prior to and during construction	WRE
Use certified flaggers when necessary to direct traffic when over-size and over-weight trucks either enter or exit public roads, to minimize risk of accidents.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Avoid restricting traffic flow for more than 20 minutes during the construction phase.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Use pilot cars both in front of and behind all trucks transporting over-size or over-weight loads on all public roadways. For all loads over 10 feet wide traveling on SR 14 from east of the proposed Project Area between MP 76.77 and MP 76.91, use three pilot cars, two in front and one in the rear. The two front pilot cars would be required to maintain a minimum 500 feet of separation. The lead pilot car would warn oncoming traffic of the over-size load, and the pilot car immediately in front of the over-size load would be responsible for stopping all oncoming traffic.	During construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Design and build all access road improvements or new construction according to WSDOT and Washington State access management standards.	During construction	WRE
Conduct pre- and post-haul construction visual assessments of roadway surface conditions to identify weak or deteriorated areas along the haul route that may require repair as a result of project-related traffic. Following the end of construction, repair all pavement sections affected by project-related traffic as needed to pre-construction conditions or better.	During and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Perform all snow removal from Project access roads in a safe manner that does not degrade roadway conditions.	During and post construction	WRE
Public Services and Utilities		
Mitigate potential impacts to public services and utilities by using tax revenues generated by the Project.	Throughout Project operation	WRE

Measure	Implementation Timeline	Implementation Responsibility
Provide all local police, fire, and emergency medical agencies with emergency response information for the Project, including employee contact information, procedures for rescue operations to the nacelles, and location of rescue basket. The Applicant would provide applicable emergency response information to local agencies prior to Project construction and would review and update employee contact information annually and provide any changes to the appropriate agencies.	Prior to, during, and post construction, and throughout Project operations	BPA (interconnection facilities) and WRE (Wind Project facilities)
Utilize fire precautions for staying abreast of fire conditions in the Project Area by contacting Department of Natural Resources (DNR). A Fire Protection and Prevention Plan would be developed by the Applicant for the Wind Project facilities for EFSEC approval and by BPA for the interconnection facilities. These plans would be implemented, in coordination with the Skamania County Fire Marshall and appropriate agencies. Both the wind turbine generators and the substation would be equipped with lightning protection systems. See Attachment 1 of this MAP for sources for potential fire and explosion along with measures to mitigate the risk of either occurring.	Prior to, during, and post construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Maintain the use of a full-time security plan during Project construction to reduce the potential need for increased police services to the Project Area.	Prior to and during construction	WRE
Prepare emergency plans to protect the public health, safety, and environment on and off the Project Area in the case of a major natural disaster or industrial accident relating to or affecting the Project. The construction specifications would require that the contractors prepare and implement a Construction Health and Safety Program that included an emergency plan. The Construction Health and Safety Program would include the following provisions: • Construction Injury and Illness Prevention Plan; • Construction Written Safety Program; • Construction Personnel Protective Devices; • Construction On-Site Fire Suppression Prevention; and • Construction Off-Site Fire Suppression Support.	Prior to construction	BPA (interconnection facilities) and WRE (Wind Project facilities)
Install the water well supplying the Operations and Maintenance facility, at either of the two sites under consideration, by a well contractor licensed pursuant to Chapter 173-162 WAC, in compliance with the requirements and standards of Chapter 173-160 WAC, and consistent with Skamania County Community Development Department and Ecology requirements for the new wells.	During construction	WRE
Coordinate and comply with the Skamania County Community Development Department Environmental Health Division, and comply with all County and State septic tank and subsurface disposal field design, installation, and maintenance requirements	During and post construction	WRE
Socioeconomic		
Impact to the local economy and social structure of the proposed Project is expected to be beneficial, in the form of additional jobs, increased sales, and increased tax revenues. Temporary increases in population during construction are likely to be minor in view of the availability of housing, transient accommodations, and other public services in the region.	During and after construction	WRE
Ensure that the applicant uses the local labor pool to the greatest extent possible; advertise positions locally and to employ local workers to the greatest extent possible.	During and post construction, and throughout Project operation	WRE

Attachment 1: Fire and Explosion Risk Mitigation Table

Construction or Operation	Potential Fire or Explosion Source	Mitigation Measures
Construction and Operation	General Fire Protection	• All on-site service vehicles fitted with fire extinguishers. • Fire station boxes with shovels, water tank sprayers, etc. installed at multiple locations on site along roadways during summer fire season. • Minimum of one water truck with sprayers must be present on each turbine string road with construction activities during fire season.
Construction and Operation	Dry vegetation in contact with hot exhaust catalytic converters under vehicles	• No gas powered vehicles allowed outside of graveled areas. • Mainly diesel vehicles (i.e. w/o catalytic converters) used on site. • Use of high clearance vehicles on site if used off-road.
Construction and Operation	Smoking	• Restricted to designated areas (outdoor gravel covered areas).
Construction and Operation	Explosives used during excavation	• Only state-licensed explosive specialist contractors are allowed to perform this work—explosives require special detonation equipment with safety lockouts. • Clear vegetation from the general footprint area surrounding the excavation zone to be blasted. • Standby water spray trucks and fire suppression equipment to be present during blasting activities.
Construction and Operation	Electrical fires	• Use generally high clearance vehicles on site. • No gas powered vehicles allowed outside of graveled areas. • All major construction equipment used is to be diesel powered (i.e., without catalytic converters).
Construction and Operation	Lightning	• Specially engineered lightning protection and grounding systems used at wind turbines and at substation. • Footprint areas around turbines and substation are graveled with no vegetation.
Construction	Portable generators – hot exhaust	• Generators not allowed to operate on open grass areas. • All portable generators to be fitted with spark arrestors on exhaust system.
Construction	Torches or field welding equipment	• Immediate surrounding area would be wetted with water sprayer. • Fire suppression equipment to be present at location of welder/torch activity.
Construction and Operation	Electrical arcing	• Electrical designs and construction specifications meet or exceed requirements of the National Electric Code and National Fire Protection Agency.

From:	Warner,Joshua P (BPA) - DIR-7
To:	"Kevin Gorman (kevin@gorgefriends.org)"; "ryan@gorgefriends.org"
Cc:	"Michael Lang (michael@gorgefriends.org)"; "nathan@gorgefriends.org"
Subject:	Whistling Ridge Energy Project interconnection decision
Date:	Thursday, June 25, 2015 7:59:00 AM

Kevin & Ryan-

I wanted to let you know in advance that the record of decision (ROD) for the Whistling Ridge Energy Project has been signed and BPA will be offering contract terms to allow the interconnection of the project into our transmission system. We will be sending out a public letter next week. The documents that have been finalized will be posted to the Whistling Ridge project page today: http://efw.bpa.gov/environmental_services/Document_Library/Whistling_Ridge/.

The people who signed the petition that you submitted dated January 30, 2015, have been added to the mailing list and will receive notice via either email or USPS. The communication is scheduled to be sent out on June 30th.

Please let me know if you have any questions.

Thanks,
Josh

Josh Warner
Acting Constituent Account Executive, Public Interest Organizations
Bonneville Power Administration
905 N.E. 11th Ave., Portland, OR 97232
(503) 230-5857
jpwarner@bpa.gov

ATTACHMENT TO EMAIL MAY BE FOUND AT

15-01544-F_0076 – 15-01544F_0145

From: Grange,Katey C (BPA) - KEC-4
To: "Shoal, Robin Z -FS"
Subject: RE: BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date: Thursday, June 25, 2015 10:30:00 AM
Attachments: image001.png
image002.png
image003.png
image004.png

Hi Robin-

That is correct- there are no project facilities, including access roads, within the boundaries of the NSA.

Let me know if you have any other questions that come up.

-Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

From: Shoal, Robin Z -FS [mailto:rshoal@fs.fed.us]
Sent: Thursday, June 25, 2015 10:15 AM
To: Grange,Katey C (BPA) - KEC-4
Subject: RE: BPA's ROD on interconnection of the Whistling Ridge Energy Project

Thanks, Katey –

I definitely appreciate the heads up! I know the general history of the project and will look through the material you sent.
Because people both internal and external will undoubtedly be asking me, I will verify through you now that there are no planned activities, including access, that would occur within the CRGNSA boundaries.

Cheers,
Robin

Robin Shoal
Staff Officer, Natural Resources & Planning
Forest Service
Columbia River Gorge National Scenic Area
office: 541-308-1716
cell: 971-806-7601
fax: 541-386-1916
rshoal@fs.fed.us
902 Wasco Avenue, Suite 200
Hood River, OR 97031
www.fs.fed.us

Caring for the land and serving people

From: Grange,Katey C (BPA) - KEC-4 [mailto:kcgrange@bpa.gov]
Sent: Thursday, June 25, 2015 8:26 AM
To: Shoal, Robin Z -FS
Cc: Harwood,Holly C (BPA) - DIR-7; Ball,Crystal A (BPA) - DIR-7
Subject: BPA's ROD on interconnection of the Whistling Ridge Energy Project

Hey Robin-

Hopefully we can catch each other soon ☺. On fronts other than B-HR, I did want to give you a heads up that we have a ROD out for the interconnection of the Whistling Ridge Project. While the project isn't in the NSA, I know this project is of interest to various folks due to its proximity. I wanted you to be aware in case you received any questions. We will post the attached docs to our external website this afternoon, www.bpa.gov/go/whistling and we will be mailing a letter to the public on June 30.

Talk to you soon.

Thanks,
Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

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BPA has prepared a Record of Decision and Supplement Analysis for the electrical interconnection of the Whistling Ridge Energy Project to our transmission system. The planned Project, a wind energy facility of up to 75 megawatts that has been approved by the state of Washington and will be constructed in Skamania County (see map). This interconnection will occur at a new 230-kilovolt substation that BPA will construct along its existing North Bonneville-Midway 230kV transmission line, which passes through the southern portion of the wind project site.

The Record of Decision, Supplement Analysis and Mitigation Action Plan will be posted to the project website on the afternoon of Thursday, June 25.

From: Harwood,Holly C (BPA) - DIR-7
To: "Burditt, Lynn -FS (lburditt@fs.fed.us)"
Cc: Grange,Katey C (BPA) - KEC-4; Ball,Crystal A (BPA) - DIR-7
Subject: FW: BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date: Thursday, June 25, 2015 10:59:00 AM
Attachments: WHISTLING_4G_ROD_Supplement_Analysis.pdf
WHISTLING_4H_ROD_Notice_of_ROD_submitted_to_FR.PDF
WHISTLING_4I_ROD_Mitigation_Action_Plan.pdf

Lynn,

It was great to see you again a few weeks ago and I'm so glad we figured out the connection – it was bugging me too! You may have already gotten this from Robin, but I wanted to make sure you got it too and Crystal is on leave for a few weeks. As Katey said in her email below, BPA's ROD on the Whistling Ridge Energy Project is being posted on our website later today. BPA has decided to offer contract terms to allow the interconnection to our transmission system of the planned Whistling Ridge Energy Project. As Katey noted, it is not in the Scenic Area, but close enough to be of interest to you.

If you have any questions, please let me know.

Regards,
Holly

Holly Harwood
Eastern Washington Local Government Coordinator
Bonneville Power Administration
360 773-5452
hcharwood@bpa.gov

From: Grange,Katey C (BPA) - KEC-4
Sent: Thursday, June 25, 2015 8:26 AM
To: 'rshoal@fs.fed.us'
Cc: Harwood,Holly C (BPA) - DIR-7; Ball,Crystal A (BPA) - DIR-7
Subject: BPA's ROD on interconnection of the Whistling Ridge Energy Project

Hey Robin-

Hopefully we can catch each other soon ☺. On fronts other than B-HR, I did want to give you a heads up that we have a ROD out for the interconnection of the Whistling Ridge Project. While the project isn't in the NSA, I know this project is of interest to various folks due to its proximity. I wanted you to be aware in case you received any questions. We will post the attached docs to our external website this afternoon, www.bpa.gov/go/whistling and we will be mailing a letter to the public on June 30.

Talk to you soon.

Thanks,
Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

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ATTACHMENT TO EMAIL MAY BE FOUND AT

15-01544-F_0076 – 15-01544F_0145

From: Essko, Ann (ATG)
To: Klumpp,Elizabeth C (BPA) - DIR-WSGL
Subject: RE: Whistling Ridge wind
Date: Thursday, June 25, 2015 1:21:43 PM

This is exactly what I needed to know. And my apologies if I was mumbling.... ☺

Here's my contact info:

Ann Essko
Senior Counsel
7141 Cleanwater Drive SW
P.O. Box 40108
Olympia, WA 98504-0108
Phone: 360.586.3633
Fax: 360.586.3593

From: Klumpp,Elizabeth C (BPA) - DIR-WSGL [mailto:ecklumpp@bpa.gov]
Sent: Thursday, June 25, 2015 1:19 PM
To: Essko, Ann (ATG)
Subject: Whistling Ridge wind

Hi Anne,

Maybe you could send me your contact information as it was hard to hear your phone message.

BPA has no internal hearing review processes. If a party opposes an action/decision that BPA has made, such as issuing the Record of Decision, then their legal recourse is to file in federal court *within 90 days* of the BPA's decision. A party could file in federal district court or the 9th Circuit.

You are welcome to call our lead NEPA attorney, Hub Adams at 503-230-4312 if you want to discuss this.

Thanks.

Liz Klumpp
Western Washington Liaison | Bonneville Power Administration | 360-943-0157 | c. 360-485-2392

From:	Harwood,Holly C (BPA) - DIR-7
To:	"David Reeploeg"
Subject:	FW: BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date:	Thursday, June 25, 2015 6:06:00 PM
Attachments:	WHISTLING_4G_ROD_Supplement_Analysis.pdf WHISTLING_4H_ROD_Notice_of_ROD_submitted_to_FR.PDF WHISTLING_4I_ROD_Mitigation_Action_Plan.pdf

David,
It was nice chatting with you this week. I still need to do the follow-up on but wanted to let you know that , BPA's ROD on the Whistling Ridge Energy Project in Skamania County and related information attached is being posted on our website today.(www.bpa.gov/go/whistling)

BPA has decided to offer contract terms to allow the interconnection to our transmission system of the planned Whistling Ridge Energy Project. We will mail a letter to the public and the mailing list on June 30.

Let me know if you have any questions.

Regards,
Holly

ATTACHMENT TO EMAIL MAY BE FOUND AT

15-01544-F_0076 – 15-01544F_0145

From:	Harwood,Holly C (BPA) - DIR-7
To:	"Rebecca Thornton"
Subject:	BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date:	Thursday, June 25, 2015 6:08:00 PM
Attachments:	WHISTLING_4G_ROD_Supplement_Analysis.pdf WHISTLING_4H_ROD_Notice_of_ROD_submitted_to_FR.PDF WHISTLING_4I_ROD_Mitigation_Action_Plan.pdf

Rebecca,

I wanted to let you know that , BPA's ROD on the Whistling Ridge Energy Project in Skamania County (and related information attached) is being posted on our website today.(www.bpa.gov/go/whistling)

BPA has decided to offer contract terms to allow the interconnection to our transmission system of the planned Whistling Ridge Energy Project. We will mail a letter to the public and the mailing list on June 30.

Let me know if you have any questions.

Regards,
Holly

ATTACHMENT TO EMAIL MAY BE FOUND AT

15-01544-F_0076 – 15-01544F_0145

From:	Hildreth, Shari
To:	Klumpp,Elizabeth C (BPA) - DIR-WSGL
Cc:	Hildreth, Shari
Subject:	RE: BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date:	Friday, June 26, 2015 11:19:40 AM

Hi Liz,

Thanks very much for your email and message (we are still in the process of changing things with my move to the back office). I am well aware of Whistling Ridge, and know Jason Spadaro quite well. The Congresswoman holds the same position as her predecessor on this issue. We are watching this—hopefully there won't be a lawsuit on the ROD.

Have a great weekend,

Shari

Shari Hildreth
District Director
Jaime Herrera Beutler, WA-03
360.695.6292
Shari.Hildreth@mail.house.gov

From: Klumpp,Elizabeth C (BPA) - DIR-WSGL [mailto:ecklumpp@bpa.gov]
Sent: Thursday, June 25, 2015 4:29 PM
To: Hildreth, Shari
Subject: BPA's ROD on interconnection of the Whistling Ridge Energy Project

Shari,

We posted the attached to our external website this afternoon, www.bpa.gov/go/whistling. We will mail a letter to the public and the mailing list on June 30.

I'm going to call you now about this one. Friends of the Gorge took Wash. EFSEC to court a few years ago when EFSEC and Gov. Gregoire issued a site certificate; the court upheld the state's decision to issue the site certificate.

Hope you are well!

Thanks.

Liz

Liz Klumpp

Western Washington Liaison | Bonneville Power Administration | 360-943-0157 | c. 360-485-2392

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The Record of Decision, Supplement Analysis and Mitigation Action Plan will be posted to the project website on the afternoon of Thursday, June 25.

From:	Klumpp,Elizabeth C (BPA) - DIR-WSGL
To:	David Hodges; Dena Horton ; Mindi Linquist; Nate Caminos (nate_caminos@cantwell.senate.gov)
Subject:	BPA"s ROD on interconnection of the Whistling Ridge Energy Project
Date:	Friday, June 26, 2015 1:09:00 PM
Attachments:	WHISTLING_4G_ROD_Supplement_Analysis.pdf WHISTLING_4H_ROD_Notice_of_ROD_submitted_to_FR.PDF WHISTLING_4I_ROD_Mitigation_Action_Plan.pdf

David and Dena,

I'm not sure if questions about this project would go to you or your peers on the eastside. It's in Skamania Co. My colleague sent this information to your eastside peers. I've been tracking this one for years so if you've got questions, just call.

We posted the attached to our external website Thursday afternoon, www.bpa.gov/go/whistling. We will mail a letter to the public and the mailing list on June 30.

Friends of the Gorge took Wash. EFSEC to court a few years ago when EFSEC and Gov. Gregoire issued a site certificate; the court upheld the state's decision to issue the site certificate.

Hope you are well!

Thanks.

Liz

Liz Klumpp
Western Washington Liaison | Bonneville Power Administration | 360-943-0157 | c. 360-485-2392

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15-01544-F_0076 – 15-01544F_0145