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Attorneys for Appellants

**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**OFFICE OF HEARINGS AND APPEALS**  
**INTERIOR BOARD OF LAND APPEALS**

**OREGON NATURAL DESERT ASS’N,**

IBLA 2007-48

Appellant

v.

**BUREAU OF LAND MANAGEMENT,**

**SECOND DECLARATION OF  
CRAIG MILLER**

Respondent,  

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I, CRAIG MILLER, state and declare as follows:

1. My name is Craig Miller and I reside in Bend, Oregon. The following matters are personally known to me, and if called as a witness I would and could truthfully testify thereto.
2. I am past president of the Board of Directors (and a current Board member) of Plaintiff Oregon Natural Desert Association (“ONDA”). I also am a charter member and serve as a part-time, contract employee of ONDA as a Geographic Information Systems (“GIS”) Analyst.
3. As part of my work as a GIS Analyst for ONDA, I am also an active participant in ONDA’s wilderness inventory program. I performed inventory work in the field in a number of

ONDA's proposed WSAs or WSA Additions on the Andrews Resource Management Area, including the Babe's Canyon proposed WSAs. I also performed the GIS analysis and mapping once we had gathered our inventory data in the field, and helped prepare ONDA's final reports which we submitted to BLM.

4. I offer the following comments to help show why the Horizon's claim that the two test wind towers will have little to no impact on the wilderness values of the area, and upon ONDA's members who use the area, is inaccurate. My statements are intended to demonstrate, among other things, that the BLM's decision to allow the developments to go ahead is uninformed and unsupported. ONDA has documented that the area in question does possess wilderness character, and those wilderness values should be managed for and protected.

6. ONDA's members frequently use the wind test area and its surroundings. This is documented by the fact that more than 150 photos have been taken on or near the area since our inventory program began in 2002. See Exh. E. The area is of particular importance to ONDA and its members because it includes four proposed Wilderness Study Areas (WSAs) within close proximity. In fact, the tower sites are all within areas identified and documented by ONDA and its volunteers to have wilderness character. Any management decisions that affect the wilderness character of these proposed WSAs will necessarily affect ONDA and its members.


7. *Viewshed Analysis.* The proposed towers are located on a ridgeline that is visible for miles around. Using standard GIS methods, I performed an analysis that calculated the areas visible from the ground at each tower site. The areas indicated as "visible" are all the locations from which one or both tower sites are visible. A person standing on those locations could be visible from at least a half mile distance without optical aids. A tower that is 150 feet tall will likely be visible to the naked eye for up to 2-5 miles, and could easily be visible through

binoculars or scope up to 10 miles away. Objects especially tend to "stick out" against the backdrop of the sky, which is the case for poles or towers on top of ridgelines. The viewshed analysis indicates that the towers will be in the line of sight *from ground level* throughout most of ONDA's four proposed WSAs that are within (or in close proximity to) the test area.

8. *Negative affects.* Wherever the wind towers are visible, the sights and sounds of man's activity will be apparent. ONDA and its members value and use the area for its wilderness character, including solitude and the appearance of naturalness. These important characteristics will be lost with the construction of the towers. What hurts the land also hurts those who use the land.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED this 11<sup>th</sup> day of January, 2007.



Craig Miller