STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

Addendum to Final Environmental Impact Statement (EIS)

Wild Horse Wind Power Project

January 23, 2006

CHAPTER 1: INTRODUCTION

1.1 Lead Agency and SEPA Responsible Official

Washington State Energy Facility Site Evaluation Council (EFSEC), 935 Plum Street SE, Olympia, Washington 98501. Allan Fiksdal, EFSEC Manager.

1.2 Background

The Final EIS for the Wild Horse Wind Power Project (WHWPP) was issued by EFSEC on May 16, 2005. On July 26, 2005, Governor Gregoire approved the Site Certification Agreement (SCA) for the project. Construction of the project began in mid-October. On December 13, 2005, the Certificate Holder, Puget Sound Energy (PSE), requested an amendment to the SCA for the following project changes:

(1) Addition of a 12,000 square foot Maintenance Center to the project site near Vantage highway, including the Informational Kiosk and Visitor parking; the footprint for this facility would be 5 acres, an increase of 3 acres from the previously approved proposal.
(2) A re-alignment of a portion of the 230 kilovolt (kv) Transmission Feeder Line on the Project Site.

1.3 Purpose

This document is a SEPA Addendum to the Wild Horse Wind Power Project Draft and Final EIS[1] (Energy Facility Site Evaluation Council. 2004, 2005a). It is being issued by EFSEC according to WAC 197-11-625. The purpose of this Addendum is to update the project

[1] Because the Final EIS was prepared in abridged format, it incorporates both the Final and Draft EIS.

description and supplement the SEPA record with additional environmental analyses that were performed in support of PSE's request.

This addendum also documents the results of the analysis performed to

1. evaluate whether the re-alignment of a portion of the transmission line, relocation of the maintenance facility from the top of the ridge to an area near the entrance to the project and increase in the size of the maintenance facility would have a probable significant adverse environmental impact on any element of the environment that could not be mitigated;
2. determine whether the significance of any identified unavoidable adverse impacts has changed from the assessment made in the Final EIS.

1.4 Preparation and Issuance

This Addendum was prepared by EFSEC. The Certificate Holder provided technical information for its preparation.

This Addendum is issued pursuant to WAC 197-11-600(4)(c) and 625, which were adopted by EFSEC in WAC 463-47-020. There is no comment period for this Addendum.

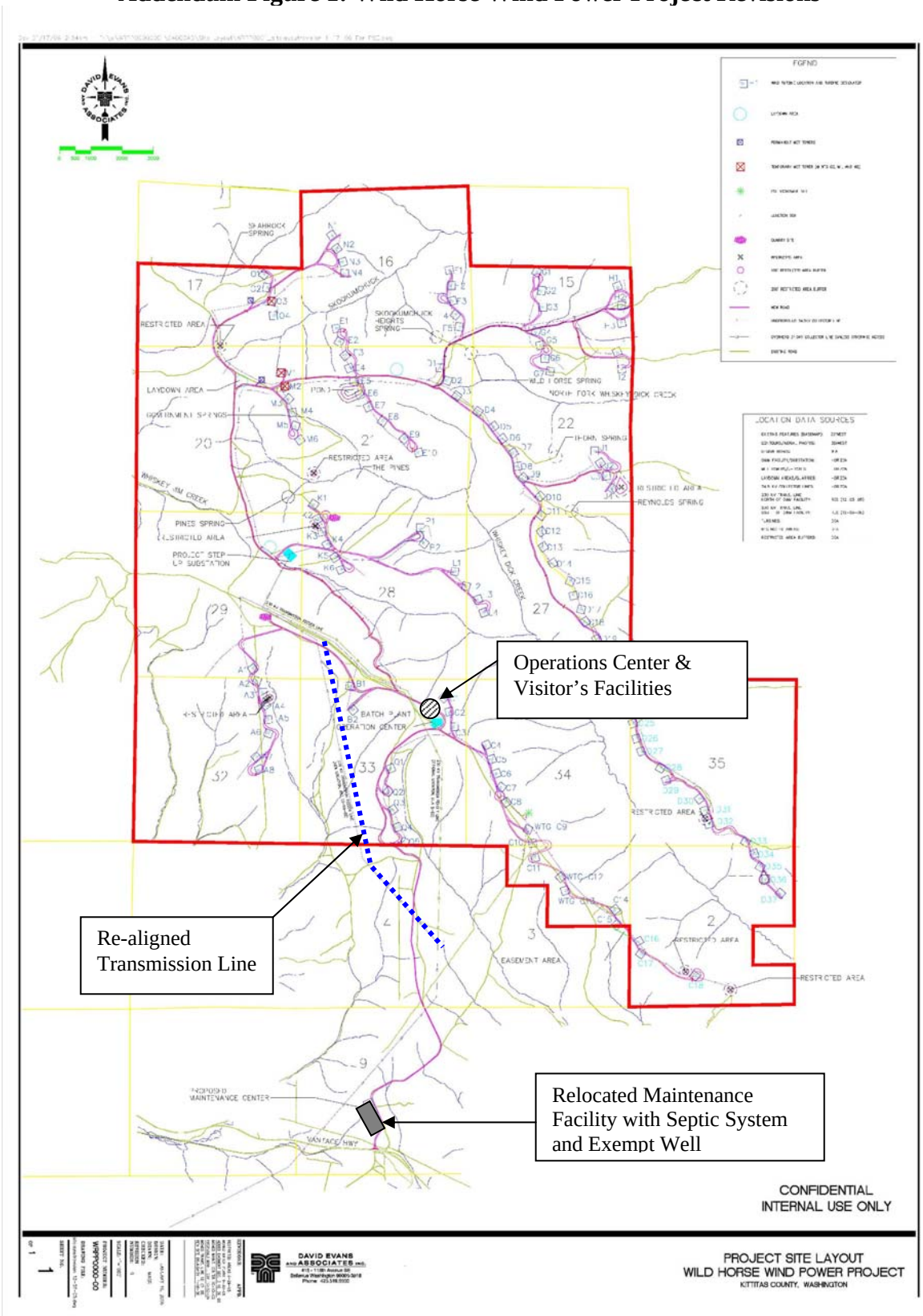
CHAPTER 2: DESCRIPTION OF PROPOSAL

PSE has requested an amendment to the SCA in order to add an approximately 12,000 square foot Maintenance Center to the site near Vantage Highway and to realign a portion of the project's Transmission Feeder Line.

2.1 Changes to the Maintenance Facility

The originally permitted project provided for an Operation and Maintenance Facility with a building footprint of 5,000 square feet and a total footprint of two acres. It was to be located at the high point of the first ridge close to wind turbine #C2. PSE is requesting that the originally permitted location now be used for an Operations Center, which will include visitor accommodations, and to re-locate the maintenance operations to a larger Maintenance Center close the Vantage Highway. The Revised Project Layout in Figure 1 illustrates this change. The new Maintenance Center would have a building footprint of approximately 12,000 square feet. The entire maintenance facility would be approximately five acres in size and would integrate the Informational Kiosk and Visitor Parking, for which two acres were already allotted in the originally approved plan. Therefore, the proposed change would result in an increase of three acres to the project footprint over the currently approved configuration. The Maintenance Facility would be equipped with its own septic system for collection and treatment of household sanitary wastes. A water well exempt according to RCW90.44.050 (withdrawing less than 5000 gallons per day) would also be installed to supply water to the Maintenance Facility.

Addendum Figure 1: Wild Horse Wind Power Project Revisions



PSE's recent experience with construction of a similar project (Hopkins Ridge project in Columbia County) is that as permitted, the Maintenance Facility would be adequate for day to day operations but would not provide enough shop space or spare parts storage for the larger and heavier turbine components. Since both Hopkins Ridge and Wild Horse utilize identical turbine components, PSE wishes to provide expanded facilities at Wild Horse that can service both projects. In addition, because of the proximity to major metropolitan areas and the visibility of the Wild Horse site from I-90 it is expected that the facility will receive more visitors than the Hopkins Ridge facility.

2.2 Changes to the 230 kv Transmission Feeder Line

PSE also proposes a partial re-alignment of the project's 230kV Transmission Feeder Line, as shown in Figure 1. PSE desires to move the transmission line several hundred feet away from the Operations Center, so it will not block skyline of views from the facility. As originally permitted, the line passes very close to the Operations Center. PSE is concerned that at this current location the line would be directly in the field of view of some of the better visual panoramas available from this ridge, including views of Mount Rainier and Mount Adams.

The proposed re-alignment has a 1,000 foot overall shorter total length thus resulting in a slightly smaller footprint than the approved proposal. For areas away from the Operations Center, the feeder line will follow the previously studied and permitted alignment.

The total footprint of permanent site impacts approved in the SCA was 165 acres. The actual footprint of permanent project impacts, including the proposed changes described above, is approximately 160 acres. Therefore, with the proposed changes, the permanent footprint of the entire project will remain below that approved in the SCA.

CHAPTER 3: IMPACTS TO THE ENVIRONMENT

3.1 Earth

The Final EIS concluded that the Wild Horse Wind Power Project would not result in any significant unavoidable adverse impacts on earth resources. Implementation of the SWPPP, BMPs, on-site emergency plans, and other mitigation measures described in the Final EIS would result in low risk from erosion or natural hazards such as earthquakes, volcanoes, and landslides.

The geology and topography of areas of the project site that would be impacted as a result of the changes to the Maintenance Facility and the Transmission Feeder Line are not significantly different from other areas being impacted by construction. With implementation of the mitigation measures discussed in the Final EIS and already required by the Site Certification Agreement, there would not be any significant adverse impacts to earth resources.

3.2 Air Quality

The EIS concluded that direct impacts from construction of the Wild Horse project would be minimized by ensuring that all construction equipment is in compliance with applicable emission limits and by implementation of BMPs to control fugitive dust. Direct impacts from operation

and maintenance activities would be minimal because the project, once built, would not produce air emissions, the amount of traffic on roads in the project area would be minimal, and roads would be maintained in good condition to minimize dust emissions. Indirect impacts are not expected because the project is not expected to induce regional growth to the extent that offsite air quality would be significantly altered. For these reasons, there would be no significant unavoidable adverse impacts with regard to air quality.

Relocation of the Maintenance Facility and re-alignment of the Transmission Feeder Line does not change the types of activities on the site that generate air emissions during construction and operation of the project. Operational impacts to air quality (primarily emissions resulting from use of vehicles on site) would be expected to decrease because the length of the vehicle trips to the Maintenance Facility would be reduced. Therefore the impacts to air resources would remain non-significant.

3.3 Water Resources

The EIS concluded that no significant unavoidable adverse impacts on water resources are expected as a result of the proposed Wild Horse project. The project has been designed to minimize the potential for impacts on water resources. No water resources would be directly affected by the project, and BMPs would minimize the potential water quality, sediment, runoff, and groundwater impacts associated with construction. The Certificate Holder would also install a septic system and an exempt water well. These facilities would be installed and operated according to state and local requirements. Therefore, with implementation of the mitigation measures outlined above, significant unavoidable adverse impacts on surface water and groundwater resources resulting from project operation are not anticipated.

The Draft and Final EIS identified all water resources potentially affected by construction on the site, including the areas that would be affected by relocating the Maintenance Facility and the re-alignment of the transmission feeder Line. With continued implementation of the mitigation measures described in the EIS and required by the SCA, the revisions to the project would not create additional impacts to surface water and groundwater resources.

3.4 Vegetation and Wetlands

The EIS concluded that with implementation of the mitigation measures listed in the EIS and avoidance of wetland and riparian areas, no significant unavoidable adverse impacts are anticipated on vegetation resources and wetlands from the proposed WHWPP. Total temporary upland vegetation disturbance would range from 289.5 acres for the 104-turbine/3-MW scenario to 401.4 acres for the 158-turbine/1-MW scenario. Total permanent vegetation impacts would be very similar (0.12 acre difference between scenarios). The temporary and permanent impacts on plant communities within the project site would be compensated for by the mitigation proposal to purchase and protect an approximately 600-acre parcel with equal or better functional habitat characteristics as the project area.

The proposed maintenance facility would result in the permanent conversion of an additional three acres of relatively low quality habitat near the Vantage Highway. The realigned portion of

the transmission line was surveyed on November 21, 2005 (Smayda. 2005). The survey concluded that the realigned route would be located on the same types of habitat as the original route; due to its shorter length, it would occupy a smaller total area. The realigned route also is expected to result in a slight reduction in the area of impact on herbaceous habitat, which includes lithosols. Based on results of the 2003 rare plant surveys and current field review, the only state-designated rare plant known to occur in the project area and realigned transmission line corridor is the hedgehog cactus, a review status species. Effects to this species are expected to be slightly reduced from the original proposed transmission line route, due to reduced effects on lithosols. The realignment was adjusted in the field to avoid additional areas of well-developed lithosols. No other rare plant species were observed in the project area during the 2003 surveys, and the realigned route is located primarily within areas previously surveyed. No effects to any federally listed threatened, endangered, candidate or proposed species would occur as a result of this realignment, as none is known or suspected to occur in the project area or on the habitats within the realignment corridor.

Therefore, with the implementation of the mitigation measures documented in the EIS, and required by the SCA, no additional unavoidable adverse impacts on vegetation and wetlands resources as a result of the proposed change are identified.

3.5 Wildlife

The EIS concluded that with mitigation, no significant unavoidable adverse impacts are anticipated for birds or other wildlife. The mitigation parcel for replacement of permanent and temporary habitat loss from the project exceeds the mitigation ratios defined in the WDFW Wind Power Guidelines. Protection of springs through livestock exclusion will provide additional mitigation for impacts on wildlife. It is currently not clear what indirect impacts the project may have on big game winter range and big game movements. It is anticipated that the mitigation (exclusion of livestock from springs) and elimination of grazing on the mitigation parcel will improve big game habitat. Controlled access and controlled hunting on the site will allow WDFW to properly manage the herds, which should eliminate the potential for creating a refuge for big game and minimize stress to big game in the winter. The level and effect of disturbance impacts on big game from maintenance operations is not known, and may or may not be significant.

As indicated above, the habitat in areas where the Maintenance Facility would be relocated and the Transmission Feeder Line re-aligned is not significantly different from other project site areas. The areas have also not been identified as places used intensively by wildlife. The new structures being proposed (i.e. a larger Maintenance Facility) would not have any significant impacts on wildlife during operation of the project. Impacts due to interaction between wildlife and operation activities might be lower with the proposed changes as fewer maintenance vehicle trips would be made into the central portion of the project site. Access to the northern portion of the site will continue to be restricted to the public in accordance with an agreement entered into by the Certificate Holder. (Williams. 2005) Implementation of the mitigation measures described in the EIS, and required by the SCA, would continue to minimize impacts on wildlife. Therefore, the project revisions being considered in this amendment would not create any significant adverse environmental impacts.

3.6 Fisheries

The EIS concluded that no significant unavoidable adverse impacts to fisheries resources are expected as a result of the proposed project. Fish-bearing aquatic resources are not located within approximately 1 mile of the project area and 5 miles downstream of the project. In addition, no drainages would be directly impacted by the project, and BMPs would minimize the potential water quality, sediment, and runoff impacts associated with construction.

The relocation of the Maintenance Facility and re-alignment of the Transmission Feeder Line will occur within the project area already considered in the Final EIS. Therefore, no additional unavoidable adverse impacts on fisheries resources will result from the proposed changes. Project design and implementation of the mitigation measures described in the EIS would continue to minimize impacts on fisheries resources.

3.7 Energy and Natural Resources

The final EIS concluded that no significant unavoidable adverse impacts to energy and natural resources are expected as a result of the Wild Horse Wind Power Project. On site construction and operation activities related to the proposed changes would not consume additional energy or natural resources than presented in the EIS. Project design and implementation of the mitigation measures described in the Draft EIS, and required by the SCA, would continue to minimize impacts for energy and natural resources. No significant adverse environmental impacts would be created as a result of the project changes.

3.8 Noise

The Final EIS concluded that haul truck traffic during construction would cause temporary high noise levels at homes within 60 feet of the roads being used to access the site during facility construction. However, there are few, if any, homes that close to the proposed construction haul routes. There fore, any adverse impacts would be temporary and would be restricted to a small number of homes.

The activities associated with relocation of the Maintenance Facility and re-alignment of the Transmission feeder Line are the same as would have otherwise occurred on the site. There fore noise emissions from these activities would not be different from those considered in the final EIS. Furthermore these project changes do not grate any additional off-site noise emissions. The Certificate holder would continue implementation of the mitigation measures identified in the Final EIS, and required by the SCA. Thus, no additional significant unavoidable adverse impacts from noise from the proposed changes are expected.

3.9 Land Use

The EIS concluded that the permanent conversion of approximately 165 acres of Forest and Range and Commercial Agriculture to commercial utility use (i.e., wind energy production) would be an unavoidable impact of the project. Potentially, up to approximately 5,300 acres of grazing land could be removed from production for the life of the project (at minimum, 20

years). This reduction represents 1.2% of the acreage of pasture or unimproved grazing land available in Kittitas County. The proposed reduction in these land uses would have a minimal impact on cattle operations during construction, and no impact during project operation is anticipated, given the county's abundance of pasture and unimproved grazing lands. Therefore, no significant unavoidable adverse impacts to local land uses are expected to result from the project construction, operations, and maintenance, and decommissioning of the project and/or associated transmission feeder lines.

The changes proposed to the project do not change these conclusions. The revisions to the project are all located on the project site. As stated previously, with the proposed changes, the permanent footprint of the entire project will remain below that approved in the SCA. Therefore, no significant unavoidable adverse impacts to local land uses are expected to result from the relocation of the Maintenance Facility or the re-alignment of the Transmission Feeder Line.

3.10 Visual Resources/Light and Glare

The EIS concluded that no significant unavoidable adverse impacts will take place during the 12-month construction period. The project would create substantial changes to the open space character of the area and, to a lesser extent, to the quality of a number of views toward the project site during the 20-year period of project operation. These changes would not constitute significant impacts because of the low to moderate levels of sensitivity of the affected views.

Re-alignment of the Transmission Feeder Line on the project site would not cause adverse impacts to visual resources. The Transmission Feeder Line would be a secondary element of the views analyzed in comparison with the wind turbines to be erected. Furthermore, the transmission line would be re-aligned into an area below the ridge, and would therefore be less visible from any viewpoint considered in the Draft and Final EIS.

If relocated closer to Vantage Highway, the Maintenance Facility would be a new element in the visual environment. It would be most visible to travelers along Vantage Highway, especially as they approach the project site entrance. Views from the landscape units 2, 3, 4, 5 and 6 identified in section 3.10 of the EIS would remain unchanged. The maintenance facility would be a distinct feature in the view from landscape unit 1, closest to the project site entry. The EIS qualified this view shed as having a moderate visual quality and an average scenic value. Because of the relatively low traffic volumes along this portion of Vantage Highway, the EIS qualified the overall level of viewer sensitivity as low to moderate in this area. However, within several miles of the project entrance several agricultural and light industrial structures are visible within the Vantage Highway corridor, including the Operating Engineers Regional Training Program site, which are similar in nature to the Maintenance Facility being proposed. It is therefore unlikely that the Maintenance Facility would cause a significant change to the overall quality of the view shed within the vicinity of the project site. Addition of the Maintenance Facility to this view would therefore not cause a significant adverse environmental impact.

3.11 Population, Housing and Economic

The EIS concluded that no significant unavoidable adverse impacts are expected. No additional significant unavoidable adverse impacts from the proposed change are expected, since the

project changes will not affect the number of employees required for construction and operation of the project, nor will the cost of the project be significantly affected.

3.12 Public Services and Utilities/Recreation

The EIS concluded that no significant unavoidable adverse impacts are anticipated for public services, utilities, or recreation. No additional significant unavoidable adverse impacts from the proposed change are expected because the project changes are all located on the project site, and will not affect use of public services, utilities, or recreation resources.

3.13 Cultural Resources

The EIS concluded that with mitigation, no significant unavoidable adverse impacts to cultural resources as a result of the construction and operation of the project are expected.

The location of the new Maintenance Center was included in the original study area for the project. No resources were identified in this area. The realigned portion of the transmission line was surveyed on November 21, 2005. (Flenniken and Trautman. 2005) In addition, a literature search was conducted. No archaeological sites or historic properties were identified. The Certificate Holder would continue to implement the mitigation measures identified in the EIS, and required by the SCA. Therefore, no additional significant unavoidable adverse impacts are expected as a result of the proposed change.

3.14 Traffic and Transportation

The EIS concluded that no significant unavoidable adverse impacts on traffic and transportation, including air navigation, are associated with construction of operation and maintenance of the WHWPP. The project revisions are restricted to the project site, and would not require additional off-site transportation resources. Therefore, no additional significant unavoidable adverse impacts are expected as a result of the proposed change.

3.15 Health and Safety

The EIS concluded that with the possible exception of impacts associated with lightning strikes, no significant unavoidable adverse impacts to health and safety would result from the construction, operation and maintenance, or decommissioning of the proposed project. The changes being proposed are within the scope of the activities considered in the EIS. Therefore no additional significant unavoidable adverse impacts are expected.

3.16 Cumulative Impacts

Since issuance of the Wild Horse Wind Power Project Final EIS, the status of two other projects proposed in Kittitas County has not changed significantly. The Kittitas Valley Wind Power Project is still under review by EFSEC, with Adjudicative Hearings planned for March 2006. As for enXco's Desert Claim Wind Power project, the Development Activities Application submitted to Kittitas County was denied in April 2005. However, enXco representatives have

indicated on the record their intent to submit an Application for Site Certification for the Desert Claim Project to EFSEC (Energy Facility Site Evaluation Council. 2005b). Therefore, analysis of the cumulative impacts of these three projects is still merited.

As indicated in the previous sections of this Addendum, the proposed revisions to the Maintenance Facility and the Transmission Feeder Line do not create any new significant adverse environmental impacts. Significant changes in impacts have not been identified in any areas of the environment. Therefore a change in cumulative impacts would not be expected when this project is considered jointly with the Kittitas Valley Wind Power Project and the Desert Claim Project.

CHAPTER 4: ADDENDUM REFERENCES

Energy Facility Site Evaluation Council (EFSEC). 2004. *Wild Horse Wind Power Project Draft EIS*. December 2003.

Energy Facility Site Evaluation Council (EFSEC). 2005a. *Wild Horse Wind Power Project Final EIS*. May 2005.

Energy Facility Site Evaluation Council. 2005b. EFSEC Monthly Meeting, November 8, 2005, Proposed Agenda. November 2005.

Flenniken, J.J. and Trautman. P. 2005. *Puget Sound Energy Proposed Transmission Line Corridor, Wild Horse Wind Power Project, Kittitas County, Washington.* December 1, 2005.

Smayda, Kathleen W. 2005. *Wild Horse Project, Rare Plan Evaluation*. December 12, 2005.

Williams, Scott. 2005. Puget Sound Energy. Personal communications to EFSEC. January 10 - 17, 2005.

CHAPTER 5: ADDENDUM DISTRIBUTION LIST

Federal Agencies

Bambrick, Dale	U.S. National Marine Fisheries Service
Boynton, Jim	U.S. Forest Service, Wenatchee National Forest
Cantwell, Maria	U.S. Senate
Bogert, L. Michael	U.S. EPA Region 10
Kurz, Gregg	U.S. Fish and Wildlife Service
Miller, Mark	U.S. Fish and Wildlife Service
Murray, Patty	U.S. Senate
Rogalski, Floyd	U.S. Forest Service, Cle Elum Ranger District
Wittpen, Nancy	Bonneville Power Administration

Tribal Government

Abrahamson, Randy	Spokane Tribe of Indians – Tribal Historic Preservation Officer
Meninick, Johnson	Yakama Indian nation – Cultural Resources
Moses Jr., Harvey Hon	Confederated Tribes of the Colville Reservation – Tribal Chair
Palmer, Caroll	Yakama Indian Nation - Natural Resources
Pleasants, Camille	Confederated Tribes of the Colville Reservation - History/Archaeology Program
Seelatsee, Lenora	Wanapum Tribe
Seyler, Warren Hon.	Spokane Tribal Business Council – Chair
Shannon, Donald	Confederated Tribes of the Colville Reservation - History/Archaeology Program
Cloud, Louis Hon.	Yakama Indian Nation – Tribal Chair

State Agencies

Brooks, Allyson	Department of Archeology and Historical Preservation
Burkell, Tom	Gingko State Park
Burkholtz, Karin	Washington Department of Community, Trade and Economic Development
Clausing, Ted	Washington Department of Fish and Wildlife
Clear, Gwen	Ecology, Central Regional Office
Dean, Brigid	Washington State Parks and Recreation Commission
SEPA Coordinator	Washington Department of Natural Resources
Hinkle, Bill, Rep.	Washington State House of Representatives
Holmquist, Janea Rep.	Washington State House of Representatives
Holmstrom, Rick	Washington State Department of Transportation, South Central Region
Johnston, Milt	Washington Department of Natural Resources
Kramer, Stephenie	Washington Office of Archaeology and Historic Preservation
Latham, Ray	Ecology, Central Regional Office
Lindley, Deborah	Washington Department of Natural Resources
Mathey, Jared	Ecology, Central Regional Office
Mattson, Larry	Washington State Department of Transportation, South Central Region
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Perun, Pamela	Ecology, Central Regional Office
Powers, Boyd	Washington Department of Natural Resources
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Renfrow, Brent	Washington Department of Fish and Wildlife
Ritchie, Barbara	Ecology, SEPA Unit
Sandison, Derek	Ecology, Central Regional Office
Swope Moody, Sandy	Washington Department of Natural Resources
Tayer, Jeff	Washington Department of Fish and Wildlife
Tribble, Michael	Attorney General's Office, Counsel for the Environment
Usibelli, Tony	Washington Department of Community, Trade and Economic Development
Vigue, Lauri	Washington Department of Fish and Wildlife
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Local Government

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Bowen, David	Kittitas County Board of Commissioners
Cousart, Robert	Mayor, City of Kittitas
Crankovich, Alan	Kittitas County Board of Commissioners
Davis, Todd	Kittitas County Noxious Weed Control Board
Hurson, Jim	Kittitas County Prosecutors Office
Huston, Perry	Kittitas County Board of Commissioners
Johnson, Patti	Kittitas County
Kjelland, Mark	Kittitas County Public Utilities District
Lael, Anna	Kittitas County Conservation District
Piercy, Darryl	Kittitas County Development Services
	Kittitas County Fire District No. 2 Chief

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Bevis, Kenneth	
Booth, Nelson	
Bricklin, David	Bricklin Newman Dold LLP
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Duleba, Erin	
Essman, W.R.	Kitttias County Field and Stream
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Freeborn, Phelps	Washington Native Plant Society, Central WA
Gagliano, Troy	Renewable Northwest Project
Garrett, Ed	Residents Opposed to Kittitas Turbines
Henn, Patrick	HeliMax
Hillis, Judith	Jones & Stokes
Hochstatter, Harold	
Horton, Denise	
Huckabay, James	
Johnson, Keith	
Johnson, Keith	Kittitas Audubon Society
Kahn, Robert	Robert D. Kahn & Company
Knudson, Desmond	DPK Consultants
Kronner, Karen	
Kruse, Robert	Friends of Wildlife and Wind Power
Lathrop, F. Steven	Attorney at Law
Lasha, Paul	
Leingang, Colin G	Yakima Training Center
Lindstrom, Gloria and Hal	
Luebbe, Lorna	Puget Sound Energy
Mahre, Lynne	
Marsh, Michael	Washington Native Plant Society
McGaffey, Karen	Perkins Coie LLP
McMahan, Tim	Stoel Rives, LLP
Nelson, Janet	Kittitas Audubon Society
Pappalardo, Mike	CH2M Hill
Peeples, Darrel	Counsel for Wind Ridge Power Partners LLC
Pennington, Patty	Zilkha Renewable Energy
Priestley, Tom	CH2M Hill
Roberts, Don	
Robertson, Mike	Residents Opposed to Kittitas Turbines
Rogers, Beth	
Rybock, James T.	Geo Engineers, Inc.
Slothower, Jeff	Attorney at Law
Strand, Debbie	Economic Development Group of Kittitas County
Sutherland, Diana	Adolphson Associates
Taylor, Chris	Zilkha Renewable Energy
Trautman, Pam	Lithic Analysts
Verhey, Steven	
Whitmire, James	
Wise, Helen	
Williams, Scott	Puget Sound Energy