From: David McDonald
To: EFSEC mi Comments
Subject: Comments on Horse Heaven Hills Draft SCA
Date: Tuesday, April 9, 2024 10:11:03 PM
Attachments: Draft SCA Comments.docx

External Email

Council attached are my comments on the Draft SCA

Thank You
David McDonald
Pasco, WA

April 9, 2024

Energy Facility Site Evaluation Council
621 Woodland Square Loop SE,
Lacey, WA 98504-3172.

Re: Comments on the Horse Heaven Wind & Solar Draft SCA

Dear Council:

The final draft SCA needs to include findings on how this project promotes environmental justice for residents of the Benton/Franklin County area that are being forced to accept a burden in the form of alien industrial features on the natural landscape for the benefit of those in more populated parts of the State or out of State. (RCW 80.50.010 {2})

The final draft SCA needs to explain how this industrial project enhances public opportunities to enjoy the esthetics of the environment and land resources. (RCW 80.50.010 {2})

The final draft SCA needs to list the turbine numbers and the impact class and other project components specifically to be removed before it is sent to the Governor.

Wind and solar energy projects drive up electricity costs where ever they are built. The final draft SCA should describe how the project will advance the state's objectives in providing affordable electricity. (RCW 80.50.010) & (RCW 80.50.010 {4})

The final draft SCA needs to explain how moving (through new transmission corridors) the electricity produced by this project to where it is needed will not destroy large swaths of natural landscape in the State (RCW 80.50.010 {2})

The final draft SCA needs to explain how the intermittent weather and sun dependent energy produced by this project will create abundant energy. (RCW 80.50.010 {4})

The Draft SCA needs to expressly state the developers need to document, prior to issuance of a permit, that they have contracts to supply power to Washington State utilities and not utilities in Alberta, California or other states. The people of the Tri-Cities should not be required to accept the environmental, health and safety burdens of this project for the environmental benefit of other states or countries.

Before commencing construction, the applicant must demonstrate compliance with the requirements of WAC 463-60-165 to identify the sources of water for the Project.

David McDonald
10312 W Argent Rd, Pasco, WA 99301

From:	Paul Krupin
To:	EFSEC mi Comments
Cc:	Greene, Sean (EFSEC); Bumpus, Sonia (EFSEC)
Subject:	Comments on the Horse Heaven Hills Draft SCA and Recommendation
Date:	Wednesday, April 10, 2024 5:52:36 PM
Attachments:	PJK Comments on DSCA and Recommendation 041024 5 pm.pdf

External Email

My comments are provided in the attached PDF file. I also uploaded the comments to your website.

Appreciatively,

Paul J. Krupin, BA, MS, JD
Board Member on behalf of TRI-CITIES C.A.R.E.S
Visit: http://www.TriCitiesCARES.org
509-531-8390 cell 509-582-5174 landline Paul@Presari.com

Comments on the Draft Recommendation to the Governor and the Draft Site Certification Agreement

Paul J. Krupin, Board Member Tri-Cities CARES

Issue: Technical and substantive compliance comments provided by Benton County.

Comment. We are in agreement with and support the comments submitted to EFSEC by Benton County on April 9, 2024. The Report and SCA should be revised to make the requested changes. It would make the documents much better.

Issue: The Report and Draft SCA do not clearly and adequately explain how the project complies with all the applicable provisions of RCW 80.50. and the associated WAC regulations.

While WAC 463-60-021 Council recognizes that the applicant does not need to demonstrate the need for energy facilities. The Report and the DSCA need to be revised to include the key remainder of the WAC & RCW requirements. The Council must carefully explain the how they consider the evidence in the record and demonstrate how they seek a balance between the need for clean energy at a reasonable cost and the need to ensure that the location of energy facilities will produce minimal adverse effects on the environment.

Comment: Revise the Report and the DSCA to remove the ambiguity and uncertainty in these documents so that they properly recognize and apply the applicable requirements in the RCW 80.50 010 (1) to (5) and associate implementing regulations in the Washington administrative code

> “Such action will be based on these premises:
>
> (1) To assure Washington state citizens that, where applicable, operational safeguards are at least as stringent as the criteria established by the federal government and are technically sufficient for their welfare and protection.
>
> (2) To preserve and protect the quality of the environment; to enhance the public's opportunity to enjoy the esthetic and recreational benefits of the air, water and land resources; to promote air cleanliness; to pursue beneficial changes in the environment; and to promote environmental justice for overburdened communities.

(3) To encourage the development and integration of clean energy sources.

(4) To provide abundant clean energy at reasonable cost.

(5) To avoid costs of complete site restoration and demolition of improvements and infrastructure at unfinished nuclear energy sites, and to use unfinished nuclear energy facilities for public uses, including economic development, under the regulatory and management control of local governments and port districts."

Issue: The Draft Recommendation on Page 9 lists only 3 restrictions on the facility as described in the final ASC. Appendix 2 is not provided in the DSCA.

There is great uncertainty and confusion in both the Report and the DSCA regarding which turbines, micrositing corridors, and other project components are being approved and which are not.

Although the decision document rely on and reference the FEIS Maps, the quality of the maps in the FEIS Option 1 and Option 2 is poor. It is very difficult to see which turbines are classified and where they really are. In addition, there is no corresponding list of turbines and other components identifying what is allowed under the SCA construction for Options 1 (the 499 ft turbines) and Option 2 (the 671 ft turbines).

Comment: Revise the Report and SCA to specify the turbines authorized under both Option 1 and Option 2.

Issue: Section IV of the Report - Applying the Statutory Standard to the Information Presented offers a less than adequate explanation and justification of the reasons why the project should be approved including the elimination of project elements from portions of the proposed project. The Report and ASC do not provide a rational basis for the removal and identification of turbine locations as a basis for removal from the project.

There is a significant lack of clarity and great uncertainty in the Report and the SCA regarding why and how wind turbines, micrositing corridors and other project components are classified into the four impact classes on the referenced FEIS Option 1 and Option 2 maps.

Comment: Revise the Report and SCA to include and reference to a table that identifies the factors that result in the classification of turbines into each of the four impact classes

- Class 0 Green – lowest impact
- Class 1 Yellow - Impacts One Resource
- Class 2 Orange - Impacts two resources
- Class 3 Red – Highest Impact - three or more impacts.

The list of factors to be identified includes wildlife resources (ferruginous hawk and migration corridors), cultural resources, visual impacts, aerial firefighting needs, recreation, fugitive dust and other significant negative impact factors that are identified in the FEIS.

This needs to be done for both Option 1 and Option 2

Appendix 2 must be finalized and provided for public review before the Recommendation is sent to the Governor. The Recommendation and the DASC must accurately state the numbers of turbines allowed.

Issue: on Page 14 of the Report discussion of Mitigation measures and the SCA do not include "micrositing corridors" on the lists of project components that are not allowed under Mitigations including, HAB-1 and other mitigations for other resources.

In spite of the details provided in the Section IV, especially on the rationale given for the mitigations for the ferruginous hawk, wildlife corridors, cultural resources, and vegetation, there is still great uncertainty and confusion regarding where specific mitigations will be applied. The decision documents should be revised to clarify these uncertainties and be consistent.

Comment: Revise the Report and ASC to include a discussion and a table listing the types of project components prohibited under each Mitigation and the four impact classes.

Issue: There is a lack of clarity and consistency between the Report and the ASC

The statement that the SCA authorizes up to 222 turbines ignores that removal and elimination of wind turbines in Class 3. The Report and ASC do not presently allow anyone to know what this project really contains. It places the actual decisions on the locations of turbines, micrositing corridors and other project components into the future under the plans and submissions listed in Article IV and dramatically weakens the enforceability of anything in the final SCA**.**

None of the SEPA documents contain a list of turbine numbers and GPS coordinates for any of the turbines listed in Option 2.

The Department of Defense Agreement covers only the smaller wind turbines under Option 1. The \DOD appears to require a new agreement for turbines proposed over 499 ft.

Comment: The Report and the SCA must be revised to accurately state the turbine number and the locations of turbines and other project components for both the Option 1 499 ft and Option 2 671 ft high turbines. Appendix 2 of the SCA must include an accurate list of project components to be approved.

Issue: There is great uncertainty in the acquisition and approval of Federal, State and Local Permits that must be obtained prior to commencement of construction.

The "ten-day notification" requirement in Section B on Page 18 of the Report is inadequate. Notification by itself, is inadequate given the risk of significant impacts to the environment.

The section is does not explicitly state what is required. It appears to leave permit approval in the hands of unidentified agencies and people. This section weakens the enforceability of the entire SCA.

Comment: Revise this provision in both the Report and SCA to state the following:

> **"The Applicant must demonstrate to the Council that all applicable Federal, State, and Local permits, not preempted by RCW 80.50.110 and 120, that are required for construction and operation of the Project, have been acquired and issued prior to the commencement of construction. Commencement of construction shall be initiated only with and after EFSEC approval."**

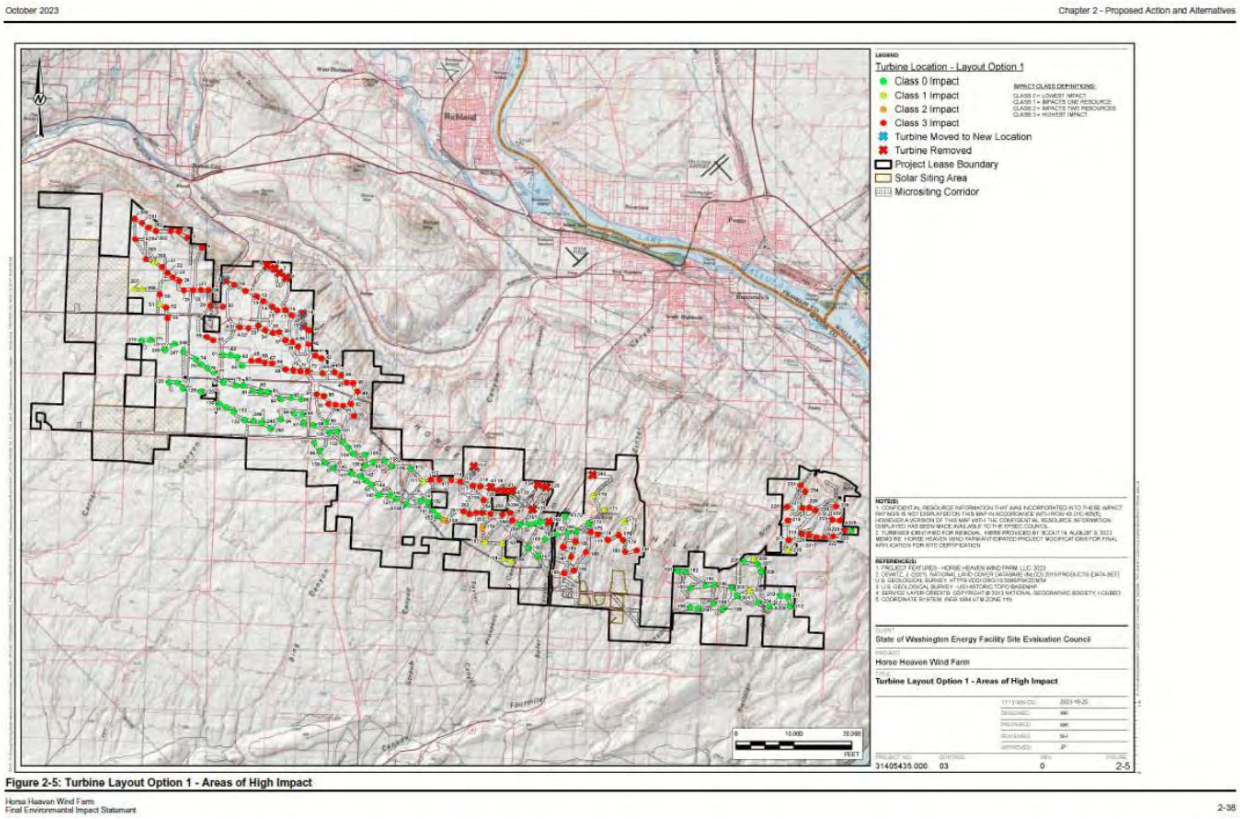
Issue: Aerial Firefighting is not adequately addressed The Report and ASC.

Although the Report states that aerial firefighting was recognized in the public comments, the SCA does not contain any recognition of the locations or turbine numbers must not be located to protect the aerial firefighting capabilities that are needed north of the project boundary. Aerial firefighting is not clearly identified as a factor that was utilized in the Option 1 and Option 2 Class determinations.

Comment: The Report and ASC need to expressly identify th threat from wildland fires and the mitigations that are needed to address these hazards.

Issue: About 45 Turbines have been placed in the Class 0 (Green) – Low Impact category incorrectly. This also occurs with 11 Class 1 turbines and 3 Class 2 Turbines. The Class O designation fails to take Wildlife, Cultural Resources, Visual, and aerial firefighting into account. These 45 turbines must be reclassified as Class 3 (Red) – Highest Impact, due to 3 or more significant impacts. The Option 2 Map does not correlate to any known turbine list and GPS Coordinates.

The Report and ASC refer to and rely on the FEIS Option 1 and Option 2 Maps.



These maps are of such a small scale that it makes it nearly impossible to read the type in the legends or read the turbine numbers on the maps.

It makes it exceedingly difficult for anyone to reasonable determine the impact the proposed mitigations will have.

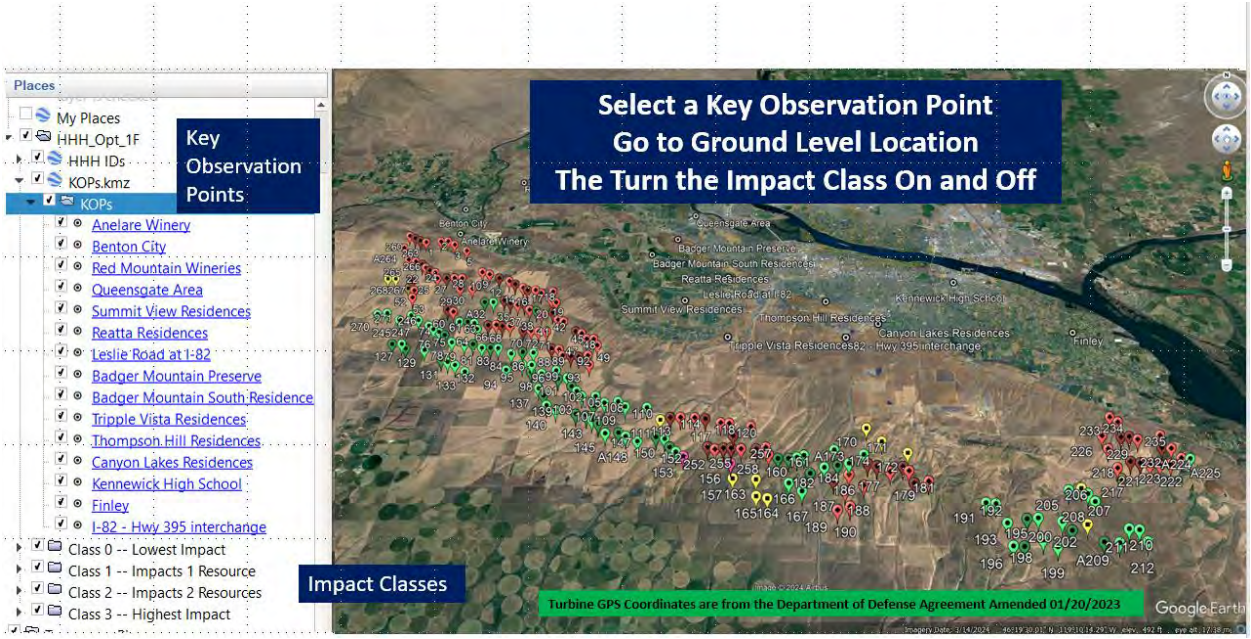
Comment: New maps should be developed and released for a timely public review before the Report & SCA goes to the Governor which show the turbine locations at the same scale for the 11 maps as was published in the draft HHH EIS and to some extent to the FEIS.

Issue: Visual Impacts were not taken into account adequately at several key residential communities and other locations in the Tri-Cities. Turbines were identified as Class 0, 1, or 2 improperly, The Report and SCA do not therefore identify the correct number of turbines as Class 3.

In order to evaluate the effects of the proposed Mitigations, Tri-Cities CARES and adjudication expert witness Dean Apostol enlisted the support of Dr. James F. Palmer.

On April 5, 2024, Dr. Palmer created a Google Earth Pro Interactive Geographic Model that can be used to develop visual images showing the effect the Council Mitigations have from the key observation points in Tri-Cities and referenced in the adjudication and FEIS. The model allows anyone to select and go to a key observation point and the turn the Class 3 Mitigations on and off. Dr. Palmer has made the model available for free. The Google Earth Program for the Horse Heaven Hills Project can be downloaded along with instructions using this link.

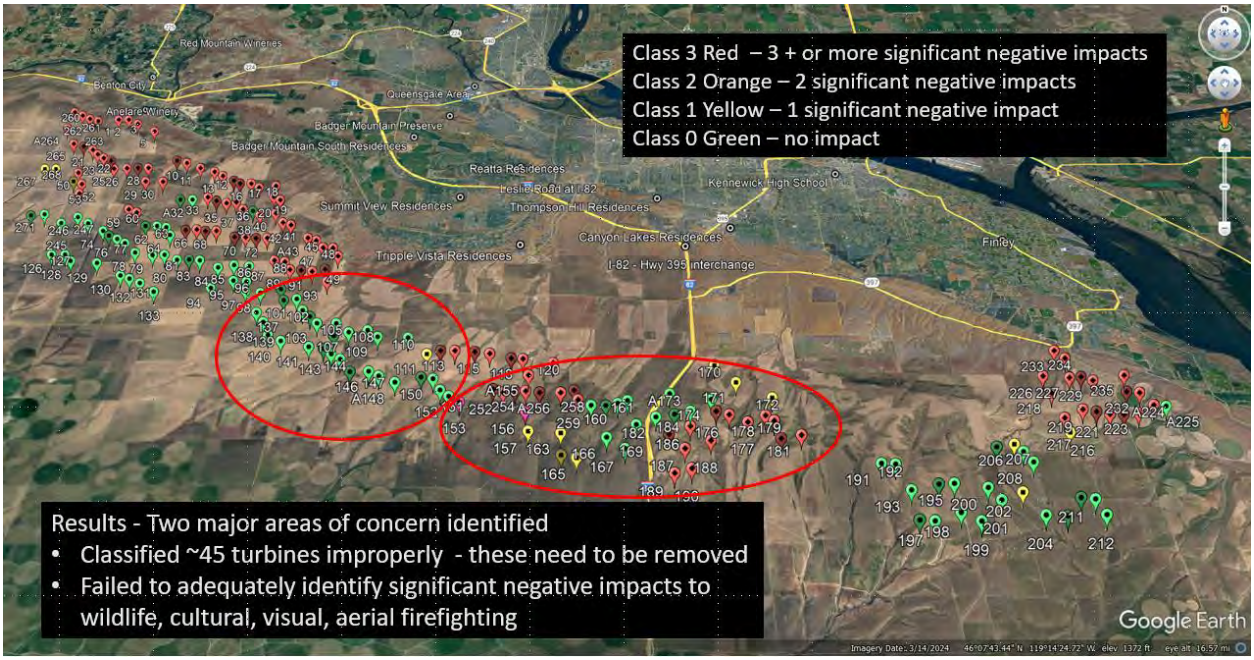
Google Earth Pro for the HHH Instructions & KMZ file or in the Appendix 1 to this submittal



Turbine GPS Coordinates are from the Department of Defense Agreement Amended 01/20/2023 found under Federal Facilities in the EFSEC website resources for the Project.

Issue: Council Mitigations are only effective in the western and easter sections of the project.

Two major areas of concern were identified with about 45 turbines improperly classifieds based on the FEIS analysis which failed to adequately identify significant negative impacts to wildlife, cultural, visual, aerial firefighting evenly across the project.



The images that follow are from Benton City, the Red Mountain Wineries, Badger Mountain Residences, Summit View Residences, Thompson Hill Residences and from KOP 5 Badger Mountain.

The first image shows the location of the KOP and the direction and view angle and width of the image.

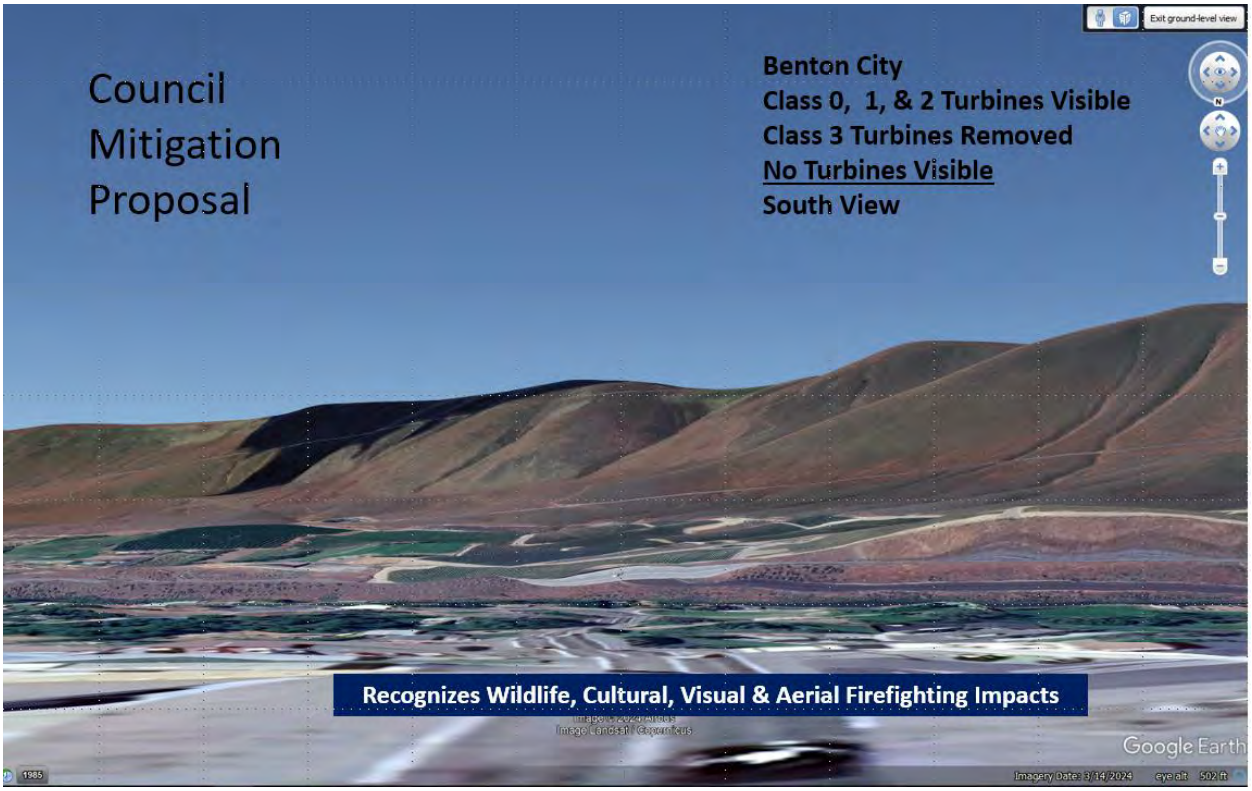
The images compare the Applicant Proposed Project, the Council Mitigation Proposed Project with the Class 3 Turbines turned off.

For the KOP's where visual problems still remain, there is a TCC Proposed Option, which removes the Class 0, 1, and 2 turbines to achieve the same level of mitigation.

Council Mitigation Adequate - Benton City

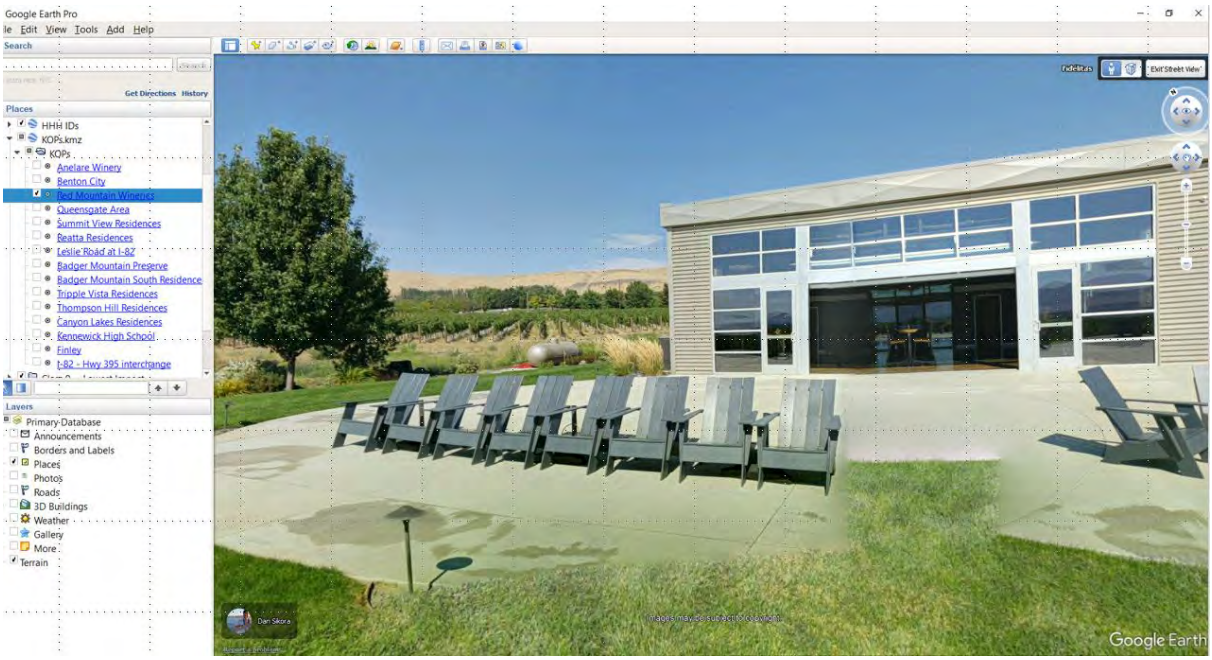

Benton City
Red Mountain Wineries
Benton City
Queensgate Area
Badger Mountain Preserve
Badger Mountain South Residences
Reatta Residences
Leslie Road at I-82
Summit View Residences
Tripple Vista Residences
I-82 - Hwy 3
Bruce Mechanical Inc
Harvest Hei
Google Earth

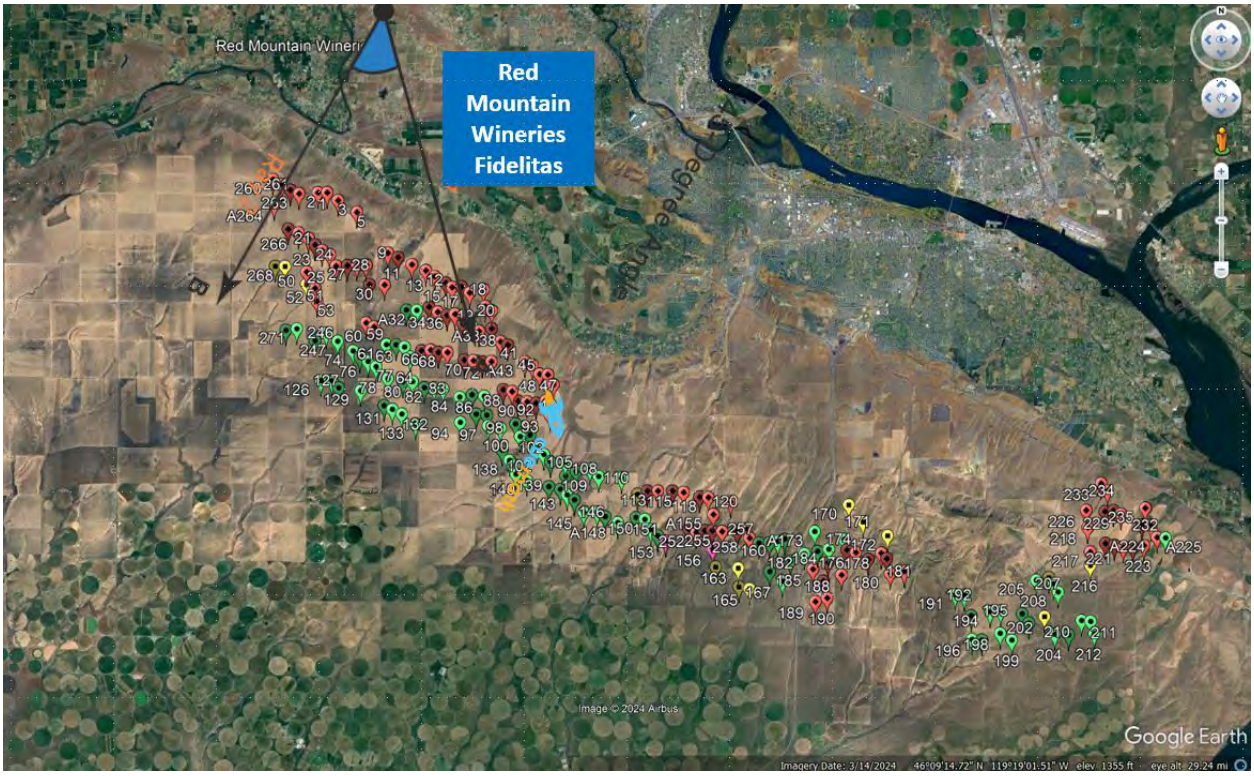

Applicant
Proposal
Benton City
Class 0, 1, 2, & 3 Turbines Visible
No Turbines Removed
4 Turbines Visible
South View
Exit ground-level view
Google Earth

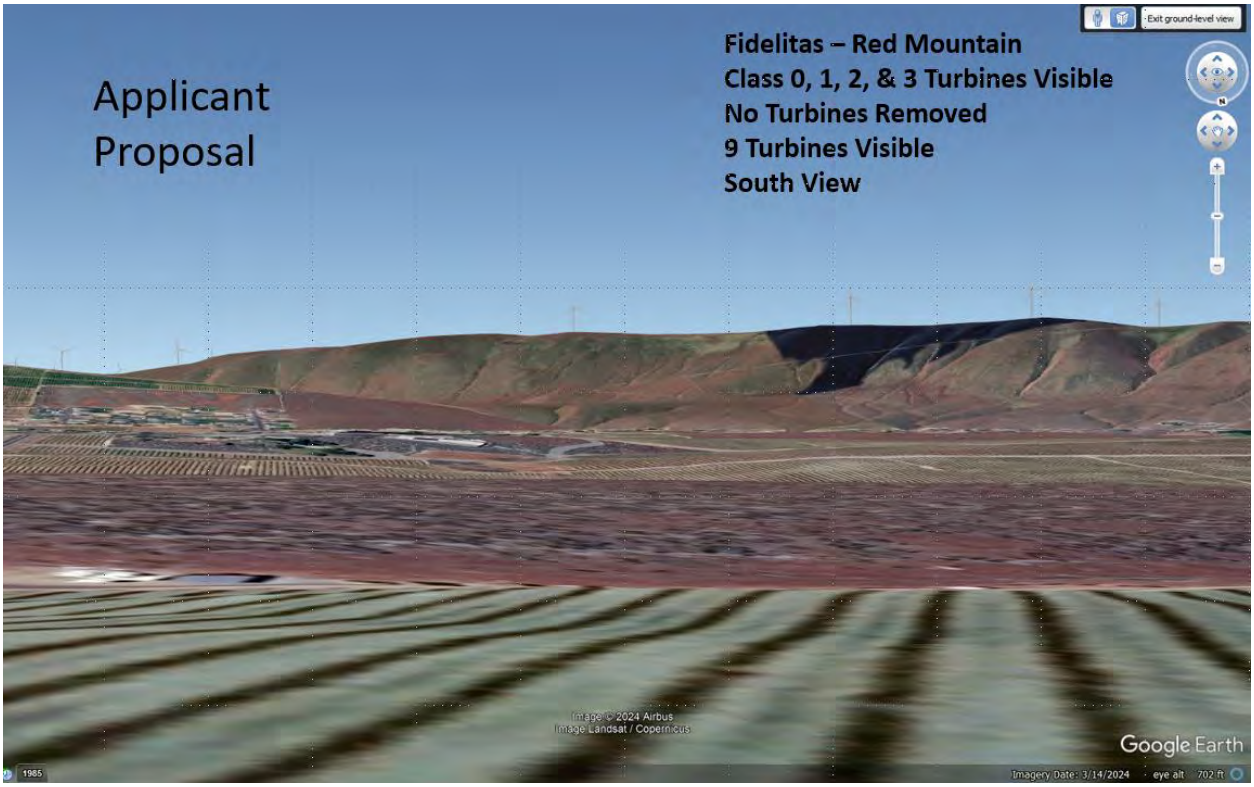


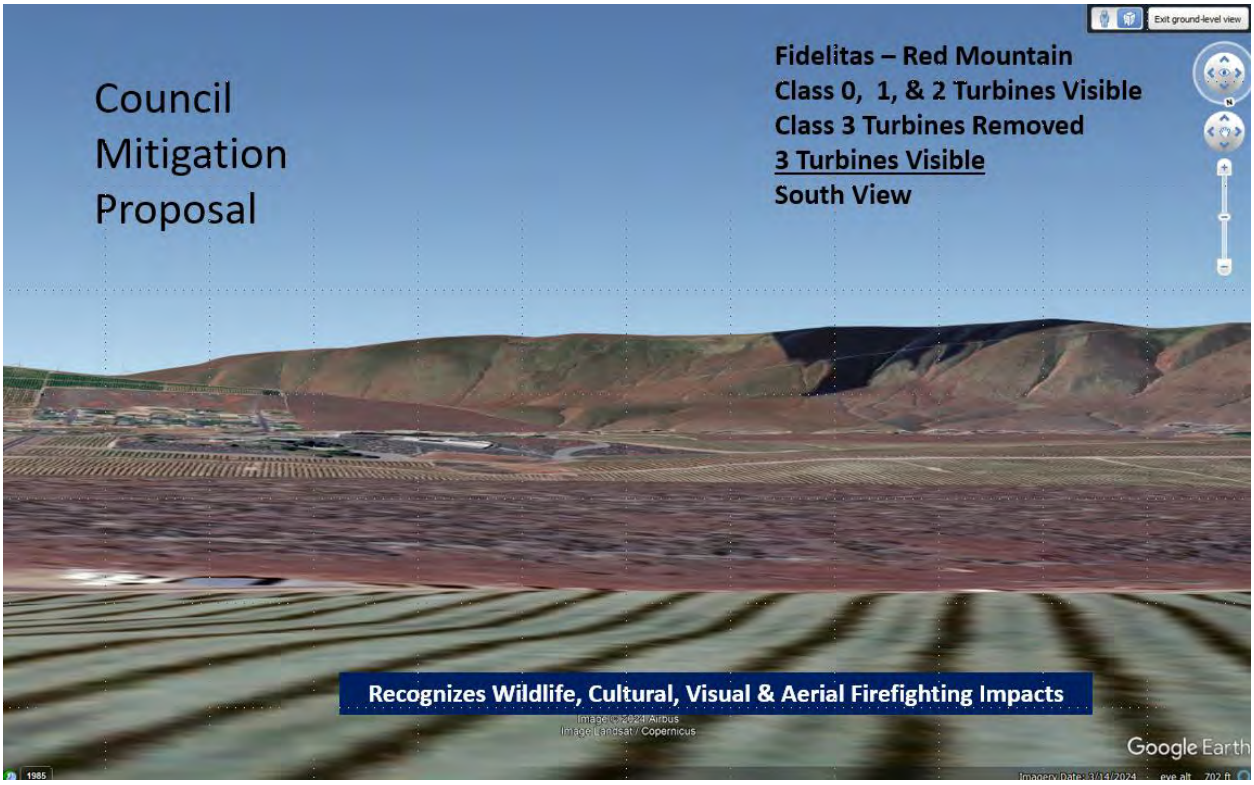
No action needed – the Council Mitigation recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Council Mitigation Adequate - the Red Mountain Wineries – Fidelitas (very near Col Solare)



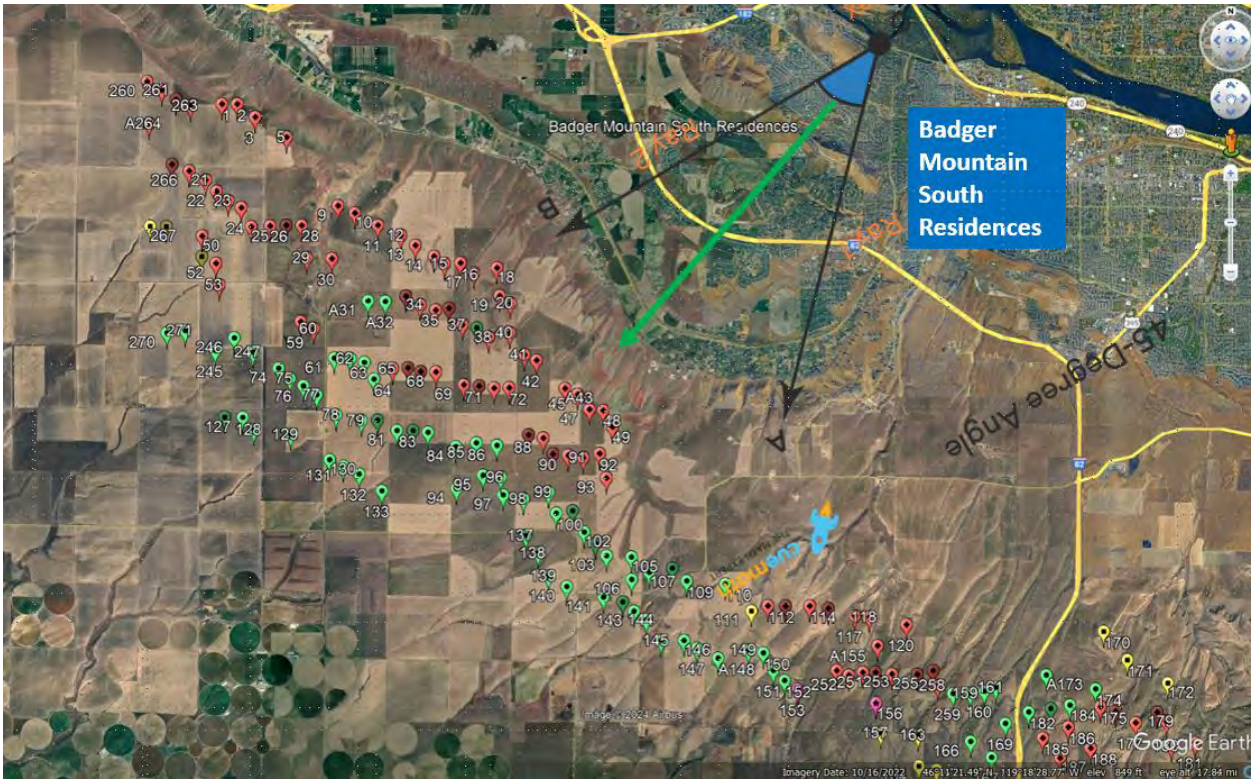

Red Mountain Wineries
Red Mountain Wineries Fidelitas
Image © 2024 Airbus
Google Earth
Imagery Date: 3/14/2024

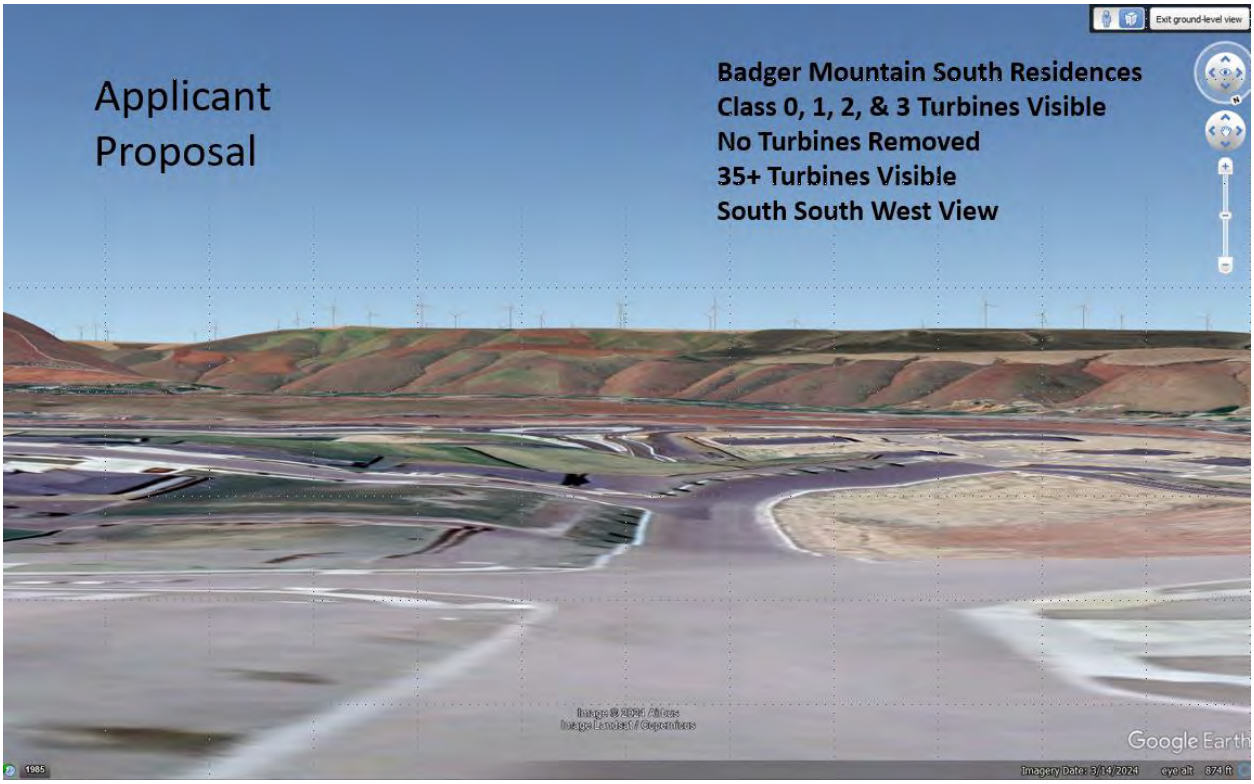

Applicant Proposal
Fidelitas – Red Mountain
Class 0, 1, 2, & 3 Turbines Visible
No Turbines Removed
9 Turbines Visible
South View
Exit ground-level view
Image © 2024 Airbus
Image Landsat / Copernicus
Google Earth
Imagery Date: 3/14/2024

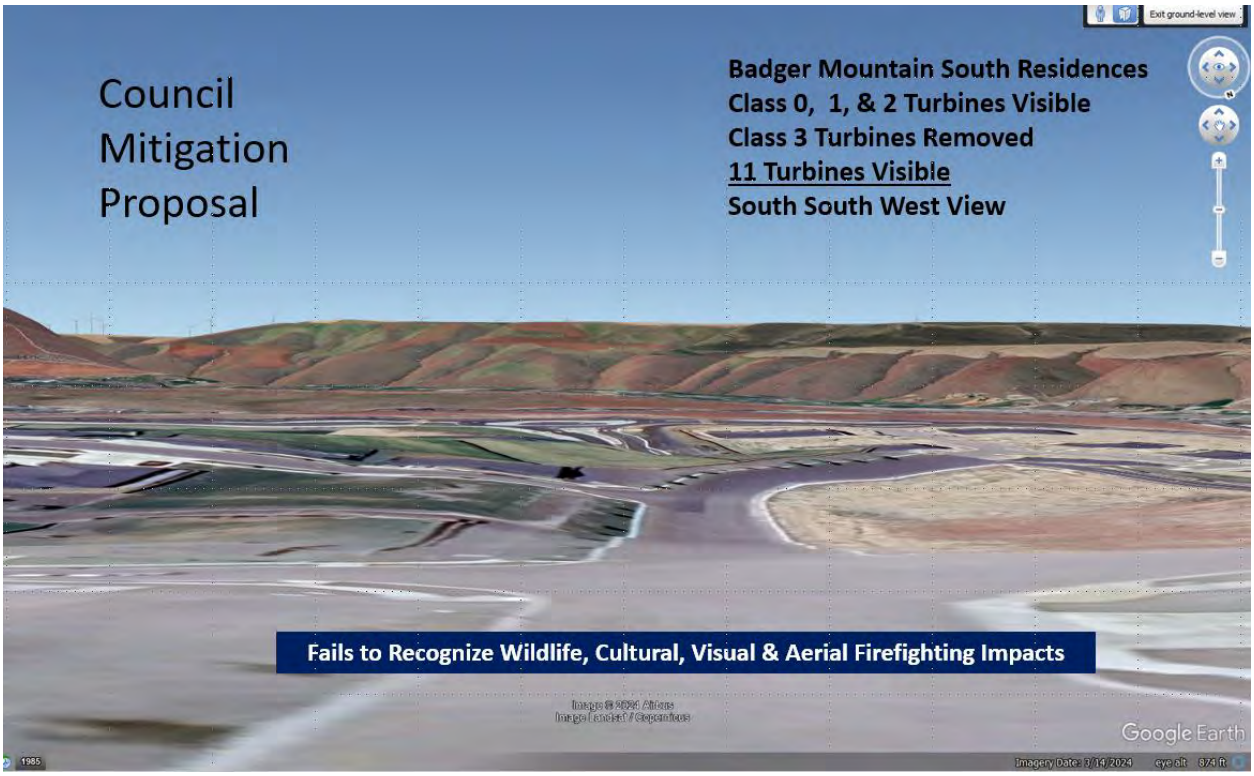


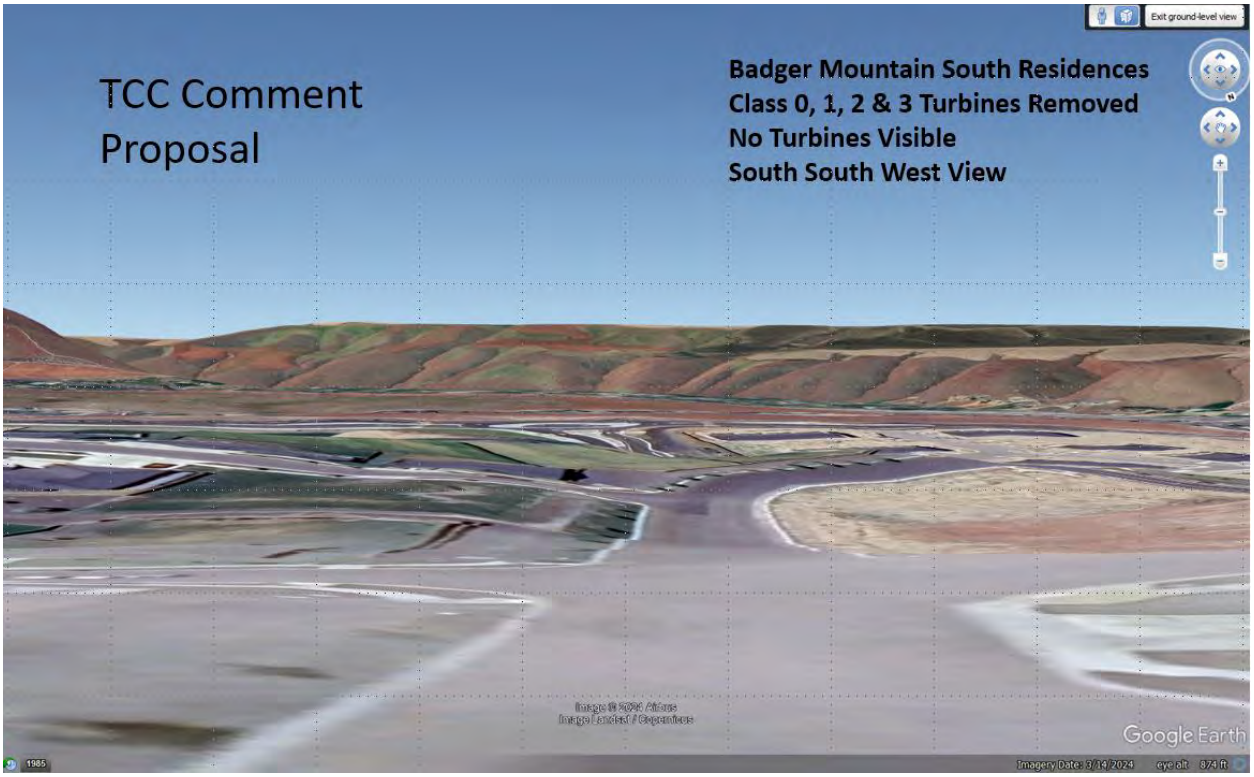
No action needed – the Council Mitigation recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Council Mitigation Inadequate – Turbine Class 3 Needed – Badger Mountain South


Badger Mountain South Residences
Badger Mountain South Residences
45-Degree Angle
Google Earth


Applicant Proposal
Badger Mountain South Residences
Class 0, 1, 2, & 3 Turbines Visible
No Turbines Removed
35+ Turbines Visible
South South West View
Exit ground-level view
Google Earth

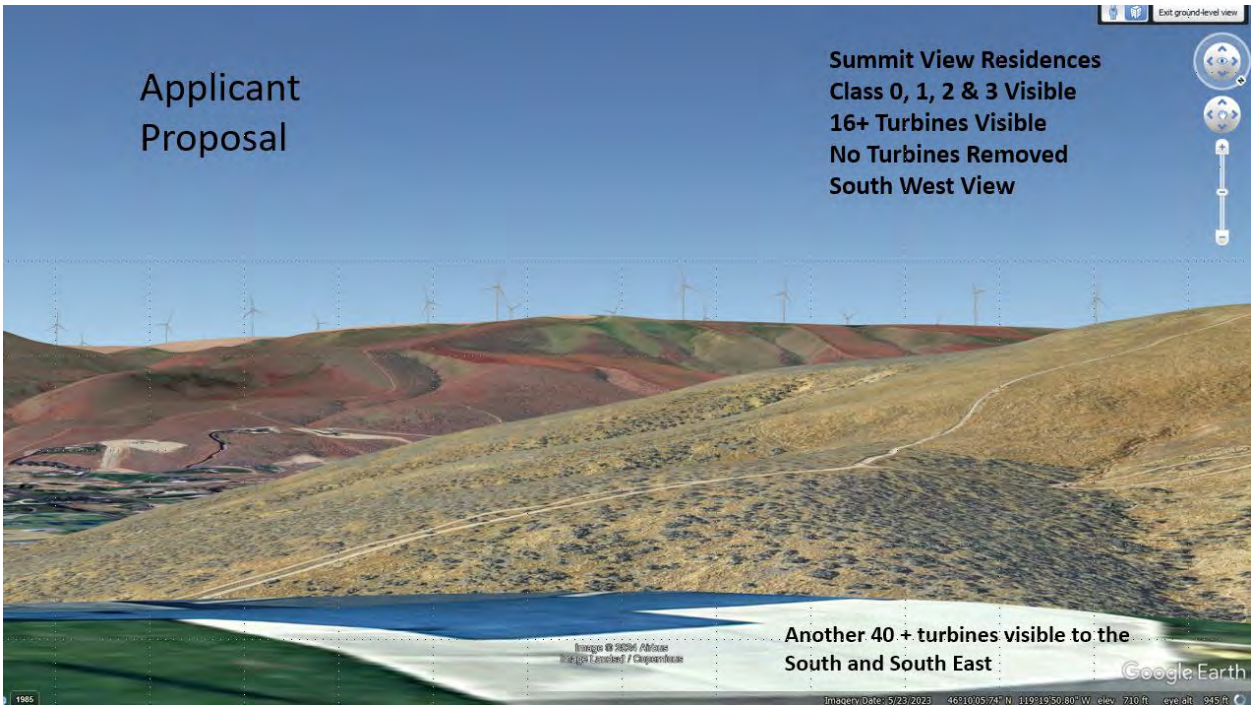


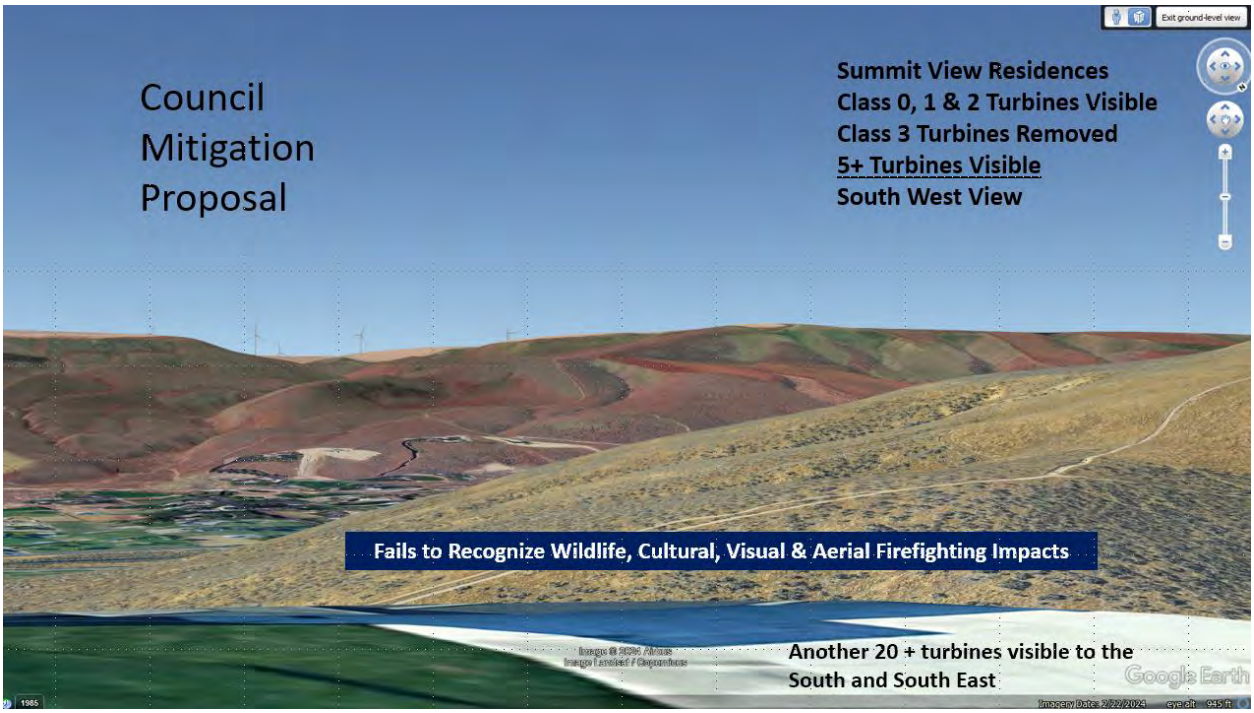


Action needed – the Council Mitigation fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Comment: Reclassify Class 0, 1 and 2 Turbines to Class 3.

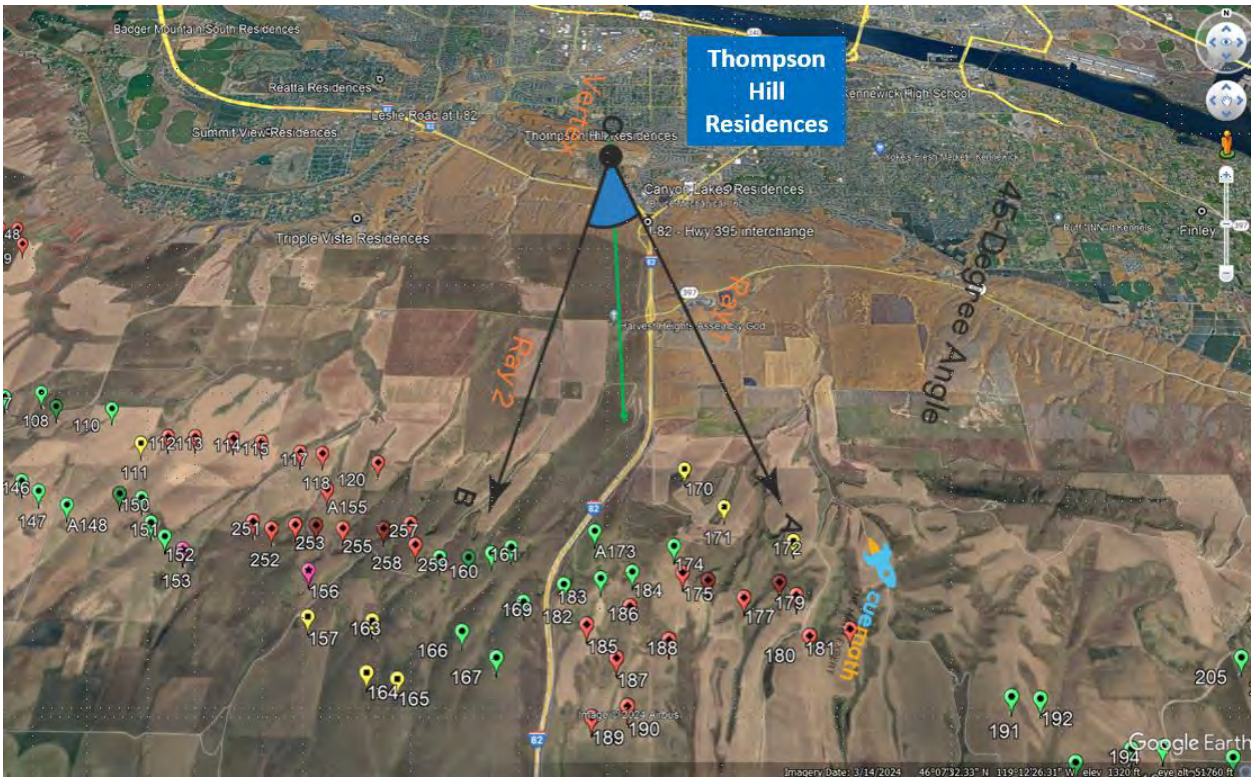
Summit View Residences

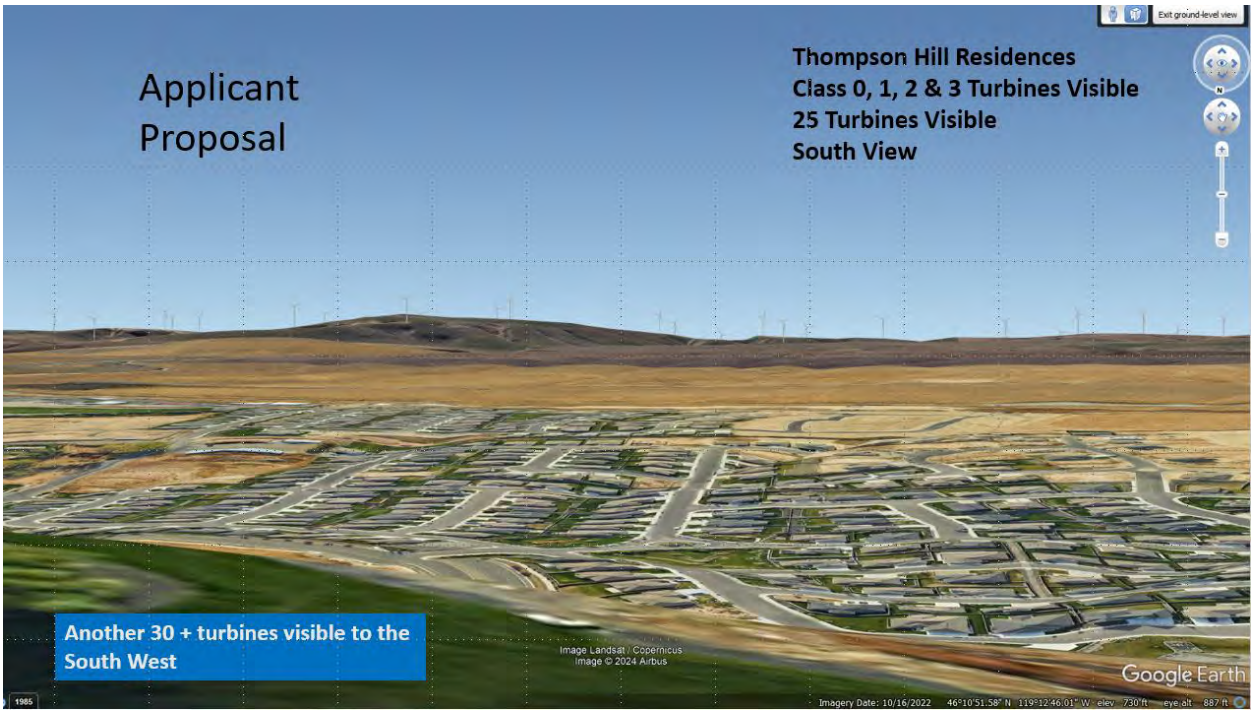


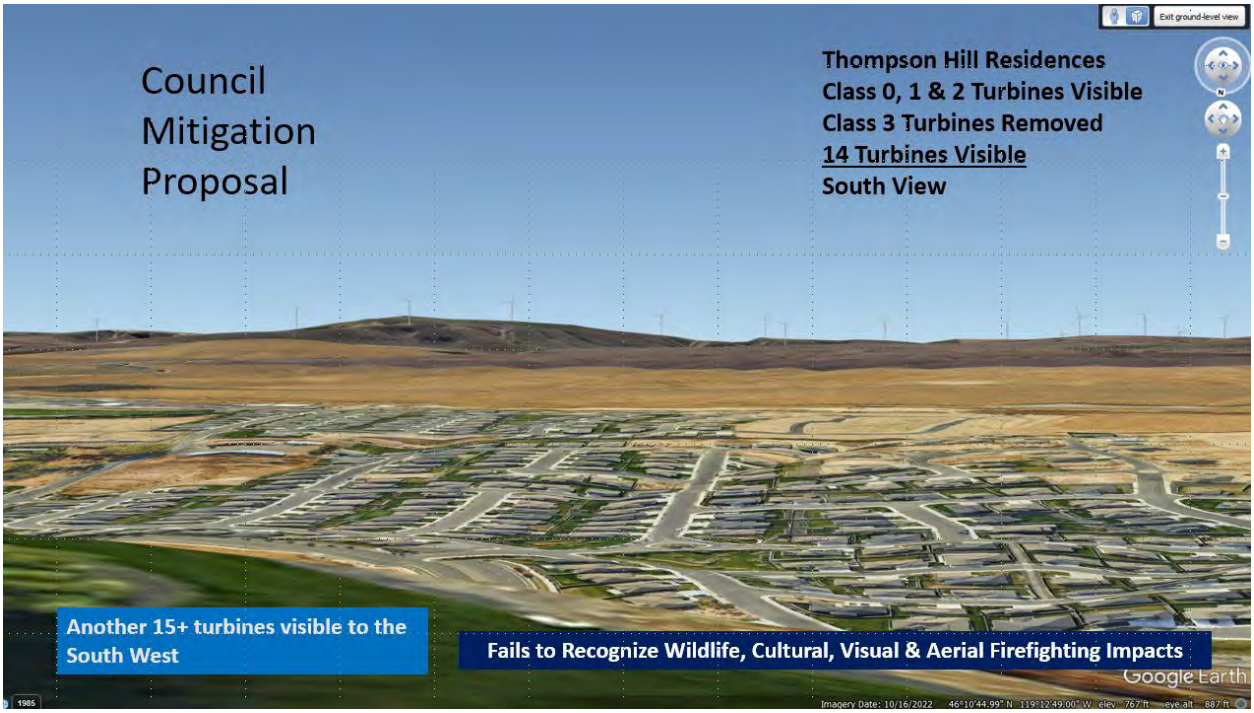


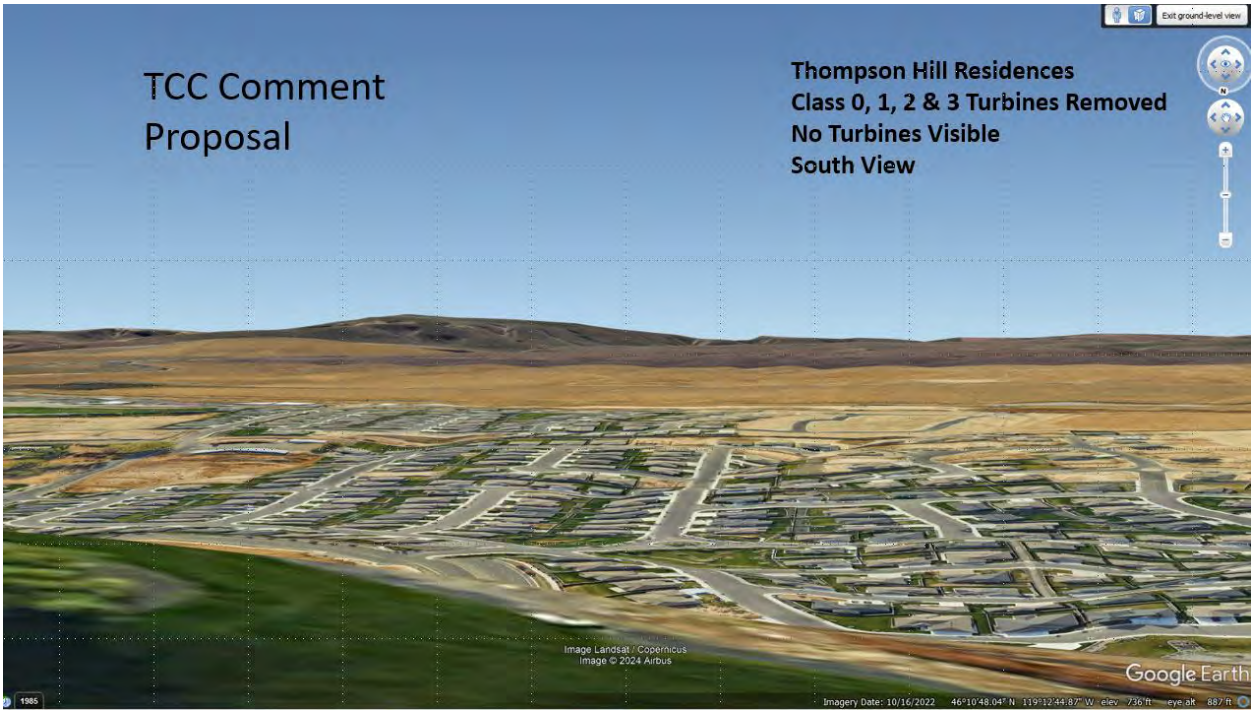
Action needed – the Council Mitigation fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Comment: Reclassify Class 0, 1 and 2 Turbines to Class 3.


Thompson Hill Residences
Badger Mountain South Residences
Reatta Residences
Summit View Residences
Leslie Road at I-82
Tapteal Drive
Thompson Hill Residences
Canyon Lakes Residences
82 - Hwy 395 interchange
Tripple Vista Residences
Finley
45-Degree Angle
Ray1
Ray2
A
B
Google Earth


Applicant Proposal
Thompson Hill Residences
Class 0, 1, 2 & 3 Turbines Visible
25 Turbines Visible
South View
Another 30 + turbines visible to the South West
Google Earth

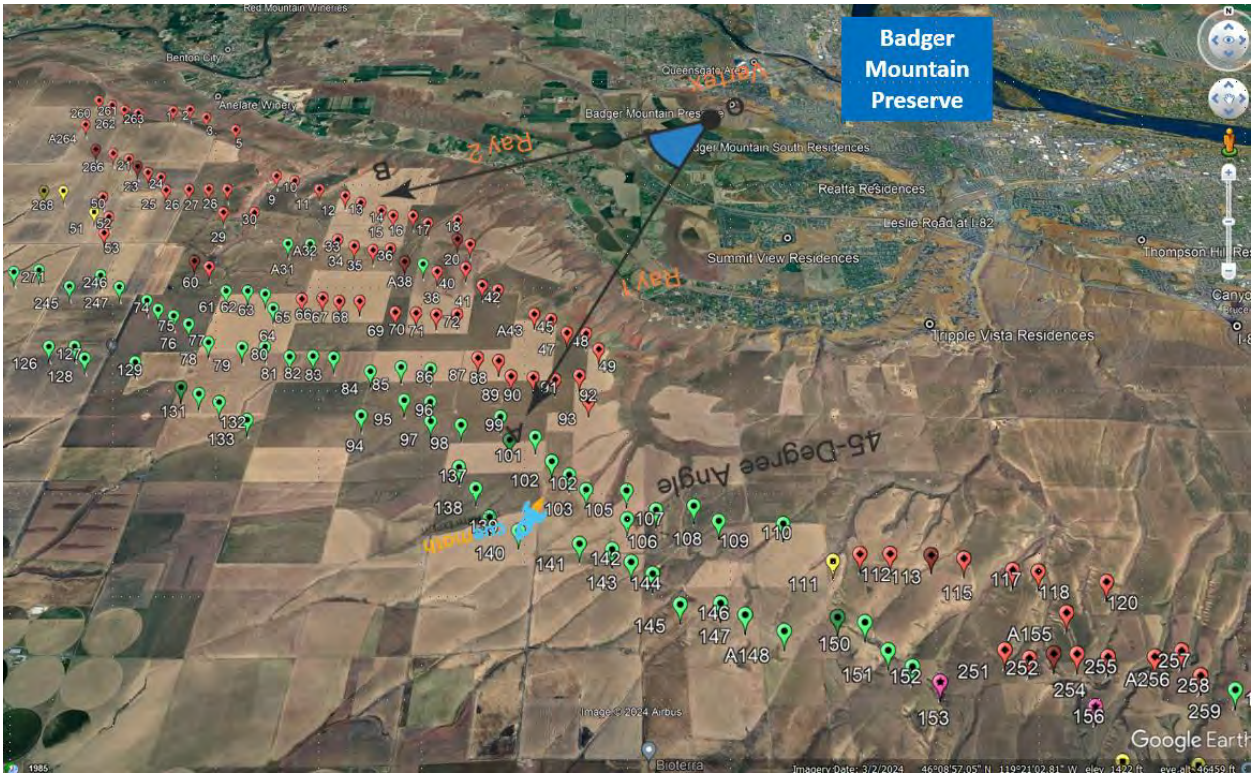


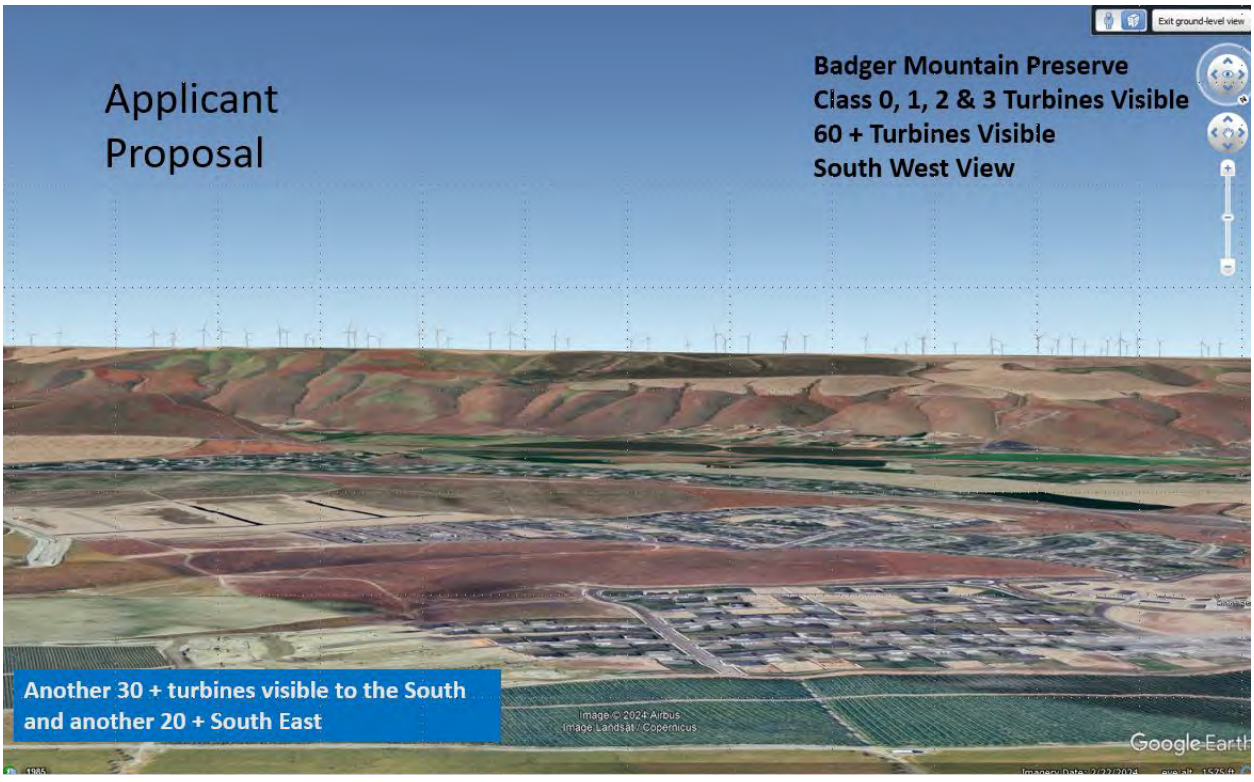


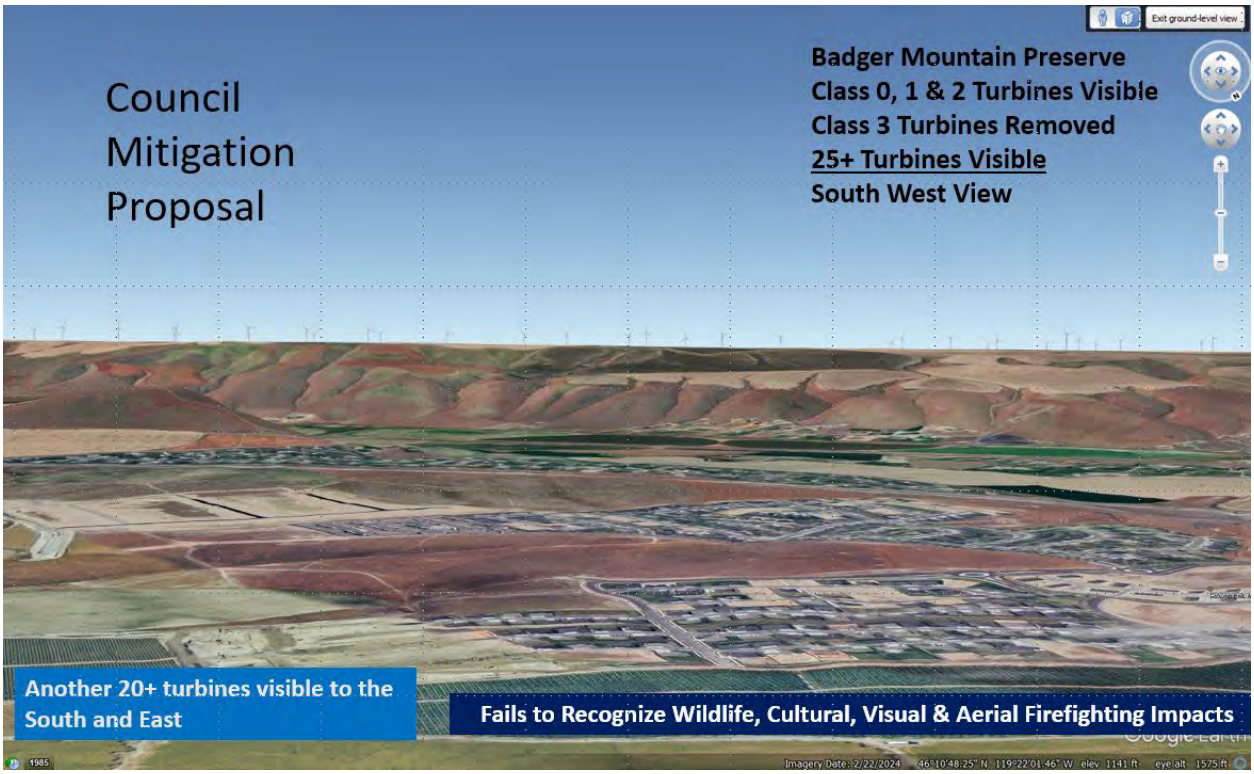
Action needed – the Council Mitigation fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

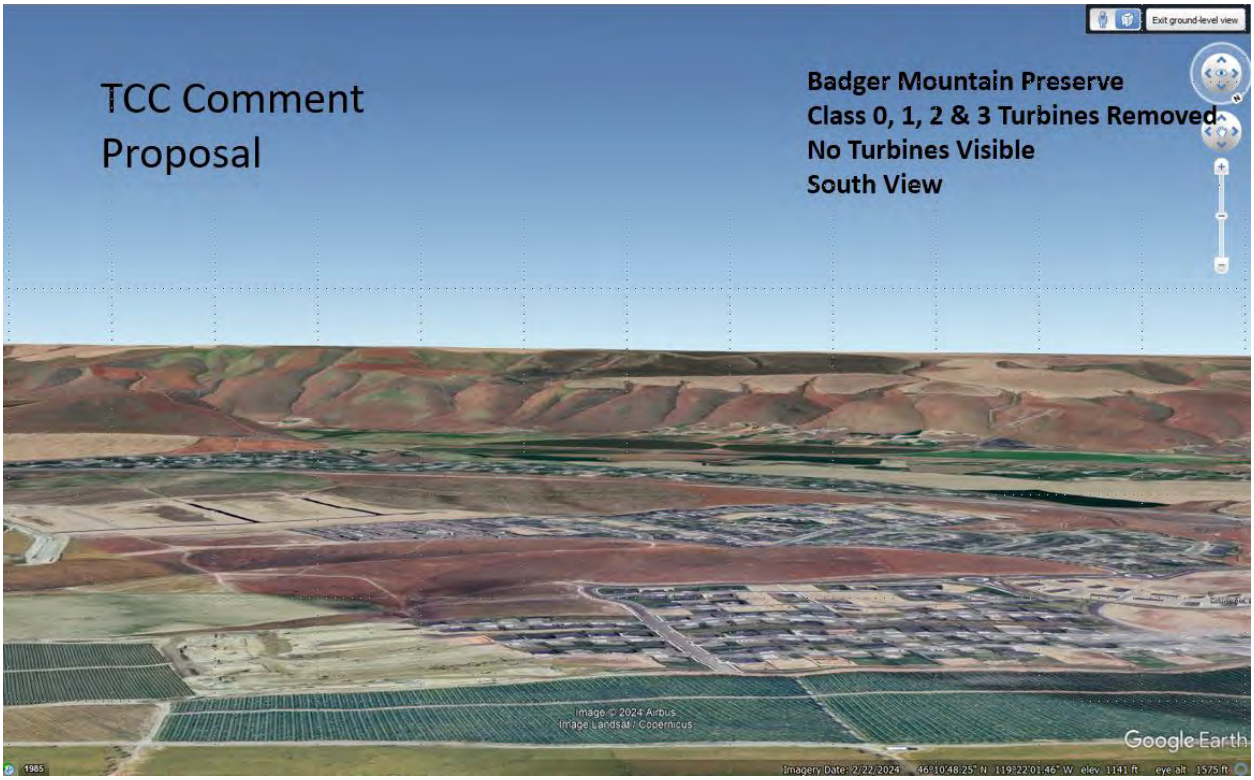
Comment: Reclassify Class 0, 1 and 2 Turbines to Class 3.

Badger Mountain Preserve





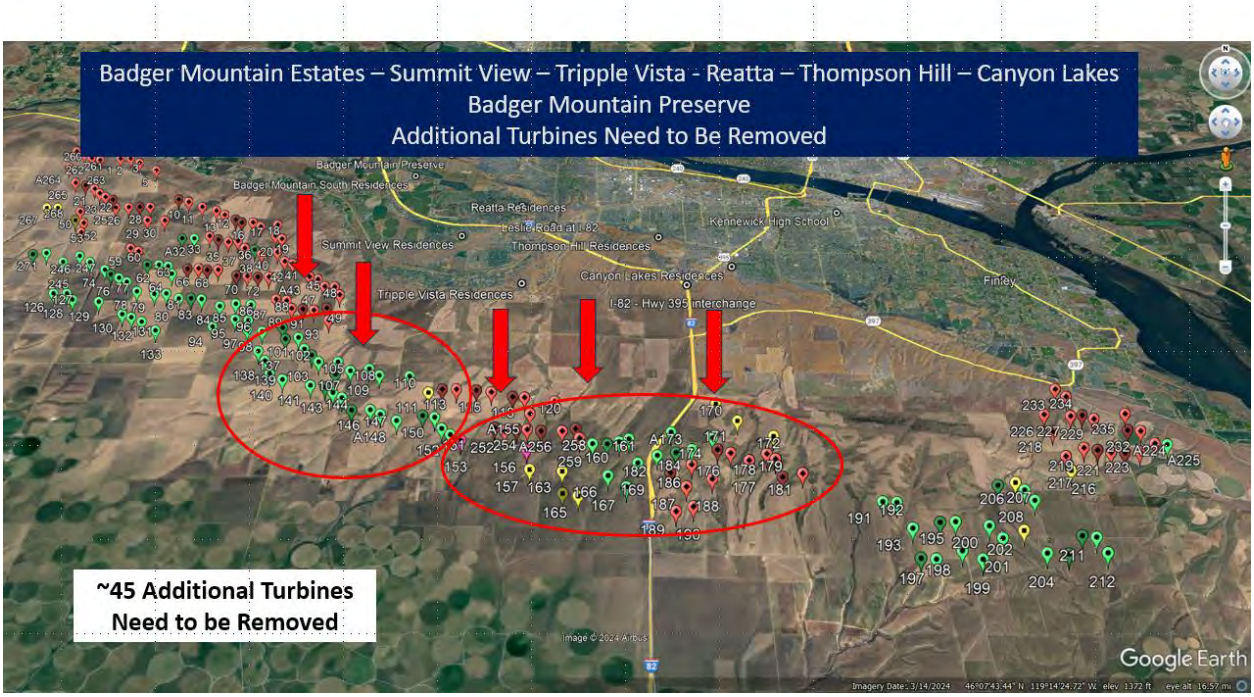

Council
Mitigation
Proposal
Badger Mountain Preserve
Class 0, 1 & 2 Turbines Visible
Class 3 Turbines Removed
25+ Turbines Visible
South West View
Another 20+ turbines visible to the South and East
Fails to Recognize Wildlife, Cultural, Visual & Aerial Firefighting Impacts


TCC Comment
Proposal
Badger Mountain Preserve
Class 0, 1, 2 & 3 Turbines Removed
No Turbines Visible
South View
Image © 2024 Airbus
Image Landsat / Copernicus
Google Earth

The Council Mitigation proposal fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts equally. Additional turbine removal is demonstrated to be needed to achieve uniform mitigation across the project.

Conclusions from the Google Pro Visuals Assessment

An estimated 45 additional turbines need to be reclassified from Class 0, 1 or 2 to Class 3. The Council Mitigation in the Report and SCA fail to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts. There are too many turbines that are still extremely visible to too many people in several residential communities in the Tri-Cities.



The images created presented using Google Earth Pro describe and illustrate the visual impact of the Proposed Council Mitigation. They compare the Applicants Proposal, the Council's Proposed Mitigation, and the TCC Proposal to identifies additional turbine removal needed to mitigate the proposed project equally across the site.

The Goole Earth computer model is conservative in that it makes the turbines look less visible and prominent than they will be in real life on the ground. The turbines are colored white. The model does not correctly portray either the tower width or the blade width, which are larger than presented.

While the turbines appear feint, the size and location are accurate based on the GPS coordinates and project turbine specifications for the 499 ft turbines.

It is important to recognize that the 671 ft turbines would be 172 feet higher that the 499 ft turbines presented in the present model and would be much more visible and prominent.

Comment: The Report and the SCA must be revised to adequately develop the rational scientific bases for classifying the turbines properly. This include the recognition of key observation points in several residential communities that were not evaluated by the Applicant in the SCA or in the DEIS or Final EIS by EFSEC.

Issue: The evaluation of the turbines is inadequate. The Report and SCA are vague and there are no accompanying analyses to substantiate the classifications of turbines presented on the maps. There is no turbine specific evaluation that identifies the significance of the negative impacts which justifies the Class 3 turbine removal decisions.

This table illustrates an example what this type of analysis could look like: Once a table like this was developed and validated the list of turbines in the right classes could be created and incorporated into the SCA Appendix 2 and referenced in the Report.

A more complete table contains an initial list of the turbines that should be reclassified from Class 0, 1, & 2 to Class 3 is provided in Appendix 2 (below).

ID	Class	Color	Wildlife	Cultural	Visual	Aerial Firefighting	Proper Class
91	3	Red	xx	xx	xx	xx	Class 3 Red 3+
93	3	Red	xx	xx	xx	xx	Class 3 Red 3+
98	0	Green	xx	xx	xx	xx	Class 3 Red 3+
99	0	Green	xx	xx	xx	xx	Class 3 Red 3+
100	0	Green	xx	xx	xx	xx	Class 3 Red 3+
101	0	Green	xx	xx	xx	xx	Class 3 Red 3+
102	0	Green	xx	xx	xx	xx	Class 3 Red 3+
102	0	Green	xx	xx	xx	xx	Class 3 Red 3+
103	0	Green	xx	xx	xx	xx	Class 3 Red 3+
105	0	Green	xx	xx	xx	xx	Class 3 Red 3+
106	0	Green	xx	xx	xx	xx	Class 3 Red 3+
107	0	Green	xx	xx	xx	xx	Class 3 Red 3+
108	0	Green	xx	xx	xx	xx	Class 3 Red 3+
109	0	Green	xx	xx	xx	xx	Class 3 Red 3+
110	0	Green	xx	xx	xx	xx	Class 3 Red 3+
137	0	Green	xx	xx	xx	xx	Class 3 Red 3+
138	0	Green	xx	xx	xx	xx	Class 3 Red 3+
139	0	Green	xx	xx	xx	xx	Class 3 Red 3+
140	0	Green	xx	xx	xx	xx	Class 3 Red 3+
141	0	Green	xx	xx	xx	xx	Class 3 Red 3+
142	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
144	0	Green	xx	xx	xx	xx	Class 3 Red 3+

Comment: The Report and SCA need to be revised to include a turbine specific analysis for wildlife resources, cultural, visual, aerial firefighting and other resources.

The references for the class reclassifications include:

Cultural resources and the confidential TCP information reviewed by the Council during the adjudication. The Council identified and considered a Mitigation proposal to eliminate all turbines east of Straub Canyon because of the resources identified there. The March 19, 2024 from Chairman Lewis ot EFSEC recognized that this proposed mitigation measure did meaningfully address some but not all of the Yakama Nation's concerns.

Aerial firefighting needs and issues are still poorly identified and are not evaluated adequately in the addressed in the Report and the ASC. The Department of Natural Resources classifies the entire area as a high fire hazard zone. Numerous bush fires are documented in the project area.

The Council's was very thoughtful as regards the evaluation of the Ferruginous Hawk. However, it did not apply the recognition and the same level of analysis of the impacts the hawk nests and other significant negative facts to the other portions of the project equally.

The Council should conduct an even-handed analysis and evaluate all areas of the project equally using the same factors and analysis across all areas of the project. This will be the only way to adequately develop a rational scientific basis for the decisions that are being made.

Appendix 1

Instructions to Visualize Horse Heaven Hills Wind Farm

Introduction

When a wind farm is first proposed, the almost universal reaction by people living in the affected community is “What will it look like from my home?” If there is a visual impact assessment, it will contain photorealistic simulations from a few viewpoints selected by the developer’s consultants. However, these viewpoints are selected by the developer’s team and it is almost certain that none of them are from your home.

The goal of these instructions is to get you up and running on Google Earth Pro to visualize the Horse Haven Hills Wind Farm from your home. One big reason to use Google Earth is that it is that the software is totally free and will run on any PC, Mac or Linux computer. After completing the steps discussed here you may want to explore the view from other locations, as well as other features of Google Earth Pro.

You will be looking at the layout for Option 1. The only spatial information available to the public is a PDF of a map you can download at:

https://drive.google.com/file/d/1LAztIg_vdqAmMhnNGcRN1qklygIWcTRt/view?usp=sharing

This PDF also includes the layout for Option 2 with fewer but taller turbines. We were unable to prepare a KMZ for this option.

These instructions refer to Horse Haven Hills Wind Farm as HHH and Google Earth Pro as GEO.

Step 1: Download and install Google Earth Pro

You need to open a web browser on your PC or Mac computer and go to:

https://www.google.com/earth/about/versions/#earth-pro

Select the “Download Earth Pro on desktop” box and then follow the instructions. This process should be straightforward—it is just like installing any other software. It will be installed where ever software is normally installed.

Once it is installed, you can open it by double clicking on it. GEO is a fun program. You can look at places all around the world, and even visit the moon and other planets.

Step 2: Download the Horse Haven Hills Wind Farm KMZ

The 3D model of HHH's Option 1 wind turbines is called HHH_Opt_1.kmz, or KMZ for short. Click on this link and select Download:

https://drive.google.com/file/d/1C7lPMkfbJUmi5Pan4GPWv7A1NeGh7Lxg/view?usp=share_link

Put it away in a location that is easy for you to find on your computer—maybe create a folder for HHH Wind Farm on your desktop or in Documents and put it there.

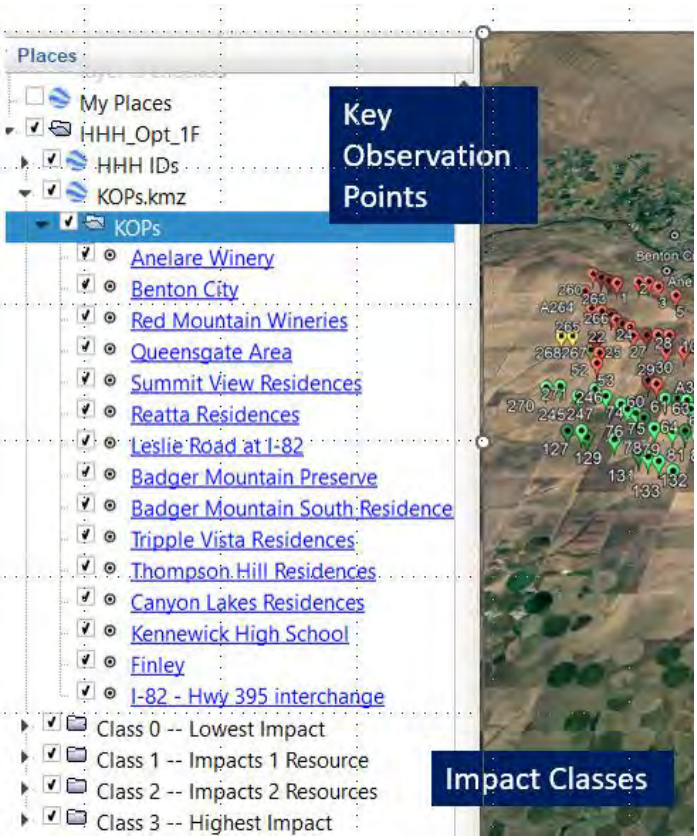
Step 3: Open the HHH KMZ

Double click on the HHH_Opt_1.kmz file and it will open in GEO.

There will be a floating window over the aerial map with tips about Navigating Google Earth. I encourage you to spend a few minutes learning how to navigate GEO. Read the tips that are listed and click on the blue phrase, "Learn more about how to navigate Google Earth." You can "Sign In" if you have a Google account (e.g., you use Gmail), but it is not necessary. When you are ready to move on, close the floating window by clicking the Close button (leave the Show Tips at Start-up box checked). You can get the Start-up Tip and other instructions from the Help menu at any time. The more complete, though somewhat dated Google Earth User Guide is at: http://earth.google.com/intl/ar/userguide/v4/index.htm . In addition you can always Google for help with any questions you may have—there are lots of training videos and user advice on how to make the most of GEO.

There are reference notes at the end of these instructions that identify GEO's primary tools. Refer to these notes to understand the GEO terms used here.

In the Places Panel in upper left side of the GEO window there is a folder named HHH_Opt_1 that has all the 3D information. Click on the greater than symbol (>) to see its contents.



- The **HHH IDs** are the turbine numbers shown in the Option 1 layout. Click on the greater than symbols to open the folders. The labels are Placemarks that have been color coded to reflect the impact on the PDF map: green for lowest impact, red for highest impact, yellow for impact to one resource and pink for impact to 2 resources. All the labels are turned on, but you can turn them off by clicking on the blue check box.
- The **KOPs** are the viewpoints used in the visual impact assessment. Double click on one to take you to an aerial view above the viewpoint. Position you mouse over a location and use the mouse's scroll wheel to move down to the ground.
- Then there are four folders for the **Impact Classes** that contain the turbines. You can turn a whole impact class of turbines off or on by clicking on the blue box. If you open an impact class folder, the individual turbines are shown using the old ID numbers. You can turn individual turbines on and off too.

If you click on an individual turbine in the map or HHH IDs, a pop-up window lists the ID, the old turbine name, the impact class from the PDF map, and the turbine's location and height to an upright blade tip.

Now you are ready to explore how the HHH wind turbines might appear from any location in the study area.

Step 4: View from Your Street.

We will start by seeing if the wind turbines will be visible from your home. In the Search panel of the Side Bar in the top left of the GEO window, type you home address and click Search. This will create a Placemark on the map and bring you to an aerial view of the address at an elevation a bit over 3,000 ft above the ground. Next we need to get down to a ground-level view.

Take the mouse cursor to the upper right side of the window and click-and-hold on the orange Pegman symbol. If the street in front or near your house turns blue, drag and drop Pegman's feet where you want the viewpoint to be. Viola! You are in Street View. At the bottom of the window is the date of the photograph, its latitude and longitude and elevation (ignore "eye alt"). The eye-level of all Street View photos is approximately 10 ft (3 m) or a bit higher than normal eye-level.

[There are alternate ways to get to a Ground View. You could simply click near the Placemark; keep clicking but not too fast, until you are at Ground View. Or you could hold the cursor/crosshairs over the location you want for a viewpoint and use the mouse scroll-wheel to get down to ground-level.]

Change to Terrain View by clicking on the building icon at the top of the Navigation Tools. Use the Look Around tool's left or right arrows to pan around the view while staying in place. (Do not use the up and down arrows or the Move Around tool yet.) Do you see any turbines? Pan until the largest turbine is in the center of the screen where it will be in proper scale.

If you do not see turbines, finish reading the instructions for this step and then go to the next step.

Expand the window to full screen size. Notice that the view stays the same—it is just larger. The view always defaults to approximately a 90º angle of view in both Terrain and Street View. The appropriate viewing distance for this view is half of its width, which is really close.

If your eyes are that distance from the screen, the turbines will be appropriately scaled. Do not use the Zoom Tool because it changes the angle of view and then the appropriate viewing distance will be unknown.

Now move the mouse cursor to the upper right corner of the screen and switch back to Street View by clicking on the blueish Pegman icon. Check that the horizon in Street View matches the horizon in Terrain View by switching back and forth. As you switch back and forth, note whether the vegetation and buildings in Street View would screen the turbines visible in Terrain View.

While not perfect, this gives you a good sense of whether the turbines will be visible from this particular viewpoint.

Step 5: Moving Around to See Turbines.

The next question is how extensive are view of the turbine in your neighborhood. Use the Look Around tool to face a direction you want to move—or click-and-hold and swipe sideways to rotate the view. Move forward Street View by clicking on the forward or backward arrows, or to move forward faster, double-click on a location further down the road. Be patient—using mouse clicks to navigate can be finnicky. If double-clicking does not work, use the mouse scroll-wheel.

In Terrain View you can move off the road (but there likely will not be corresponding Street View photos off the road). Rotate the view to the direction you want to go (the Move Around tool will show where north is relative to the direction you are facing). Then move straight forward using the scroll-wheel, or double-click on a location you want to move toward.

If you stay on the road, switching back and forth between the Terrain and Street Views gives you some idea of how often the turbines will be screened or not.

Step 6: View Settings to Improve the Visual Contrast.

Sometimes it may be difficult to see the turbines with GEO's default settings, which do not include the variable effects of sun lighting. GEO can simulate sunlight for a specific time of day. When the turbines are front lit they will appear lighter, when they are backlit they will be darker. In the Tool Bar click on the Show Sunlight icon of the rising sun. It brings up a slider that controls the sun's angle for the time of day.

Another adjustment changes the sky to be lighter and more vibrant. In Windows, open the GEO Options in the Tools menu (In Mac, open Preferences in the Google Earth Pro menu) and check Photorealistic Atmosphere Rendering in the 3D View tab.

Step 7: Saving a Viewpoint.

If you have found a view that you want to save so you can come pack to it, you can do that in Terrain View. First use the Look Around tool to put the most prominent turbine in the center of the image and the horizon in the middle of the image. Then click on the Add Placemark tool (it looks like a yellow pushpin) in the Tool Bar. This brings up a window: type in the viewpoint name, and make sure that the Altitude is Clamped to Ground. Then click OK. It should be saved under My Places in the Places panel, though it may be somewhere else in the Places panel.

Now you can always get back to that view. Click the Exit ground-level view button in the upper right corner of the window (if it is not visible, just move around the view a bit). The Placemark become visible from an elevated view. Either double-click on the Placemark in My Places, or double-click at the base of the Placemark to retrieve the view.

You can save a view as a .jpg file. In the File menu, select Save, then Save Image. Select Map Options to control the information displayed with the view. Click in the Untitled Map box to title the image. In the upper left corner is the Legend, and you can turn features that may be in the view on or off. Adjust the image resolution—the higher the better, though it means a larger file. Then click Save Image.

Step 8: Identifying Individual Turbines

If you are going to submit comments to the EFSEC, then you may want to include images of a particular view. It may be useful to refer to the individual turbines on the Option 1 map that concern you in the view. This is the primary reason for including the HHH IDs in the KMZ.

The HHH IDs may not always show in Terrain View. If you click and drag the Terrain View downward, they may appear. You can also click Exit Ground-level View, but then you need to keep track of which turbine interested you.

Step 9: Evaluation of Google Earth Pro Visualizations

Widely distributing a GEO KMZ is a new approach to help a community understand how a proposed wind farm may change the landscape. We invite you to take a short 10 minute survey to help us learn about whether it was helpful or not. Your participation is completely voluntary and you may decline to answer any of the questions or stop at any time. Your responses are completely anonymous.

If you agree to participate in the evaluation survey, click on the link below to be taken to a Google Forms questionnaire.

https://docs.google.com/forms/d/e/1FAIpQLSc1i3RV8JxWOq-q4jG5nXFmh9hk8ueVsnCIrbe3CHBlqp-ong/viewform?usp=sharing

We appreciate your participation in this evaluation of Google Earth Pro as a visual impact visualization too.

Dean Apostol

Scenic Expert for Tri-Cities C.A.R.E.S. Forestry

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James Palmer, Emeritus Professor

SUNY College of Environmental Science & Forestry

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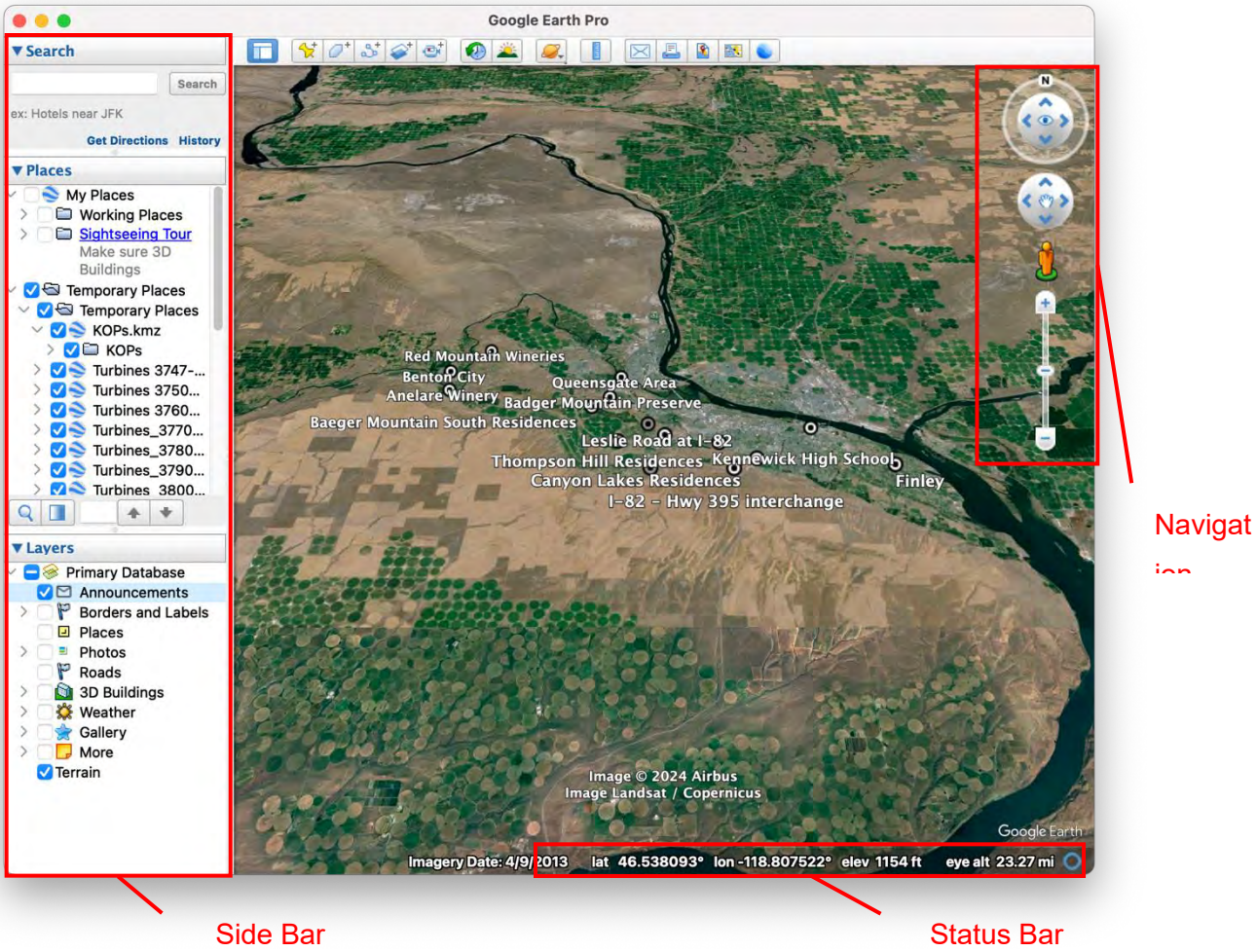
Google Earth Pro Reference Notes

Introduction

These notes locate the basic tools needed to get around in Google Earth Pro. I am using a Mac, so the images may be slightly different on a PC. The somewhat out of date Google Earth User Guide is at: http://earth.google.com/intl/ar/userguide/v4/index.htm .

Home Screen

Then you double-click on HHH_Turbines & KOPs_FINAL.kmz, you will see a scree something like that shown below.



The **Side Bar** includes three panels which are collapsed or expanded by clicking on the triangle or caret mark.

- **Search**. Locate your home or any place in the world.
- **Places**. This is where **Placemarks** are kept. The KMZ has Placemarks for the turbines and the visual impact assessment photo simulation viewpoints.
- **Layers**. This panel contains various map features, such as roads, terrain, boundaries and names.

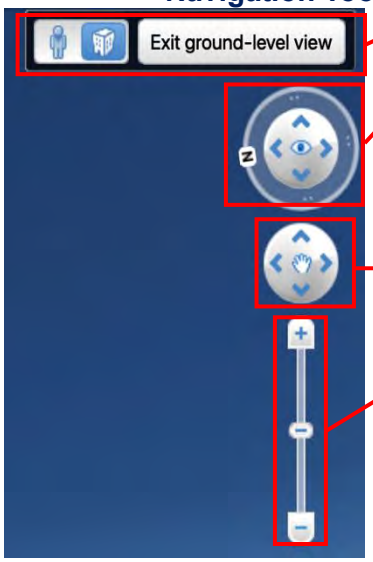
The **Tool Bar** includes many useful tools, such as a **Ruler** for measurements, **Sun** to adjust the direction of sunlight, or creating features as a **Placemark**, **Polygon** or **Path**. Placing the mouse cursor over a tool reveals its purpose.

The **Status Bar** provides the date of the image, the Latitude/Longitude coordinates, and the ground and viewer elevation.

Navigation Tools for **Earth** or **Map View**.

- **Look Around**. This moves the map or view around the viewer. Clicking the left and right arrows rotates the view; the up and down arrows change the tilt of the view. Click and hold on the N to move it around to set the direction of north.
- **Move Around**. This moves the viewer around in the map.
- **Pegman**. The changes the screen to Street View (and Terrain View). Click and drag Pegman onto the map and the screen changes to Terrain View (make sure that Terrain is checked in the Layers panel). When Pegman is placed on a blue road, the screen changes to Street View.
- **Zoom**. Moves the view closer or further away.

Navigation Tools for **Ground View**.

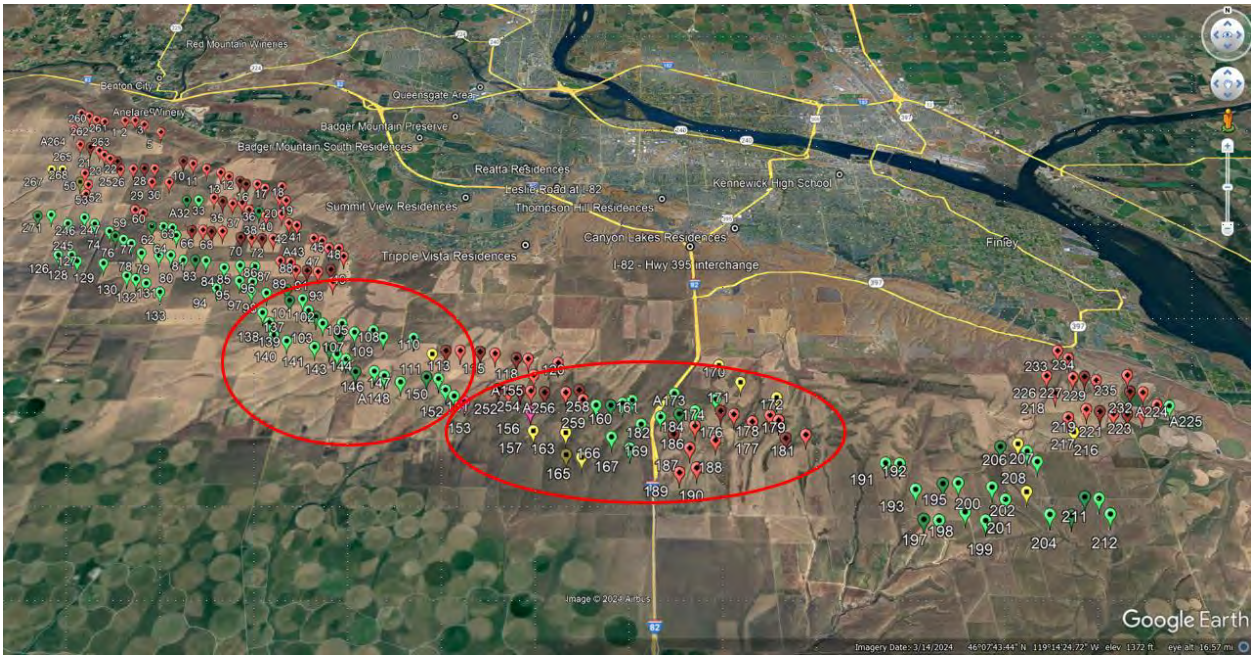


- **Ground View**. Allows you to select Pegman's Street View (if available) or Terrain View, and to exit back to Earth View.
- **Look Around**. This moves the map or view around the viewer. Clicking the left and right arrows rotates the view; the up and down arrows change the tilt of the view. Click and hold on the N to move it around to set the direction of north.
- **Move Around**. This moves the viewer around in the map.
- **Zoom**. Moves the view closer or further away.

Appendix 2

This table contains an initial list of the turbines that should be reclassified from Class 0, 1, & 2 to Class 3 for the Option 1 turbines only.

This table is based on the turbine numbers in the following image based on the Google Earth Pro Geographic Model developed by Dr. James Palmer.



This table was developed very quickly during the very short public comment period. More time would be needed to do a better compilation and to conduct an adequate verification that all the turbines have been properly identified and classified.

Turbine Number	Class	Color	Wildlife	Cultural	Visual	Aerial Firefighting	Proper Class
98	0	Green	xx	xx	xx	xx	Class 3 Red 3+
99	0	Green	xx	xx	xx	xx	Class 3 Red 3+
100	0	Green	xx	xx	xx	xx	Class 3 Red 3+
101	0	Green	xx	xx	xx	xx	Class 3 Red 3+
102	0	Green	xx	xx	xx	xx	Class 3 Red 3+
103	0	Green	xx	xx	xx	xx	Class 3 Red 3+
105	0	Green	xx	xx	xx	xx	Class 3 Red 3+
106	0	Green	xx	xx	xx	xx	Class 3 Red 3+
107	0	Green	xx	xx	xx	xx	Class 3 Red 3+
108	0	Green	xx	xx	xx	xx	Class 3 Red 3+
109	0	Green	xx	xx	xx	xx	Class 3 Red 3+

110	0	Green	xx	xx	xx	xx	Class 3 Red 3+
137	0	Green	xx	xx	xx	xx	Class 3 Red 3+
138	0	Green	xx	xx	xx	xx	Class 3 Red 3+
139	0	Green	xx	xx	xx	xx	Class 3 Red 3+
140	0	Green	xx	xx	xx	xx	Class 3 Red 3+
141	0	Green	xx	xx	xx	xx	Class 3 Red 3+
142	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
144	0	Green	xx	xx	xx	xx	Class 3 Red 3+
145	0	Green	xx	xx	xx	xx	Class 3 Red 3+
146	0	Green	xx	xx	xx	xx	Class 3 Red 3+
147	0	Green	xx	xx	xx	xx	Class 3 Red 3+
149	0	Green	xx	xx	xx	xx	Class 3 Red 3+
150	0	Green	xx	xx	xx	xx	Class 3 Red 3+
151	0	Green	xx	xx	xx	xx	Class 3 Red 3+
152	0	Green	xx	xx	xx	xx	Class 3 Red 3+
153	0	Green	xx	xx	xx	xx	Class 3 Red 3+
156	0	Green	xx	xx	xx	xx	Class 3 Red 3+
159	0	Green	xx	xx	xx	xx	Class 3 Red 3+
160	0	Green	xx	xx	xx	xx	Class 3 Red 3+
161	0	Green	xx	xx	xx	xx	Class 3 Red 3+
163	0	Green	xx	xx	xx	xx	Class 3 Red 3+
166	1	Green	xx	xx	xx	xx	Class 3 Red 3+
167	0	Green	xx	xx	xx	xx	Class 3 Red 3+
169	0	Green	xx	xx	xx	xx	Class 3 Red 3+
171	0	Green	xx	xx	xx	xx	Class 3 Red 3+
174	0	Green	xx	xx	xx	xx	Class 3 Red 3+
182	0	Green	xx	xx	xx	xx	Class 3 Red 3+
183	0	Green	xx	xx	xx	xx	Class 3 Red 3+
184	0	Green	xx	xx	xx	xx	Class 3 Red 3+
191	0	Green	xx	xx	xx	xx	Class 3 Red 3+
192	0	Green	xx	xx	xx	xx	Class 3 Red 3+
193	0	Green	xx	xx	xx	xx	Class 3 Red 3+
194	0	Green	xx	xx	xx	xx	Class 3 Red 3+
195	0	Green	xx	xx	xx	xx	Class 3 Red 3+
196	0	Green	xx	xx	xx	xx	Class 3 Red 3+
197	0	Green	xx	xx	xx	xx	Class 3 Red 3+
198	0	Green	xx	xx	xx	xx	Class 3 Red 3+
199	0	Green	xx	xx	xx	xx	Class 3 Red 3+
201	0	Green	xx	xx	xx	xx	Class 3 Red 3+

202	0	Green	xx	xx	xx	xx	Class 3 Red 3+
204	0	Green	xx	xx	xx	xx	Class 3 Red 3+
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270	0	Green	xx	xx	xx	xx	Class 3 Red 3+
271	0	Green	xx	xx	xx	xx	Class 3 Red 3+
A173	0	Green	xx	xx	xx	xx	Class 3 Red 3+
A209	0	Green	xx	xx	xx	xx	Class 3 Red 3+
A224	0	Green	xx	xx	xx	xx	Class 3 Red 3+
169	0	Green	xx	xx	xx	xx	Class 3 Red 3+
153	2	Orange	xx	xx	xx	xx	Class 3 Red 3+
155	2	Orange	xx	xx	xx	xx	Class 3 Red 3+
156	2	Orange	xx	xx	xx	xx	Class 3 Red 3+
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71	3	Red					
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88	3	Red					
89	3	Red	xx	xx	xx	xx	Class 3 Red 3+
89	3	Red					
90	3	Red					
91	3	Red	xx	xx	xx	xx	Class 3 Red 3+
92	3	Red					
93	3	Red	xx	xx	xx	xx	Class 3 Red 3+

111	3	Red
112	3	Red
113	3	Red
114	3	Red
115	3	Red
117	3	Red
118	3	Red
120	3	Red
175	3	Red
176	3	Red
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253	3	Red

254	3	Red					
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260	3	Red					
261	3	Red					
262	3	Red					
263	3	Red					
265	3	Red					
A225	3	Red					
A256	3	Red					
A43	3	Red					
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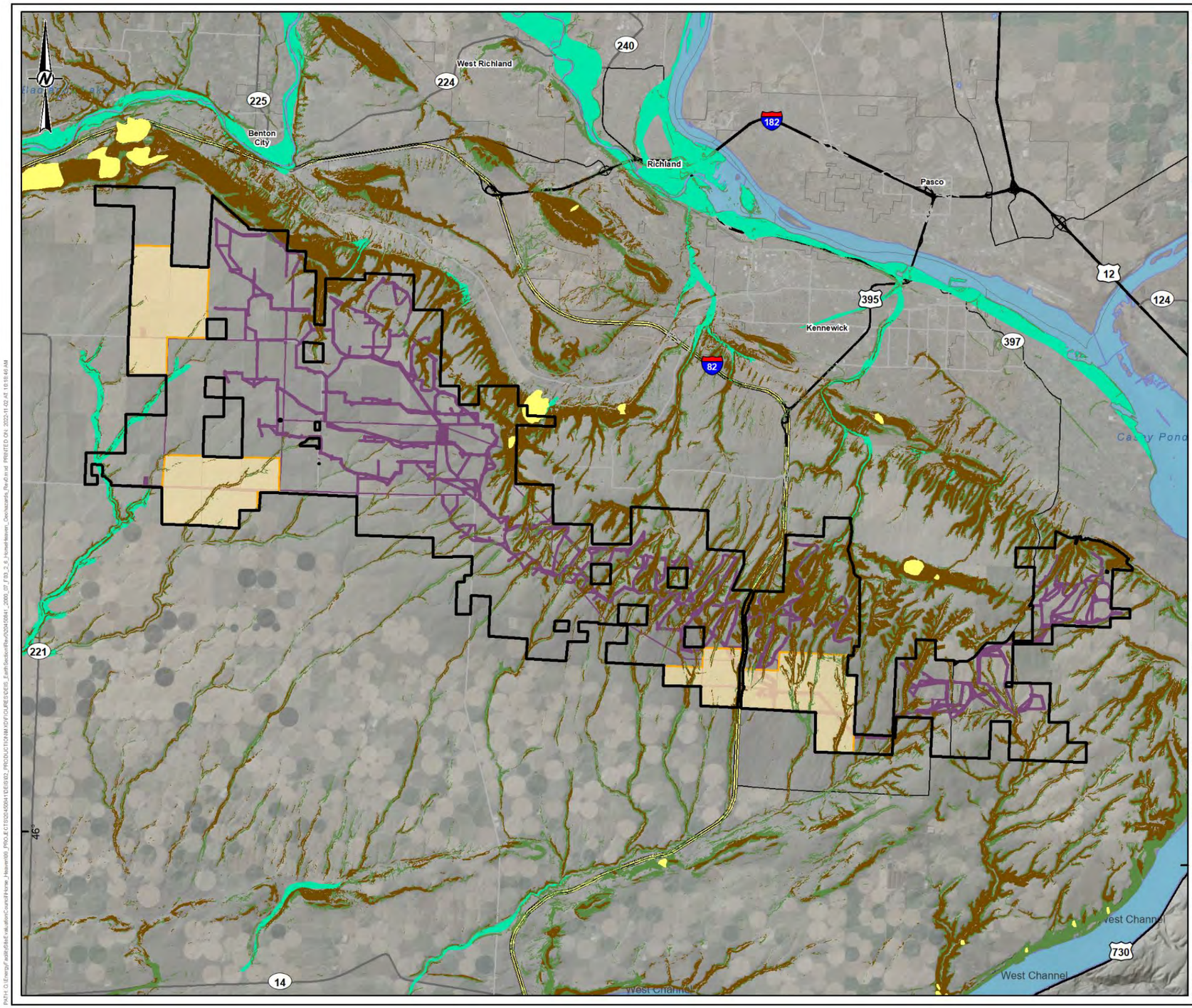
157	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
163	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
164	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
165	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
165	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
170	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
171	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
172	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
200	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
206	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
216	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
266	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
267	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
268	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
113							

From:	Valerie Miller
To:	EFSEC (EFSEC); EFSEC mi Comments
Subject:	Geological Hazard Homeowner Assurance
Date:	Wednesday, April 10, 2024 5:40:12 PM
Attachments:	geological hazard efsec photo.pdf

External Email

Public Comment
Horse Heaven Hills Project-Comment for Site Certification Agreement
Valerie and Josh Miller Representing ourselves and 32 other affected Homeowners on the attached **Joint Public Comment** . For perspective, our homes are on the edge or and even within the historical landslide area. See the attached figure.

Joint Public Comment-Geological Hazards Final



LEGEND

- Project Lease Boundary
- Solar Siting Area
- Micrositing Corridor
- Municipal Boundary
- Historic Landslide Area
- Combined Erosion Hazard & Steep Slope (≥15%)
- Steep Slope (≥15%)
- Liquefaction Potential - Moderate to High

0 3 6
MILES

REFERENCE(S)
1. PROJECT FEATURES PROVIDED BY TETRA TECH, NOV 2021
2. HAZARD AREAS: WADNR, 2021.
3. SERVICE LAYER CREDITS: ESRI
4. COORDINATE SYSTEM: WGS 1984 UTM ZONE 11N

CLIENT
State of Washington Energy Facility Site Evaluation Council

PROJECT
Horse Heaven Wind Farm

TITLE
Geologically Hazardous Areas Surrounding Project Lease Boundary

YYYY-MM-DD	2021-12-10
DESIGNED	HJ
PREPARED	HJ
REVIEWED	AH
APPROVED	JP

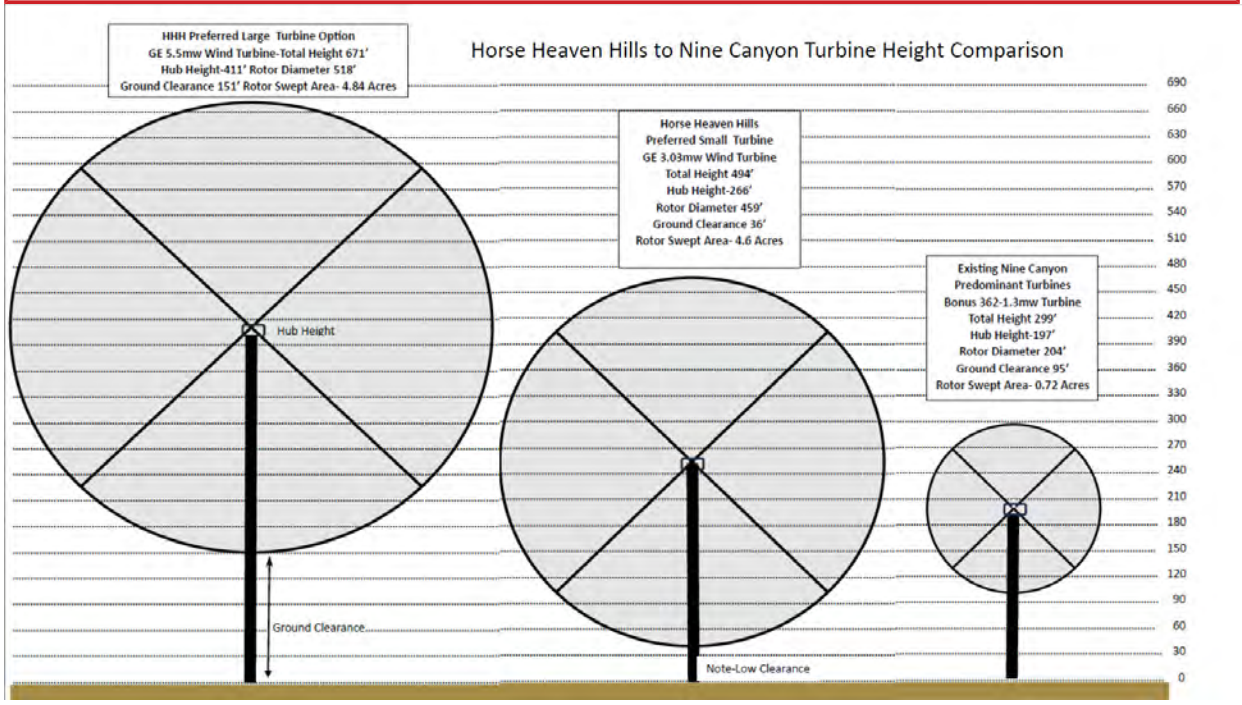
PROJECT NO.	CONTROL	REV.	FIGURE
20450841	2000	0	3.2-6

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

Figure 3.2-6: Geologically Hazardous Areas within the Project Vicinity

From: Paul Krupin
To: EFSEC mi Comments
Cc: Greene, Sean (EFSEC); Bumpus, Sonja (EFSEC)
Subject: Height and Dimensions of Proposed Horse Heaven Hills Turbines compared to Nine Canyon Turbines - Graphic
Date: Wednesday, April 10, 2024 8:46:36 PM
Attachments: image001.png
HHH to NC Turbine Height Comparison.pdf

External Email



Prepared by Dave Sharp.

Appreciatively,

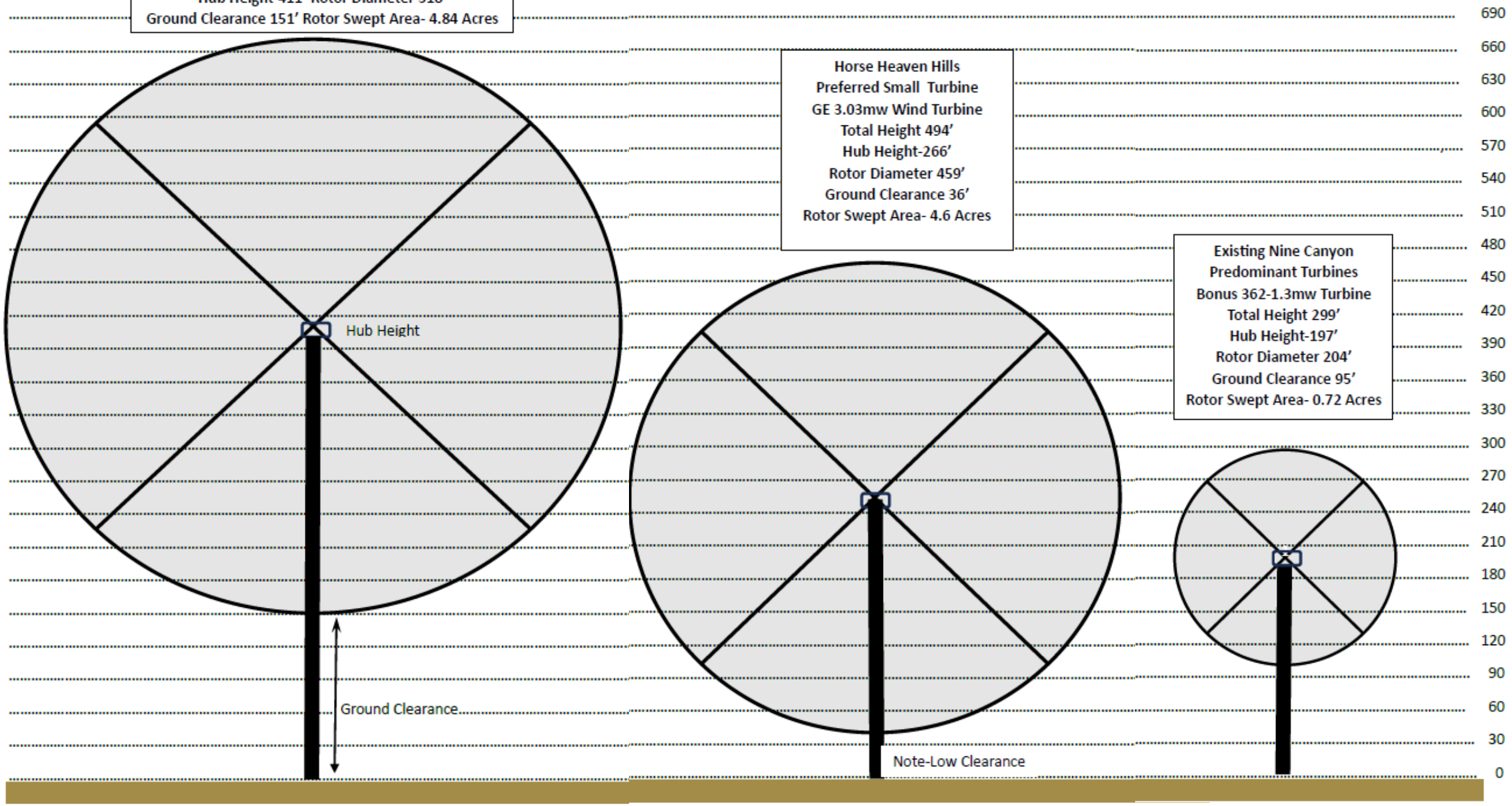
Paul J. Krupin, BA, MS, JD
Board Member on behalf of TRI-CITIES C.A.R.E.S
Visit: http://www.TriCitiesCARES.org
509-531-8390 cell 509-582-5174 landline Paul@Presari.com

Horse Heaven Hills to Nine Canyon Turbine Height Comparison

HHH Preferred Large Turbine Option
GE 5.5mw Wind Turbine-Total Height 671'
Hub Height-411' Rotor Diameter 518'
Ground Clearance 151' Rotor Swept Area- 4.84 Acres

Horse Heaven Hills
Preferred Small Turbine
GE 3.03mw Wind Turbine
Total Height 494'
Hub Height-266'
Rotor Diameter 459'
Ground Clearance 36'
Rotor Swept Area- 4.6 Acres

Existing Nine Canyon
Predominant Turbines
Bonus 362-1.3mw Turbine
Total Height 299'
Hub Height-197'
Rotor Diameter 204'
Ground Clearance 95'
Rotor Swept Area- 0.72 Acres



From:	Paul Krupin
To:	EFSEC mi Comments
Subject:	Horse Heaven Hills Draft SCSA and Recommendation - Comments - Bad Link Correction - attached
Date:	Thursday, April 11, 2024 12:17:37 PM
Attachments:	PJK Comments on DSCA and Recommendation 041124 corrected 12 pm.pdf

External Email

The document I uploaded and also sent to you by email yesterday at 5:45 to 5:50 PM had a bad hyperlink to the Google Earth GIS Model.

The hyperlink link has been corrected in the attached file containing the right Instructions.

Please replace the file you have with the new file attached.

Appreciatively,

Paul J. Krupin, BA, MS, JD
Board Member on behalf of TRI-CITIES C.A.R.E.S
Visit: http://www.TriCitiesCARES.org
509-531-8390 cell 509-582-5174 landline Paul@Presari.com

Comments on the Draft Recommendation to the Governor and the Draft Site Certification Agreement

Paul J. Krupin, Board Member Tri-Cities CARES

Issue: Technical and substantive compliance comments provided by Benton County.

Comment. We are in agreement with and support the comments submitted to EFSEC by Benton County on April 9, 2024. The Report and SCA should be revised to make the requested changes. It would make the documents much better.

Issue: The Report and Draft SCA do not clearly and adequately explain how the project complies with all the applicable provisions of RCW 80.50. and the associated WAC regulations.

While WAC 463-60-021 Council recognizes that the applicant does not need to demonstrate the need for energy facilities. The Report and the DSCA need to be revised to include the key remainder of the WAC & RCW requirements. The Council must carefully explain the how they consider the evidence in the record and demonstrate how they seek a balance between the need for clean energy at a reasonable cost and the need to ensure that the location of energy facilities will produce minimal adverse effects on the environment.

Comment: Revise the Report and the DSCA to remove the ambiguity and uncertainty in these documents so that they properly recognize and apply the applicable requirements in the RCW 80.50 010 (1) to (5) and associate implementing regulations in the Washington administrative code

> “Such action will be based on these premises:
>
> (1) To assure Washington state citizens that, where applicable, operational safeguards are at least as stringent as the criteria established by the federal government and are technically sufficient for their welfare and protection.
>
> (2) To preserve and protect the quality of the environment; to enhance the public's opportunity to enjoy the esthetic and recreational benefits of the air, water and land resources; to promote air cleanliness; to pursue beneficial changes in the environment; and to promote environmental justice for overburdened communities.

(3) To encourage the development and integration of clean energy sources.

(4) To provide abundant clean energy at reasonable cost.

(5) To avoid costs of complete site restoration and demolition of improvements and infrastructure at unfinished nuclear energy sites, and to use unfinished nuclear energy facilities for public uses, including economic development, under the regulatory and management control of local governments and port districts."

Issue: The Draft Recommendation on Page 9 lists only 3 restrictions on the facility as described in the final ASC. Appendix 2 is not provided in the DSCA.

There is great uncertainty and confusion in both the Report and the DSCA regarding which turbines, micrositing corridors, and other project components are being approved and which are not.

Although the decision document rely on and reference the FEIS Maps, the quality of the maps in the FEIS Option 1 and Option 2 is poor. It is very difficult to see which turbines are classified and where they really are. In addition, there is no corresponding list of turbines and other components identifying what is allowed under the SCA construction for Options 1 (the 499 ft turbines) and Option 2 (the 671 ft turbines).

Comment: Revise the Report and SCA to specify the turbines authorized under both Option 1 and Option 2.

Issue: Section IV of the Report - Applying the Statutory Standard to the Information Presented offers a less than adequate explanation and justification of the reasons why the project should be approved including the elimination of project elements from portions of the proposed project. The Report and ASC do not provide a rational basis for the removal and identification of turbine locations as a basis for removal from the project.

There is a significant lack of clarity and great uncertainty in the Report and the SCA regarding why and how wind turbines, micrositing corridors and other project components are classified into the four impact classes on the referenced FEIS Option 1 and Option 2 maps.

Comment: Revise the Report and SCA to include and reference to a table that identifies the factors that result in the classification of turbines into each of the four impact classes

- Class 0 Green – lowest impact
- Class 1 Yellow - Impacts One Resource
- Class 2 Orange - Impacts two resources
- Class 3 Red – Highest Impact - three or more impacts.

The list of factors to be identified includes wildlife resources (ferruginous hawk and migration corridors), cultural resources, visual impacts, aerial firefighting needs, recreation, fugitive dust and other significant negative impact factors that are identified in the FEIS.

This needs to be done for both Option 1 and Option 2

Appendix 2 must be finalized and provided for public review before the Recommendation is sent to the Governor. The Recommendation and the DASC must accurately state the numbers of turbines allowed.

Issue: on Page 14 of the Report discussion of Mitigation measures and the SCA do not include "micrositing corridors" on the lists of project components that are not allowed under Mitigations including, HAB-1 and other mitigations for other resources.

In spite of the details provided in the Section IV, especially on the rationale given for the mitigations for the ferruginous hawk, wildlife corridors, cultural resources, and vegetation, there is still great uncertainty and confusion regarding where specific mitigations will be applied. The decision documents should be revised to clarify these uncertainties and be consistent.

Comment: Revise the Report and ASC to include a discussion and a table listing the types of project components prohibited under each Mitigation and the four impact classes.

Issue: There is a lack of clarity and consistency between the Report and the ASC

The statement that the SCA authorizes up to 222 turbines ignores that removal and elimination of wind turbines in Class 3. The Report and ASC do not presently allow anyone to know what this project really contains. It places the actual decisions on the locations of turbines, micrositing corridors and other project components into the future under the plans and submissions listed in Article IV and dramatically weakens the enforceability of anything in the final SCA**.**

None of the SEPA documents contain a list of turbine numbers and GPS coordinates for any of the turbines listed in Option 2.

The Department of Defense Agreement covers only the smaller wind turbines under Option 1. The \DOD appears to require a new agreement for turbines proposed over 499 ft.

Comment: The Report and the SCA must be revised to accurately state the turbine number and the locations of turbines and other project components for both the Option 1 499 ft and Option 2 671 ft high turbines. Appendix 2 of the SCA must include an accurate list of project components to be approved.

Issue: There is great uncertainty in the acquisition and approval of Federal, State and Local Permits that must be obtained prior to commencement of construction.

The "ten-day notification" requirement in Section B on Page 18 of the Report is inadequate. Notification by itself, is inadequate given the risk of significant impacts to the environment.

The section is does not explicitly state what is required. It appears to leave permit approval in the hands of unidentified agencies and people. This section weakens the enforceability of the entire SCA.

Comment: Revise this provision in both the Report and SCA to state the following:

> **"The Applicant must demonstrate to the Council that all applicable Federal, State, and Local permits, not preempted by RCW 80.50.110 and 120, that are required for construction and operation of the Project, have been acquired and issued prior to the commencement of construction. Commencement of construction shall be initiated only with and after EFSEC approval."**

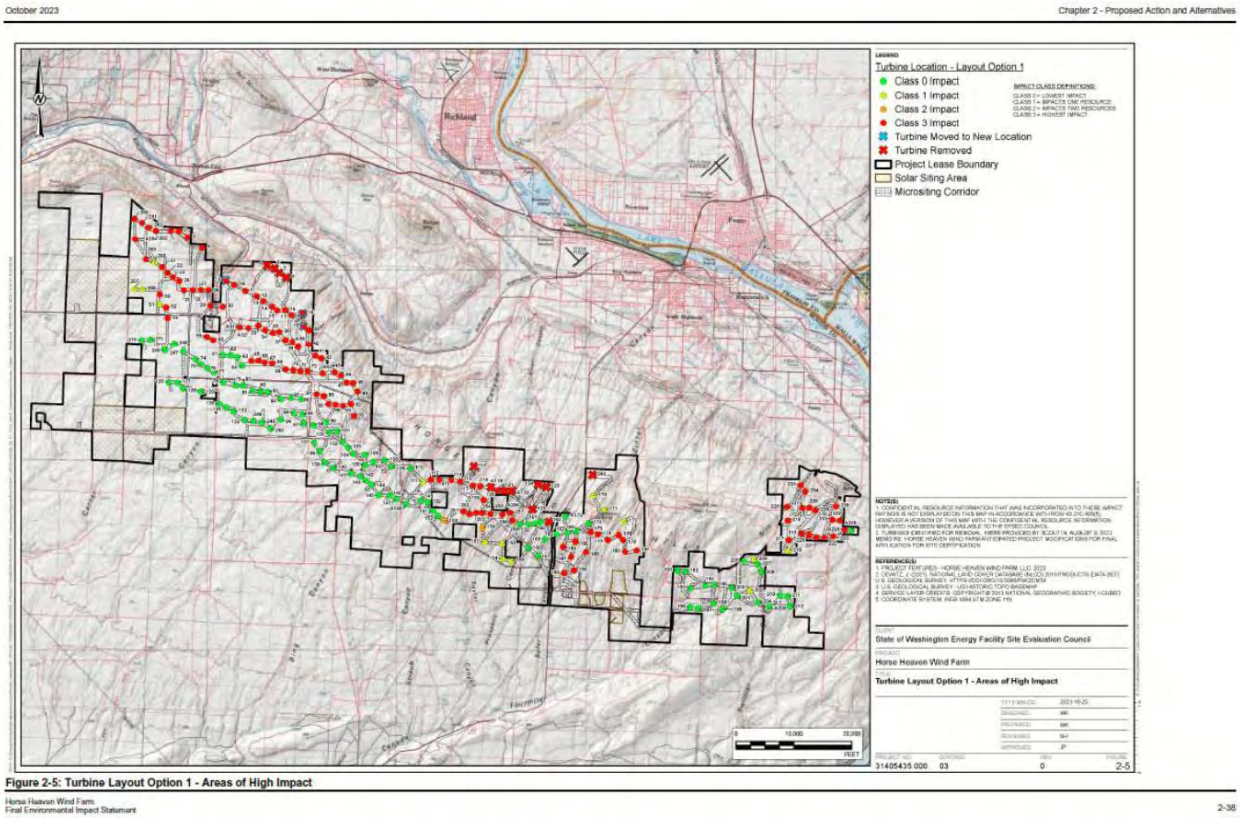
Issue: Aerial Firefighting is not adequately addressed The Report and ASC.

Although the Report states that aerial firefighting was recognized in the public comments, the SCA does not contain any recognition of the locations or turbine numbers must not be located to protect the aerial firefighting capabilities that are needed north of the project boundary. Aerial firefighting is not clearly identified as a factor that was utilized in the Option 1 and Option 2 Class determinations.

Comment: The Report and ASC need to expressly identify th threat from wildland fires and the mitigations that are needed to address these hazards.

Issue: About 45 Turbines have been placed in the Class 0 (Green) – Low Impact category incorrectly. This also occurs with 11 Class 1 turbines and 3 Class 2 Turbines. The Class O designation fails to take Wildlife, Cultural Resources, Visual, and aerial firefighting into account. These 45 turbines must be reclassified as Class 3 (Red) – Highest Impact, due to 3 or more significant impacts. The Option 2 Map does not correlate to any known turbine list and GPS Coordinates.

The Report and ASC refer to and rely on the FEIS Option 1 and Option 2 Maps.



These maps are of such a small scale that it makes it nearly impossible to read the type in the legends or read the turbine numbers on the maps.

It makes it exceedingly difficult for anyone to reasonable determine the impact the proposed mitigations will have.

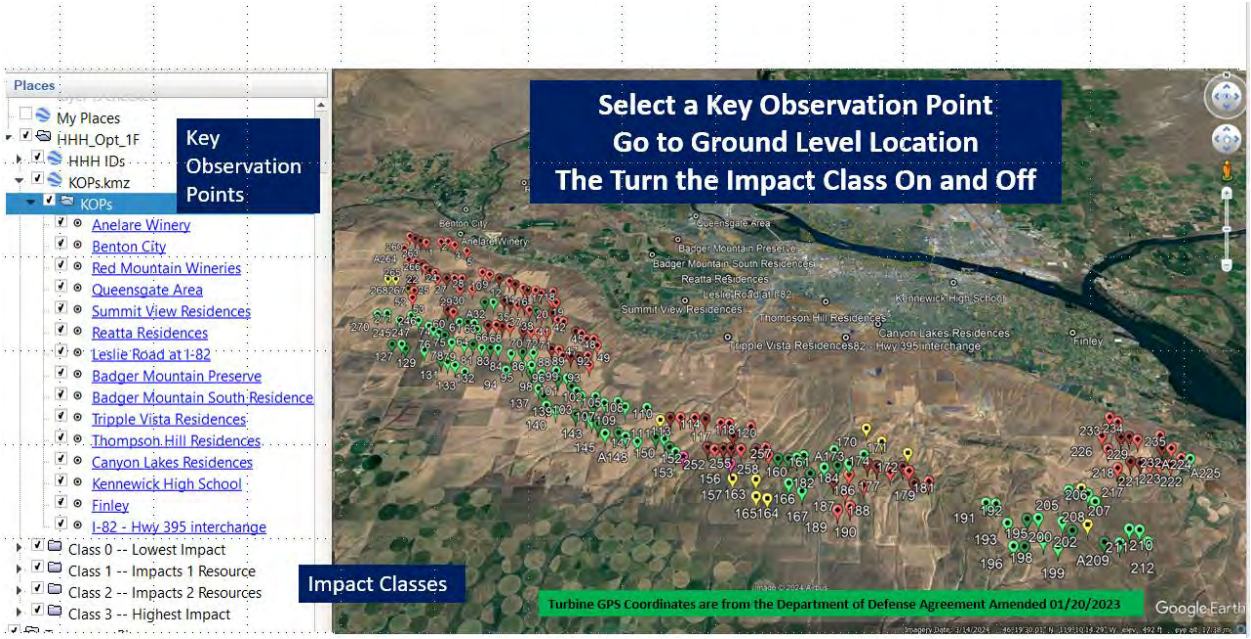
Comment: New maps should be developed and released for a timely public review before the Report & SCA goes to the Governor which show the turbine locations at the same scale for the 11 maps as was published in the draft HHH EIS and to some extent to the FEIS.

Issue: Visual Impacts were not taken into account adequately at several key residential communities and other locations in the Tri-Cities. Turbines were identified as Class 0, 1, or 2 improperly, The Report and SCA do not therefore identify the correct number of turbines as Class 3.

In order to evaluate the effects of the proposed Mitigations, Tri-Cities CARES and adjudication expert witness Dean Apostol enlisted the support of Dr. James F. Palmer.

On April 5, 2024, Dr. Palmer created a Google Earth Pro Interactive Geographic Model that can be used to develop visual images showing the effect the Council Mitigations have from the key observation points in Tri-Cities and referenced in the adjudication and FEIS. The model allows anyone to select and go to a key observation point and the turn the Class 3 Mitigations on and off. Dr. Palmer has made the model available for free. The Google Earth Program for the Horse Heaven Hills Project can be downloaded along with instructions using this link.

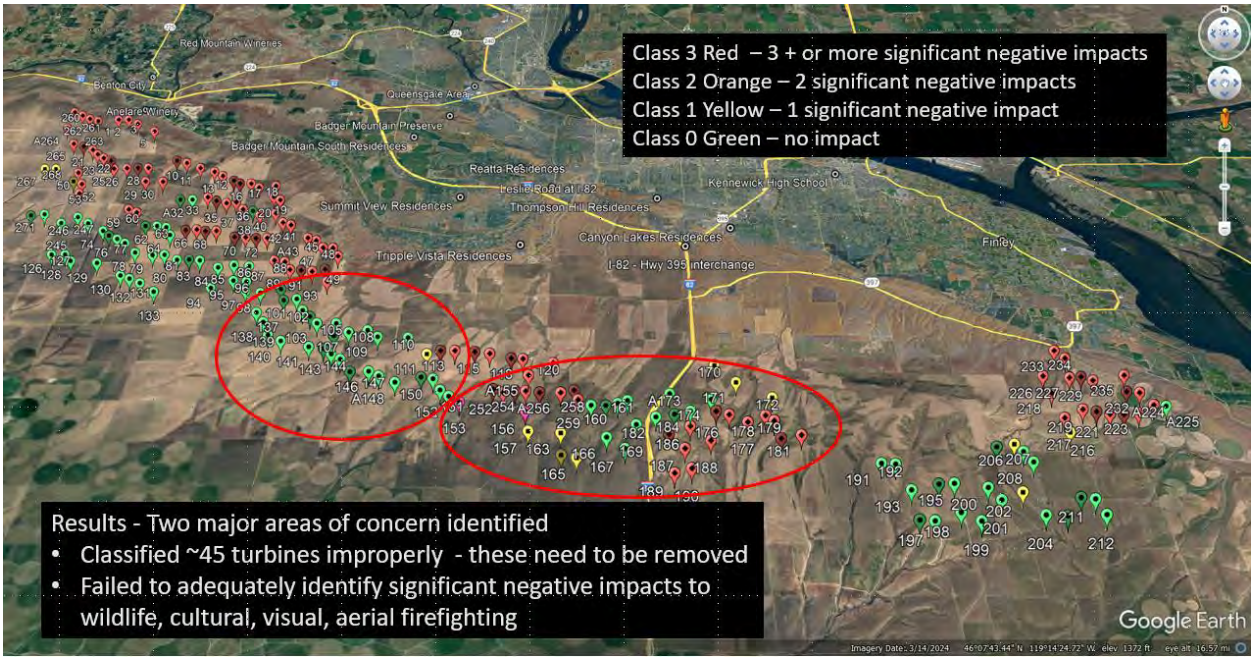
Google Earth Pro for the HHH Instructions & KMZ file or in the Appendix 1 to this submittal



Turbine GPS Coordinates are from the Department of Defense Agreement Amended 01/20/2023 found under Federal Facilities in the EFSEC website resources for the Project.

Issue: Council Mitigations are only effective in the western and easter sections of the project.

Two major areas of concern were identified with about 45 turbines improperly classifieds based on the FEIS analysis which failed to adequately identify significant negative impacts to wildlife, cultural, visual, aerial firefighting evenly across the project.



The images that follow are from Benton City, the Red Mountain Wineries, Badger Mountain Residences, Summit View Residences, Thompson Hill Residences and from KOP 5 Badger Mountain.

The first image shows the location of the KOP and the direction and view angle and width of the image.

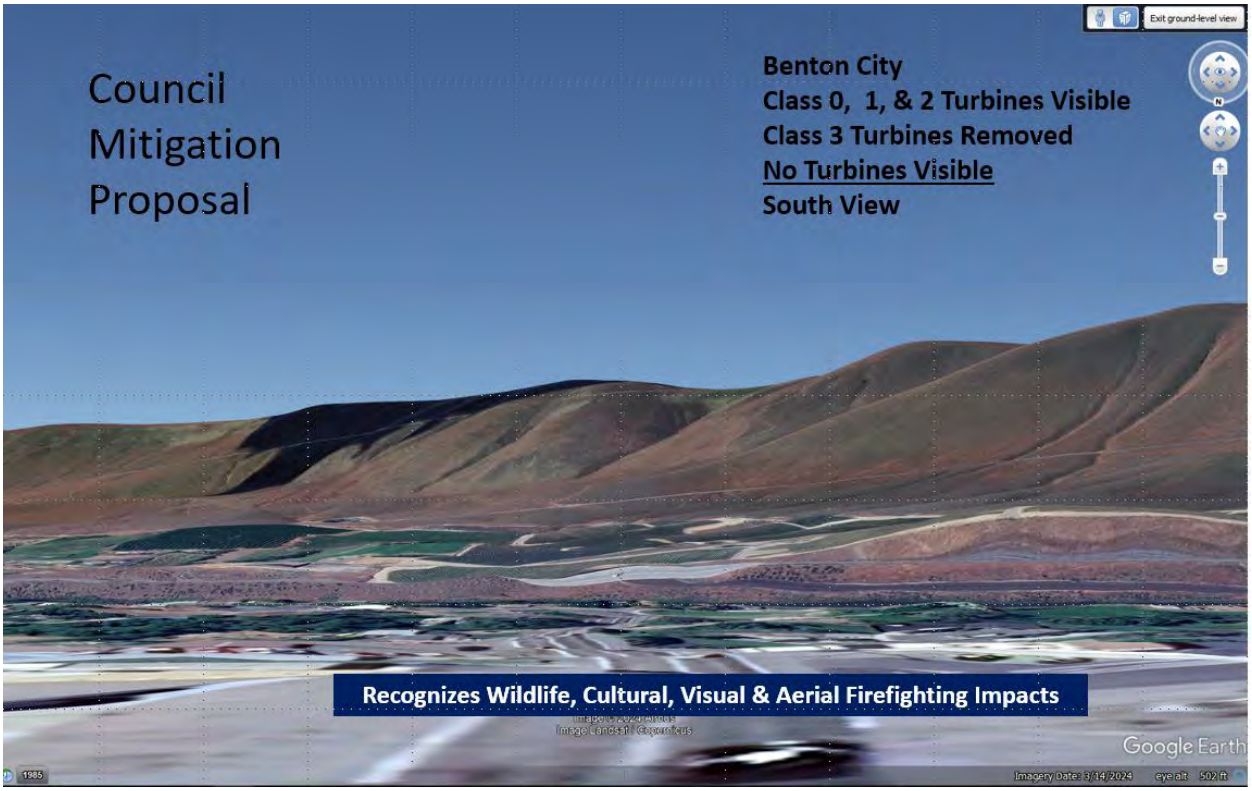
The images compare the Applicant Proposed Project, the Council Mitigation Proposed Project with the Class 3 Turbines turned off.

For the KOP's where visual problems still remain, there is a TCC Proposed Option, which removes the Class 0, 1, and 2 turbines to achieve the same level of mitigation.

Council Mitigation Adequate - Benton City

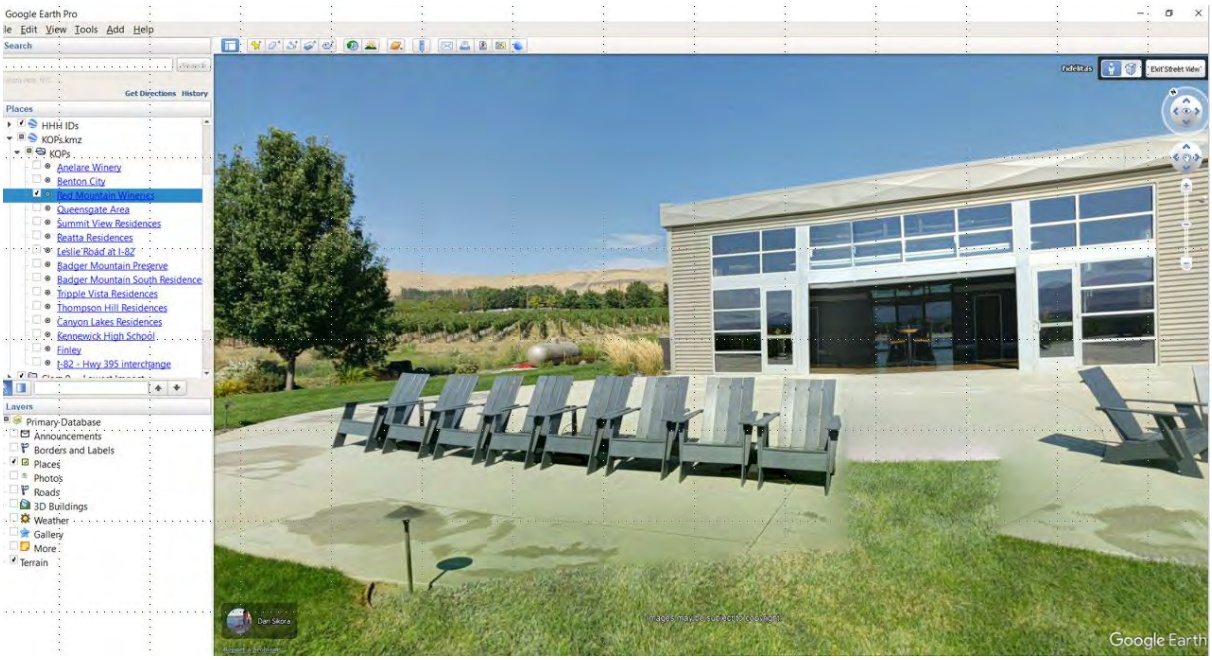

Benton City
Red Mountain Wineries
Benton City
Queensgate Area
Badger Mountain Preserve
Badger Mountain South Residences
Reatta Residences
Leslie Road at I-82
Summit View Residences
Tripple Vista Residences
I-82 - Hwy 3
Bruce Mechanical Inc
Harvest Hei
Google Earth

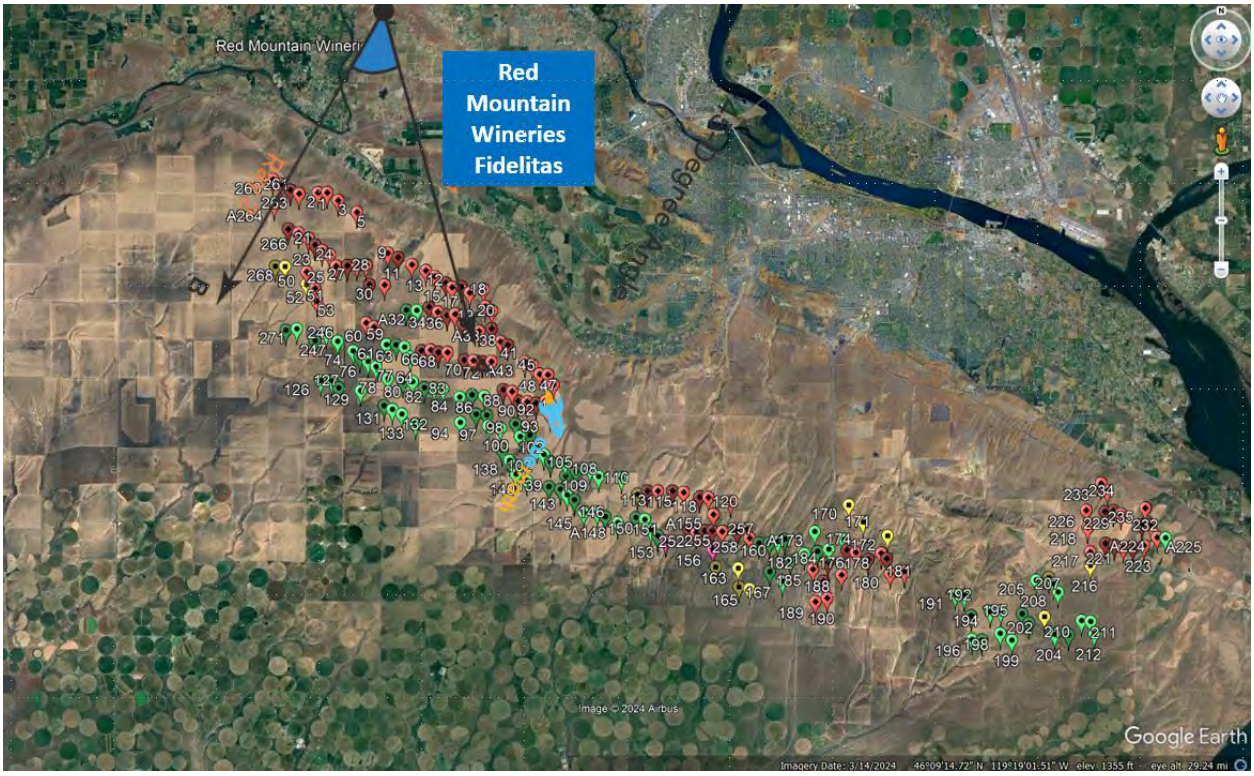

Applicant
Proposal
Benton City
Class 0, 1, 2, & 3 Turbines Visible
No Turbines Removed
4 Turbines Visible
South View
Exit ground-level view
Google Earth

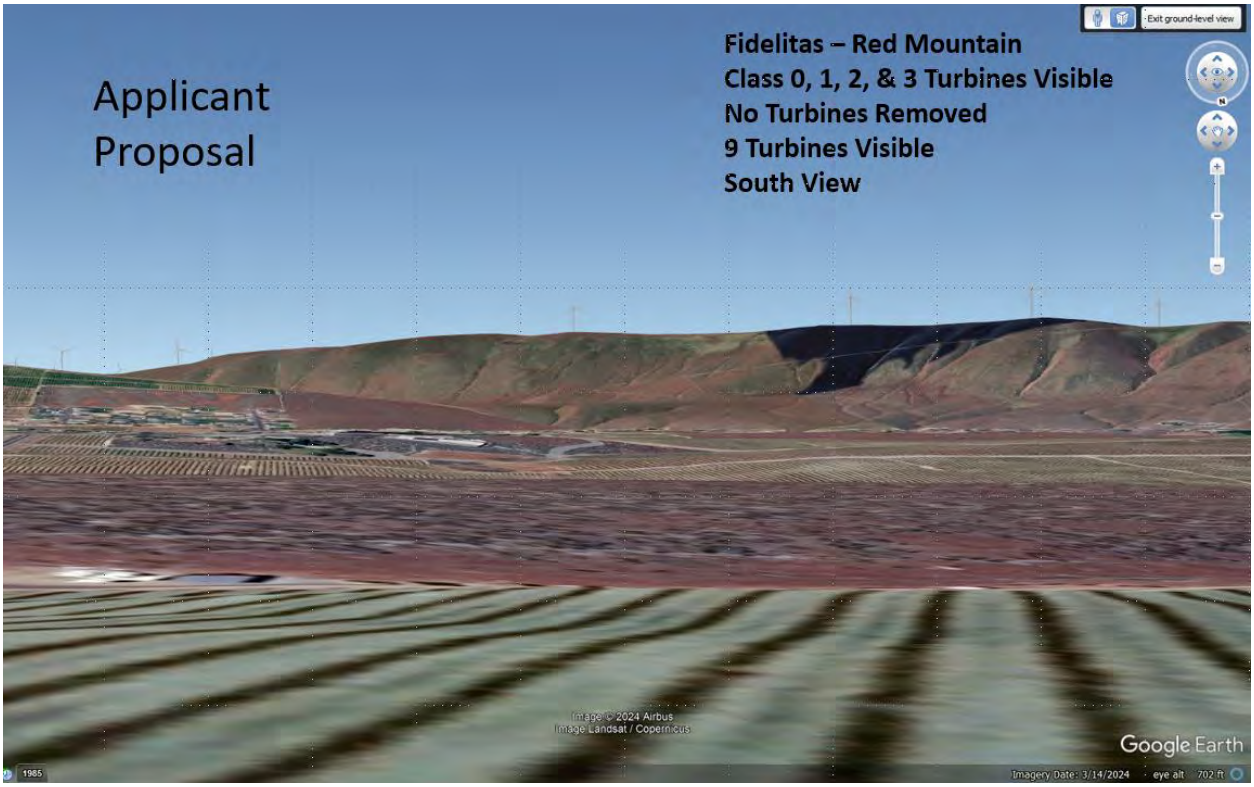


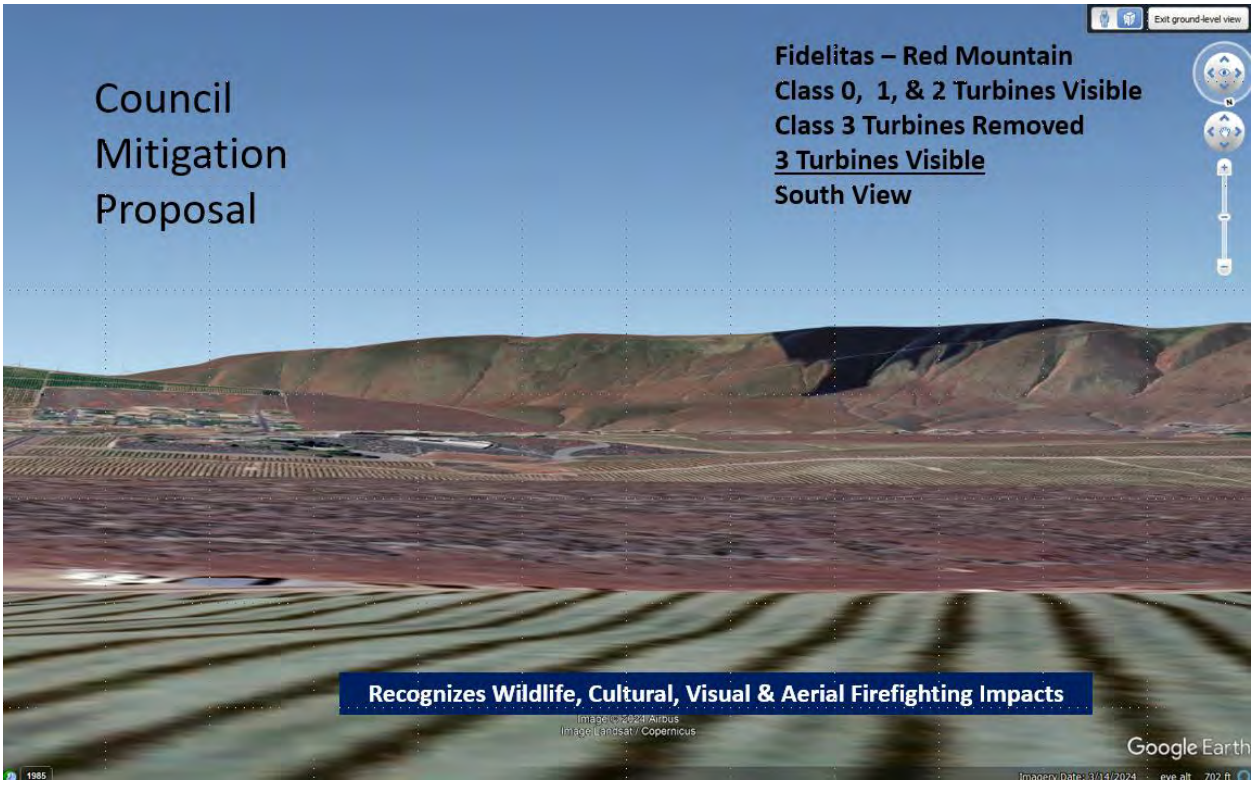
No action needed – the Council Mitigation recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Council Mitigation Adequate - the Red Mountain Wineries – Fidelitas (very near Col Solare)



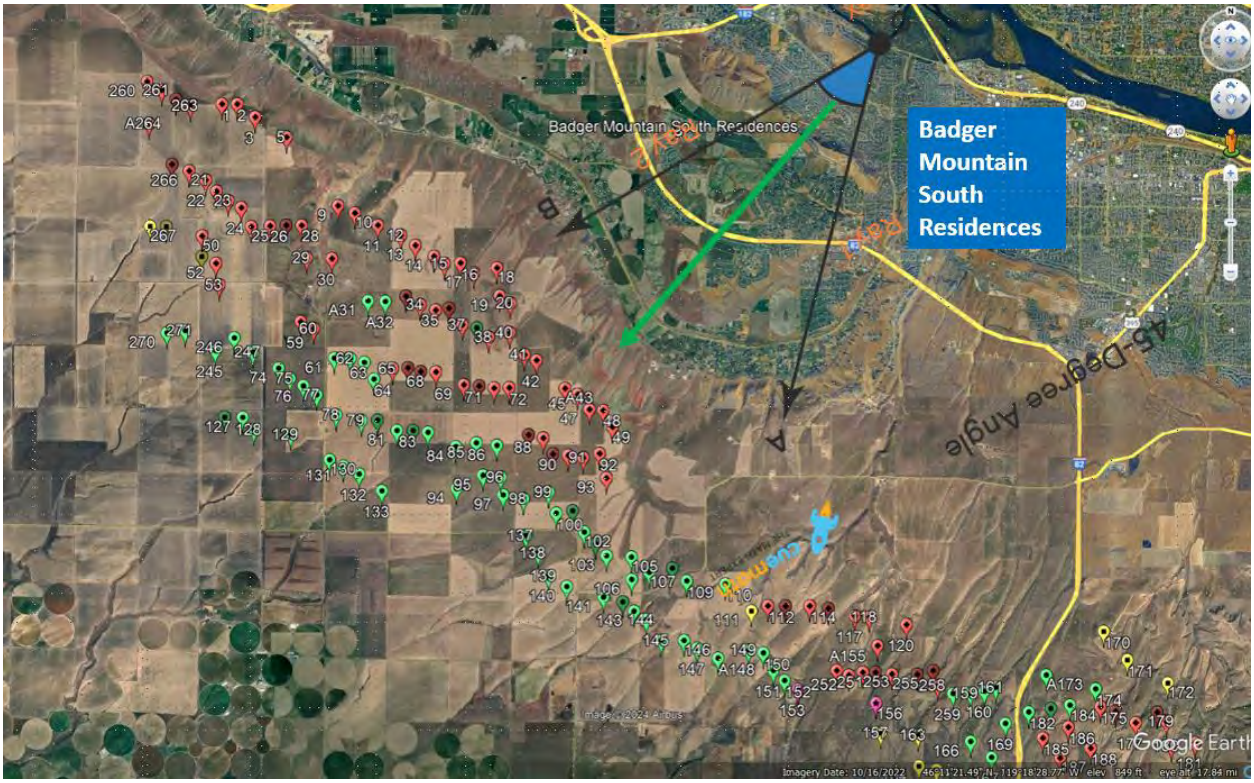

Red Mountain Wineries
Red Mountain Wineries Fidelitas
Image © 2024 Airbus
Google Earth
Imagery Date: 3/14/2024

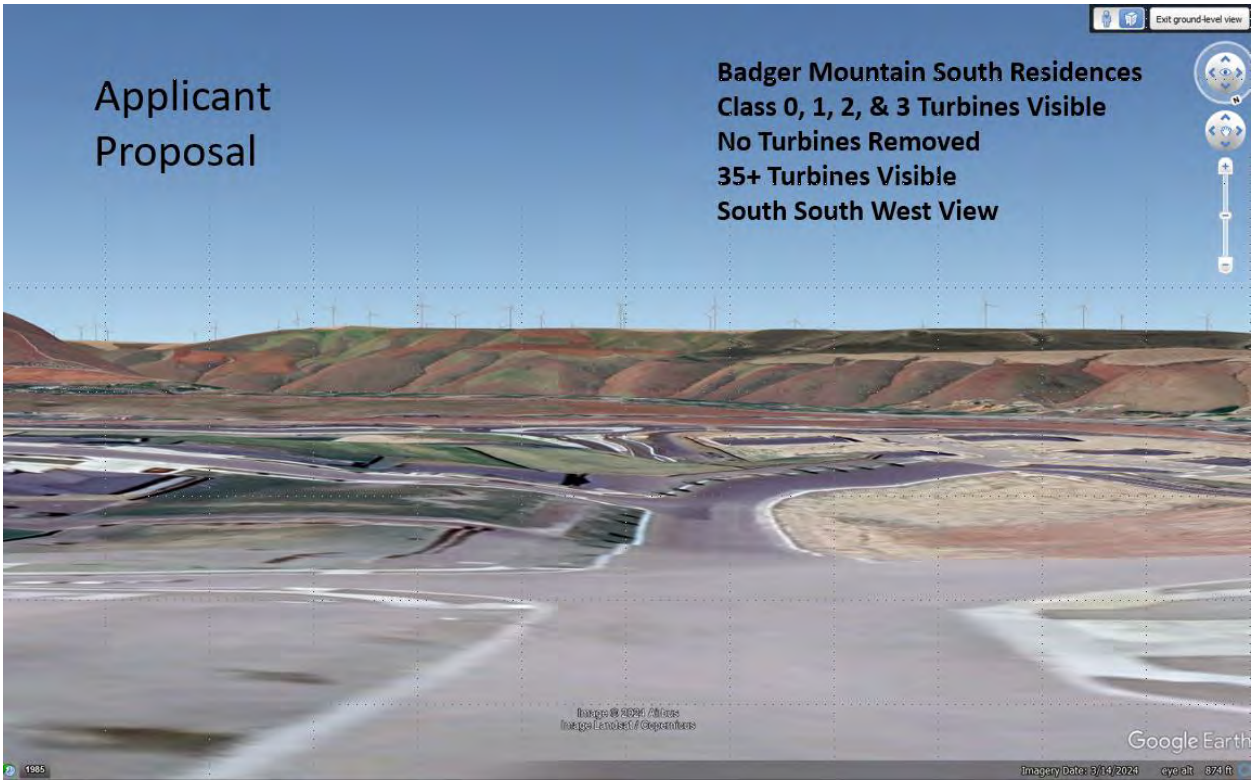

Applicant Proposal
Fidelitas – Red Mountain
Class 0, 1, 2, & 3 Turbines Visible
No Turbines Removed
9 Turbines Visible
South View
Exit ground-level view
Image © 2024 Airbus
Image Landsat / Copernicus
Google Earth
Imagery Date: 3/14/2024

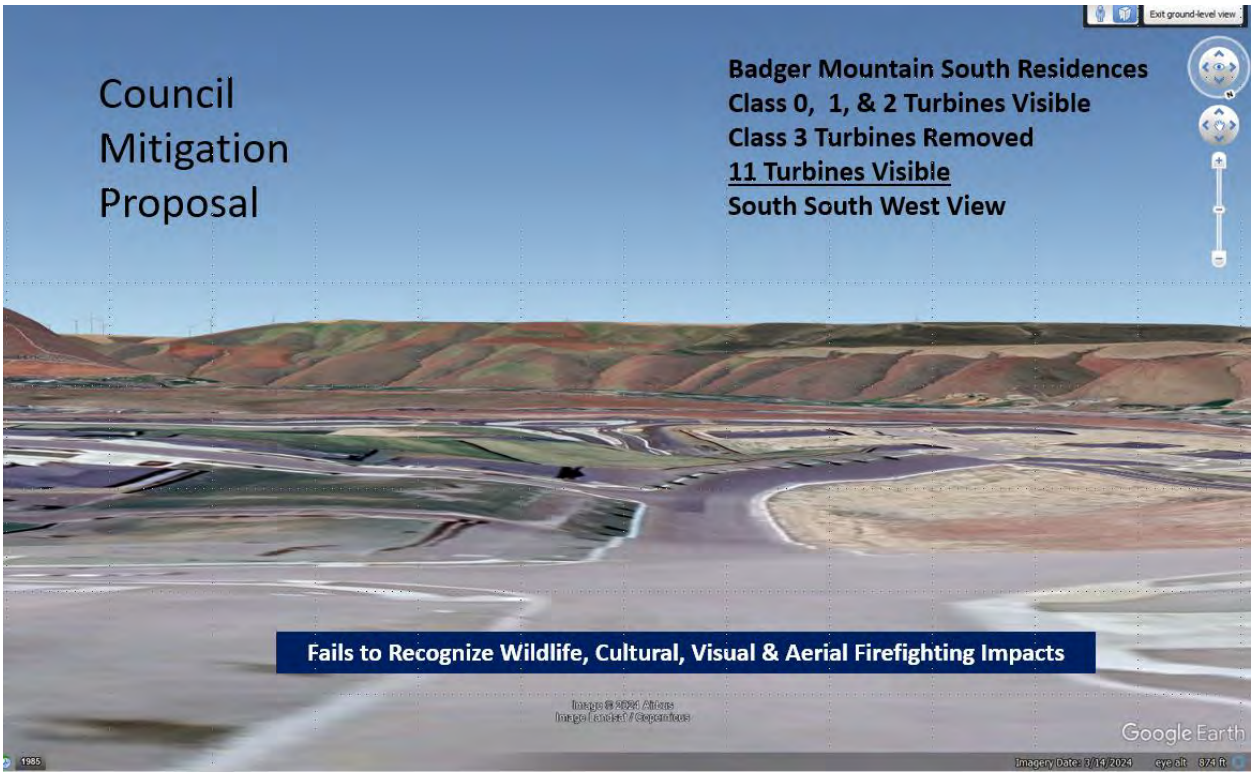


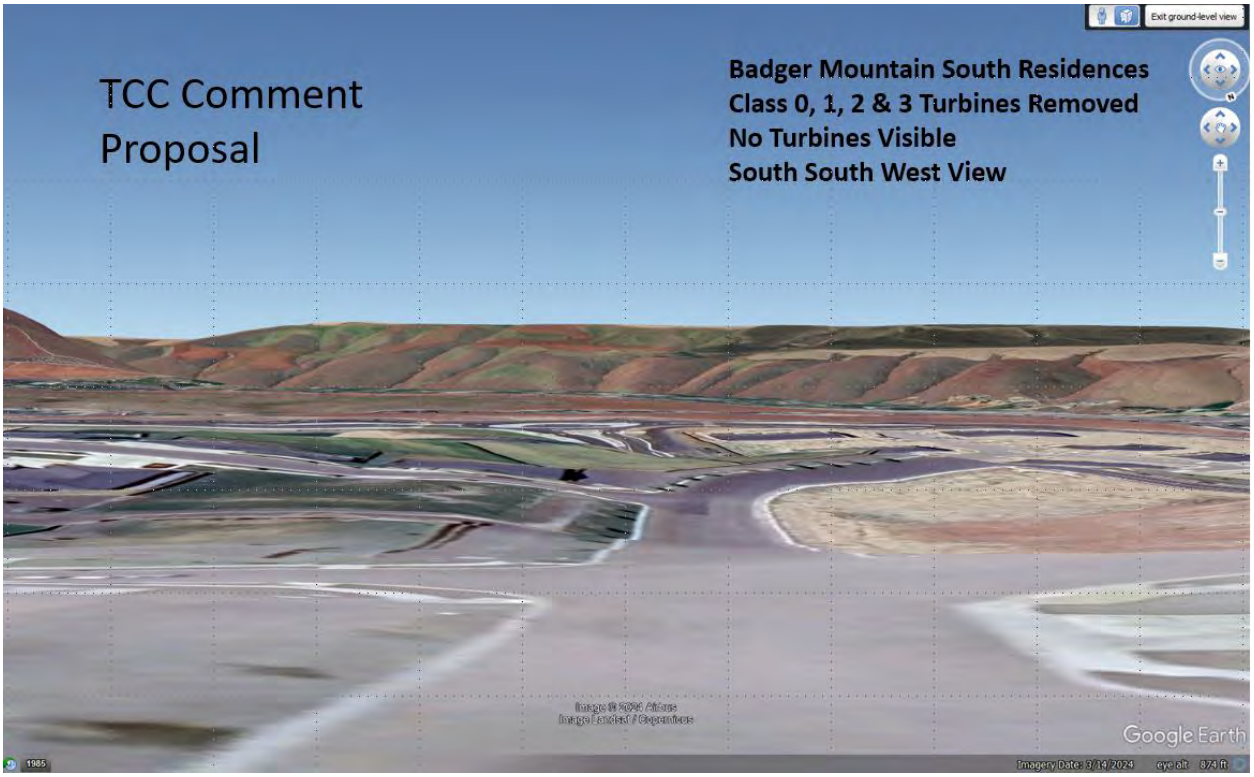
No action needed – the Council Mitigation recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Council Mitigation Inadequate – Turbine Class 3 Needed – Badger Mountain South


Badger Mountain South Residences
Badger Mountain South Residences
45-Degree Angle
Google Earth


Applicant Proposal
Badger Mountain South Residences
Class 0, 1, 2, & 3 Turbines Visible
No Turbines Removed
35+ Turbines Visible
South South West View
Exit ground-level view
Google Earth

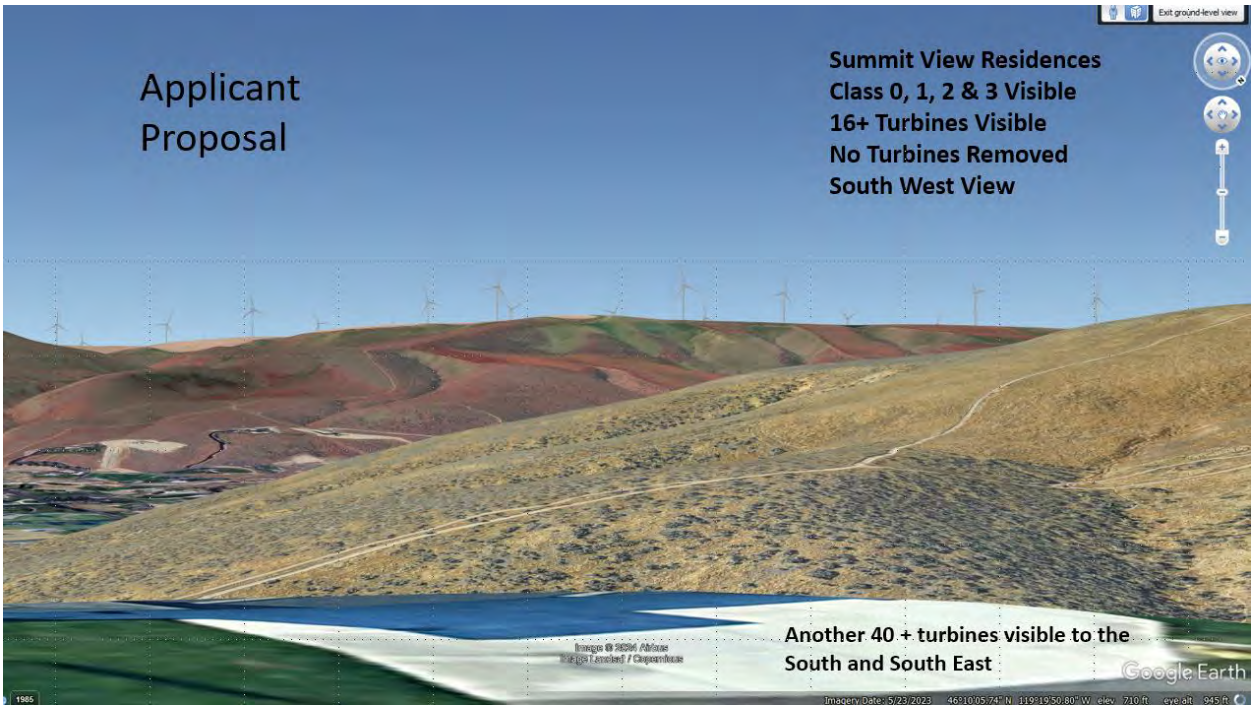


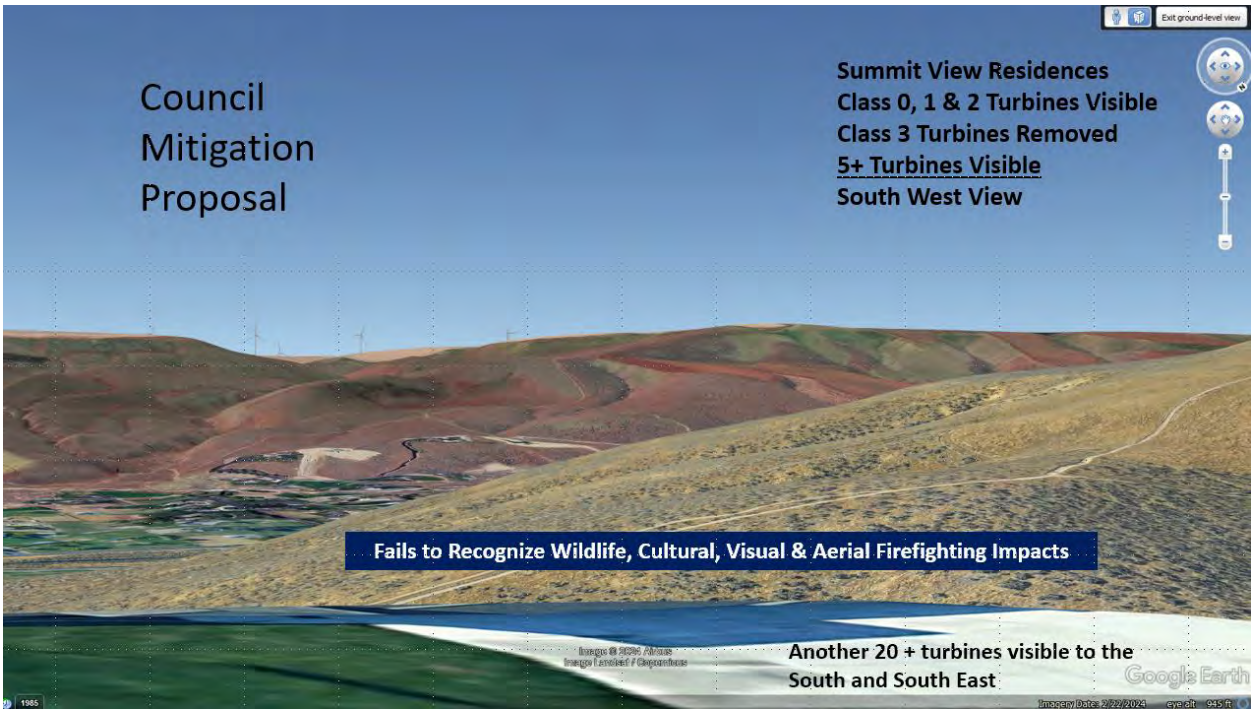


Action needed – the Council Mitigation fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Comment: Reclassify Class 0, 1 and 2 Turbines to Class 3.

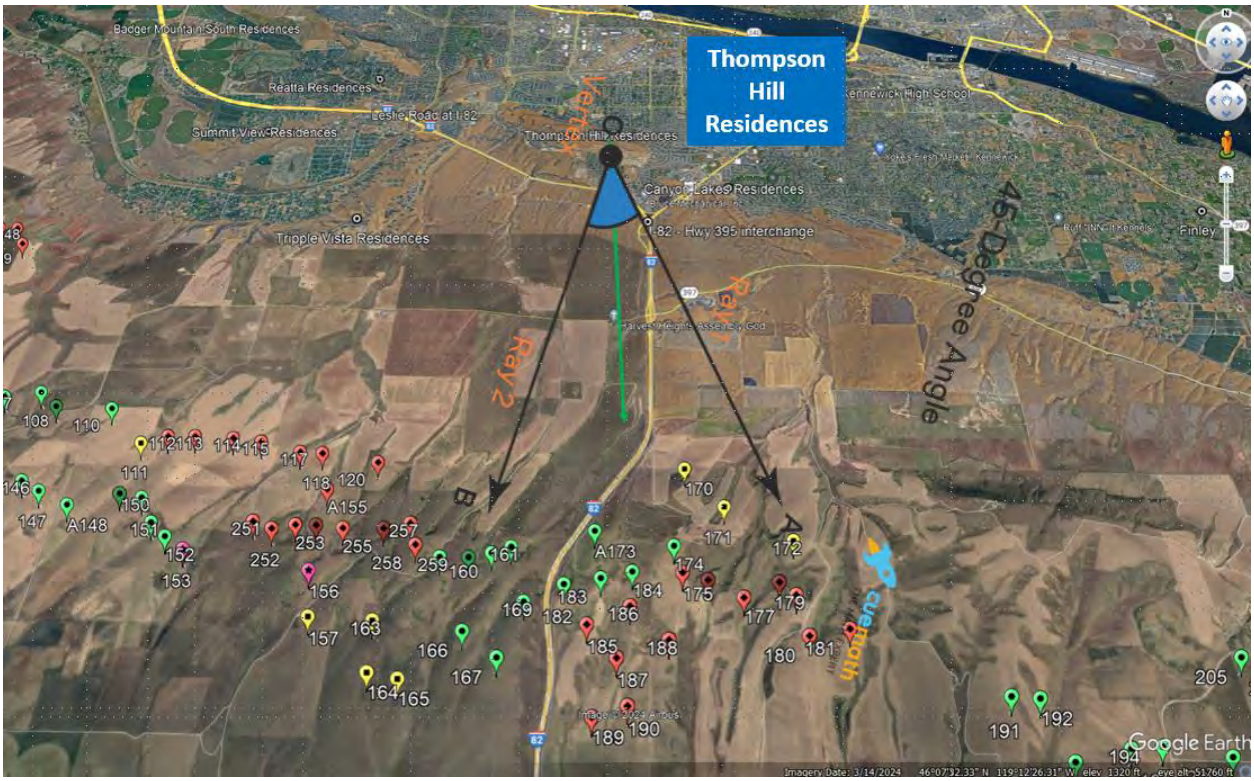
Summit View Residences

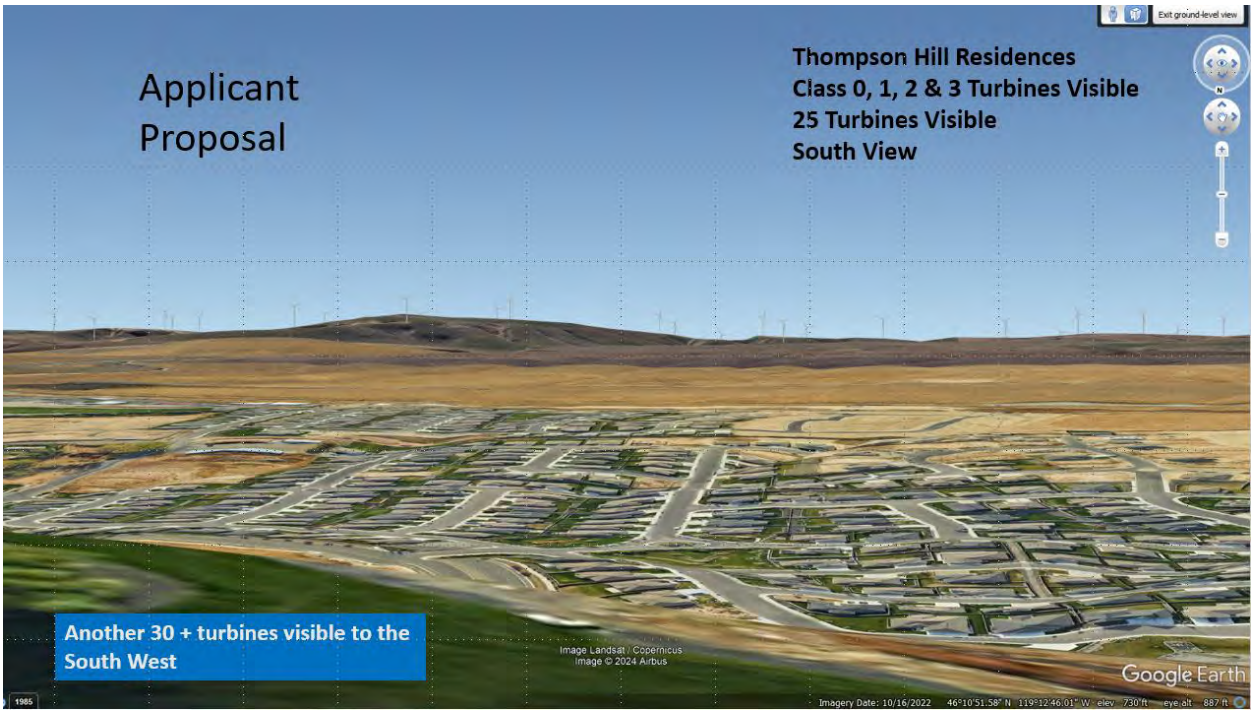


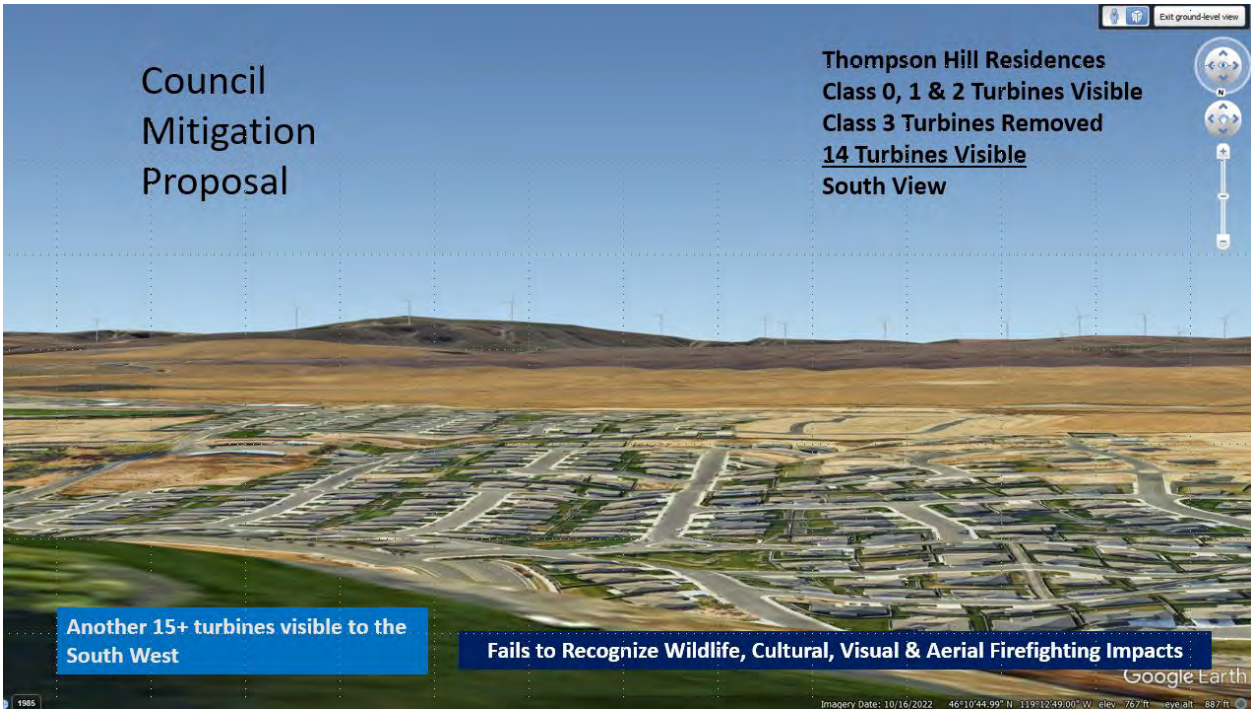


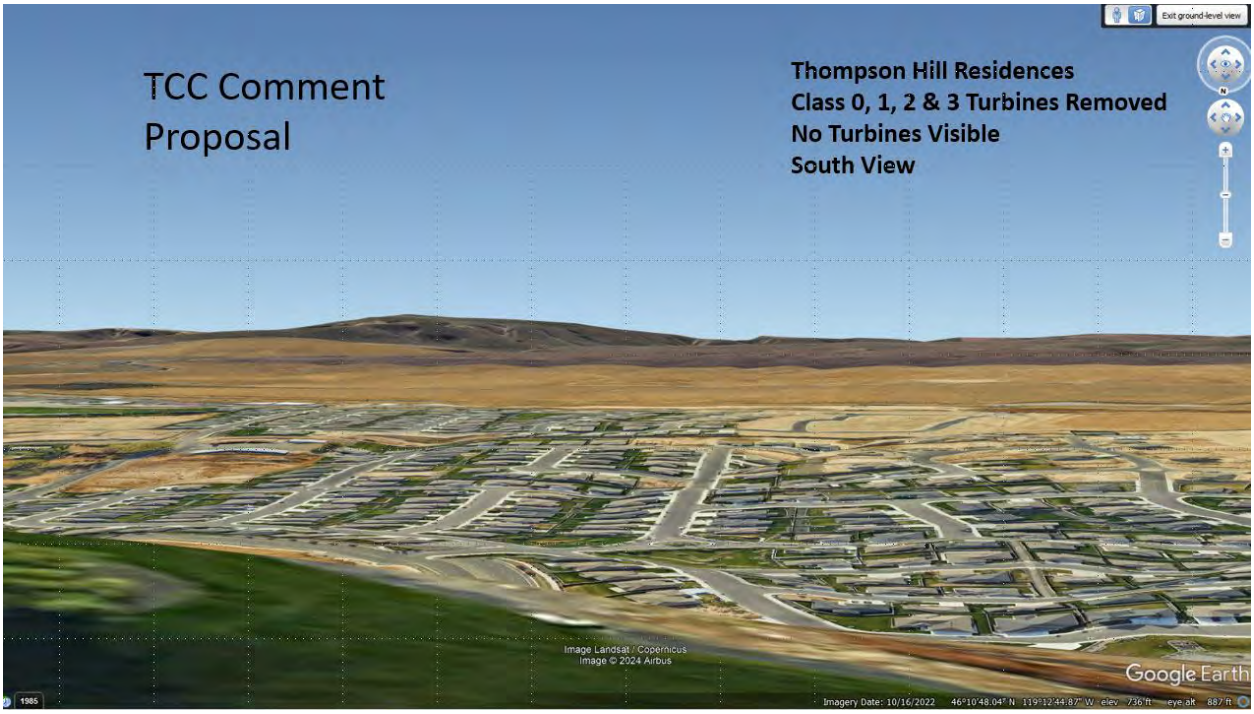
Action needed – the Council Mitigation fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

Comment: Reclassify Class 0, 1 and 2 Turbines to Class 3.


Thompson Hill Residences
Badger Mountain South Residences
Reatta Residences
Summit View Residences
Leslie Road at I-82
Tapteal Drive
Thompson Hill Residences
Canyon Lakes Residences
82 - Hwy 395 interchange
Tripple Vista Residences
Finley
45-Degree Angle
Ray1
Ray2
A
B
Google Earth


Applicant Proposal
Thompson Hill Residences
Class 0, 1, 2 & 3 Turbines Visible
25 Turbines Visible
South View
Another 30 + turbines visible to the South West
Google Earth

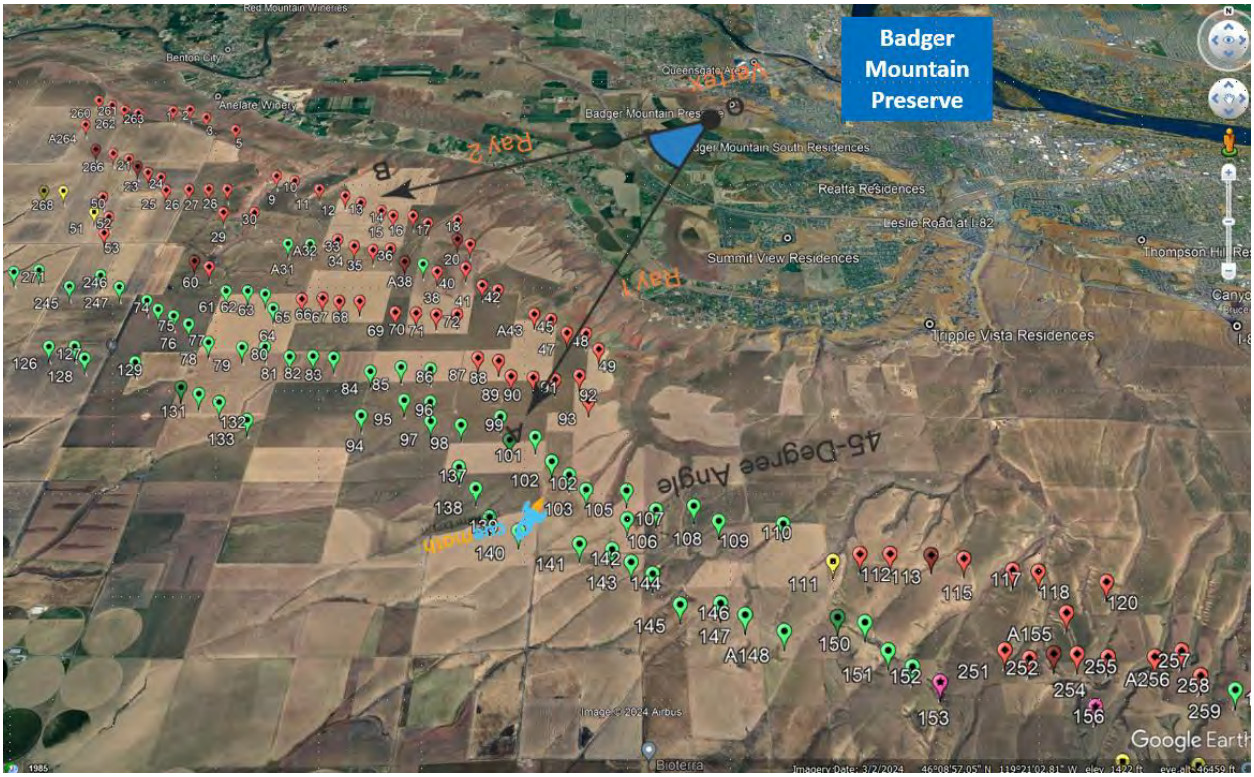


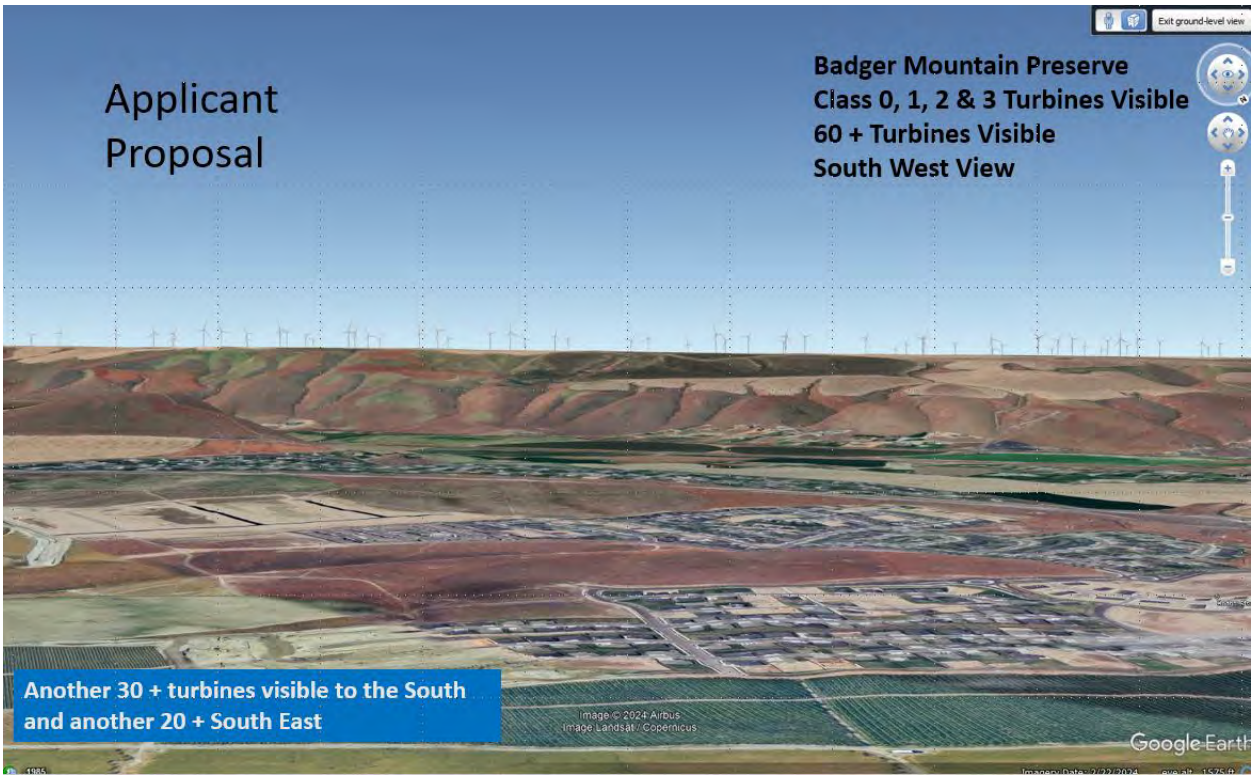


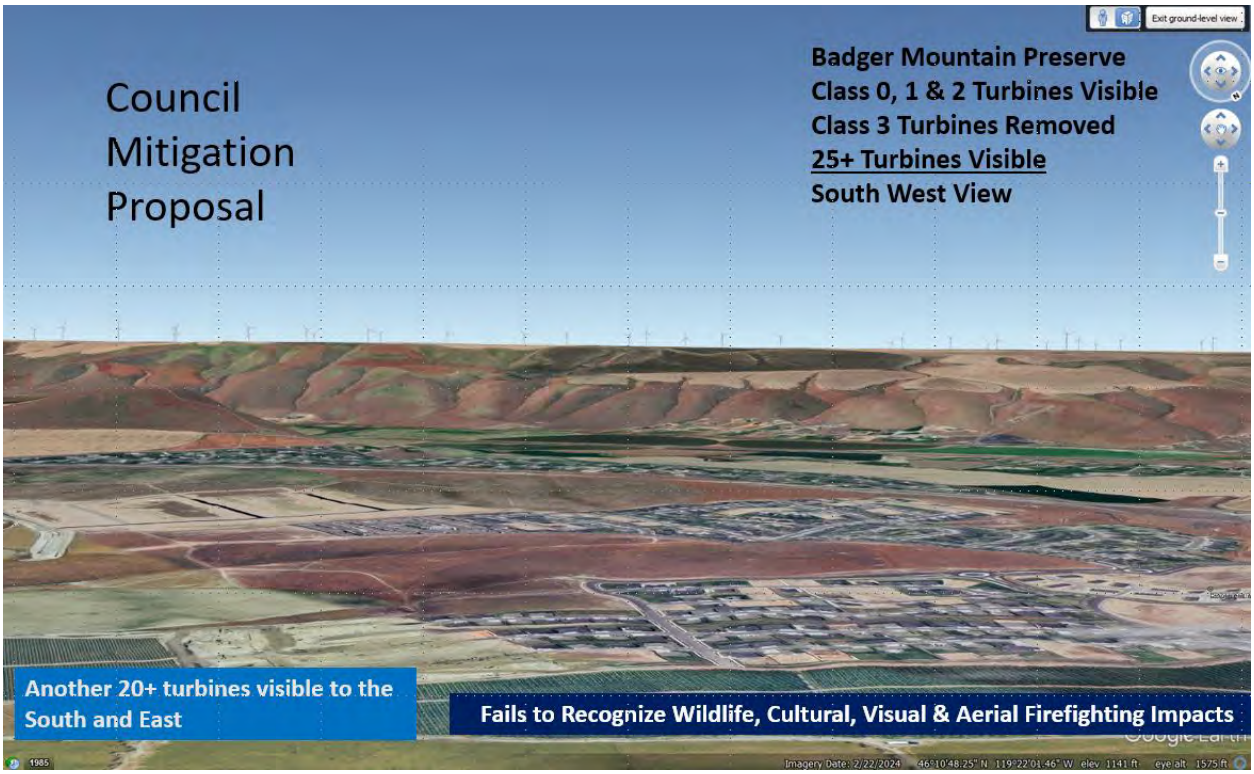
Action needed – the Council Mitigation fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts.

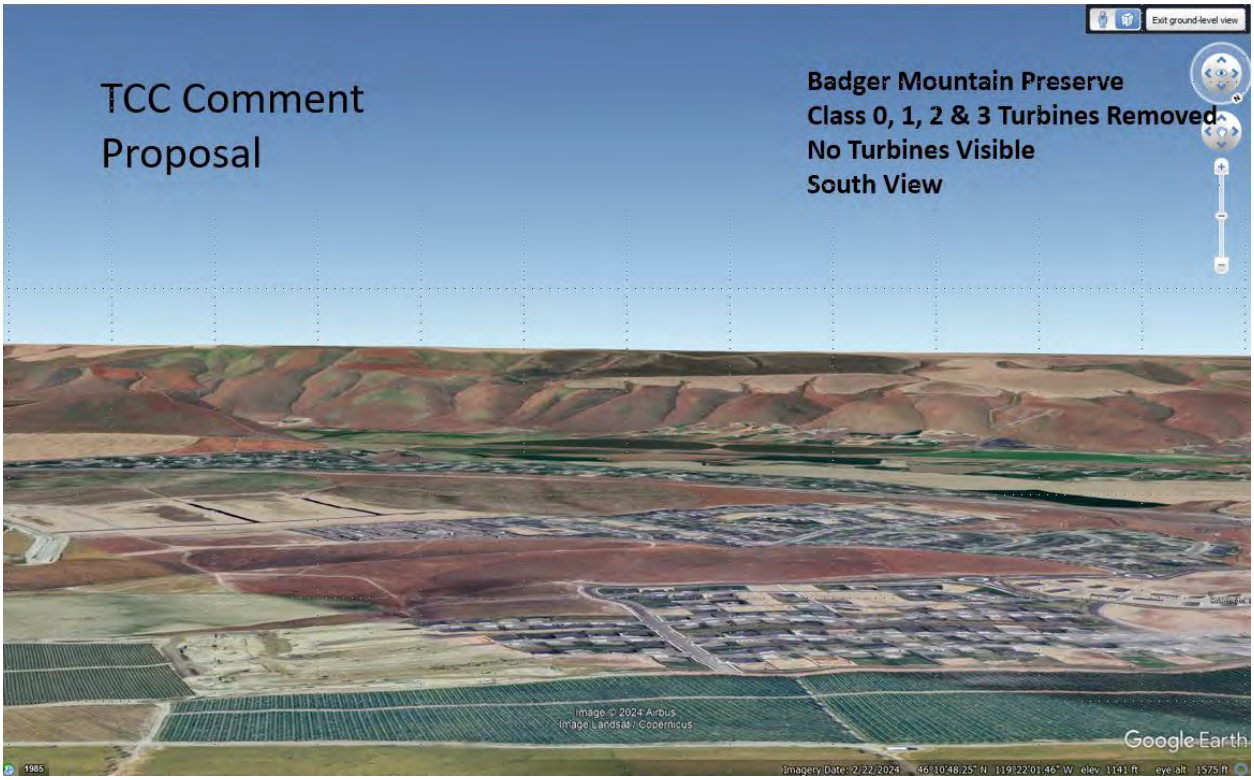
Comment: Reclassify Class 0, 1 and 2 Turbines to Class 3.

Badger Mountain Preserve





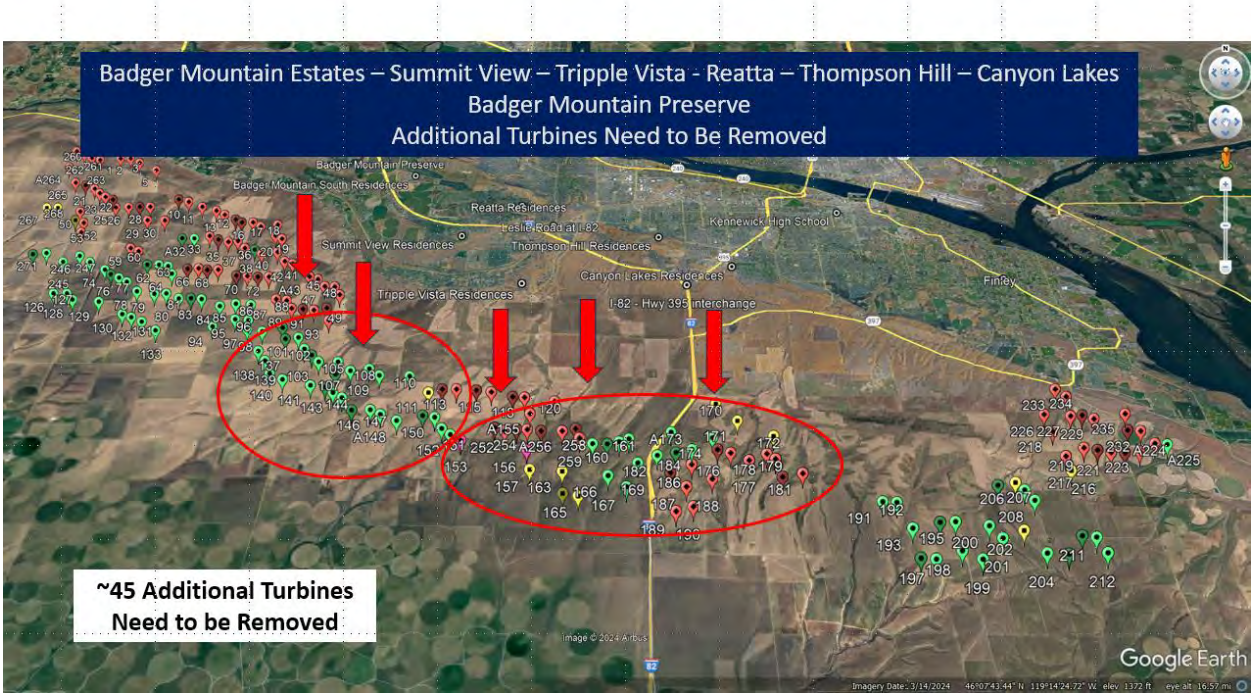

Council
Mitigation
Proposal
Badger Mountain Preserve
Class 0, 1 & 2 Turbines Visible
Class 3 Turbines Removed
25+ Turbines Visible
South West View
Another 20+ turbines visible to the South and East
Fails to Recognize Wildlife, Cultural, Visual & Aerial Firefighting Impacts


TCC Comment
Proposal
Badger Mountain Preserve
Class 0, 1, 2 & 3 Turbines Removed
No Turbines Visible
South View
Image © 2024 Airbus
Image Landsat / Copernicus
Google Earth

The Council Mitigation proposal fails to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts equally. Additional turbine removal is demonstrated to be needed to achieve uniform mitigation across the project.

Conclusions from the Google Pro Visuals Assessment

An estimated 45 additional turbines need to be reclassified from Class 0, 1 or 2 to Class 3. The Council Mitigation in the Report and SCA fail to recognizes Wildlife, Cultural, Visual and Aerial Firefighting Impacts. There are too many turbines that are still extremely visible to too many people in several residential communities in the Tri-Cities.



The images created presented using Google Earth Pro describe and illustrate the visual impact of the Proposed Council Mitigation. They compare the Applicants Proposal, the Council's Proposed Mitigation, and the TCC Proposal to identifies additional turbine removal needed to mitigate the proposed project equally across the site.

The Goole Earth computer model is conservative in that it makes the turbines look less visible and prominent than they will be in real life on the ground. The turbines are colored white. The model does not correctly portray either the tower width or the blade width, which are larger than presented.

While the turbines appear feint, the size and location are accurate based on the GPS coordinates and project turbine specifications for the 499 ft turbines.

It is important to recognize that the 671 ft turbines would be 172 feet higher that the 499 ft turbines presented in the present model and would be much more visible and prominent.

Comment: The Report and the SCA must be revised to adequately develop the rational scientific bases for classifying the turbines properly. This include the recognition of key observation points in several residential communities that were not evaluated by the Applicant in the SCA or in the DEIS or Final EIS by EFSEC.

Issue: The evaluation of the turbines is inadequate. The Report and SCA are vague and there are no accompanying analyses to substantiate the classifications of turbines presented on the maps. There is no turbine specific evaluation that identifies the significance of the negative impacts which justifies the Class 3 turbine removal decisions.

This table illustrates an example what this type of analysis could look like: Once a table like this was developed and validated the list of turbines in the right classes could be created and incorporated into the SCA Appendix 2 and referenced in the Report.

A more complete table contains an initial list of the turbines that should be reclassified from Class 0, 1, & 2 to Class 3 is provided in Appendix 2 (below).

ID	Class	Color	Wildlife	Cultural	Visual	Aerial Firefighting	Proper Class
91	3	Red	xx	xx	xx	xx	Class 3 Red 3+
93	3	Red	xx	xx	xx	xx	Class 3 Red 3+
98	0	Green	xx	xx	xx	xx	Class 3 Red 3+
99	0	Green	xx	xx	xx	xx	Class 3 Red 3+
100	0	Green	xx	xx	xx	xx	Class 3 Red 3+
101	0	Green	xx	xx	xx	xx	Class 3 Red 3+
102	0	Green	xx	xx	xx	xx	Class 3 Red 3+
102	0	Green	xx	xx	xx	xx	Class 3 Red 3+
103	0	Green	xx	xx	xx	xx	Class 3 Red 3+
105	0	Green	xx	xx	xx	xx	Class 3 Red 3+
106	0	Green	xx	xx	xx	xx	Class 3 Red 3+
107	0	Green	xx	xx	xx	xx	Class 3 Red 3+
108	0	Green	xx	xx	xx	xx	Class 3 Red 3+
109	0	Green	xx	xx	xx	xx	Class 3 Red 3+
110	0	Green	xx	xx	xx	xx	Class 3 Red 3+
137	0	Green	xx	xx	xx	xx	Class 3 Red 3+
138	0	Green	xx	xx	xx	xx	Class 3 Red 3+
139	0	Green	xx	xx	xx	xx	Class 3 Red 3+
140	0	Green	xx	xx	xx	xx	Class 3 Red 3+
141	0	Green	xx	xx	xx	xx	Class 3 Red 3+
142	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
144	0	Green	xx	xx	xx	xx	Class 3 Red 3+

Comment: The Report and SCA need to be revised to include a turbine specific analysis for wildlife resources, cultural, visual, aerial firefighting and other resources.

The references for the class reclassifications include:

Cultural resources and the confidential TCP information reviewed by the Council during the adjudication. The Council identified and considered a Mitigation proposal to eliminate all turbines east of Straub Canyon because of the resources identified there. The March 19, 2024 from Chairman Lewis ot EFSEC recognized that this proposed mitigation measure did meaningfully address some but not all of the Yakama Nation's concerns.

Aerial firefighting needs and issues are still poorly identified and are not evaluated adequately in the addressed in the Report and the ASC. The Department of Natural Resources classifies the entire area as a high fire hazard zone. Numerous bush fires are documented in the project area.

The Council's was very thoughtful as regards the evaluation of the Ferruginous Hawk. However, it did not apply the recognition and the same level of analysis of the impacts the hawk nests and other significant negative facts to the other portions of the project equally.

The Council should conduct an even-handed analysis and evaluate all areas of the project equally using the same factors and analysis across all areas of the project. This will be the only way to adequately develop a rational scientific basis for the decisions that are being made.

Appendix 1

Instructions to Visualize Horse Heaven Hills Wind Farm

Introduction

When a wind farm is first proposed, the almost universal reaction by people living in the affected community is “What will it look like from my home?” If there is a visual impact assessment, it will contain photorealistic simulations from a few viewpoints selected by the developer’s consultants. However, these viewpoints are selected by the developer’s team and it is almost certain that none of them are from your home.

The goal of these instructions is to get you up and running on Google Earth Pro to visualize the Horse Haven Hills Wind Farm from your home. One big reason to use Google Earth is that it is that the software is totally free and will run on any PC, Mac or Linux computer. After completing the steps discussed here you may want to explore the view from other locations, as well as other features of Google Earth Pro.

You will be looking at the layout for Option 1. The only spatial information available to the public is a PDF of a map you can download at:

https://drive.google.com/file/d/1LAztIg_vdqAmMhnNGcRN1qkIygIWcTRt/view?usp=sharing

This PDF also includes the layout for Option 2 with fewer but taller turbines. We were unable to prepare a KMZ for this option.

These instructions refer to Horse Haven Hills Wind Farm as HHH and Google Earth Pro as GEO.

Step 1: Download and install Google Earth Pro

You need to open a web browser on your PC or Mac computer and go to:

https://www.google.com/earth/about/versions/#earth-pro

Select the “Download Earth Pro on desktop” box and then follow the instructions. This process should be straightforward—it is just like installing any other software. It will be installed where ever software is normally installed.

Once it is installed, you can open it by double clicking on it. GEO is a fun program. You can look a places all around the world, and even visit the moon and other planets.

Step 2: Download the Horse Haven Hills Wind Farm KMZ

The 3D model of HHH’s Option 1 wind turbines is called HHH_Opt_1.kmz, or KMZ for short. Click on this link and select Download:

https://drive.google.com/file/d/14-ZGS3nRxiJMLwaDg87hW_PY_6UPS_0X/view?usp=sharing

Put it away in a location that is easy for you to find on your computer—maybe create a folder for HHH Wind Farm on your desktop or in Documents and put it there.

Step 3: Open the HHH KMZ

Double click on the HHH_Opt_1.kmz file and it will open in GEO.

There will be a floating window over the aerial map with tips about Navigating Google Earth. I encourage you to spend a few minutes learning how to navigate GEO. Read the tips that are listed and click on the blue phrase, “Learn more about how to navigate Google Earth.” You can “Sign In” if you have a Google account (e.g., you use Gmail), but it is not necessary.

When you are ready to move on, close the floating window by clicking the Close button (leave the Show Tips at Start-up box checked). You can get the Start-up Tip and other instructions from the Help menu at any time. The more complete, though somewhat dated Google Earth User Guide is at: http://earth.google.com/intl/ar/userguide/v4/index.htm . In addition you can always Google for help with any questions you may have—there are lots of training videos and user advice on how to make the most of GEO.

There are reference notes at the end of these instructions that identify GEO's primary tools. Refer to these notes to understand the GEO terms used here.

In the Places Panel in upper left side of the GEO window there is a folder named HHH_Opt_1 that has all the 3D information. Select (highlight) HHH_Opt_1. In the File menu, put the cursor over Save and then select Save to My Places. Now when you start GEO next time HHH_Opt_1 will already be installed. Do not click on the KMZ file again or it will be loaded twice. To remove HHH_Opt_1 from GEO, right click on it and select Delete.

Click on the greater than symbol (>) to see its contents.

- ***The HHH IDs are the turbine numbers shown in the Option 1 layout. Click on the greater than symbols to open the folders. The labels are Placemarks that have been color coded to reflect the impact on the PDF map: green for lowest impact, red for highest impact, yellow for impact to one resource and pink for impact to 2 resources. All the labels are turned on, but you can turn them off by clicking on the blue check box.***
- ***The KOPs are the viewpoints used in the visual impact assessment. Double click on one to take you to an aerial view above the viewpoint. Position you mouse over a location and use the mouse's scroll wheel to move down to the ground.***
- ***Then there are four folders for the Impact Classes that contain the turbines. You can turn a whole impact class of turbines off or on by clicking on the blue box. If you open an impact class folder, the individual turbines are shown using the old ID numbers. You can turn individual turbines on and off too.***

If you click on an individual turbine in the map or HHH IDs, a pop-up window lists the ID, the old turbine name, the impact class from the PDF map, and the turbine's location and height to an upright blade tip.

Now you are ready to explore how the HHH wind turbines might appear from any location in the study area.

Step 4: View from Your Street.

We will start by seeing if the wind turbines will be visible from your home. In the Search panel of the Side Bar in the top left of the GEO window, type you home address and click Search. This will create a Placemark on the map and bring you to an aerial view of the address at an elevation a bit over 3,000 ft above the ground. Next we need to get down to a ground-level view.

Take the mouse cursor to the upper right side of the window and click-and-hold on the orange Pegman symbol. If the street in front or near your house turns blue, drag and drop Pegman's feet where you want the viewpoint to be. Viola! You are in Street View. At the bottom of the window is the date of the photograph, its latitude and longitude and elevation (ignore "eye alt"). The eye-level of all Street View photos is approximately 10 ft (3 m) or a bit higher than normal eye-level.

[There are alternate ways to get to a Ground View. You could simply click near the Placemark; keep clicking but not too fast, until you are at Ground View. Or you could hold the cursor/crosshairs over the location you want for a viewpoint and use the mouse scroll-wheel to get down to ground-level.]

Change to Terrain View by clicking on the building icon at the top of the Navigation Tools. Use the Look Around tool's left or right arrows to pan around the view while staying in place. (Do not use the up and down arrows or the Move Around tool yet.) Do you see any turbines? Pan until the largest turbine is in the center of the screen where it will be in proper scale.

If you do not see turbines, finish reading the instructions for this step and then go to the next step.

Expand the window to full screen size. Notice that the view stays the same—it is just larger. The view always defaults to approximately a 90º angle of view in both Terrain and Street View. The appropriate viewing distance for this view is half of its width, which is really close. If your eyes are that distance from the screen, the turbines will be appropriately scaled. Do not use the Zoom Tool because it changes the angle of view and then the appropriate viewing distance will be unknown.

Now move the mouse cursor to the upper right corner of the screen and switch back to Street View by clicking on the blueish Pegman icon. Check that the horizon in Street View matches the horizon in Terrain View by switching back and forth. As you switch back and forth, note whether the vegetation and buildings in Street View would screen the turbines visible in Terrain View.

While not perfect, this gives you a good sense of whether the turbines will be visible from this particular viewpoint.

Step 5: Moving Around to See Turbines.

The next question is how extensive are view of the turbine in your neighborhood. Use the Look Around tool to face a direction you want to move—or click-and-hold and swipe sideways to rotate the view. Move forward Street View by clicking on the forward or backward arrows, or to move forward faster, double-click on a location further down the road. Be patient—using mouse clicks to navigate can be finnicky. If double-clicking does not work, use the mouse scroll-wheel.

In Terrain View you can move off the road (but there likely will not be corresponding Street View photos off the road). Rotate the view to the direction you want to go (the Move Around tool will show where north is relative to the direction you are facing). Then move straight forward using the scroll-wheel, or double-click on a location you want to move toward.

If you stay on the road, switching back and forth between the Terrain and Street Views gives you some idea of how often the turbines will be screened or not.

Step 6: View Settings to Improve the Visual Contrast.

Sometimes it may be difficult to see the turbines with GEO's default settings, which do not include the variable effects of sun lighting. GEO can simulate sunlight for a specific time of day. When the turbines are front lit they will appear lighter, when they are backlit they will be darker. In the Tool Bar click on the Show Sunlight icon of the rising sun. It brings up a slider that controls the sun's angle for the time of day.

Another adjustment changes the sky to be lighter and more vibrant. In Windows, open the GEO Options in the Tools menu (In Mac, open Preferences in the Google Earth Pro menu) and check Photorealistic Atmosphere Rendering in the 3D View tab.

Step 7: Saving a Viewpoint.

If you have found a view that you want to save so you can come pack to it, you can do that in Terrain View. First use the Look Around tool to put the most prominent turbine in the center of the image and the horizon in the middle of the image. Then click on the Add Placemark tool (it looks like a yellow pushpin) in the Tool Bar. This brings up a window: type in the viewpoint name, and make sure that the Altitude is Clamped to Ground. Then click OK. It should be saved under My Places in the Places panel, though it may be somewhere else in the Places panel.

Now you can always get back to that view. Click the Exit ground-level view button in the upper right corner of the window (if it is not visible, just move around the view a bit). The Placemark become visible from an elevated view. Either double-click on the Placemark in MyPlaces, or double-click at the base of the Placemark to retrieve the view.

You can save a view as a .jpg file. In the File menu, select Save, then Save Image. Select Map Options to control the information displayed with the view. Click in the Untitled Map box to title the image. In the upper left corner is the Legend, and you can turn features that may be in the view on or off. Adjust the image resolution—the higher the better, though it means a larger file. Then click Save Image.

Step 8: Identifying Individual Turbines

If you are going to submit comments to the EFSEC, then you may want to include images of a particular view. It may be useful to refer to the individual turbines on the Option 1 map that concern you in the view. This is the primary reason for including the HHH IDs in the KMZ.

The HHH IDs may not always show in Terrain View. If you click and drag the Terrain View downward, they may appear. You can also click Exit Ground-level View, but then you need to keep track of which turbine interested you.

Step 9: Evaluation of Google Earth Pro Visualizations

Widely distributing a GEO KMZ is a new approach to help a community understand how a proposed wind farm may change the landscape. We invite you to take a short 10 minute survey to help us learn about whether it was helpful or not. Your participation is completely voluntary and you may decline to answer any of the questions or stop at any time. Your responses are completely anonymous.

If you agree to participate in the evaluation survey, click on the link below to be taken to a Google Forms questionnaire.

https://docs.google.com/forms/d/e/1FAIpQLSc1i3RV8JxWOq-q4jG5nXFmh9hk8ueVsnCIrbe3CHBlqp-ong/viewform?usp=sharing

We appreciate your participation in this evaluation of Google Earth Pro as a visual impact visualization too.

Dean Apostol

Scenic Expert for Tri-Cities C.A.R.E.S.

dean.apostol@gmail.com

James Palmer, Emeritus Professor

SUNY College of Environmental Science & Forestry

palmer.jf@gmail.com

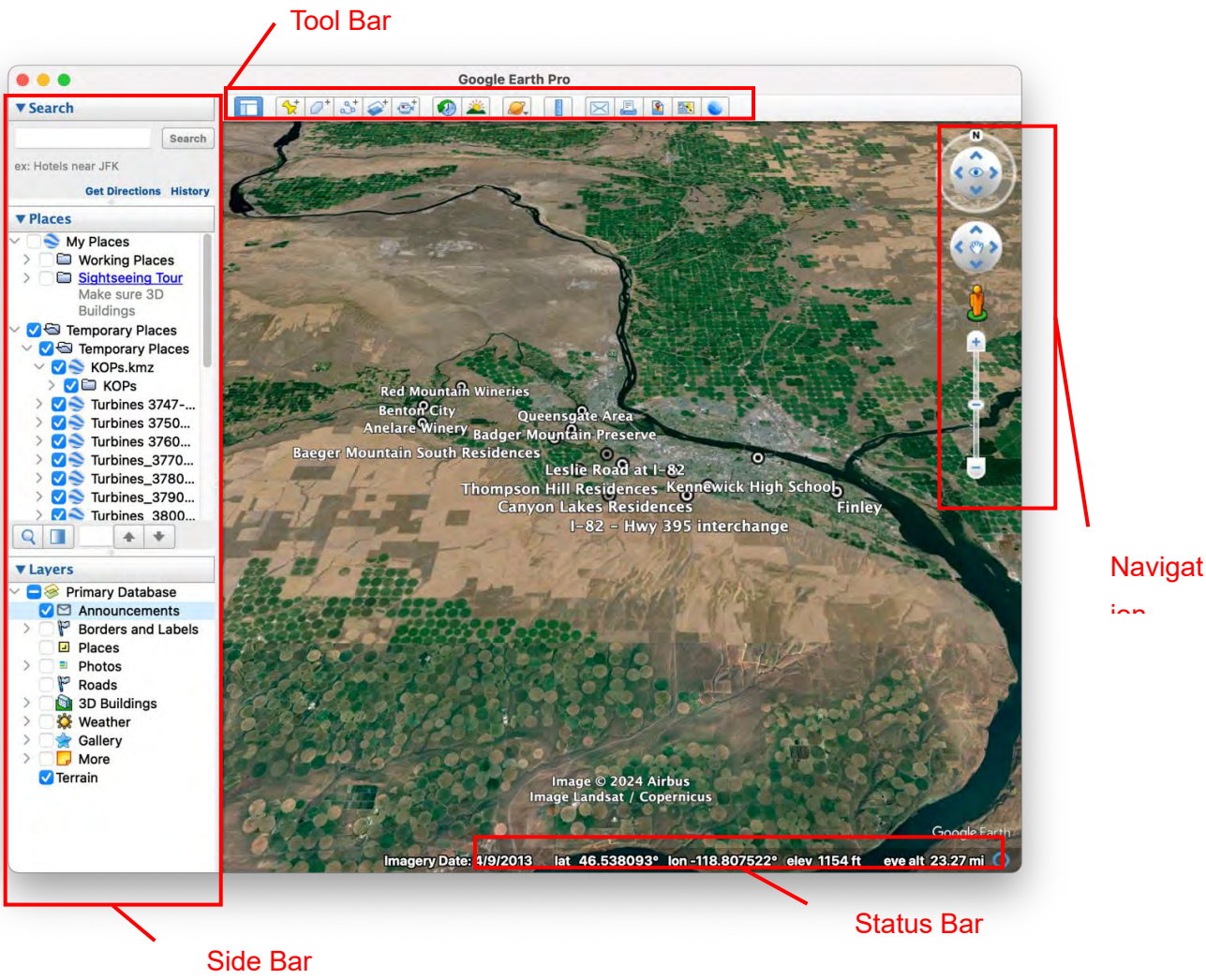
Google Earth Pro Reference Notes

Introduction

These notes locate the basic tools needed to get around in Google Earth Pro. I am using a Mac, so the images may be slightly different on a PC. The somewhat out of date Google Earth User Guide is at: http://earth.google.com/intl/ar/userguide/v4/index.htm .

Home Screen

Then you double-click on HHH_Turbines&KOPs_FINAL.kmz, you will see a screen something like that shown below.



The **Side Bar** includes three panels which are collapsed or expanded by clicking on the triangle or caret mark.

- ***Search. Locate your home or any place in the world.***
- ***Places. This is where Placemarks are kept. The KMZ has Placemarks for the turbines and the visual impact assessment photo simulation viewpoints.***
- ***Layers. This panel contains various map features, such as roads, terrain, boundaries and names.***

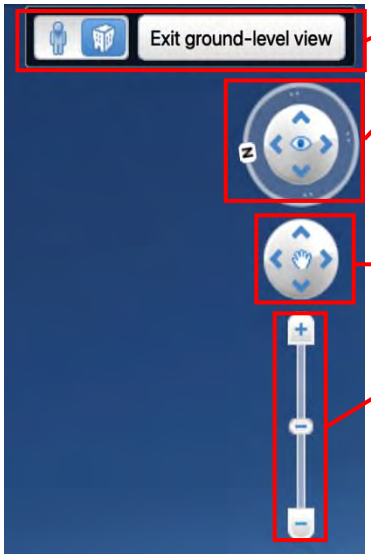
The **Tool Bar** includes many useful tools, such as a **Ruler** for measurements, **Sun** to adjust the direction of sunlight, or creating features as a **Placemark**, **Polygon** or **Path**. Placing the mouse cursor over a tool reveals its purpose.

The **Status Bar** provides the date of the image, the Latitude/Longitude coordinates, and the ground and viewer elevation.

Navigation Tools for **Earth** or **Map View**.

- ***Look Around. This moves the map or view around the viewer. Clicking the left and right arrows rotates the view; the up and down arrows change the tilt of the view. Click and hold on the N to move it around to set the direction of north.***
- ***Move Around. This moves the viewer around in the map.***
- ***Pegman. The changes the screen to Street View (and Terrain View). Click and drag Pegman onto the map and the screen changes to Terrain View (make sure that Terrain is checked in the Layers panel). When Pegman is placed on a blue road, the screen changes to Street View.***
- ***Zoom. Moves the view closer or further away.***

Navigation Tools for **Ground View**.

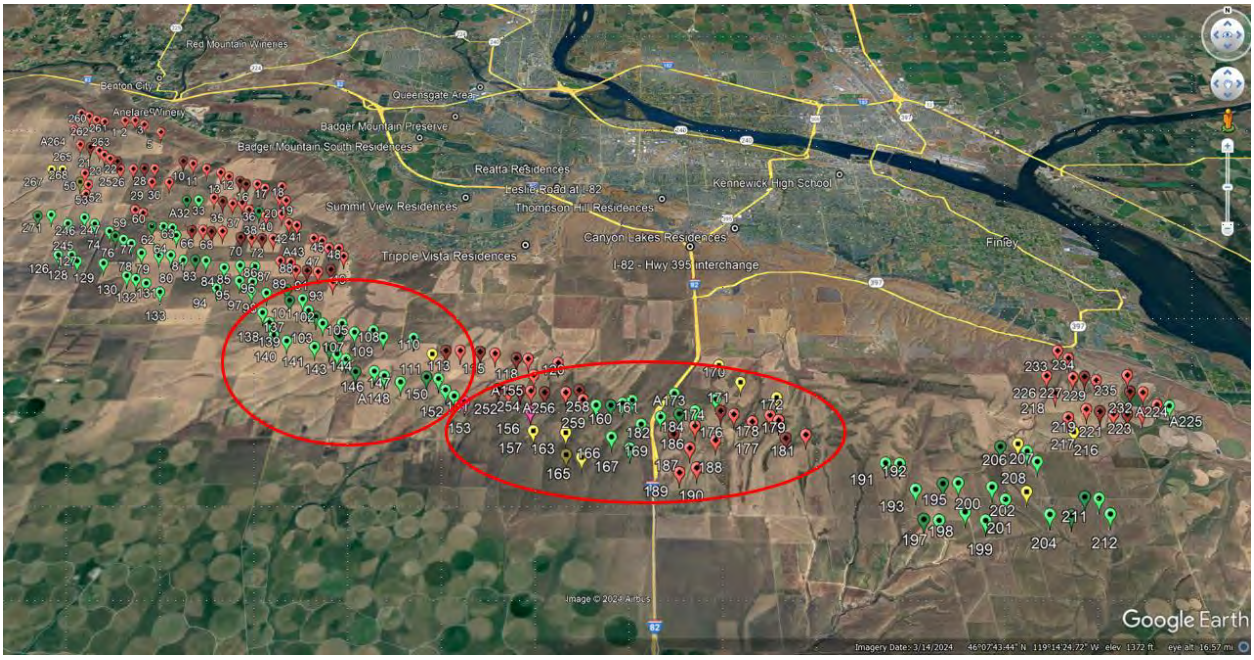


- ***Ground View. Allows you to select Pegman's Street View (if available) or Terrain View, and to exit back to Earth View.***
- ***Look Around. This moves the map or view around the viewer. Clicking the left and right arrows rotates the view; the up and down arrows change the tilt of the view. Click and hold on the N to move it around to set the direction of north.***
- ***Move Around. This moves the viewer around in the map.***
- ***Zoom. Moves the view closer or further away.***

Appendix 2

This table contains an initial list of the turbines that should be reclassified from Class 0, 1, & 2 to Class 3 for the Option 1 turbines only.

This table is based on the turbine numbers in the following image based on the Google Earth Pro Geographic Model developed by Dr. James Palmer.



This table was developed very quickly during the very short public comment period. More time would be needed to do a better compilation and to conduct an adequate verification that all the turbines have been properly identified and classified.

Turbine Number	Class	Color	Wildlife	Cultural	Visual	Aerial Firefighting	Proper Class
98	0	Green	xx	xx	xx	xx	Class 3 Red 3+
99	0	Green	xx	xx	xx	xx	Class 3 Red 3+
100	0	Green	xx	xx	xx	xx	Class 3 Red 3+
101	0	Green	xx	xx	xx	xx	Class 3 Red 3+
102	0	Green	xx	xx	xx	xx	Class 3 Red 3+
103	0	Green	xx	xx	xx	xx	Class 3 Red 3+
105	0	Green	xx	xx	xx	xx	Class 3 Red 3+
106	0	Green	xx	xx	xx	xx	Class 3 Red 3+
107	0	Green	xx	xx	xx	xx	Class 3 Red 3+
108	0	Green	xx	xx	xx	xx	Class 3 Red 3+
109	0	Green	xx	xx	xx	xx	Class 3 Red 3+

110	0	Green	xx	xx	xx	xx	Class 3 Red 3+
137	0	Green	xx	xx	xx	xx	Class 3 Red 3+
138	0	Green	xx	xx	xx	xx	Class 3 Red 3+
139	0	Green	xx	xx	xx	xx	Class 3 Red 3+
140	0	Green	xx	xx	xx	xx	Class 3 Red 3+
141	0	Green	xx	xx	xx	xx	Class 3 Red 3+
142	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
143	0	Green	xx	xx	xx	xx	Class 3 Red 3+
144	0	Green	xx	xx	xx	xx	Class 3 Red 3+
145	0	Green	xx	xx	xx	xx	Class 3 Red 3+
146	0	Green	xx	xx	xx	xx	Class 3 Red 3+
147	0	Green	xx	xx	xx	xx	Class 3 Red 3+
149	0	Green	xx	xx	xx	xx	Class 3 Red 3+
150	0	Green	xx	xx	xx	xx	Class 3 Red 3+
151	0	Green	xx	xx	xx	xx	Class 3 Red 3+
152	0	Green	xx	xx	xx	xx	Class 3 Red 3+
153	0	Green	xx	xx	xx	xx	Class 3 Red 3+
156	0	Green	xx	xx	xx	xx	Class 3 Red 3+
159	0	Green	xx	xx	xx	xx	Class 3 Red 3+
160	0	Green	xx	xx	xx	xx	Class 3 Red 3+
161	0	Green	xx	xx	xx	xx	Class 3 Red 3+
163	0	Green	xx	xx	xx	xx	Class 3 Red 3+
166	1	Green	xx	xx	xx	xx	Class 3 Red 3+
167	0	Green	xx	xx	xx	xx	Class 3 Red 3+
169	0	Green	xx	xx	xx	xx	Class 3 Red 3+
171	0	Green	xx	xx	xx	xx	Class 3 Red 3+
174	0	Green	xx	xx	xx	xx	Class 3 Red 3+
182	0	Green	xx	xx	xx	xx	Class 3 Red 3+
183	0	Green	xx	xx	xx	xx	Class 3 Red 3+
184	0	Green	xx	xx	xx	xx	Class 3 Red 3+
191	0	Green	xx	xx	xx	xx	Class 3 Red 3+
192	0	Green	xx	xx	xx	xx	Class 3 Red 3+
193	0	Green	xx	xx	xx	xx	Class 3 Red 3+
194	0	Green	xx	xx	xx	xx	Class 3 Red 3+
195	0	Green	xx	xx	xx	xx	Class 3 Red 3+
196	0	Green	xx	xx	xx	xx	Class 3 Red 3+
197	0	Green	xx	xx	xx	xx	Class 3 Red 3+
198	0	Green	xx	xx	xx	xx	Class 3 Red 3+
199	0	Green	xx	xx	xx	xx	Class 3 Red 3+
201	0	Green	xx	xx	xx	xx	Class 3 Red 3+

202	0	Green	xx	xx	xx	xx	Class 3 Red 3+
204	0	Green	xx	xx	xx	xx	Class 3 Red 3+
205	0	Green	xx	xx	xx	xx	Class 3 Red 3+
207	0	Green	xx	xx	xx	xx	Class 3 Red 3+
208	0	Green	xx	xx	xx	xx	Class 3 Red 3+
210	0	Green	xx	xx	xx	xx	Class 3 Red 3+
211	0	Green	xx	xx	xx	xx	Class 3 Red 3+
212	0	Green	xx	xx	xx	xx	Class 3 Red 3+
245	0	Green	xx	xx	xx	xx	Class 3 Red 3+
246	0	Green	xx	xx	xx	xx	Class 3 Red 3+
247	0	Green	xx	xx	xx	xx	Class 3 Red 3+
259	0	Green	xx	xx	xx	xx	Class 3 Red 3+
270	0	Green	xx	xx	xx	xx	Class 3 Red 3+
271	0	Green	xx	xx	xx	xx	Class 3 Red 3+
A173	0	Green	xx	xx	xx	xx	Class 3 Red 3+
A209	0	Green	xx	xx	xx	xx	Class 3 Red 3+
A224	0	Green	xx	xx	xx	xx	Class 3 Red 3+
169	0	Green	xx	xx	xx	xx	Class 3 Red 3+
153	2	Orange	xx	xx	xx	xx	Class 3 Red 3+
155	2	Orange	xx	xx	xx	xx	Class 3 Red 3+
156	2	Orange	xx	xx	xx	xx	Class 3 Red 3+
1	3	Red					
2	3	Red					
3	3	Red					
5	3	Red					
9	3	Red					
10	3	Red					
11	3	Red					
12	3	Red					
13	3	Red					
14	3	Red					
15	3	Red					
16	3	Red					
17	3	Red					
18	3	Red					
19	3	Red					
20	3	Red					
21	3	Red					
22	3	Red					
23	3	Red					
24	3	Red					

25	3	Red					
26	3	Red					
27	3	Red					
28	3	Red					
29	3	Red					
30	3	Red					
33	0	Red					
34	0	Red					
35	0	Red					
36	0	Red					
37	0	Red					
38	0	Red					
40	0	Red					
41	0	Red					
42	3	Red					
45	3	Red					
46	3	Red					
47	3	Red					
48	3	Red					
49	3	Red					
50	3	Red					
52	3	Red					
53	3	Red					
59	3	Red					
60	3	Red					
65	3	Red					
66	3	Red					
67	3	Red					
68	3	Red					
69	3	Red					
70	3	Red					
71	3	Red					
72	3	Red					
87	3	Red					
88	3	Red					
89	3	Red	xx	xx	xx	xx	Class 3 Red 3+
89	3	Red					
90	3	Red					
91	3	Red	xx	xx	xx	xx	Class 3 Red 3+
92	3	Red					
93	3	Red	xx	xx	xx	xx	Class 3 Red 3+

111	3	Red
112	3	Red
113	3	Red
114	3	Red
115	3	Red
117	3	Red
118	3	Red
120	3	Red
175	3	Red
176	3	Red
177	3	Red
178	3	Red
179	3	Red
180	3	Red
181	3	Red
185	3	Red
186	3	Red
187	3	Red
188	3	Red
189	3	Red
190	3	Red
202	3	Red
217	3	Red
218	3	Red
219	3	Red
220	3	Red
221	3	Red
222	3	Red
223	3	Red
226	3	Red
227	3	Red
228	3	Red
229	3	Red
231	3	Red
232	3	Red
233	3	Red
234	3	Red
235	3	Red
251	3	Red
252	3	Red
253	3	Red

254	3	Red					
255	3	Red					
257	3	Red					
258	3	Red					
260	3	Red					
261	3	Red					
262	3	Red					
263	3	Red					
265	3	Red					
A225	3	Red					
A256	3	Red					
A43	3	Red					
51	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
157	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
163	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
164	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
165	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
165	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
170	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
171	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
172	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
200	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
206	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
216	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
266	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
267	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
268	1	Yellow	xx	xx	xx	xx	Class 3 Red 3+
113							

From:	Ob Server
To:	EFSEC mi Comments
Subject:	Fw: J comments on Horse Heaven Hills, LLC & Scott Clean Energy, LLC project
Date:	Wednesday, April 10, 2024 4:45:11 PM
Attachments:	J comments on HHH wind-solar-battery project 041024.doc

External Email

----- Forwarded Message -----
From: Ob Server <jpolehn1@yahoo.com>
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>
Sent: Wednesday, April 10, 2024 at 04:42:49 PM PDT
Subject: J comments on Horse Heaven Hills, LLC & Scott Clean Energy, LLC project

Dear EFSEC: 4/10/24

Below are my attached comments on the subject project (Docket EF-220011). I do NOT agree with implementation of the project for a variety of reason specified in my attached comments. I ask that EFSEC NOT recommend the project to WA State Governor J. Inslee. It is NOT the place of the government to choose products and services for the taxpaying citizens it serves.

Sincerely,
J. Polehn
POB 482
Richland, WA 99352
jpolehn1@yahoo.com

J. Polehn comments for HHH project due 4/10/24,

Re:
Docket No. EF-220011 Report to the Governor Page 1 of 22
BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
In the Matter of:
Docket No. EF-220011
Scout Clean Energy, LLC,
Horse Heaven Wind Farm, LLC,
Applicant

Dear EFSEC/Governor Inslee:

I ask EFSEC to NOT approve the Scout Clean Energy, LLC/Horse Heaven Hills Wind Farm, LLC that includes Solar and Battery project elements to the Governor for the following reasons. If EFSEC does approve the project, I ask the Washington State Governor to NOT approve the project for the following reasons.

* WA State is choosing winners and losers in the electric power market. This IS clearly mission creep by the WA State government. The voting citizen taxpayers of WA State did NOT give those we put in public office, as well as the unelected employees, the authority to choose what consumers have access to in the market place.

* WA State has NOT done a **cradle to grave analysis** of whether the wind turbines, solar panels, & battery facilities are, in fact, providing "**clean abundant energy**" (i.e., literally comparing it to water generated power from dams, nuclear power, petroleum/gas power facilities) that **has documented peer reviewed evidence** demonstrating reduction in greenhouse gases. It is a well documented fact that it takes copious amounts of petroleum fuels to dig up "clean" energy materials, transport them to the production sites for manufacturing, manufacturing the wind turbine and solar panels and batteries, transporting the wind turbines and solar panels and batteries to the sites, as well maintaining the wind turbines and solar panels and batteries, and finally doing the decontamination and decommissioning of the site.**[2] [5]** Despite the claims of EFSEC to the WA State Governor, there is NO evidence wind, solar, and associated batteries provide "clean abundant energy." EFSEC has NOT done its job; it is merely going along with the political narrative. Further, despite there being copious evidence of no such significant (i.e., measurable) man caused planetary climate alteration, EFSEC is capriciously recommending the Horse Heaven Hills wind & solar & battery project continue.

* The power generated is not needed by the Tri-Cities and nearby communities and will be sold to out of area entities (i.e., out of area entities will benefit from the power but Tri-Cities and nearby communities will not) so unfair negative burden is placed on the Tri-Cities area community residents.

* The zoning of this Benton County area is designated as farm land. Wind turbines, solar panels, and batteries are NOT agriculture; they ARE industrial. Mechanical and electrical equipment do NOT grow from seeds nor out of the ground. They are NOT living entities.

* The electric power will NOT be on demand 24 hours/day, 365 days per year, negating the "clean, abundant energy" in the EFSEC recommendation to the Governor as well as negating the requirement to EFSEC: "The Council's mandate is to balance need for **abundant energy** at a **reasonable cost** with the broad interests of the public.". In winter of 2024, the Tri-Cities had over a consecutive month of very low/no wind & cloudy conditions making the wind turbines & solar panels worthless (i.e., no wind, no sun, no power generated). This Horse Heaven Hills wind, solar, battery project is definitely NOT in the best interests of the public since it **will cause electrical power grid instability** making power NOT available to the consumers (i.e., NOT abundant) and WILL **increase electrical power costs** to the public, including the taxpayers! Further, the wind turbines are subject to a 30% failure rate, adding to the costs, and the solar panels are subject to hail and blowing debris damage. **[3] [4] [6] [7]**

* Fiduciary duty to the taxpayers not being done & will result in lawsuits (again a cost to the taxpayers) **[1]**

* Land leveled (i.e., destruction of vegetation, habitat, increased dust exposure of humans & animals, scenery, (mis) use of water needed for crops and humans & animals, destruction of property values)

* Source of water for the construction, operation, & decontamination & decommissioning of the project has not been secured.

* Those making the decision do not have to live with viewing/being exposed (monetarily or health wise). The community does not want this project.

* Is not cost effective as it's (mis) using taxpayer funds to choose to benefit, over the objections of consumers, residents/taxpayers/voters, of one form of electricity over another. Gov't mission creep. **[1] [2]**

* Vibration mental & physical health on the surrounding populations have not been addressed nor mitigated for.

* Decontamination & decommissioning impacts, including cost to the taxpayers, have not been addressed. D&D costs to the taxpayers are inappropriate & should be born by the company.

* Lawsuit costs to the taxpayers have not been addressed (e.g., loss of life, industry, etc. because of unstable electrical grid conditions & elevated costs of electricity).

* The out of WA St. company, Scout Clean Energy, LLC, headquartered in Bolder, CO has not posted a bond to pay for potential damages (i.e., what can go wrong) from the project (e.g., fire from the battery facilities/BESS that cannot be put out & leakage from batteries that contaminate the soils, health issues the project causes to Tri-Cities & communities residents, etc.).

In closing, I ask that EFSEC NOT recommend this project to Washington State Governor, J. Inslee and that, should this project come to his desk for signing it, he reject the project as NOT in the best interests of Washington State citizens.

Sincerely,
J. Polehn
POB 482
Richland, WA 99352
jpolehn1@yahoo.com

Footnotes:
[1] How to destroy the myth of cheap wind and solar, American Experiment, **Isaac Orr**, **Mitch Rolling** 4/3/24,
https://www.americanexperiment.org/how-to-destroy-the-myth-of-cheap-wind-and-solar/

[2] Can 'clean energy' schemes get any crazier? Climate Science Press, uwe.roland.gross 4/2/24
https://climate-science.press/2024/04/02/can-clean-energy-schemes-get-any-crazier/

[3] Icy blast of bankruptcies loom for Swedish wind-power sector, experts warn Climate Science Press, 3/17/24, uwe.roland.gross
https://climate-science.press/2024/03/17/icy-blast-of-bankruptcies-loom-for-swedish-wind-power-sector-experts-warn/

[4] The Death of a Wind Farm, Climate Science Press, 2/24/24, **uwe.roland.gross**
https://climate-science.press/2024/02/24/the-death-of-a-wind-farm/

[5] Greta Thunberg is the poster girl for hypocrites using the products they want to ban,

Climate Science Press, 4/9/24**,** **Ronald Stein** **,** uwe.roland.gross

https://climate-science.press/2024/04/09/greta-thunberg-is-the-poster-girl-for-hypocrites-using-the-products-they-want-to-ban/

[6] Wind, solar power nearly leave Alberta without electricity as temperature drops below -40.

Alberta required a transfer of electric power from the neighboring province of Saskatchewan as all of its solar and wind production ceased amid the bitter drop in temperature.

Life Site News, Anthony Murdoch, 1/16/24,

https://www.lifesitenews.com/news/wind-solar-power-nearly-leave-alberta-without-electricity-as-temperature-drops-below-40/

[7] Mark Lynas '99% Consensus' on Climate Change – Busted in Peer Review. Climate Science Press, 11/2/23, **uwe.roland.gross**
https://climate-science.press/2023/11/02/mark-lynas-99-consensus-on-climate-change-busted-in-peer-review/#

From:	Dave Sharp
To:	EFSEC (EFSEC); EFSEC mi Comments
Cc:	Moon, Amy (EFSEC); Greene, Sean (EFSEC); Hafkemeyer, Ami (EFSEC)
Subject:	Public Comment-Draft SCA and Recommendation to the Govenor
Date:	Wednesday, April 10, 2024 6:22:49 PM
Attachments:	Scaled Comparison Horse Heaven and Nine Canyon-Depiction-Model Final.pdf Avian Report Deficiencies-Towers and Turbines.pdf

External Email

Issues with the AVIAN Reports.

I have also attached a fatality model that TCC has developed. We believe the fatality rates will be at the upper end of what has been experienced for Northwest wind projects, at least twice the Nine Canyon rate.

Public Comment
Horse Heaven Hills
Tri Cities CARES
Avian Report Deficiencies
Dave Sharp

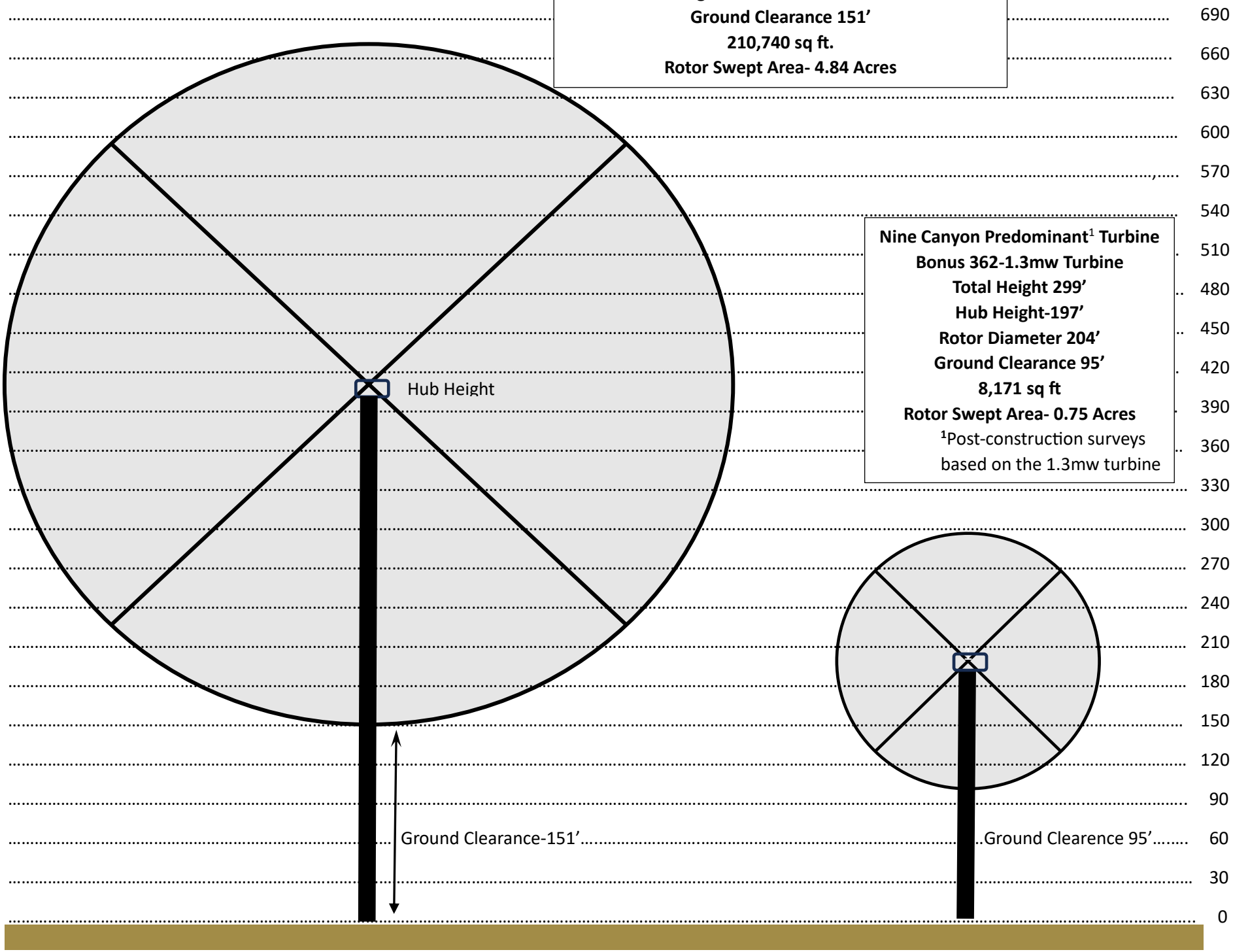
David Sharp
Tri-Cities CARES
Email: dave@tricitiescares.org
Webpage: www.tricitiescares.org

SCALED COMPARISON-
NINE CANYON VS HORSE HEAVEN HILLS WIND PROJECTS

Abstract

Depictions shown are of existing Nine Canyon and proposed HHH turbines. The larger turbines are two options for the HHH project being proposed. This can be used as a comparative risk model for avian species for and visual comparisons of the project.

Dave Sharp
dave@tricitiescares.org


HHH Preferred (TCC Opinion) Large Turbine Option
GE 5.5mw Wind Turbine-Total Height 671'
Hub Height-411' Rotor Diameter 518'
Ground Clearance 151'
210,740 sq ft.
Rotor Swept Area- 4.84 Acres
Nine Canyon Predominant[1] Turbine
Bonus 362-1.3mw Turbine
Total Height 299'
Hub Height-197'
Rotor Diameter 204'
Ground Clearance 95'
8,171 sq ft
Rotor Swept Area- 0.75 Acres
[1]Post-construction surveys based on the 1.3mw turbine
Hub Height
Ground Clearance-151'
Ground Clearence 95'
690
660
630
600
570
540
510
480
450
420
390
360
330
300
270
240
210
180
150
120
90
60
30
0

HHH Preferred (TCC Opinion) **Smaller Turbine Option**
GE 3.03mw Wind Turbine or 3.3mw Mystery Turbine
Total Height 494'
Hub Height-266'
Rotor Diameter 459'
Ground Clearance 36'
168,000 sq ft.
Rotor Swept Area- 3.8 Acres

Nine Canyon Predominant[1] Turbine
Bonus 362-1.3mw Turbine
Total Height 299'
Hub Height-197'
Rotor Diameter 204'
Ground Clearance 95'
8,171 sq ft
Rotor Swept Area- 0.75 Acres
[1]Post-construction surveys based on the 1.3mw turbine

690
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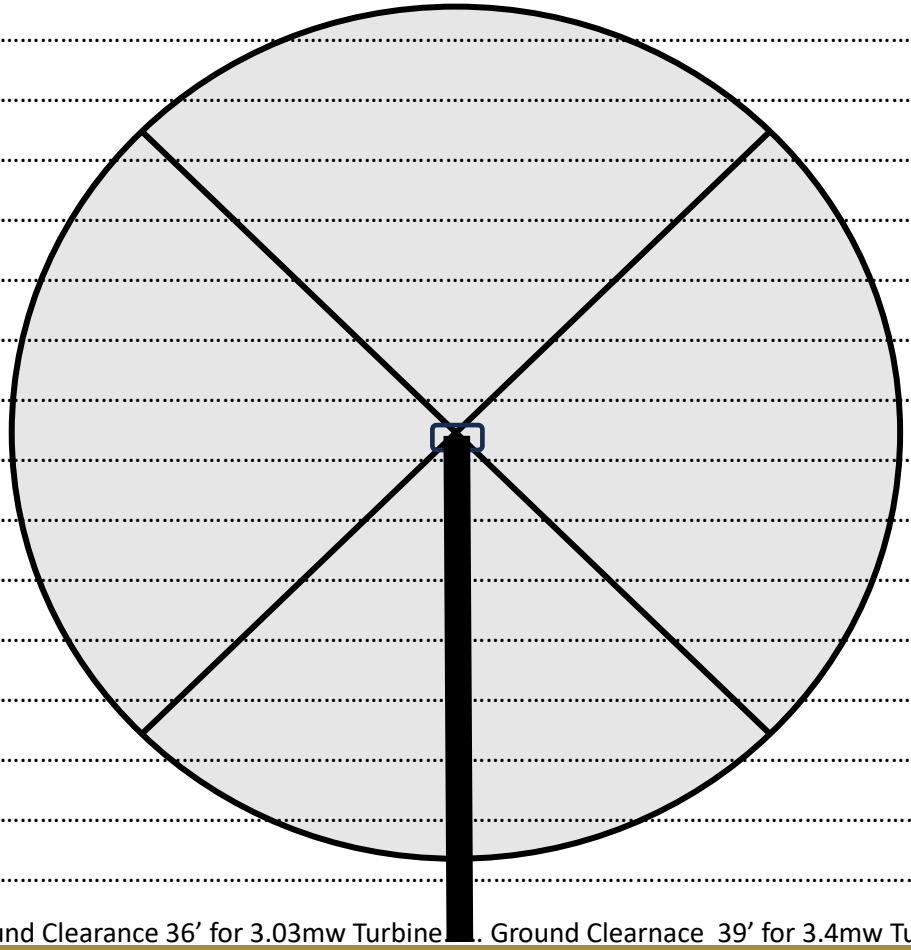
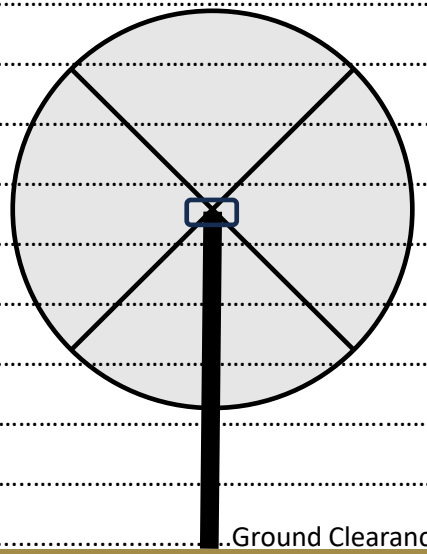




..... Ground Clearance 36' for 3.03mw Turbine..... Ground Clearnace 39' for 3.4mw Turbine 95'.....Ground Clearance 95'.....

Tri-Cities CARES Fatality Rate Comparison Table- HHH Turbine Models Compared to Nine Canyon						
Turbine Parameters	**GE 2.82mw**	**GE 3.03mw**	**Mystery Turbine GE-3.4mw**	**GE 5.5mw**	**SG 6.0mw**	**Nine Canyon 1.3mw**
Nameplate-mw	2.82	3.03	3.4	5.5	6	1.3
Ground Clearance-m/ft	25/83.5	11/36.5	12/38.5	46/152	30/98.5	14.4/47.5
Rotor Diameter-ft	417	459	459	518	557	203
Rotor Sweep Area (RSA)- sq ft	136,570	165,500	165,500	210,740	243,670	32,480
Rotor Sweep Area-(RSA)-Acres	3.14	3.80	3.80	4.84	5.59	1
Est. Operating Hrs-% of Year	80%	85%	85%	90%	90%	70%
RSA Ratio/NC	4.20	5.10	5.10	6.49	7.50	1
Nameplate Ratio/NC	2.17	2.33	2.62	4.23	4.62	1
Ratio Operating Hours/NC	1.143	1.214	1.214	1.286	1.286	1
Modeled Fatality Ratio-NC Base of 1	2.22	2.65	2.37	1.97	2.09	1
Nine Canyon Fatality Rate-Birds/mw/yr	2.76	2.76	2.76	2.76	2.76	2.76
Fatality Rate-Birds/mw/yr -(FR)	**6.11**	**7.33**	**6.53**	**5.44**	**5.77**	**2.76**

Summary-Small Turbine Fatality Rate is over 6.5 birds/mw/year: over twice that of the Nine Canyon

GE 2.82 Model has Fatality Rate 20% less than the 3.03 Model

Notes

1. Nine Canyon 1.3 turbine used for calculations. 1.3 was the machine in service when post construction was done in 2003
2. Operating Hours were estimated-Developer did not allow access to any performance information.
3. Modeled Facility Ratio = The Product of RSA Ratio, Operating Hours Ratio, and Inverse of Nameplate Ratio
4. Fatality Rate - Product of RS Ratio, Operating Ratio, Inverse Ratio of Namplate, and Nine Canyon Fatality Rate of 2.6 birds/mw/yr
5. Physical Dimensions from ASC for HHH, and from the US National Wind Turbine Database for Nine Canyon
6. Nine Canyon Fatality Rate-***"Cumulative Effects to Birds, Bats, and Land Cover from Renewable Energy Development in the Columbia Plateau Ecoregion of Eastern Oregon and Washington"***- Appendix T2, Posted on EFSEC Website

Disclaimer-

This is meant to be a comparative model using Nine Canyon actual survey results. This is not a standard model, and is intended to provide information where none has been offered by the Applicant. Examination of the scaled depictions show clearly that the small "squatty" turbine with close ground clearance but 499' height are the most impactful. It is intuitively obvious that the Rotor Sweep Area crosses low flight paths as well as higher flight paths

Appendix T2 below is from the EFSEC website.

*Cumulative Impacts to Birds, Bats and Land Cover from Rewable Energy Development in the CPE

Appendix T2. All bird and raptor fatality estimates at operating wind energy facilities in the Columbia Plateau Ecoregion.

Fatality Range Projected Using TCC Model

Project Name, State, Study Period	All Bird Fatalities/MW/Study Period	Raptor Fatalities/MW/Study Period	Reference
Windy Flats, WA (2010-2011)	8.45	0.04	Enz et al. 2011
Biglow Canyon II, OR (2009-2010)	7.72	0.20	Enk et al. 2011
Montague, OR (2019-2020)*	7.61	0.07	Chatfield and Martin 2021
Leaning Juniper, OR (2006-2008)*	6.66	0.21	Gritski et al. 2008
Linden Ranch, WA (2010-2011)*	6.65	0.27	Enz and Bay 2011
Shepherd's Flat North (2012-2014)*	6.39	0.06	Smith et al. 2015a
Biglow Canyon III, OR (2011-2012)*	4.41	0.06	Enz et al. 2013
White Creek, WA (2007-2011)*	4.05	0.47	Downes and Gritski 2012
Shepherd's Flat Central (2012-2014) *	3.74	0.15	Smith et al. 2015b
Mary Hill & Hoctor Ridge, WA (2011-2012)*	3.42	0.11	Enz et al. 2012
Willow Creek (2009-2011)	3.22	0.38	Northwest Wildlife Consultants 2011
Tuolumne, WA (2009-2010)	3.20	0.29	Enz and Bay 2010
Stateline, OR, WA (2001-2002)*	3.17	--	Erickson et al. 2004
Klondike II, OR (2005-2006)*	3.14	--	NWC and WEST 2007
Klondike IIIa, OR (2009-2010)*	3.06	0.12	Gritski et al. 2011
Hopkins Ridge, WA (2008-2008)*	2.99	0.07	Young et al. 2009
Shepherd's Flat South (2012-2014)*	2.86	0.09	Smith et al. 2015c
Nine Canyon, WA (2002-2003)*	2.76	0.03	Erickson et al. 2003
Stateline, OR, WA (2003-2003)*	2.68	0.09	Erickson et al. 2004
Klondike III, OR (2007-2009)*	2.65	0.27	Gritski et al. 2010
Biglow Canyon II, OR (2010-2011)	2.60	--	Enk et al. 2012
Combine Hills, OR (2004-2005)*	2.56	0.00	Young et al. 2006
Big Horn, WA (2006-2007)	2.54	0.15	Kronner et al. 2008
Klondike IIIa, OR (2008-2009)*	2.54	0.00	Gritski et al. 2011
Leaning Juniper II, OR (2011-2013)*	2.50	0.07	Downes et al. 2013
Biglow Canyon I, OR (2009-2009)*	2.47	0.00	Enk et al. 2010
Juniper Canyon, WA (2011-2012)*	2.44	0.16	Enz and Bay 2012
Combine Hills, OR (2011-2011)*	2.33	0.05	Enz et al. 2012
Biglow Canyon III, OR (2010-2011)*	2.28	0.00	Enk et al. 2012
Hay Canyon, OR (2009-2010)	2.21	0.00	Gritski and Kronner 2010
Rattlesnake Road (2009-2011)*	2.16	0.06	Gritzki et al. 2011
Pebble Springs, OR (2009-2010)	1.93	0.04	Gritski and Kronner 2010
Chopin, OR (2016-2017)*	1.80	--	Hallingstad and Riser-Espinoza 2017
Biglow Canyon I, OR (2008-2008)*	1.76	0.03	Jeffrey et al. 2009
Wild Horse, WA (2007-2007)*	1.55	--	Erickson et al. 2008
Kittitas Valley, WA (2012-2013)*	1.54	0.31	Stantec Consulting 2013

Table 2.3-1. Potential Turbine Specifications

Turbine Parameters/Features	Turbine Layout: Option 1		Turbine Layout: Option 2	
	GE 2.82-MW Turbine	GE 3.03-MW Turbine	GE 5.5-MW Turbine	SG 6.0-MW Turbine
Tower Type	Tubular	Tubular	Tubular	Tubular steel / Hybrid
Maximize Number of Turbines considered	244	244	150	150
Turbine Rotor Diameter	127 / 417 *(meters/feet)*	140 / 459 *(meters/feet)*	158 / 518 *(meters/feet)*	170 / 557 *(meters/feet)*
Turbine Hub Height (ground to nacelle)	89 / 292 (meters/feet)	81 / 266 *(meters/feet)*	125 / 411 *(meters/feet)*	115 / 377 *(meters/feet)*
Maximum Total Height (ground to blade tip)	152 / 499 *(meters/feet)*	151 / 496 *(meters/feet)*	204 / 671 *(meters/feet)*	200 / 657 *(meters/feet)*
Tower Base Diameter	4.6 / 15.1 *(meters/feet)*	4.6 / 15.1 *(meters/feet)*	4.6 / 15.1 *(meters/feet)*	4.7 / 15.5 *(meters/feet)*

Note: All values are approximate.

Public Comment
Horse Heaven Hills Project
Tri-Cities CARES
David Sharp

This comment is lengthy, with the expectation that Sean, Amy, and Ami will look at the details.

Before reading, ask some questions. What specifics do you actually know about avian species risk for this project, and how does that compare to other projects in the Northwest. What has the Applicant provided to you with the 27 or so wildlife and habitat technical reports? Most of the Council's effort has been around Ferruginous Hawk nests and habitat. Other than the Ferruginous Hawk discussion, the only specific number offered by the Applicant is that the avian fatality rate will be in line with Nine Canyon at 2.76 birds/mw/year. And that number appears to be just an opinion and not backed up by rationale or science.

Summary- A major building block to assess environmental risk of the Horse Heaven Hills Project is impact to avian species as summarized by Appendix M-Bird and Bat Conservation Strategy (BBCS). TCC believes that a large portion of the BBCS is a house of cards that does not carry forth information to the FEIS that would allow the Council to make objective decisions to assess risk to avian species. Without that information, the Council is not able to fulfil the requirements of RCW 80.50.010, to balance environmental impacts with project benefit.

RCW 80.50.010 Balancing Project Benefit with Environmental Risk. At the time of the Draft SCA, TCC does not believe that it is possible to ascertain the level of impact to avian species based upon what the Applicant has provided in Appendix M, and the FASC. Because of that, we believe the FEIS is deficient. and EFSEC is not able to certify that environmental risks have been balanced with project benefits. As a result, before construction is allowed to proceed, the issues identified here must be resolved. Regarding ordering of turbines, one of the first things Scout will want to do is get the turbines ordered. Since TCC has major issues with the methods that the Applicant used to justify larger turbines with a non-standard risk model, there should not be approval for the purchase the machines until concerns are addressed.

Tri-Cities CARES believes that the only turbine model that was correctly modeled with the Avian Use Survey was the GE-2.82 machine and until more information is obtained, that should be the only turbine that is certified for use in the SCA. Read more below for rationale.

The Draft SCA allows for future adjustments to mitigation if it is found later that it is required. Our recommendation is that EFSEC, as lead agency, hire WEST or another independent firm to aggregate the AUSs and present a report in standard format that can be compared to other projects in the Northwest.

Recommendations-

- Have WEST compile, aggregate and present the report in their standard manner. Find out what happened for the turbine height differences. If it cannot be resolved or adequately explained, only allow use of the GE-2.82 machine

- Require that the USFWS recommended collision modeling be performed for Eagles with incidental take. As lead agency, EFSEC has the power to do so.
- After consolidated reports are aggregated, have staff review for potential additional avian mitigation. TCC sees Four areas.
    - 1. There is the lone turbine on the extreme east end of the project. That area had what appeared to be high use rate by the American White Pelican.
    - 2. They have a large breeding area, Badger Island, approximately 2 miles distant3.
    - 3. For the Horse Heaven Hills project West of I-82 there was a high mean use by sandhill crane.
    - 4. An area just East of I-82 has a number of turbines in an area of high mean use by Buteos and diurnal raptors. See discussion and figures following.

    EFSEC Staff should review those areas.

Project Turbine and Towers Impact on Avian Species- Tri-Cities CARES has reason to believe that the aggregation of the Avian Use Surveys results is not representative of what the underlying surveys show. Furthermore, TCC believes that flight height data of Avian species appears to be inappropriately applied to the final results in Appendix M, which carried through to the FASC and Appendix 4.6-1 Wildlife. This is critical information because the applicant is using exposure index, based upon flight height, to justify larger turbines. On previous projects where Scout has used the exposure index, i.e. Sweetland Wind, two different heights were used, but the turbine model was the same. That project proposes 4 separate designs, heights, and perhaps another turbine model as yet unknown.

There were over 2100 individual surveys performed for the 4 Avian Use Survey final reports. All of those surveyed at a flight height of 25-150 meters. The final shortened survey for only the East portion of the project was only 96 surveys. That report indicated flight heights of 10-155 meters and discriminated between the 4 turbine models. Appendix M that aggregated the results shows the 10-155 meters as flight height data for the entire project. See Golder page, below from Appendix 4.6-1, attached, to see how flight height is being used.

In another case, we found that the Eastern portion of the Horse Heaven Project, initially called Four Mile project, had the project area reduced because of higher risk to avian species. After the final report was issued, another abbreviated survey was performed. That survey appeared to remove survey point areas that had high avian mean use within the areas of the project that were to remain. Diurnal raptors and Buteos had high use rates. The effect was to remove unfavorable data from an area that had high avian use of species of concern. One area removed had the highest Buteo usage. We are unsure of how the AUSs were aggregated to the final report, but this gives the appearance of cherry-picking data. There may be a simple answer, but the perception is not good. EFSEC needs to investigate this issue.

All indications are that this project will have a significant impact to diurnal raptors, and potentially American White Pelicans, Sandhill Cranes, and eagles. Compared to Northwest projects, diurnal mean use was in the upper 10-20%. This conclusion is based upon the underlying and non-aggregated AUS reports.

The Horse Heaven project is a consolidation of 3 separate wind projects that were under development from approximately 2016 to the present. It is probably the most studied site ever in the state with no less than 27 technical reports associated with wildlife and habitat. Western Ecological System Technology (WES) performed most of the reports, including Avian Use Surveys (AUS), site characteristics, raptor nest surveys. WEST has impeccable credentials and the most utilized consultant for wind project avian and other technical studies. At the end of 2020, WEST abruptly left the scene; just prior to the ASC to the State. Because of the number of AUS reports, it is important for those reports to be properly aggregated. The obvious party to combine the reports was WEST. Appendix M, mentioned above was published with attribution to the Applicant. Another technical consultant, Golder, provided Appendix 4.6-1 Wind Turbine Collision Risk to Avian Species.

TCC has identified a number of irregularities of how the Avian Use Surveys (AUS) were aggregated and presented to the Council in the form of Appendix M, which fed the Final ASC. We have not identified issues with the underlying original reports contained in Appendix L-Biological Reports. Issues identified include:

1. The BBCS, written by the Applicant cannot be considered a credible technical report.
2. We see no overarching examination of avian impacts of the HHH project compared to other projects in the Northwest. Specifically, some of the underlying AUS reports provide a ranking of mean use for all avian species and diurnal raptors. They are provided in standard categories such as Waterfowl, Waterbirds, Vultures, etc. The final Appendix M does not provide that information.
3. The final Appendix M does not provide Spatial (see figure 4 below) information that would allow differentiation of high and low use point surveys areas. Without that, the Council has no way of knowing which areas are at higher risk. As an example, see the flight pattern Figure 5b, below. One survey point (#1) has an extremely high mean use rate for diurnal raptors. One page later, Appendix C, Shows Mean Use sorted by category and species. The first line #1, highlighted in red shows the Diurnal Raptor use as the second highest in the area, and the Buteo mean use is the highest.
4. The Applicant provides no fatality estimates based upon the HHH project configuration and turbine model selection.
5. The only fatality number provided by the Applicant is 2.76 birds/mw/year based upon the Nine Canyon post construction surveys. There was no calculation or rationale provided for the number. Tri-Cities CARES has performed a simplified collision model based upon the Nine Canyon results using and use of turbine model parameters for the HHH project. Our model shows 2 to 3 times the fatality rate than Nine Canyon rates. Our model is attached.
6. The Applicant has chosen not to use the USFWS collision modeling recommendation for Bald and Golden eagles. The last 4 major wind projects in the State; Skookumcuck, Goodnoe Hills Repowering, Hopkins Ridge, and Lower Snake River have all utilized that collision modeling method.
7. The Applicant has hired a third-party consultant, Golder to provide fatality risk assessment. Golder used a method called Bird Exposure Index (EI), which simply identifies the number of avian observations at survey points and whether that bird was flying at a height within the

vertical bounds of the rotor dimension. The EI index was utilized in earlier underlying AUSs, but in context as a starting point to assess relative risk.

8. As described in the Final ASC Page 3-123 footnote 26, the EI has significant limitations: ***As discussed in the BBCS (Appendix M), the exposure calculation is not a rate nor a likelihood; instead, it is a unitless index that does not account for other possible collision risk factors.*** At this point it should be mentioned that Appendix M has not been updated since the first submittal in June of 2021. The footnote that appears in the ASC mentioned above did not, and still does not appear in Appendix M. Mr McIvoy submitted pre-filed testimony in the adjudication process but did not have benefit of the clarification above. Here are some of the possible collision risk factors not considered in the EI:
    a. Rotor Swept Area (vs the EI method of Rotor Swept Height)
    b. Avian flight patterns
    c. Operating Hours-Specifically, large rotor machines and low ground clearance are designed to operate more hours/year.
    d. Project configuration; distance between turbines and strings
    e. Blade area profile and feather and feather angle as a function of wind velocity operating conditions
    f. Rotational velocity
    g. Seasonal Use
9. Avian Use Survey protocol is to collect avia flight height data. All final AUS surveys taken used a flight height from 25-150 meters. That range would put the avian species in a hazardous zone. That dimension was likely based upon the GE 2.82 dimensional parameters, indicating that the most likely turbine size to be used that machine. Sometime in 2020, after the final AUS surveys were completed, the Applicant apparently decided to potentially use other turbine options. A late AUS was completed for Horse Heaven East. That AUS was the first and only AUS that showed a discriminated flight height between the 4 turbine models. Tri-Cities CARES fails to understand how data taken prior to the multi-turbine decision could be discriminated to identify flight heights outside of the 125-150 meters that the surveyors used. It raises a question of whether the late avian survey was used to scale all previous data? Recommend EFSEC staff investigate.
10. Underlying AUS surveys included a single project East of I-82, and two projects West of I-82. Each area had AUSs performed. The Horse Heaven Project was posed as phase 1 and phase 2: HHE and HHW. Yet, when the final report was issued, all survey results appeared aggregated into a single project. Doing that has the tendency to average everything, and hides high impact areas.
11. EFSEC Staff is invited to review the underlying AUS reports in Appendix L, PDF Pages Noted
    a. PDF pages 4-100, Horse Heaven (West) Baseline Studies, Including AUS (25-150 Meters Flight Heights) 327 surveys each large and small birds
    b. Pages 297-348 Badger Canyon AUS. (25-150 Meters) 327 surveys each large and small
    c. Pages 348- 401 Four Mile Project, (25-150 Meters) 312 Surveys each
    d. Page 402-454 Horse Heaven West AUS and Raptor Nest. Large Birds (25-150 Meters) 178 surveys
    e. PDF Pages 474-514 Horse Heaven East, (10-155 Meters) 96 survey

    There is a great deal of more understandable detail in those reports compared to Appendix- M

We question whether has the necessary information to evaluate environmental impact to avian species on the basis information from Appendix M-Bird and Bat Conservation Strategy, the Final ASC Section 2.3.1, and Table 2.3-1 Potential Turbine Specifications., Chapter 4 Wildlife Mortality from Comprehensive Project starting at page 4-179, and the Final Environmental Impact Statement Appendix 4.6-1 Wind Turbine Wildlife Collision Risk Assessment.

The **ONLY** quantitative number provided for avian fatality on a project wide basis is that the fatality rate will be in line with the post construction survey performed in 2003 for Nine Canyon. That is 2.76 birds/mw/year, and 0.03 Diurnal Raptors/mw/yr. Reference **Appendix T2 of Cumulative Effects to Birds, Bats, and Land Cover from Renewable Energy Development in the Columbia Plateau Ecoregion of Eastern Oregon and Washington (Jansen 2023a**).

There has been no collision analysis performed for the project using industry accepted collision models that provide a project wide estimate of avian fatalities; specifically, species of concern including diurnal raptors such as the Ferruginous Hawk, American White Pelican, Sandhill Crane, Bald and Golden Eagles. There are at least 10 collision models for that purpose, and the Exposure Index is not one of them.

As planned by the Applicant, Exposure Index (EI) will be their basis for quantifying Collision Risk, and they will use the results to make decisions to substitute different turbine models that have not even been proposed, or to discriminate between the existing 4 models now in the ASC. The EI uses just a fraction of the parameters required to make a turbine-to-turbine comparison. EFSEC should review any changes in turbine models from an avian risk standpoint including requirement for a collision analysis.

On top of that, Golder and Associates wrote Appendix 4.6-1 as part of the FEIS that TCC believes was meant to be used to justify substitution of larger turbines and nameplate, on the basis of less impact/mw. There are a number of issues with the Golder Appendix. First, if one reads the executive summary, Golder leaves themselves plenty of room to be incorrect. Looking at the Appendix in total it could be described as a "lukewarm" endorsement of the topic which they were presenting. The Appendix pretty much describes itself with this one sentence. *"However, the Exposure Index is not directly translatable to the number of bird mortalities".* A copy of a page of the Golder Appendix is attached to show how the EI is being used across different sized turbine models.

Another quote from the Golder Appendix. "*The exposure index can also be used to compare relative collision risk for a particular species between turbines with different rotor swept zones."* Note the word **zone and not area.** This is an example of how simplistic the EI is. If the rotor diameter is doubled, the EI would double. However, a collision model would use rotor swept **area** as representative of risk for the bird. Doubling the rotor diameter would increase the hazard area by a factor of 4. Yes, the EI can be used to compare but it is simplistic and does not quantify the hazard area seen by avian species.

Last topic-Scout intends to unveil a "mystery" turbine that has almost exactly the same dimensions as the GE-3.03. However, they will build whatever turbines they are approved to build. Technology improvements are not enough to gain 10%. It is likely blade design which may make them

aerodynamically more efficient such as winglets on modern jetliners. That, however, induces more collision risks to avian species. Any turbine models to be purchased in lieu of those in the ASC, must be collision modeled. All turbines are not the same.

The Applicant has hidden behind the load of confidentiality for a lot of their information. EFSEC should ensure that the environment takes precedent over other considerations.

From Appendix L, PDF Page 370 Four Mile Final AUS Report June 2018-May 2019
Note Buteo Flight Paths Survey Pt #1 was excluded from subsequent large bird survey

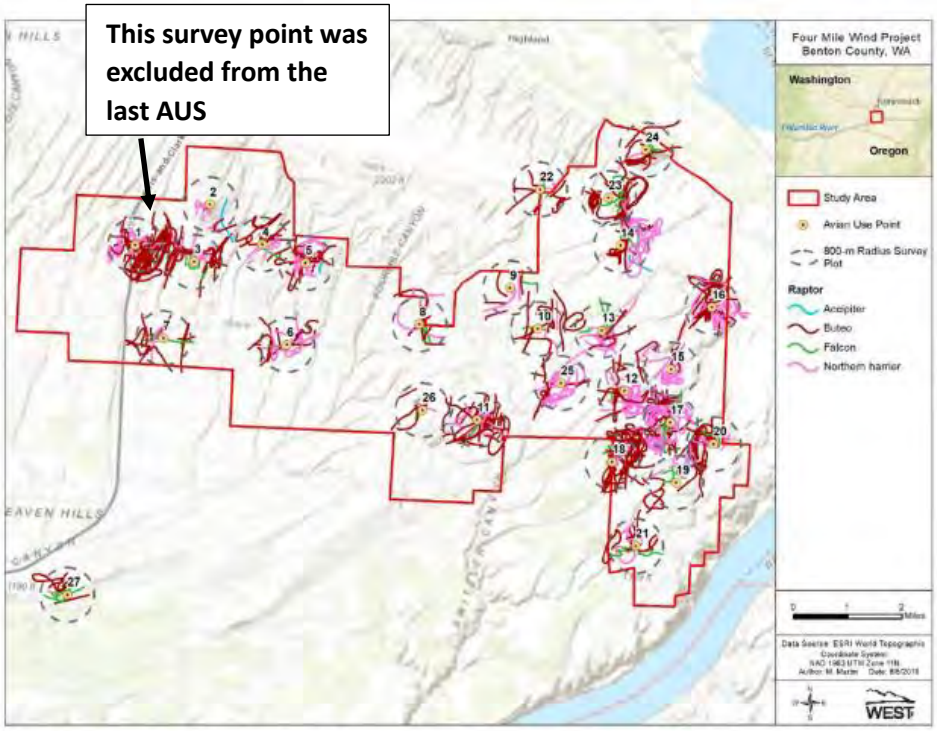


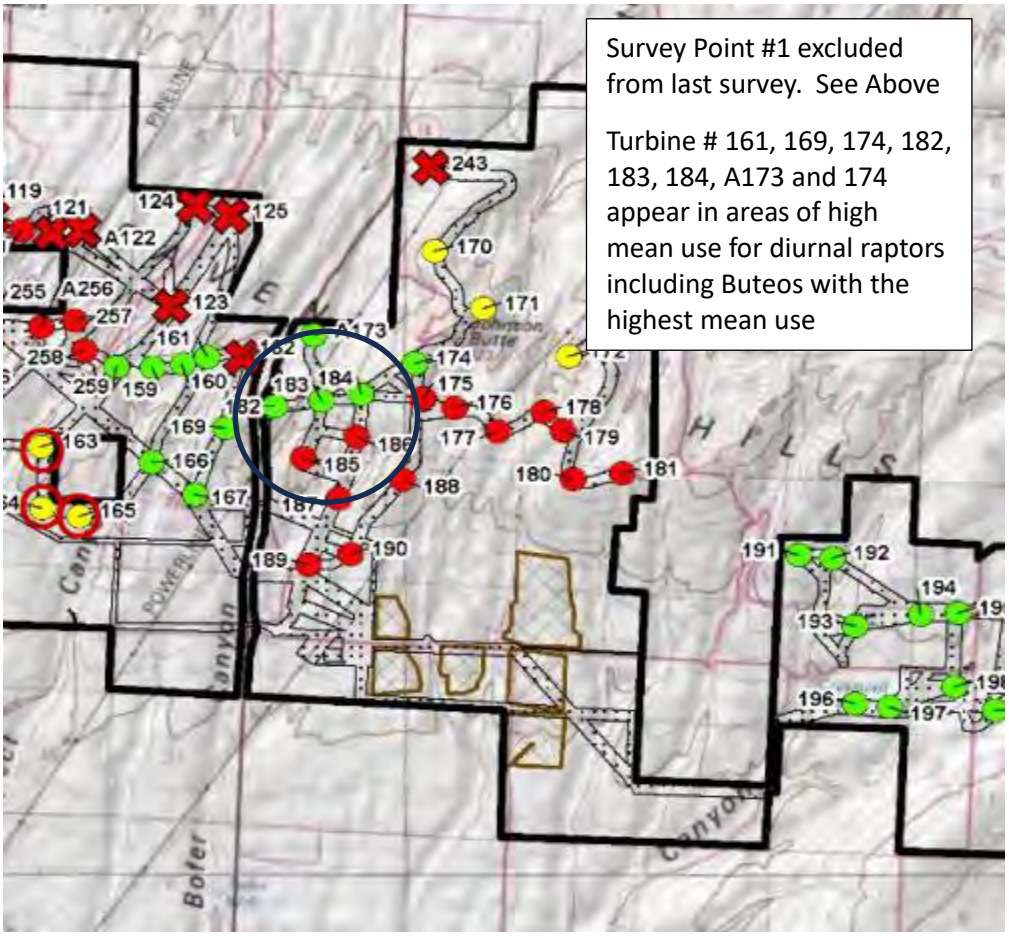
Figure 5b. Flight paths of diurnal raptor subtypes recorded during large bird surveys at the Four Mile Wind Project Study Area from June 5, 2018 to May 29, 2019.

The identified survey point has the highest Buteo use of any survey point, and is located in an area where several Turbines will be installed. See Excerpt from Figure 2-5 High impact areas.

Appendix C. Mean use (number of large birds/60-minute survey; number of small birds/10-minute survey) by point for large bird types, diurnal raptor subtypes, all large birds, and all small birds at the Four Mile Wind Project, Benton County, Washington from June 5, 2018 to May 29, 2019.

Obs. Pt.	Waterbirds	Waterfowl	Shorebirds	Gulls/Terns	Diurnal Raptors	*Accipiters*	*Buteos*	*Northern Harrier*	*Eagles*	*Falcons*	Owls	Upland Game Birds	Doves/ Pigeons	Large Corvids	All Large Birds	All Small Birds
1	27.27	0	0	0	4.64	0	2.91	1.27	0.18	0.27	0	0	0	1.64	33.55	7.45
2	0	0	0	0	0.82	0.09	0.18	0.55	0	0	0	1	0	0.55	2.36	4.27
3	0	3	0	0	2.64	0	1.45	0.55	0	0.64	0	0	1.73	0.91	8.27	4.45
4	0	0	0	0	1.42	0	0.75	0.58	0	0.08	0.08	0.67	1.58	2.00	5.75	5.00
5	0.09	11.36	0	0	2.55	0.09	1.27	1.18	0	0	0	0	0.36	1.82	16.18	1.73
6	0	0	0	0	2.00	0	0.92	1.00	0	0.08	0	0	4.42	6.58	13.00	6.33
7	0	0	0	0	2.00	0	1.33	0.17	0	0.50	0	0	0.08	1.75	3.83	2.67
8	0.17	2.83	0	0	0.92	0	0.42	0.25	0	0.25	0	0	0	2.83	6.75	7.67
9	0	0	0	0	0.75	0	0.33	0.33	0	0.08	0	0.08	0	7.25	8.08	17.58
10	0	0.73	0	0.36	1.27	0	0.91	0.18	0	0.18	0	0	0	5.73	8.09	6.64
11	9.73	0	0	0	2.55	0	1.64	0.82	0	0.09	0	0	0	4.73	17.00	7.09
12	0.08	281.33	0	0	2.58	0	1.00	1.25	0.08	0.25	0	0	0	0.92	284.92	0.58
13	7.33	82.92	0.08	2.33	1.75	0	0.58	0.75	0	0.42	0	0	0	0.92	95.33	4.83
14	0	39.50	0	0	2.83	0.08	0.92	1.50	0.08	0.25	0	0	0.17	5.67	48.17	3.08
15	6.50	25.58	0	0	1.50	0	0.58	0.92	0	0	0	0.08	0	2.00	35.67	3.08
16	16.50	337.42	0	0	3.08	0	2.00	1.00	0	0.08	0	0.17	0	6.17	363.33	6.08
17	6.67	80.83	0	0	5.00	0	1.33	3.25	0	0.42	0	0	0	1.33	93.83	3.67
18	0.83	78.17	0	0	3.33	0.08	2.25	0.42	0	0.58	0	0	5.92	2.58	90.83	10.33
19	0.18	2.64	0	0	1.27	0	0.55	0.45	0	0.27	0	0	0	2.91	7.00	8.36
20	9.45	9.45	0	0	1.73	0.09	0.45	1.09	0	0.09	0	0.09	0	3.18	23.91	3.55
21	2.92	4.25	0	0	1.58	0	0.50	0.42	0	0.67	0	0	0.08	1.08	9.92	5.08
22	2.42	23.17	0	0	1.17	0	0.75	0.17	0	0.25	0	0	0.08	3.42	30.25	2.33
23	4.08	67.92	1.67	4.17	2.67	0	1.67	0.25	0.08	0.67	0	0.75	0	9.08	90.33	4.50
24	0.82	0	0	0	1.09	0	0.64	0.09	0	0.36	0	0.18	0	3.36	5.45	1.64
25	3.70	53.40	0	0	1.70	0	0.90	0.80	0	0	0	0	0	0.80	59.6	2.40
26	0	0	0	0	0.90	0	0.70	0.10	0	0.10	0	0	0	4.00	4.90	7.80
27	6.10	3.50	0	0	0.90	0	0.40	0.10	0	0.40	0	0	0.10	3.00	13.60	3.90

From Figure 2-5.6 High Impact Zone with area highlighted just East of I-82. The circled are roughly Correlates to the high avian mean use flight data and Appendix C #1. In the highest mean use for Buteos on the project, there are 7 turbines located in close proximity. But the Council was not presented with this look.



From Appendix M FASC-Map of all surveys performed. No aggregated tabulated data for each survey point.

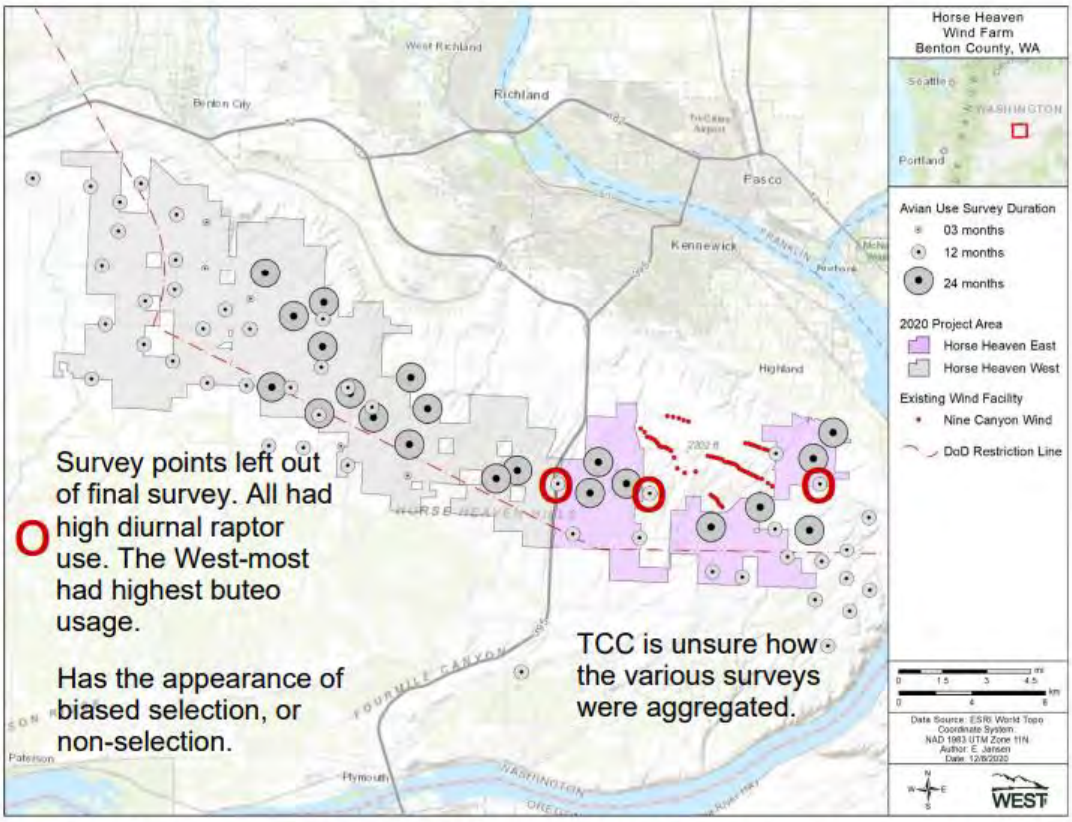


Figure 4. Fixed-point avian use points and survey duration from 2017 – 2020 at the Horse Heaven Wind Farm, Benton County, Washington.

Table A-1: Exposure Indices Calculated for Small Bird Species Observed During Avian Use Studies, 2017-2020

Common Name	Overall Mean Use	Percentage Flying	Option 1				Option 2			
			GE 2.82 MW Turbine (25 to 155 m RSH)		GE 3.03 MW Turbine (10 to 155 m RSH)		GE 5.5 MW Turbine (45 to 205 m RSH)		SG 6.0 MW Turbine (30 to 200 m RSH)	
			Percentage Flying within RSH	Exposure Index	Percentage Flying within RSH	Exposure Index	Percentage Flying within RSH	Exposure Index	Percentage Flying within RSH	Exposure Index
Horned lark	5.30	69.0	8.5	0.312	34.9	1.275	0	0	5.1	0.187
Unidentified small bird	0.15	96.1	21.6	0.032	95.9	0.149	21.6	0.032	21.6	0.032
Bank swallow	0.14	100.0	0	0	50.0	0.072	0	0	0	0
White-crowned sparrow	0.14	70.0	0	0	62.5	0.063	0	0	0	0
European starling	0.10	69.6	79.8	0.057	81.9	0.059	2.1	0.002	78.7	0.057
Barn swallow	0.09	100.0	10.3	0.010	41.4	0.039	0	0	10.3	0.010
Brewer's blackbird	0.03	100.0	0	0	50.0	0.014	0	0	0	0
Western meadowlark	0.28	31.8	0	0	11.7	0.011	0	0	0	0
Western kingbird	0.03	31.3	20.0	0.002	80.0	0.008	0	0	20.0	0.002
Unidentified swallow	0.02	100.0	0	0	28.6	0.007	0	0	0	0
Savannah sparrow	0.06	76.9	0	0	12.0	0.006	0	0	0	0
Cliff swallow	0.04	100.0	0	0	10.0	0.004	0	0	0	0
American goldfinch	0.02	14.9	71.4	0.002	71.4	0.002	0	0	0	0
Red-winged blackbird	<0.01	100.0	66.7	0.001	100.0	0.002	0	0	66.7	0.001

From:	frank frankkliewer.com
To:	EFSEC mi Comments
Subject:	Request for Revisions to the Draft SCA Horse Heaven Hills Wind and Solar Project
Date:	Wednesday, April 10, 2024 4:16:24 PM
Attachments:	Request for Revisions to the Draft SCA.pdf

External Email

Request for Revisions to the Draft SCA

As a resident of the Horse Heaven Hills for the past 5 years, I have developed a sense of the tremendous impact the proposed wind turbines and solar panel project would have for this incredibly beautiful and environmentally sensitive area.

As a retired manager of Community and Economic Development for a large jurisdiction and appointed university professor of emerging technology, as well as a real estate developer for decades, I bring a special understanding of the significant risks of this project.

First of all, let me summarize some of the major problems that must be addressed before this project is considered for approval. Then I will delve into some very specific concerns and a realistic and appropriate direction for clean energy development in Benton County.

Summary of Some Significant Issues:

Noise pollution: Wind turbines can generate significant noise, which can be a concern for nearby residents, potentially affecting their quality of life and property values.

Visual impact: The large-scale installation of wind turbines and solar panels can significantly alter the visual landscape of the Horse Heaven Hills, impacting the aesthetic appeal of the area affecting tourism and other economic activities. Loss of property value is inevitable and should be covered by an irrevocable bond in an amount that will protect landowners.

Wildlife habitat fragmentation: While the project aims to minimize impacts on wildlife, the construction and operation of wind turbines and solar panels will lead to habitat fragmentation, affecting the movement and behavior of various wildlife species in the area. There is no reasonable mitigation for this impact.

Community engagement and public acceptance: The project has faced opposition from local communities, including concerns about property values, visual impacts, and the potential loss of agricultural land. Ensuring effective community engagement and addressing public concerns has not occurred. Some may point to Covid 19 impacts on public meetings but is no longer a valid excuse to cutoff important community input on the local level, unhindered by remote alternatives.

Grid integration challenges: Integrating large-scale renewable energy projects into the existing power grid does pose technical challenges, such as managing fluctuations in power generation due to variable wind and solar resources. This must be coordinated with local Public Utilities that need to be in agreement with the project.

Endangered species protection: The Horse Heaven Hills is home to various endangered species, including the ferruginous hawk. Ensuring the protection of these species and their habitats is of utmost importance even with supposed planning and mitigation measures that currently fall short of presenting reasonable solutions. This will be addressed in more detail below.

Economic sustainability: The long-term economic viability of the project, including factors such as maintenance costs, power purchase agreements, and potential changes in renewable energy policies, can impact the project's sustainability. The ultimate cost and impact of

decommissioning the site, left to our children must be adequately addressed.

Cultural and historical significance: The Horse Heaven Hills have cultural and historical significance for local communities, including the Confederated Tribes and Bands of the Yakama Nation. Ensuring the protection of these values is a significant concern for the project.

Highlighted Issues:

A very specific consideration is the endangered ferruginous hawk, Buteo regalis, now facing new threats in Washington State, particularly in Benton County, due to the proposed Horse Heaven Hills wind farm project. This majestic bird of prey, known for its regal appearance and significant size, is already listed as threatened by the Washington Department of Fish and Wildlife due to habitat loss and other factors affecting its population.

If you have never witnessed the soaring beauty of the ferruginous hawk, you've missed something special. My wife and I have watched in wonder many times as this magnificent bird seems to hang motionless in the sky as it searches its habitat hundreds of feet below. The way in which it glides with the winds is a joy to behold. The loss of this species, as endangered by this wind farm project is unimaginable and would be a huge loss to future generations. So, let's look at the issues in more detail.

Habitat Loss: The Horse Heaven Hills wind farm project would further exacerbate habitat loss for the ferruginous hawk. These birds require large territories for nesting and hunting, and the construction of wind turbines could disrupt the natural habitat and prey availability in the area.

Population Decline: There has been a significant decline in the breeding territory occupancy, nest success, and productivity of the ferruginous hawk in Washington State. The number of breeding pairs has decreased, and the distribution of breeding pairs has contracted since the 1990s.

Endangered Status: The Washington Department of Fish and Wildlife has classified the ferruginous hawk as threatened, and there is a recommendation to reclassify the species to endangered due to the ongoing decline in population and habitat conditions.

Unique Characteristics: The ferruginous hawk is the largest hawk in the genus Buteo and is recognized for its regal appearance and significant size. It's known for its broad wings and distinctive coloration, which includes a dark phase and a more common light phase with a rufous tail and white underparts.

Prey Base and Nesting: The survival of ferruginous hawks is heavily dependent on the availability of prey, such as ground squirrels and other small mammals. They are also sensitive to disturbance at the nest, and too much human activity around nesting sites can lead to desertion.

Conservation Efforts: Efforts to conserve the ferruginous hawk include constructing nest platforms to facilitate nesting and tracking the birds by satellite to better understand their migration routes. Conservation organizations and government agencies are working to protect the remaining populations and their habitat.

These facts highlight the challenges facing the endangered ferruginous hawk in Washington State's Benton County due to the proposed Horse Heaven Hills wind farm project. The project would significantly impact the habitat and prey base of these birds, further endangering an already declining population.

The proposed two-mile radius protection around nesting sites for the ferruginous hawk does not fully account for the extensive territories these birds require for hunting and foraging. I have observed these hawks soaring throughout the Horse Heaven Hills, which suggests that their territories extend well beyond the proposed two-mile nesting area protection radius mitigation.

The proposed wind turbine heights of 400 to 600 feet also pose a significant risk to the hawks, as they could interfere with the birds' soaring and hunting behaviors. The turbines could potentially disrupt the hawks' flight paths, leading to collisions or displacement from their

preferred habitat.

The current proposal, therefore, does not adequately protect the endangered ferruginous hawk population in Benton County. A more comprehensive approach to conservation would consider the hawks' extensive territories and their need for unobstructed flight paths. This would involve expanding the protected areas of wind turbines to minimize their impact on the hawks' habitat.

In addition to these measures, ongoing monitoring and research would help to better understand the needs of the ferruginous hawk and inform future conservation efforts. By working together, conservation organizations and government agencies can help to protect this iconic species and ensure its survival in Washington State's Benton County.

Property Value Decline:

Another Major consideration is the loss of property values due to the view impact of the massive wind turbines and solar panels in the Horse Heaven Hill residential areas. It seems a bond of at least $2 billion should be in place to pay for loss of property values, before construction is allowed to proceed.

The concern about the potential loss of property values due to the visual impact of wind turbines and solar panels in the Horse Heaven Hills residential areas is understandable. The large-scale installations of renewable energy infrastructure can indeed affect the scenic views and potentially decrease property values.

While it's difficult to provide an exact figure without more detailed analysis, a bond of at least $2 billion could be considered a reasonable amount to compensate for potential property value losses. This would depend on the size of the affected area, the number of properties impacted, and the actual decrease in property values. It is worth noting that there are many forms of damage and significant losses that have been attributed to wind and solar farms including the health of residents.

Aerial Firefighting:

I have had personal experience with three devastating urban wildfires and this issue must be addressed thoroughly.

The height of wind turbines can indeed pose challenges for aerial firefighting efforts, particularly in areas prone to wildfires. Most aerial firefighting activities, such as dropping water or flame retardant, take place below 500 feet. The proposed wind turbines in the Horse Heaven Hills area could reach up to 657 feet, potentially interfering with firefighting efforts from the air.

In the event of a wildfire, aerial firefighting is often a crucial component of the response. Helicopters and other aircraft are used to drop water or fire retardant on the flames, helping to contain and suppress the fire. However, the presence of tall wind turbines can create no-fly zones for these aircraft, limiting their ability to operate effectively in the area.

This issue has led to concerns among firefighting professionals and community members, who worry that the presence of wind turbines could hinder firefighting efforts and potentially increase the risk to life and property in the event of a wildfire. Efforts are being made to address these concerns through legislation and project planning, such as requiring developers to consider the impact of wind turbine placement on firefighting operations. This issue is critical and must have further consideration.

These additional concerns highlight the complex nature of the Horse Heaven Hills wind and solar project and the need for careful planning, community engagement, and consideration of environmental, social, and economic factors.

Irreplaceable Land Use Loss:

The of the most disastrous effects of the Horse Heaven Hills wind and solar farm is the loss of extremely fertile land at a time of threatened food shortages. The Horse Heave Hills American Vintners Area is one of the best wine growing areas in the world, challenging France, and California. Blanketing these areas with solar panels and other associated development is not a wise use of precious land resources.

The Horse Heaven Hills American Viticultural Area (AVA) is a renowned wine-growing region, known for its unique terroir and high-quality wines. The AVA spans over 570,000 acres in southeastern Washington, and its distinctive climate, soil, and topography contribute to the production of exceptional wines. The AVA is home to more than 20 wineries, and the wine industry plays a significant role in the local economy.

The concern about the potential loss of this valuable agricultural land to wind and solar energy projects is understandable. The blanketing of such areas with solar panels and other associated developments would indeed have a negative impact on the wine industry, as well as on the local economy and the environment.

At a time of threatened food shortages, preserving fertile agricultural land is crucial. The Horse Heaven Hills AVA is not only an important wine-growing region but also a significant agricultural area, producing various crops such as wheat, corn, and hay. Converting this land for energy production would result in a loss of valuable agricultural resources and negatively impact the local food supply.

Furthermore, the development of wind and solar energy projects in such areas could also have unintended environmental consequences. The construction of wind turbines and solar panels could lead to habitat loss and fragmentation, potentially affecting local wildlife populations, including the endangered ferruginous hawk.

The development of wind and solar energy projects in the Horse Heaven Hills AVA must be approached with caution, considering the potential impacts on the wine industry, local agriculture, the environment, and wildlife. A balanced approach that considers the importance of preserving fertile agricultural land and protecting the local ecosystem is necessary for a sustainable energy transition.

In Conclusion, An Alternative Approach to Clean Energy in Benton County:

Benton County, Washington, is seeing advancements in nuclear power technology with Energy Northwest's partnership with Puget Sound Energy and the potential development of X-energy's advanced small nuclear reactors. The project aims to deploy up to 12 Xe-100 advanced small modular reactors (SMRs) in central Washington, capable of generating up to 960 megawatts of electricity. This initiative is part of a broader effort to meet Washington state's mandate to produce 100% of its power from "clean" sources by 2045, as set out in the Washington state Clean Energy Transformation Act.

Nuclear power, particularly with the advent of advanced SMRs, offers the potential for a more efficient and consistent source of clean energy compared to wind turbines and solar panels. These advanced SMRs are designed to have simplified, standardized, and scalable designs, making them potentially more reliable and cost-effective than traditional nuclear power plants. They are also designed to produce minimal waste and have enhanced safety features.

The investment in nuclear power in Benton County represents a significant step towards achieving clean energy goals without compromising the reliability and affordability of the power grid in the Northwest. Advanced nuclear technologies offer an alternative to inefficient wind and solar without disrupting the environment and destroying natural resources for future generations.

The development of new nuclear power technologies in Benton County is indeed a crucial step towards meeting clean energy goals, offering a potentially more efficient and reliable source of clean power compared to wind and solar.

Respectfully Submitted to: comments@efsec.wa.gov on April 10, 2024 by,

Frank Kliewer, Horse Heaven Hills

Respondent No: 158
Login: Anonymous
Email: n/a

Responded At: Apr 09, 2024 21:00:13 pm
Last Seen: Apr 09, 2024 21:00:13 pm
IP Address: n/a

Q1. **First & Last Name** Patricia Loera

Q2. **Email address** loerajp@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

I would like to urge the committee to please consider and make the following changes in the plan: 1. Removing turbines within 2 miles of Ferruginous Hawk nests 2. Removing turbines from highly rated wildlife corridors 3. Modifying the Eastern solar site to lessen impact on habitat 4. Removing turbines that impact visual & cultural resources 5. Removing additional turbines to allow for adequate aerial firefighting

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 159
Login: Anonymous
Email: n/a

Responded At: Apr 09, 2024 21:18:56 pm
Last Seen: Apr 09, 2024 21:18:56 pm
IP Address: n/a

Q1.	**First & Last Name**	Barbara Thompson
Q2.	**Email address**	bluemtngirl@hotmail.com
Q3.	**Are you part of an Agency or Organization?**	No

Q4. **Share any comment**

Last summer there was a large fire that broke out during a high wind warning, June 13, 2023. It was called the Hansen Fire. It burned over 6,000 acres. We had planes flying over dropping loads of fire retardant. Had these 600 foot wind farms been in place these large planes may not have been able to fly over our homes, orchards and vineyards trying to stop this fast moving fire. We have fires that burn through here almost every year. Instead of spending MILLIONS of dollars building Chinese made wind mills, that will have to be replaced in 20 years or become a fire hazard themself, that money should be spend on nuclear power or more Hydrodams. And if the salmon and steelhead runs are depleting.. put a bounty on seals.. And did you know that Steelhead eat salmon eggs? Also, the wildlife that will be affected by the Windmills, the hawks, owls, and the sand hill cranes that migrate through here. There is a better use for the funds to develop more efficient methods of producing reliable electricity that throwing more money into windmills. Article is from TriCity Herald: https://www.tri-cityherald.com/news/local/crime/article276424506.html

Q5.	**Upload your document or picture (optional)**	not answered

Respondent No: 160
Login: Anonymous
Email: n/a

Responded At: Apr 09, 2024 22:00:14 pm
Last Seen: Apr 09, 2024 22:00:14 pm
IP Address: n/a

Q1. **First & Last Name** Ramona Rommereim

Q2. **Email address** rl.rommereim@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

We oppose the wind farm here. We support nuclear and hydropower energy

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 161
Login: Anonymous
Email: n/a

Responded At: Apr 09, 2024 22:02:36 pm
Last Seen: Apr 09, 2024 22:02:36 pm
IP Address: n/a

Q1. **First & Last Name** — Don rommereim

Q2. **Email address** — donrommereim@gmail.com

Q3. **Are you part of an Agency or Organization?** — No

Q4. **Share any comment**

No to the wind generation south of Tricities. We like hydro and nuclear power

Q5. **Upload your document or picture (optional)** — not answered

Respondent No: 162
Login: Anonymous
Email: n/a

Responded At: Apr 09, 2024 22:28:37 pm
Last Seen: Apr 09, 2024 22:28:37 pm
IP Address: n/a

Q1. **First & Last Name** Sara Fearing

Q2. **Email address** s_dfearing@hotmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

I've lived in Tri-Cities all of my 76 years and the Horse Heaven Hills have been a part of my life that entire time. No one that I know of around here want to see some company come in and erect structures on those hills that will forever change and pollute the way they look. Wind turbines are a senseless machine that provide very little return for the amount of money they cost to build and maintain. Landowners, manufacturers, and contractors profit from these eyesores while the rest of us get to live with our landscape forever altered & desecrated. If Mr. Inslee wants hundreds or even thousands more wind turbines in his state, then a much better location to build them would be along the Washington coast and the base of Mr. Rainier where the wind almost always blows and millions more people in our state can get the pleasure of seeing them on a daily basis. A solution to any future energy needs in our state that makes far more sense would be to build more nuclear plants on the thousands of empty acres on the Hanford reservation. Lots of jobs, safe, clean energy and an accepted method of power generation in our area. We do not need wind turbines here and we certainly don't want them!!

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 1
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 01:19:38 am
Last Seen: Apr 10, 2024 01:19:38 am
IP Address: n/a

Q1. **First & Last Name** Jeanette Kennidy

Q2. **Email address** jkkennidy@hotmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

H. Indirect Habitat Loss Management Plan The Certificate Holder shall in coordination with the PTAG develop an Indirect Habitat Loss Management Plan (IHLMP) that addresses potential indirect habitat loss resulting from the Project (see Appendix 2; Hab-5 Indirect Habitat Loss Management Plan). Compensatory habitat mitigation must fully offset the loss of habitat function and value. The IHLMP must be provided. to the PTAG for review 90 days prior to construction. Approval of the IHLMP shall reside with EFSEC. The objectives of the IHLMP would be to identify a Project-specific Zone of Influence (ZOI) and required mitigation based on the Project-specific ZOI. The Project-specific ZOI would be. developed based on Project conditions and may differ from the ZOI presented in the EIS. The IHLMP would include: 1. A description of the study's purpose and objectives. 2. A description of methods to define Project-specific ZOIs (e.g., gradient analysis, nest density). 3. A description of data requirements to establish Project-specific ZOIs and field programs that would be implemented (pre-construction and post-operation). 4. A description of the duration of studies required to establish Project-specific ZOIs. 5. A description of criteria to be used to compensate for loss of habitat function and value. 6. An environmental effectiveness monitoring strategy of compensatory habitat to ensure that the habitat meets success criteria. The IHLMP would also include a series of compensatory site-selection criteria, developed in consultation with the PTAG. The selection criteria would be used to evaluate candidate habitat. compensation habitats through one or more actions of land acquisition, on-site easements and restoration (excluding areas impacted by the Project such as temporary laydown areas), and/or fee-based mitigation (see Appendix 2; Hab-8 Indirect Habitat Loss Compensation). The development of conservation easements shall be prioritized. Habitats that achieve more of the criteria would be identified as the preferential sites. Selection criteria would include, at a minimum: 1. Proximity to the Lease Boundary (e.g., hierarchy of preferences with respect to location— within the Lease Boundary being the highest priority, adjacent to the Lease. Boundary being the second highest priority, and off site being the third priority). 2. Protection of existing native shrub-steppe or grassland habitats.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 2
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 06:40:22 am
Last Seen: Apr 10, 2024 06:40:22 am
IP Address: n/a

Q1.	**First & Last Name**	Chrissy Borskey
Q2.	**Email address**	chrissy.borskey@ge.com
Q3.	**Are you part of an Agency or Organization?**	No

Q4. **Share any comment**

Thank you for the opportunity for GE Vernova to submit comments on the Horse Heaven Clean Energy Center Project.

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/6fcb1581805c9b89180626c4a6f4edaa5939aa6a/original/1712756337/fc6d312302db41bf40a0054beda45578_Comments_to_EFSEC_-_GE_Vernova_-_4-9-2024_-_FINAL.pdf?1712756337

Respondent No: 3
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 09:42:30 am
Last Seen: Apr 10, 2024 09:42:30 am
IP Address: n/a

Q1.	**First & Last Name**	Michelle Mercer
Q2.	**Email address**	michelle.mercer@co.benton.wa.us
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Benton County

Q4. **Share any comment**

Please see attached comment letter from the Benton County Board of Commissioners.

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/bea4dcef1bd909e77e5ec0abd5904285e5118c9e/original/1712767348/1e30041156cdba5763d7d42b5107ec36_BOCC_Signed_EFSEC_Comment_Letter_RE-Horse_Heaven_Wind_Farm.pdf?1712767348

Respondent No: 4
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 09:49:03 am
Last Seen: Apr 10, 2024 09:49:03 am
IP Address: n/a

Q1. **First & Last Name** mike minelli

Q2. **Email address** compari64@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

As a scientist and environmentalist I am a degreed and qualified to review technical data and information. My review of the SCA and the Report to the Governor does not demonstrate sufficient and specific detail to be considered valid for initiating the project. Examples are : Number of turbines Location of each Model to be used Designed output is confusing. (is it 1150 mw or 1150 PLUS 800mw?) Decomissioning plan (only a general not specific reference in document such $, source of $, Accountability for execution Solar plan? Who is the customer? WA. State or other? Fire disaster details? Road and Traffic specificity (Who, what, agreed with WDOT and Benton County?) Source and volume of water required Without sufficient critical details, as referenced above the applicant will have the latitude to operate at will I believe EFSEC will not allow the obvious open check approach and expedited approval is allowed

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 5
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 10:23:59 am
Last Seen: Apr 10, 2024 10:23:59 am
IP Address: n/a

Q1.	**First & Last Name**	Pam Minelli
Q2.	**Email address**	pam_minelli@hotmail.com
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Tri-Cities CARES
Q4.	**Share any comment**	See attached comment below:
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/e84b97f5aa418a9e3174a70df670efae72a43184/original/1712769691/d057593c8a85d398b5e3719803c0d2a8_HH_Project_Comment_4.10.24.pdf?1712769691

Respondent No: 6
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 10:42:08 am
Last Seen: Apr 10, 2024 10:42:08 am
IP Address: n/a

Q1. **First & Last Name** michael minelli

Q2. **Email address** compari64@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

As a degreed scientist and environmentalist I am qualified to review technical data and information as a professional. My review of the SCA and Report to the Governor is in need of much greater specificity of the project basics: plan. Examples of those topics are: Number of Turbines Where will they be placed Which Turbine Model(s) have been selected Project design for energy output (confusion as to 1150 mw or 1150 plus 800 mw) Decommissioning plan: $ set aside, accountability for plan execution(applicant?, State? County?) Solar Plan (referenced in generalities without detail) Is there a Customer for energy output? (State of WA. or other) Fire Disaster Plan Road and Traffic Plan (roads new and modified) Water (source, volume, transport to cite?) Final Comment: This plan is not sufficient and should not be approved without additional basic detail. With these plans the applicant will have the latitude to operate at will with minimal control of the details. It appears the wording is clearly open ended and intentional. It is essential that EFSEC does not allow a "blank check" expedited approach for your recommendation.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 7
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 10:42:51 am
Last Seen: Apr 10, 2024 10:42:51 am
IP Address: n/a

Q1. **First & Last Name**

not answered

Q2. **Email address**

not answered

Q3. **Are you part of an Agency or Organization?**

Yes (please specify)
Portland General Electric

Q4. **Share any comment**

not answered

Q5. **Upload your document or picture (optional)**

https://s3-us-west-1.amazonaws.com/ehq-production-us-california/9d67769bfbcad9a8d2f7a4c9cc253f7268d416a4/original/1712770904/40160f59e5ba9820670511d06efca71a_4-10-2024_PGE_Comments_-_Horse_Heaven_Wind_Project.pdf?1712770904

Respondent No: 8
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 11:28:51 am
Last Seen: Apr 10, 2024 11:28:51 am
IP Address: n/a

Q1.	**First & Last Name**	Joseph Zimsen
Q2.	**Email address**	Jos.zimsen@gmail.com
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Green Workers Alliance

Q4. **Share any comment**

As a native son of Washington State (Bremerton born and raised), I know that the people of Washington love clean air, clean water and the abundance natural beauty of their home. The value of the wild places preserved in our state is immeasurable. With more mountains per square mile than even Switzerland, all efforts to preserve the diverse natural beauty - three immense and stunning National Parks, four major volcanic peaks, vast forests, powerful rivers, and wide open semi-arid prairie - will be for nothing without power generation moving from fossil fuels to carbon free energy sources like wind and solar. While it's true that Washington already gets 70% of the electricity needed from the hydro-electric dams erected in the 1930s - 1970s, the rest of the country isn't so fortunate. Washington has led the way in renewable energy for almost 100 years. This is not the time to back off that progress and risk losing the environments we all love and enjoy living in harmony with. Please ratify this project as soon as humanly possible. There is nothing less than our future at stake.

Q5.	**Upload your document or picture (optional)**	not answered

Respondent No: 9
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 11:39:15 am
Last Seen: Apr 10, 2024 11:39:15 am
IP Address: n/a

Q1. **First & Last Name** Holiday Lammon

Q2. **Email address** puppylammon@aol.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 10
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 11:40:06 am
Last Seen: Apr 10, 2024 11:40:06 am
IP Address: n/a

Q1. **First & Last Name** Toni Jacks

Q2. **Email address** alohatoni@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 11
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 11:46:26 am
Last Seen: Apr 10, 2024 11:46:26 am
IP Address: n/a

Q1. **First & Last Name** Diane Watts

Q2. **Email address** dwatts36@yahoo.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 12
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 11:48:07 am
Last Seen: Apr 10, 2024 11:48:07 am
IP Address: n/a

Q1. **First & Last Name** Margaret Jonecs

Q2. **Email address** miamuffin1958@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 13
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 11:58:22 am
Last Seen: Apr 10, 2024 11:58:22 am
IP Address: n/a

Q1. **First & Last Name** — Anonymous

Q2. **Email address** — not answered

Q3. **Are you part of an Agency or Organization?** — No

Q4. **Share any comment**

Approving Scout Energy's proposed current infrastructure proposal for a windmill farm in it's current proposed location would cause too much environmental harm to the endangered ferruginous hawks. It would be great hypocrisy to approve such a project while our government is currently seeking the removal of the Snake River Dams to protect other species. Washington should take a stand to protect all animals and be consistent across the board . While their our options to protect salmon from dams; there is no protection for the hawks from the proposed windmills . The current windmill energy project would wipe out an endangered species that primarily make their home in the proposed area and that would be irresponsible by Washington State to approve such a project at it's current plan.

Q5. **Upload your document or picture (optional)** — not answered

Respondent No: 14
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 12:04:00 pm
Last Seen: Apr 10, 2024 12:04:00 pm
IP Address: n/a

Q1. **First & Last Name** Thor Thompson

Q2. **Email address** tthompsonseattle@aol.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 15
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 12:05:26 pm
Last Seen: Apr 10, 2024 12:05:26 pm
IP Address: n/a

Q1. **First & Last Name** Mary Marsh

Q2. **Email address** marym@localaccess.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 16
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 12:07:10 pm
Last Seen: Apr 10, 2024 12:07:10 pm
IP Address: n/a

Q1. **First & Last Name** Percy Hilo

Q2. **Email address** percivalpeacival@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 17
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 12:08:14 pm
Last Seen: Apr 10, 2024 12:08:14 pm
IP Address: n/a

Q1. **First & Last Name** Maria Joseph

Q2. **Email address** palaciokitty54@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 18
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 12:29:23 pm
Last Seen: Apr 10, 2024 12:29:23 pm
IP Address: n/a

Q1.	**First & Last Name**	Trina Bayard
Q2.	**Email address**	trina.bayard@audubon.org
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Audubon Washington
Q4.	**Share any comment**	Please see attached comment letter
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/0b64ef87c491cced580b26b1a1e13d63fba9e481/original/1712777345/7baf5a78dcaab49275007736cba55be6_AudubonWA_comments_draft_SCA_and_EFSEC_recommendation_4_10_24.pdf?1712777345

Respondent No: 19
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:03:17 pm
Last Seen: Apr 10, 2024 13:03:17 pm
IP Address: n/a

Q1. **First & Last Name** Gwyn'ellyn Wren

Q2. **Email address** bardcreek@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 20
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:04:53 pm
Last Seen: Apr 10, 2024 13:04:53 pm
IP Address: n/a

Q1. **First & Last Name** Kristi Hunziker

Q2. **Email address** hunzykris@yahoo.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 21
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:06:19 pm
Last Seen: Apr 10, 2024 13:06:19 pm
IP Address: n/a

Q1. **First & Last Name** Colleen Burns

Q2. **Email address** cabmeyer1@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 22
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:07:55 pm
Last Seen: Apr 10, 2024 13:07:55 pm
IP Address: n/a

Q1. **First & Last Name** Matilda Evans

Q2. **Email address** texastilly2001@yahoo.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

I'm writing to express grave concern over EFSEC's pursuit of overreaching and unprecedented measures related to Ferruginous hawk habitat. The impact of these measures reaches far beyond the Horse Heaven project – it could ultimately staunch the development of clean energy infrastructure across Central Washington – and the vast economic and environmental benefits that come with it. Applying a 2-mile exclusion zone for any new development around Ferruginous hawk nesting areas – regardless of whether a nest is active or abandoned – is overly rigid and arbitrary in its application. This extreme approach hasn't been thoroughly vetted, is not based on the best available science for preserving species and habitat, is unreasonably broad, and undermines the years of work the Washington State Legislature has put into streamlining the state's siting and permitting process. Worse of all, this precedent will further jeopardize the success of our state's nationally renowned climate agenda.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 23
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:09:36 pm
Last Seen: Apr 10, 2024 13:09:36 pm
IP Address: n/a

Q1. **First & Last Name** Alison Williams

Q2. **Email address** ralransmom@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 24
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:10:19 pm
Last Seen: Apr 10, 2024 13:10:19 pm
IP Address: n/a

Q1. **First & Last Name** Terry Taylor

Q2. **Email address** ttaylor63@hotmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 25
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:13:38 pm
Last Seen: Apr 10, 2024 13:13:38 pm
IP Address: n/a

Q1. **First & Last Name** Vicki Lewis

Q2. **Email address** vichar@comcast.net

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 26
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:14:19 pm
Last Seen: Apr 10, 2024 13:14:19 pm
IP Address: n/a

Q1. **First & Last Name** Jeffrey Obert

Q2. **Email address** jaobert@live.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 27
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:16:00 pm
Last Seen: Apr 10, 2024 13:16:00 pm
IP Address: n/a

Q1. **First & Last Name** Dennis Hood

Q2. **Email address** djhood34@msn.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 28
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:17:06 pm
Last Seen: Apr 10, 2024 13:17:06 pm
IP Address: n/a

Q1. **First & Last Name** Brenda Seifert

Q2. **Email address** brendag45@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

The Horse Heaven Clean Energy Center – and other renewable energy projects like it – are critical for meeting Washington state's clean energy goals and addressing the dangerous impacts of climate change. The Washington Department of Commerce made this point clear in a recent Seattle Times article covering the project and our state's energy needs: "Glenn Blackmon, manager of Washington's Energy Policy Office, estimated that by 2035 the state will need an additional 22 gigawatts of renewable energy, citing a recent study from the nonprofit Clean Energy Transition Institute. "While it would be the largest renewable project in Washington, the Horse Heaven site represents less than 5% of that total need and is taking years longer than expected to build. "'We actually need several more like it,' Blackmon said." Meeting the need of 22 gigawatts of new renewable energy will be seriously jeopardized if EFSEC adopts the unprecedented 2-mile exclusion zone for both active and inactive Ferruginous hawk nests. This ruling would not only severely harm the Horse Heaven Project, but it would also create an incredibly dangerous precedent that would be applied to the development of all new wind, solar, storage, transmission, and other utility infrastructure within Central Washington. This ruling would put reaching our state's clean energy and decarbonization goals further out of reach – at a time when the harmful impacts of climate change are only worsening. Development impacts must be accounted for, which is why the Horse Heaven project included robust mitigation and habitat conservation measures based on the best available science for protecting species and habitat. To preserve our clean energy future, I strongly encourage the council to reconsider this unprecedented approach and adopt the proven mitigation measures as proposed for the Horse Heaven Clean Energy Center.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 29
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:18:40 pm
Last Seen: Apr 10, 2024 13:18:40 pm
IP Address: n/a

Q1. **First & Last Name** Rowena Frombach

Q2. **Email address** frombachrenna@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

I'm writing to express grave concern over EFSEC's pursuit of overreaching and unprecedented measures related to Ferruginous hawk habitat. The impact of these measures reaches far beyond the Horse Heaven project – it could ultimately staunch the development of clean energy infrastructure across Central Washington – and the vast economic and environmental benefits that come with it. Applying a 2-mile exclusion zone for any new development around Ferruginous hawk nesting areas – regardless of whether a nest is active or abandoned – is overly rigid and arbitrary in its application. This extreme approach hasn't been thoroughly vetted, is not based on the best available science for preserving species and habitat, is unreasonably broad, and undermines the years of work the Washington State Legislature has put into streamlining the state's siting and permitting process. Worse of all, this precedent will further jeopardize the success of our state's nationally renowned climate agenda.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 30
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:20:08 pm
Last Seen: Apr 10, 2024 13:20:08 pm
IP Address: n/a

Q1.	**First & Last Name**	Teresa Nelson
Q2.	**Email address**	steveandtess2@gmail.com
Q3.	**Are you part of an Agency or Organization?**	No

Q4. **Share any comment**

To whom it may concern; Please...No more windmills. They are killing our bird population and are an unsightly monstrosity to look at every day. Thank-you, Teresa Nelson

Q5.	**Upload your document or picture (optional)**	not answered

Respondent No: 31
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 13:28:23 pm
Last Seen: Apr 10, 2024 13:28:23 pm
IP Address: n/a

Q1.	**First & Last Name**	Chrissy Borskey
Q2.	**Email address**	chrissy.borskey@ge.com
Q3.	**Are you part of an Agency or Organization?**	No

Q4. **Share any comment**

Thank you for allowing us to submit these comments. Please remove the previous version from GE Vernova dated 4-9-2024 and use the attached version (entitled: "Comments to EFSEC - GE Vernova - 4-10-2024 - Final1 for submittal")

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/3740d11d0e3716d14ba299545525de59eabc6e6f/original/1712780838/d74189a2a5d9f9020c79314d5899244a_Comments_to_EFSEC_-_GE_Vernova_-_4-10-2024_-_FINAL1_-_for_submittal.pdf?1712780838

Respondent No: 32
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 14:25:20 pm
Last Seen: Apr 10, 2024 14:25:20 pm
IP Address: n/a

Q1. **First & Last Name**	John M. Endres
Q2. **Email address**	jmmendres@tds.net
Q3. **Are you part of an Agency or Organization?**	No
Q4. **Share any comment**	not answered
Q5. **Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/0d19180b9a7b8aa7dc4380051552f4da5b7ee261/original/1712784290/5efdd323114c02dab5a2b52d2552b712_Horse_Heaven_Draft_SCA_Comments_jme_20240410.docx?1712784290

Respondent No: 33
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 15:21:06 pm
Last Seen: Apr 10, 2024 15:21:06 pm
IP Address: n/a

Q1.	**First & Last Name**	Paul Gonseth, P.E.
Q2.	**Email address**	gonsetp@wsdot.wa.gov
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** WSDOT
Q4.	**Share any comment**	not answered
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/ab40348fce6b88abcb3337a412d767c0e4444cfd/original/1712787628/4f278e91a2b8de14914185b4e8302a58_EFSEC_Horse-Heaven_SCA.pdf?1712787628

Respondent No: 34
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 15:46:44 pm
Last Seen: Apr 10, 2024 15:46:44 pm
IP Address: n/a

Q1. **First & Last Name** Richard Engelmann

Q2. **Email address** rengelmann3@charter.net

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

Deny the Horse Heaven Wind Farm application for site certification. The amount of electricity to be generated by this project does not justify its noise and major disturbance of land, wildlife and viewscape. The state and Benton County would be far better served by investment in small modular nuclear power plants, which would have far less environmental impact than this and other planned wind/solar projects. In the near future the state plans to replace the average 40 GWh/day generated by carbon emitting generation (natural gas and coal) with wind and solar power. Based on its name plate generating capacity of 1.15 GW and a typical 25% capacity factor for these projects (U.S. Energy Administration and Statista statistics as well as other sources), the Horse Heaven Hills Wind Farm project would generate on average only 7 GWh/day and replace only 1/6 of the state's current carbon emitting generation. This is a small amount for a project with nearly 36 square miles of project area strung out along a 30-mile swath of land. In stark contrast, the Columbia River Generating Station occupies only about one and a half square miles and yet generates about four times as much as this project would. It would take six of these high environmental impact projects to replace the state's current natural gas and coal generation. And that's not taking into account additional capacity that will be needed to replace the Snake River dam generating capacity the governor wants removed, plus the additional capacity needed to supply data farms, state forced conversion of homes and buildings to all electric, and charging all of the electric vehicles we will be forced to buy. Under current planning, the only new near-term electricity production will be from huge land disturbing wind and solar projects. No better place to stop this harmful approach than to deny approval of this project and begin the switch to more sensible nuclear power now.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 35
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 16:08:48 pm
Last Seen: Apr 10, 2024 16:08:48 pm
IP Address: n/a

Q1.	**First & Last Name**	Christy Hembree
Q2.	**Email address**	chblueskye@gmail.com
Q3.	**Are you part of an Agency or Organization?**	No

Q4. **Share any comment**

Dear Sir or Madam, New Comments in response to the EFSEC's The Recommendation to the Governor and The Draft Site Certification Agreement , under the latest public comment period, open from April 1-April 10th at midnight: 1. Wind towers don't belong on our horse heaven hills, which provide critical habitat for threatened and endangered species of plants and animals, recreational opportunities, ecological diversity, cultural heritage and beauty spots for our area. 2. This Wind project doesn't fit with our hydro and nuclear power grid and the power generated wont help our state. Plans have been accepted and are in progress to site 12 new XE-100 modular reactors on the Hanford site at Energy Northwest, a project which will work harmoniously with our existing power grid, create more long term jobs, and fit into an already existing energy footprint at Energy Northwest and will create up to 960 MW of electricity for our state. This project renders Scout's proposed project unnecessary and meets our own energy needs, while creating a smaller footprint in an area already allocated for energy generation. 3. Horse Heaven Hills are a multi-use beauty spot that should be preserved for its ecological value, wildlife diversity, multiple recreation opportunities, cultural heritage, etc. If anything Horse Heaven Hills should receive National Monument status and be removed from current and future threat of development. 4 There are plenty of other sites in Washington state that a wind-project of this magnitude could be sited without threatening the local treasure that are the Horse Heaven Hills. This area of low rainfall, 7-14 inches annually, is totally unsuited for a this scale of proposed wind and solar project, and would burden our communities with increased fire danger, eventual cost of clean-up, and unsightly and unsafe towers, which will not even benefit us locally or regionally. 5 . Unfortunately, some local groups have begun pandering to Scout's energy plan under the mistaken belief that mitigating the damage is a possibility and that compromise is better than nothing. However, fragmenting vital habitat and creating a fire-and eco-hazards, parading as "green energy" is not a sane "green energy plan" for our area, which is already responsibly pulling its weight with carbon-free hydro-electric and nuclear power. 6. This wind & solar project has been a bad idea from the beginning, an eyesore foisted on east-siders by west-siders who would never tolerate a wind-tower mega-plex of the size and scope proposed by Scout, in their back yard (IE citing this project, say, in Puget Sound). It not the way to go about meeting our state's future green energy requirements. Additionally, the proposed industrial sized solar mega-complex is also not the way to go about meeting our state's clean energy needs, when roof-top solar can provide more immediate, more efficient and effective solar power on peoples' homes and businesses, where the infrastructure for it is already in place, or is far easier to place; without destroying intact ecosystems and valuable wildlife habitat or arable farmland. 7. EFSEC is making its public comment process deliberately opaque and hard to participate in, so that they can check off the obligatory boxes of pretending to listen to and consider local public comment; all the while stream-rollering a project down our communities' throats: a project that most tri-cities residents and nearby communities have vigorously opposed from its inception. 8. As from the beginning, as a life-long Richland resident, photographer, hiker, native plant enthusiast, amateur naturalist, equestrian and mountain biker, I am totally against the Scout Energy Wind and Solar Project, in any of its proposed forms or variations. I have visited our ridgelines from a young age, onward, and have experienced first-hand the value of our keeping our ridgelines intact. Their value as intact ecosystems with their unique plant and animal communities, their threatened and endangered species habitat, their recreational opportunities, and their intrinsic value in their own right as beauty spots, and as natural carbon sinks; far outweighs the paltry energy value that the Scout Energy Project is proposing to provide. Sacrificing the Horse Heaven Hills ridgeline system, to accommodate this utterly unnecessary and unwanted Wind and Solar Project is sheer madness. It's tantamount to killing the very planet you are purporting to help save. We have a better way to meet those energy needs through Hydroelectric and Nuclear Power, with the proposed modular reactors providing power and synergizing harmoniously with our existing power grid, without sacrificing the natural beauty, intact ecosystems, critical wildlife and plant habitat, recreational opportunities and value as natural carbon sinks, that our Horse Heaven Hills provide. Scout energy and their solar and wind turbine industrial complex eco-hazard are neither wanted nor needed in our communities and in our state. Recommendation is to end/oppose the Scout Wind and Solar project, once and for all, in any of its variations, and give our Horse Heaven Hills National Monument Status for their protection, now and into the future. Thank-you for your consideration. Christy Hembree

Q5. **Upload your document or picture (optional)** https://s3-us-west-1.amazonaws.com/ehq-production-us-california/43f7af3240a85434a46af304dd9b3498d45b43fc/original/1712790056/69a2ab627228bc5e419f109e8f86cbd8_DSC_7090_copy.jpg?1712790056

Respondent No: 36
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 16:19:14 pm
Last Seen: Apr 10, 2024 16:19:14 pm
IP Address: n/a

Q1. **First & Last Name** Debbie Berkowitz

Q2. **Email address** cdberkowitz@charter.net

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

In my comment letter dated Feb. 1, 2023 on the Horse Heaven Draft EIS, I expressed the idea that clean energy is important but should be sited in a way that considers other environmental concerns like habitat and biodiversity losses and habitat connectivity. I was concerned that the actions proposed by the DEIS as presented would prove significantly harmful to the natural environment and did not take into account the concerns that WDFW, as well as members of the public, had presented to EFSEC. EFSEC's Horse Heaven Wind Farm draft Site Certification Agreement (SCA) and draft Recommendation Report to the Governor go a long way towards addressing these concerns. I appreciate that, in these documents, EFSEC proposes measures that take into account best available science to help reduce the adverse impacts of this proposed project. With the recommended scaled-down project and mitigation/protective measures included in the SCA and Recommendation Report, I am now writing in support of this project. In my comment letter dated Feb. 1, 2023 on the Horse Heaven Draft EIS, I expressed the idea that clean energy is important but should be sited in a way that considers other environmental concerns like habitat and biodiversity losses and habitat connectivity. I was concerned that the actions proposed by the DEIS as presented would prove significantly harmful to the natural environment and did not take into account the concerns that WDFW, as well as members of the public, had presented to EFSEC. EFSEC's Horse Heaven Wind Farm draft Site Certification Agreement (SCA) and draft Recommendation Report to the Governor go a long way towards addressing these concerns. I appreciate that, in these documents, EFSEC proposes measures that take into account best available science to help reduce the adverse impacts of this proposed project. With the recommended scaled-down project and mitigation/protective measures included in the SCA and Recommendation Report, I am now writing in support of this project. Sincerely, Debbie Berkowitz

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 37
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 16:43:31 pm
Last Seen: Apr 10, 2024 16:43:31 pm
IP Address: n/a

Q1.	**First & Last Name**	Spencer Gray
Q2.	**Email address**	sgray@nippc.org
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Northwest & Intermountain Power Producers Coalition
Q4.	**Share any comment**	not answered
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/b3c20abf74a53be73e04c7885248d94513b69f92/original/1712792595/8bcc0c48b0e3b059eb5c98ad99edc8d4_NIPPC_Horse_Heaven_Letter_%2804.10.2024%29.pdf?1712792595

Respondent No: 38
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 16:48:23 pm
Last Seen: Apr 10, 2024 16:48:23 pm
IP Address: n/a

Q1.	**First & Last Name**	Karen Brun
Q2.	**Email address**	karen@tricitiescares.org
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Tri-Cities CARES

Q4. **Share any comment**

This project needs to be reduced even further to adequately mitigate aerial firefighting, cultural resource, visual, wildlife impacts.

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/e967b2fb0b55151333c20fba6334f85fc76f23bd/original/1712792833/aeee7e43b82389223dba96603d0f426a_Final_TCC_RESPONSE_TO_DRAFT_REPORT_TO_GOVERNOR.docx?1712792833

Respondent No: 39
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 16:49:51 pm
Last Seen: Apr 10, 2024 16:49:51 pm
IP Address: n/a

Q1.	**First & Last Name**	Karen Brun
Q2.	**Email address**	karen@tricitiescares.org
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Tri-Cities CARES

Q4. **Share any comment**

This project needs to be reduced even further to fully mitigate cultural, aerial firefighting, visual, and wildlife impacts.

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/892cea86827c26c28b3c714957301c77fd9309d4/original/1712792986/c8e20d13a7708a5773dbec51b66f36df_Final_TCC_COMMENTS_TO_HHH_DRAFT_SCA.docx?1712792986

Respondent No: 40
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 16:56:15 pm
Last Seen: Apr 10, 2024 16:56:15 pm
IP Address: n/a

Q1.	**First & Last Name**	Karen Brun
Q2.	**Email address**	karen@tricitiescares.org
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Tri-Cities CARES
Q4.	**Share any comment**	not answered
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/892cea86827c26c28b3c714957301c77fd9309d4/original/1712793372/c40fde2b53d49680ea494b920325c2e5_Final_TCC_COMMENTS_TO_HHH_DRAFT_SCA.docx?1712793372

Respondent No: 41
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 17:49:45 pm
Last Seen: Apr 10, 2024 17:49:45 pm
IP Address: n/a

Q1.	**First & Last Name**	Paul Krupin
Q2.	**Email address**	Paul@Presari.com
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** I am a Board Member of Tri-Cities CARES.
Q4.	**Share any comment**	My comments are provided in the attached PDF file.
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/2a4723bc4dc225819b7b6c557888528972375fed/original/1712796573/0d0830c17e906db3d9f300dd2d7f4c60_PJK_Comments_on_DSCA_and_Recommendation_041024_5_pm.pdf?1712796573

Respondent No: 42
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 17:49:56 pm
Last Seen: Apr 10, 2024 17:49:56 pm
IP Address: n/a

Q1. **First & Last Name** Dave Knutzen

Q2. **Email address** dave.knutzen@nmt.us

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

I am writing in support of the Horse Heaven Hills Clean Energy Project. Throughout his 36 years in Congress, Norm Dicks has demonstrated the ability to reach across the aisle and problem solve. His OpEd strikes the right balance between environmental conservation and responsible clean energy development. EFSEC and WDFW should seek common sense solutions to resolve issues regarding the Ferruginous Hawk buffers. As a former Washington Department Fish and Wildlife fish employee and the current CEO of Northwest Marine Technology, I have always encouraged leaders throughout Washington to follow the science to determine best environmental practices in the protection of salmon. For five decades, my company has been a leader in protecting endangered fish species throughout Washington State. Washington State is already facing significant impacts on vulnerable fish populations due to climate change. The declining salmon populations and subsequent decline in Southern Resident Orcas require us to pivot to more advanced renewable sources of energy including wind, solar, and nuclear. We should follow Norm Dicks' leadership and strike the right balance. The fact that EFSEC is using data for the hawk and wildlife corridor that is not peer reviewed or gone through a major WDFW policy review is simply inappropriate. EFSEC must recalibrate its approach, ensuring that decisions align with scientific evidence and regulatory standards. The stakes are high, and EFSEC's actions will profoundly influence our ability to meet CETA requirements and combat climate change effectively. Thank you

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 43
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 17:59:52 pm
Last Seen: Apr 10, 2024 17:59:52 pm
IP Address: n/a

Q1.	**First & Last Name**	Kate Brouns
Q2.	**Email address**	kate@renewablenw.org
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Renewable Northwest
Q4.	**Share any comment**	not answered
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/2cb08d8001c220381325b9f77c8a982fe1079837/original/1712797161/ab58d54f8b7d37ac7b1f7dde954a1adf_2024-04-10_RNW_Horse_Heaven_comments.docx.pdf?1712797161

Respondent No: 44
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 18:04:32 pm
Last Seen: Apr 10, 2024 18:04:32 pm
IP Address: n/a

Q1.	**First & Last Name**	Ariel Stavitsky, on behalf of Scout Clean Energy
Q2.	**Email address**	ariel.stavitsky@stoel.com
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** Stoel Rives LLP

Q4. **Share any comment**

Please note this comment is in redacted, publicly available form. An unredacted, confidential version of this comment will be submitted to EFSEC by separate email shortly. Thank you.

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/9db28407d7d0222f8e23cf342ffdc1a99c4beda1/original/1712797456/0c7855030750ded6c1de4da2ac147229_REDACTED_Scout_Comments-EFSEC_Final_Project_Action_2024.04.10.pdf?1712797456

Respondent No: 45
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 18:56:08 pm
Last Seen: Apr 10, 2024 18:56:08 pm
IP Address: n/a

Q1.	**First & Last Name**	David Heiduck
Q2.	**Email address**	david@wpd-canada.ca
Q3.	**Are you part of an Agency or Organization?**	**Yes (please specify)** wpd
Q4.	**Share any comment**	not answered
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/8046101a35ac1649e1cb61ab86b8627ac36eff51/original/1712800543/57133405eb23b2b3d6a4b62b72f049ff_comment_letter_wpd_USA.pdf?1712800543

Respondent No: 46
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:03:10 pm
Last Seen: Apr 10, 2024 19:03:10 pm
IP Address: n/a

Q1. **First & Last Name**	Frank Kliewer
Q2. **Email address**	Frank@FrankKliewer.com
Q3. **Are you part of an Agency or Organization?**	No
Q4. **Share any comment**	not answered
Q5. **Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/9623683852926e17b9370171a3d49556f3435ffc/original/1712800983/b8066f5ae09a373ab5873201cd1be418_Request_for_Revisions_to_the_Draft_SCA.pdf?1712800983

Respondent No: 47
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:15:16 pm
Last Seen: Apr 10, 2024 19:15:16 pm
IP Address: n/a

Q1. **First & Last Name** — gayle graves

Q2. **Email address** — gayle.graves@gmail.com

Q3. **Are you part of an Agency or Organization?** — No

Q4. **Share any comment**

From a business case point of view and a project management perspective my feedback is very driven by the fact that milestone dates for information releases have been on holidays when one would expect less interest and participation from the preoccupied public. While the projects investors will benefit by tax incentives and the buyers of tax credits will benefit from the project our environment will be irreversible in the damage of the Pacific Flyway, the shrub steppe, the climate rise by degrees annual effecting our food supply and economy. Our public will pay higher energy rates (as we need more heat in the winter and cooler homes an businesses in the summer) The higher energy rates are due to the nature of the proposed green energy proposal that are ill natured manufacturing of those in the money pipeline. True engineers, scientists have innovative answers and proven models of efficiency but are not heard due the to fear of lost research money. The public will suffer the government will gain and the true natives of this gifted land to them and the pioneers will be put to waste. The beautiful gift of nature and life will never recover from the non recyclable turbines, the scars on the land, the economic devastation to the food supply chain and self sufficiency of the american dream. Below are pictures of a fire so close to homes in the horse heaven hills (thank you fire station 1) I watch it from the top of the hill move at lightening speed to the bottom of the hill. Fire put out and then jump again all the way up the hill again to the home up on top of the hill. These turbines, the climate impact, the destruction, the fires they bring (and the plane danger to try to put out if they can fly into this area at all) will be a scar and tragedy of all. The investors and government are the only parties that will be benefit.

Q5. **Upload your document or picture (optional)** — https://s3-us-west-1.amazonaws.com/ehq-production-us-california/837a80938534a324bae6fd7f7c7d535390fe559e/original/1712801684/533d77e7955b33e2edf9d41406c3ac95_Horse_Heaven_Hills_fire_July_2022.JPG?1712801684

Respondent No: 48
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:17:03 pm
Last Seen: Apr 10, 2024 19:17:03 pm
IP Address: n/a

Q1.	**First & Last Name**	gayle graves
Q2.	**Email address**	gayle.graves@gmail.com
Q3.	**Are you part of an Agency or Organization?**	No
Q4.	**Share any comment**	
	2 of 7 photos	
Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/1258c343651bdb43d74b62f9001c4d2b5c7d2760/original/1712801817/a70e27797374530ed16a1a469699ab14_Horse_Heaven_Hills_fire_7-2020.JPG?1712801817

Respondent No: 49
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:17:56 pm
Last Seen: Apr 10, 2024 19:17:56 pm
IP Address: n/a

Q1. **First & Last Name**	gayle graves
Q2. **Email address**	gayle.graves@gmail.com
Q3. **Are you part of an Agency or Organization?**	No
Q4. **Share any comment**	

3 of 7

Q5. **Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/3fb8b78437b98d189b562f1678fb62b48312a9cf/original/1712801870/38732c9b71cfc4aaee5f723846d932ff_Horese_Heavn_hills_7-2020.JPG?1712801870

Respondent No: 50
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:19:04 pm
Last Seen: Apr 10, 2024 19:19:04 pm
IP Address: n/a

Q1.	**First & Last Name**	gayle graves
Q2.	**Email address**	gayle.graves@gmail.com
Q3.	**Are you part of an Agency or Organization?**	No
Q4.	**Share any comment**	

Q5.	**Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/a9e73dcbb21940f5372a71dc9b5bbedfbf14172b/original/1712801937/a50b16d9b05f4bbe25b87493730e108e_tempImageyKPhGD.jpg?1712801937

Respondent No: 51
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:20:15 pm
Last Seen: Apr 10, 2024 19:20:15 pm
IP Address: n/a

Q1. **First & Last Name**	gayle graves
Q2. **Email address**	gayle.graves@gmail.com
Q3. **Are you part of an Agency or Organization?**	No
Q4. **Share any comment** 5 or 7	
Q5. **Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/eca5c97e0ae252ac525d8f03243fc17cac5254cb/original/1712801998/5be6937bfdcd8b496d63a226ccfc49e6_tempImageZf1CRZ.jpg?1712801998

Respondent No: 52
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:21:55 pm
Last Seen: Apr 10, 2024 19:21:55 pm
IP Address: n/a

Q1. **First & Last Name**	gayle graves
Q2. **Email address**	gayle.graves@gmail.com
Q3. **Are you part of an Agency or Organization?**	No
Q4. **Share any comment** 6 or 7	
Q5. **Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/c8b69beaacb9a511b9e42ff73020ad1ca51fc392/original/1712802108/07b247fb6cb7b8c6f90d1afe12095470_Horse_Heaven_Hills_fire_evening_7-2020.JPG?1712802108

Respondent No: 53
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 19:23:00 pm
Last Seen: Apr 10, 2024 19:23:00 pm
IP Address: n/a

Q1. **First & Last Name**	gayle graves
Q2. **Email address**	gayle.graves@gmail.com
Q3. **Are you part of an Agency or Organization?**	No
Q4. **Share any comment** 7 or 7	
Q5. **Upload your document or picture (optional)**	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/3abd0da6b3ee9155bed5777d313950f3f78f750f/original/1712802173/8739e996f2b631d325fe12862bffb540_Horse_Heaven_Hill_fire_7-2020.JPG?1712802173

Respondent No: 54
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 21:21:57 pm
Last Seen: Apr 10, 2024 21:21:57 pm
IP Address: n/a

Q1. **First & Last Name** Carol Larkin

Q2. **Email address** calarkin45@gmail.com

Q3. **Are you part of an Agency or Organization?** No

Q4. **Share any comment**

While I live in Richland, I am sickened by the thought of the desecration of the open views of predominantly blue skies, beautiful sunrises and sunsets, framed by hills and ridgelines. Over 100,000 residents will live within 6 miles of the turbines which will stretch 26 miles East to West. Other WA counties with wind farms average about 2,000 people within 6 miles. I'm sure such a project would not be allowed if it were marring the view of Seattle residents. The visual impact will make the TC less desirable for tourism and future growth and development. Thousands of homeowners could face property value reductions based on proximity to the project. The energy produced is not needed and can't be utilized here and would increase electricity rates.. Between nuclear power from the Columbia Generating Station, solar projects, the Nine Canyon Wind Farms and power from Ice Harbor Dam, the TC generates enough clean energy for more than a million homes. The times when extra power is needed, are typically times when the wind doesn't blow. But energy production from windfarms in the region is often highest at the same time that hydro peaks, which reduces surplus hydro energy sales and revenues, increases net hydro power costs and increases retail rates. Developers are proposing far more capacity than can be connected to the grid. Turbines last 15-25 years and are difficult to recycle. Wind sources require a lot of steel and concrete. The project would create only 250 local jobs and just during short construction periods, with only 20 permanent positions. The small economic benefits are far outweighed by the negative environmental, economic, and social impacts.

Q5. **Upload your document or picture (optional)** not answered

Respondent No: 55
Login: Anonymous
Email: n/a

Responded At: Apr 10, 2024 22:54:08 pm
Last Seen: Apr 10, 2024 22:54:08 pm
IP Address: n/a

Q1. **First & Last Name** — Derek Benedict

Q2. **Email address** — dsbened@frontier.com

Q3. **Are you part of an Agency or Organization?** — No

Q4. **Share any comment**

The science is VERY clear -- if we don't stop and reverse the damage that human overpopulation has caused our planet -- all hope for our future will be lost...

Q5. **Upload your document or picture (optional)** — not answered