



June 10, 2021

Sonia Bumpus, SEPA Responsible Official
Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey, WA 98504-3172

Ms. Bumpus,

The Kennewick Irrigation District (KID) is a public entity founded in 1917 that delivers 102,674 acre-feet of water per year from the Yakima River to 20,201 acres of agricultural and residential land in the Tri-Cities area. Our district priorities, as adopted by our elected board of directors, includes, among other things, service to our community and care of the environment.

With that in mind, KID takes environmental concerns very seriously, whether it involves our own projects or outside projects with a potential impact to our community, such as the proposed Horse Heaven Hills Wind Project (HHHWP).

We agree with the identification of the environmental elements of Wildlife/Habitat, Visual/Aesthetics, and Land Use as requiring detailed analysis in the EIS.

However, our community has great concerns with the potential impacts that this proposal will have on our landscape and on our quality of life, beyond those three elements already identified for detailed analysis.

To address these concerns, the scope for the HHHWP EIS should include the following elements identified as potentially requiring detailed analysis based on additional information:

- Air
 - A detailed investigation of the impacts on air quality in the form of fugitive dust sourced from access roads built for this project (the SEPA checklist mentions up to 105 miles of gravel surfaced access roads will be constructed), including dust generated from maintenance vehicle road use and dust generated by wind blowing across the road surface.
- Water (water quality and water resources)
 - A detailed investigation of impacts on water quality and water resources from road construction and maintenance across the numerous dry washes in the project area that eventually drain to the Yakima and Columbia rivers (the SEPA checklist identifies temporary impacts to 19 of 31 ephemeral streams in the project area, as well as both of the two perennial streams identified, and permanent impacts to one ephemeral stream).
 - A detailed investigation of impacts to water resources, especially water used for O&M and solar panel washing. The SEPA checklist indicates that no additional surface water diversions or onsite groundwater withdrawals will be required for the project. Where is the O&M water sourced from (the SEPA checklist estimates 5,000 gallons for domestic use, and 2,025,000 gallons for solar panel washing) and what contingencies are in place if source water is curtailed during a drought?

- Vegetation
 - A detailed investigation of impacts to native vegetation, including the impacts of newly disturbed sites (the SEPA checklist mentions 9,826 acres of earth disturbing activities, including 6,869 acres of permanent disturbance and 2,957 acres of “temporary” disturbance) on the establishment of invasive species such as kochia and tumbleweeds.
- Energy and Natural Resources
 - A detailed investigation of the effects of the introduction of intermittent power on the grid and on existing energy infrastructure.
 - A detailed investigation of the impacts to the environment related to the lifespan of batteries designed to store up to 300 MW of electricity, including analysis of impacts related to mineral extraction and manufacturing, maintenance, and disposal of said batteries.
- Noise
 - A detailed investigation of the impacts of noise on not only local residential areas but also wildlife that frequents the project area.
- Light and Glare
 - A detailed investigation of the impacts of light and glare resulting from shine off of turbine blades, including those impacts affecting views from the project area from the Tri-Cities, and on drivers traveling via local roads and highways, and pilots flying planes near the project area.
- Historic Resources
 - A detailed investigation of the impacts to historic resources and properties not only in the project area, but those historic properties that will be diminished by wind turbines and solar arrays visible in the distance.
- Cultural Resources
 - A detailed investigation of the impacts to archaeological sites and sites of cultural importance to regional tribes such as the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) and the Yakama Nation.

Thank you for the opportunity to provide comments on scoping for the HHHWP EIS.

Sincerely,



Charles Freeman
District Manager

cc: Board of Directors

Seth Defoe, Land and Water Resources Manager

John Crotty, Legal Counsel