Horse Heaven Wind Project-Agricultural Impacts Review
Kelly McLain, GMA lead, Policy Advisor to the Director & Legislative Liaison, WSDA

Overarching comments: I believe that the project proponent has provided solid supporting information for placement of the wind turbines in this project. I have provided more detailed notes below on some issues that are more generalized in the mitigation and seem to not fully weigh the impacts of large, semi-permanent (~25-30 year) solar array placement on that landscape. Unlike wind, solar siting completely takes that land out of agricultural production for the life of the energy project; construction can cause significant landscape impacts and changes to soil composition and future productivity; and appropriately detailed rehabilitation of those acres should be included in the mitigation plan. Washington State has substantial and important clean energy production goals, but those must be balanced with the state's goals around preserving, protecting, and even growing our agricultural economy (including acreage).

Section 1.10.1 Mitigation Measures Summary
Proposed mitigation measures seem sufficient for the expected level of disturbance. While not a requirement, surrounding farms could be impacted if dust abatement and/or high intensity ground disturbance occurs during known periods of high wind. Suggestion: include a shutdown wind speed for those types of activities to further limit wind erosion on site and negative impacts on adjacent landowners off site. This is especially true for the portions of the project requiring large areas of excavation for footings (wind) and to installation of the framework but not the panels for the solar.

Section 2.23 Proposal: Pertinent Federal, State, and Local Requirements
6,570 acres of solar impact, 6,869 acres of permanent disturbance in total are substantial. See comments under Section 4.2.6 below for thoughts about mitigation and requirements at the end of the life of the solar project to ensure site recovery to previously established uses.

Section 3.1 Earth
627 acres of the solar project and 812 acres of turbine placement are identified as erosion and one other category and classified by the county as Geologic Hazard Areas. The decision to not site in these areas is appropriate mitigation.

Section 3.3 Water
The report sites 21 temporary impacts on ephemeral and intermittent streams and one permanent ephemeral stream corridor impact for the project. Because rainfall is so limited in this area, and these stream corridors provide for snowmelt runoff and groundwater recharge, every effort should be made to limit impacts as much as possible to those down gradient. The NPDES permit for Construction Storm Water as well as the required SWPP are sufficient to mitigate these impacts.

Section 4.2.1 Built Environment: Land Use Plans and Zoning Ordinances

As stated, the project proponent has submitted to EFSEC documents in alignment with those required through the Conditional Use Permitting process in Benton County. These activities would be conditionally allowed and restrictions would be placed by the local jurisdiction had the proponent chosen that path over EFSEC. With some minor additions and future focused mitigations (see below), I believe the majority of impacts from this project can be mitigated and minimally impact surrounding agricultural land uses.

Section 4.2.6 Agricultural Crops/Animals

6,866 acres of permanent impact for at a minimum, the life of the solar project. These proposed acres lie in an area designated by Benton County as agricultural areas of long-term commercial significance. We agree with the project proponent that this is a small fraction of the total agricultural land in the county (3.1%) and as such, the total acreage impact should be negligible for surrounding agricultural lands (roads, access to farming resources, etc.). This project, as proposed, would not irreparably harm the existing agricultural fabric of Benton County. It is also being placed adjacent to an existing Wind Farm, indicating the support for these types of land uses on the landscape.

While I appreciate the sentiment that agricultural lands will be restored at the end of the project's life (~25 years), there is no way to prove that this is even possible. The impact of compaction and landscape alteration and then "rehabilitation" of such ground has never been tested before. I do believe that EFSEC should do everything in their power to ensure that appropriate, monitored rehabilitation occur at the end of the project. This is truly attempted restoration of these high value agricultural lands. The soil being disturbed is a finite resource and some post-project monitoring of recovery should be required to assure previous land use goals (average per acre yield or some surrogate) can be met on the altered and then restored site.

Appendix B – Preliminary Geotechnical Investigation Report

This report is sufficient for addressing the geotechnical hazards as it relates to the construction and permanent placement of proposed wind turbines. This report does not include information about the parcels and solar siting fields also intended in the project. Given that these have both a short-term (construction phase), long-term transitory (operations phase), and unknown after removal recovery phase that is primarily caused by the solar siting impact, the project proponent should be required to obtain additional analysis from the consultant for these sites. That information could give both EFSEC as well as the proponent knowledge to inform more specific requirements for post-use rehabilitation of the landscape.