

From: [Jan Tomlinson](#)
To: [EESEC \(UTC\)](#)
Subject: Proposed Horse Heaven Hills Wind Farm
Date: Monday, March 29, 2021 10:29:08 PM

Public Comment #0351
Horse Heaven Wind Farm
Docket #210011

External Email

Hello,

As a retired USDA Forest Service historical archaeologist/historic preservationist, I am wondering if a cultural resource survey was completed as part of Scout Clean Energy's abbreviated environmental checklist? Now that Scout has withdrawn their application for expedited processing - which was a smart move - and will now complete a full environmental impact statement (EIS), a cultural resource survey should be required. The Horse Heaven Hills have been used by Native Americans for thousands of years. Euro-Americans established homesteads on the same lands. Evidence of these prehistoric and historic occupations certainly still exists, though some archaeological/historic sites may have been disturbed by farming and grazing activities.

I will say that I am a proponent of wind and solar energy, especially now that there are storage batteries. I do share the concern for impacts to birds and star gazing. I live on a ridge above Badger Canyon (on the north side) and south of I-82. I can see the wind farm on Jump Off Joe from my house. I can also see the newer homes across Badger Canyon, up at Triple Vista, off Clodfelter Road, and along the ridge to the west. I would prefer not to see those houses, those windmills, powerlines and freeways. I don't know how far away the windmills are proposed to be located. Perhaps they can be moved further south to be less of an impact on the view and airplane flight paths. More work needs to be done to prevent birds from flying into the blades.

Briefly, those are my concerns. Thank you.

Respectfully,

Jan Tomlinson

From: [Julie Randazzo](#)
To: [EESEC \(UTC\)](#)
Subject: Scout Clean Energy Windfarm
Date: Monday, March 29, 2021 11:04:28 PM

Public Comment #0352
Horse Heaven Wind Farm
Docket #210011

External Email

Hello,

I am writing in support of the Scout Clean Energy Windfarm. What a wonderful opportunity to do some good in the community, provide clean and renewal energy, and support the people whose livelihoods will depend on this.

Thank you for listening,

Julie Randazzo

From: [Elinor Kasza](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Hills Wind Turbine Project
Date: Monday, March 29, 2021 11:24:56 PM

Public Comment #0353
Horse Heaven Wind Farm
Docket #210011

External Email

As a nearly life-long resident of the Tri-Cities, I strongly oppose the proposed Scout Energy Wind Farm project in the Horse Heaven Hills.

Elinor Kasza
1616 Hains Ave
Richland, WA
99354

elinorkasza@gmail.com

Owens, Joan (UTC)

From: William <ejajasen@msn.com>
Sent: Monday, March 29, 2021 11:26 PM
To: EFSEC (UTC)
Subject: Please oppose Wind Turbines

Follow Up Flag: Follow up
Flag Status: Flagged

External Email

Energy Facility Site Evaluation Council Board,

I once planned to install a wind turbine and solar panels on my property in Benton County but was told by power brokers and industry consultants that these forms of energy production were not economically viable (> 12 year ROI) due to insufficient solar radiation and inconsistent wind. Without government or tax payer incentives, wind turbines are not a viable source of energy production. I oppose the proposed Horse Heaven Wind Farm for the following three (3) reasons.

1. The Wind Farm is bad energy policy for our region that would destroy our Pacific Northwest infrastructure and cause significant cost increases in energy production similar to California. California relies heavily on wind and solar and has or is shutting down its nuclear power plants and some hydroelectric dams resulting in some of the most expensive power cost in the nation. See the chart below for cost comparison. Please do not support increased power production costs in our region by allowing wind turbines to be constructed.

2. I oppose the Wind Farm on grounds of aesthetic appeal. Wind turbines already destroy the iconic beauty of the Columbia Gorge and views of Mt Hood. Please do not contribute to the industrial blight and mechanical pollution of the Horse Heaven Hills by allowing Wind Turbines to be installed.

3. I oppose the Wind Farm because it is bad environmental policy better suited for other locations where electricity generation from wind is more viable and efficient. As espoused in the recent Forbes article this Wind Farm would displace energy production from carbon free hydroelectric dams resulting in no net environmental benefit. It is likely, if installed, the wind farm would result in a net increase in carbon emissions for our region. This is bad for the environment.

Finally most large turbines are manufactured outside of the United States resulting in no job benefit for our economy. Please help ensure we keep our county beautiful and efficient by keeping wind turbines out of Benton County.

Sincerely

Bill Jasen

Located between Benton City and W Richland.

Sent from my iPhone

Washington Electricity Prices Low

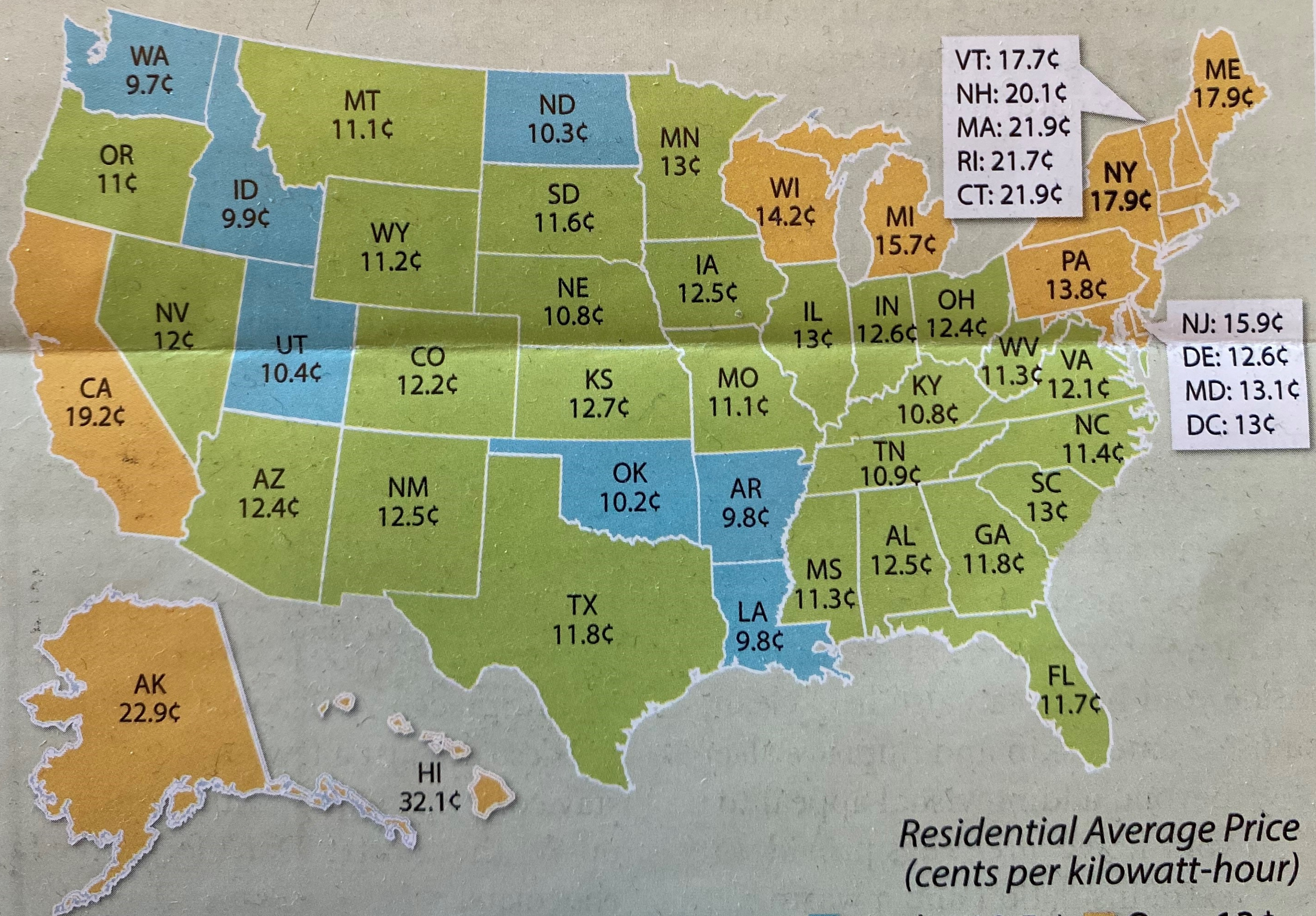
There are many reasons people choose to live in Washington. If you haven't

already, you can add the low cost of electricity to the list.

Average Prices for Residential Electricity

2019 figures, in cents per kWh

U.S. Average: 13.01¢ per kWh



Source: U.S. Energy Information Administration
Numbers rounded to nearest tenth of a cent

From: jfmontana@charter.net
To: [EESEC \(UTC\)](#)
Cc: jfmontana@charter.net
Subject: Proposed Tri Cities Wing Farm Project
Date: Wednesday, March 31, 2021 4:40:25 AM

Public Comment #0355
Horse Heaven Wind Farm
Docket #210011

External Email

I am registering a strong "NO" - we don't need wind farms polluting the top of our ridgelines. These are eyesores, are a danger to migratory birds and raptors, and we have lost enough land access in SE Washington state due to wind farms that the general population didn't/don't want. IF the west side of the state is in favor of more wind farms, build them on their side of the state. Wind farms are far less efficient than the existing hydro power facilities on the Columbia & Snake Rivers.

J. W. Ficklin
Kennewick, WA

From: [Stephanie Haug](#)
To: [EFSEC \(UTC\)](#)
Subject: Horse Heaven Wind Farm
Date: Wednesday, March 31, 2021 6:58:01 AM
Attachments: [image001.png](#)
[HHWF-EFSEC.letter.pdf](#)

Public Comment #0356
Horse Heaven Wind Farm
Docket #210011

External Email

Hello –

Please find the attached letter from the Mayor and City Council of the City of West Richland regarding the Horse Heaven Wind Farm Project.

Warmest Regards,

Stephanie Haug, MMC
City Clerk

(509) 967-3431 ext. 7102 | shaug@westrichland.org
3100 Belmont Blvd. West Richland, WA 99353





3100 Belmont Blvd., Suite 106, West Richland, WA 99353
Office of the Mayor (509) 967-3431 FAX (509) 967-5706

March 30, 2021

Energy Facility Site Evaluation Council
Sonia Bumpus, EFSEC Manager
621 Woodland Square Loop, PO Box 43172
Olympia, WA 98504-3172

efsec@utc.wa.gov

Re: Horse Heaven Wind Farm Project Proposal

Dear Ms. Bumpus,

Thank you for the opportunity to comment today on the Horse Heaven Wind Farm Project, which is proposed to be located south of Kennewick in unincorporated Benton County.

Upon review of the application submitted by Scout Clean Energy (dated February 8, 2021), the City Council of the City of West Richland, as well as the Mayor, do not support this project. We believe the location, size and scope of this project is inconsistent with the county's goals of preserving rural character, preserving agricultural lands of long term commercial significance, and preserving the natural setting, views, and rich history that Benton County and the greater Tri Cities Area enjoy so very much.

It is our understanding that the applicant, Scout Clean Energy, is requesting that their application for Site Certification be reviewed in accordance with the EFSEC expedited process requirements. The Council strongly encourages EFSEC to **deny** the applicant's request for expedited review based upon the following: 1) the environmental impacts are significant; and should be reviewed and 2) the project is inconsistent with the county plans including the Comprehensive Plan, Zoning Ordinance, and Critical Area Ordinance.

The County has received hundreds of calls, emails, and comments from area residents regarding this project proposal. The overwhelming majority of people do not support this project. They have wide ranging concerns about the loss of habitat and agriculture, negative impacts to wildlife, property values, concerns relating to health and noise, impacts to viewsheds, including those related to the County's natural setting, history, and tourism. People in Benton County and the Tri Cities regional area, including West Richland, care deeply about preserving their ridges and skylines for future generations.

This project is being proposed to occur only 4 miles south from one of the largest urban areas in Eastern Washington (Tri-Cities Region-Kennewick, Richland, Pasco, and West Richland). The twenty-six (26) mile long proposal is situated in an area with unique geological features comprised of naturally vegetated steep slopes, native habitat, commercially significant agricultural land, and unique views. As proposed, the wind turbines will be seen from 86% of the land area in Benton County, including our West Richland residents. The visual impacts will be seen from as far away as Franklin County, Walla Walla County, and the State of Oregon. The local public utility districts have not shown an interest in needing or wanting additional energy from the project to service the

region. These and many other concerns are examples of issues being discussed by so many people living in this region.

In summary, the West Richland Mayor and City Council do not believe this project, with the proposed significant environmental impacts, complies with the goals and policies of the Benton County Comprehensive Plan, the criteria required to obtain a conditional use permit, or the requirements of the Benton County Critical Area Ordinance. Further, the public has overwhelmingly stated its desire to protect its unique geologic features, ridges and skylines for future generations.

Thank you for the opportunity to comment and advise the Energy Facility Site Evaluation Council that the West Richland Mayor and City Councilmembers do not support this project. We respectfully request that EFSEC deny the applicant's request for expedited review of this application due to the potential environmental impacts and the need for an environmental review that includes public input, as well as the application's lack of consistency with the local plans and ordinances.

Sincerely,

City of West Richland Mayor/CEO

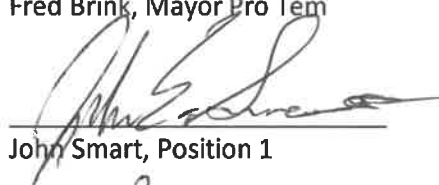


Brent Gerry, Mayor

City of West Richland Council



Fred Brink, Mayor Pro Tem



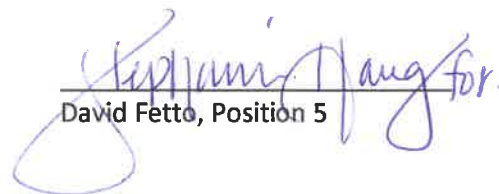
John Smart, Position 1



Gail Brown, Position 3



Richard Bloom, Position 4



David Fetto, Position 5

From: [Norbert Rossi](#)
To: [EESEC \(UTC\)](#)
Subject: HHH Wind Farm Project
Date: Wednesday, March 31, 2021 7:13:20 AM

Public Comment #0357
Horse Heaven Wind Farm
Docket #210011

External Email

After listening to the comments at last night's meeting, we are more convinced that the wind farm project is a bad idea for our area. All the affiliated government agencies stand against it. It would have an adverse affect on the environment and ecology of the area. It would also have an impact on bird migration. I understand that the Biden administration is putting huge chunks of money into "green energy" and you want to capitalize on that. But most of the electricity generated would not be for local consumption. California and the Seattle area don't want these windmills, and neither do we. It is a huge price to pay for short-term jobs. If this company goes under, as Solendra did, who pays for the removal of these unsightly and polluting windmill parts 10-20 years from now?

Please register our disapproval of this proposed project.

Norbert and Debora Rossi

Sent from [Mail](#) for Windows 10

From: [Malek, Debra D](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Wind Project - Vote
Date: Wednesday, March 31, 2021 7:40:55 AM
Importance: High

Public Comment #0358
Horse Heaven Wind Farm
Docket #210011

External Email

Good morning,

Horse Heaven Wind Project – **We vote NO!** They are already everywhere else and look bad. We have such high level winds they would probably fly off and do major damage.

Thank you,
Debra and Joseph Malek
26905 S. 959 PR SE
Kennewick, WA

Joe & Debbie Malek
Executive Assistant
Legal Services
W: (509) 376-6232
C: (509) 539-1332
E: Debra_D_Malek@rl.gov

The information contained in this e-mail may be private or confidential. If you are not the intended recipient, any dissemination, distribution, or copying is prohibited and may be legally actionable.

From: [Dave Sharp](#)
To: [EESEC \(UTC\)](#)
Subject: Public Comment Follow up-Horse Heaven Windfarm-Section 1.10
Date: Wednesday, March 31, 2021 7:59:49 AM
Attachments: [Public Comment 3-Woodford Tri County ADLS.pdf](#)
[Public Comment #3 Section 1.10 Light and Glare.pdf](#)

Public Comment #0359
Horse Heaven Wind Farm
Docket #210011

External Email

This follows up my public comment made two days ago, specifically about Aviation Lighting and Mitigation. Two PDF documents are attached. 1. The comment document, and 2. A local Planning board reporting on ADLS commitment made by a developer and the status of FAA approvals. Pages 4 and 5.



TRI-COUNTY REGIONAL PLANNING COMMISSION

EST. 1958

November 12, 2020

Woodford County Zoning Board of Appeals
115 North Main St, Room 100
Eureka, IL 61530

RE: Woodford County Zoning Petition 20-11-S

Dear Board Members,

Tri-County Regional Planning Commission staff submit the following to help the Board in its deliberation of this case.

I. APPLICATION

This special use is to allow for the use of property for a wind energy conversion system (WECS). Included in the application are 86 wind turbine locations in Woodford County that are zoned Agricultural (AG). Turbine sites are located in Clayton, Greene, Minonk, and Panola Townships. Zero turbine sites fall within the 1.5-mile planning boundaries of nearby municipalities, which are Benson, El Paso, Minonk, Panola, Roanoke, and Secor.

II. CONSIDERATIONS

Current Land Use. The subject property is agricultural. The leased parcels total approximately 22,000 acres, most of which are in agricultural production. The total area to be used for the WECS—including turbine towers, equipment, and access roads—is approximately 84 acres.

Adjacent Land Use Trends. The subject parcels are bordered almost entirely by agricultural uses. Exceptions are farmsteads and other rural residences. Residences are either located inside participating parcels or are a required distance from the nearest proposed turbine.

Zoning Ordinance. The proposed WECS is allowed as a special use under Section 24 Subsection 7 of the Woodford County Zoning Ordinance and regulated under Section 28 of the ordinance.

Comprehensive Plan. All or almost all the land identified for special use is classified as “Agriculture” in the Future Land Use Map of the Woodford County Comprehensive Plan. The plan offers the following principles relevant to the case.

- Agriculture is preserved and supported through mutual respect and balance among agriculture, development, and the environment.
- Diversification in the agricultural economy is encouraged by supporting non-traditional and value-added agricultural products, and agriculture-related industry.

III. FINDINGS OF FACT

The Zoning Board of Appeals shall make a finding that the granting of the special use:

A. Will not be detrimental to the public health, safety, and welfare.

(POSITIVE) Most scientific, peer-reviewed studies conclude that there is no evidence to demonstrate a causal link between proximity to wind turbines and serious health effects. This includes external effects such as electromagnetic fields (EMF), shadow flicker, audible noise, low-frequency noise, and infrasound. Per the application, the applicant will provide necessary public safety measures including fencing, controlled access, and signage. Turbine blades are designed, built, and operated to withstand severe weather and high wind. Moreover, the project will not interfere with airplane navigational radar, weather radar, or wireless communication. Therefore, the special use should not be detrimental to the public health, safety, and welfare.

B. Will not be injurious to the use and enjoyment of other property in the immediate vicinity for the purpose already permitted. The applicant need not demonstrate complete compatibility, but the applicant shall demonstrate reasonable efforts to minimize incompatibility.

(NEUTRAL) Property in the immediate vicinity of the project sites is mostly used for agriculture, exceptions being farmsteads and other rural residences. Turbine towers will impact the project area and beyond visually. Individual residents and property owners may have negative feelings toward the sight of turbine towers in the area. Additionally, rotating turbine blades in in other WECS projects have infrequently cast shadows into homes or other inconvenient locations near the project area. Per the application, the project will comply with the shadow flicker requirements of the Woodford County Zoning Ordinance. Appendix M of the application includes a shadow flicker study showing that no non-participating, inhabited dwelling will exceed 30 hours of shadow flicker per year.

The operation of wind turbines will generate audible noise, which some studies have found can be annoying for some people. Location and setback restrictions are put in place to limit audible noise exposure. The towers identified in the special use application meet the setback requirements of the Woodford County Zoning Ordinance. Allowable limits for turbine noise are set by the State of Illinois, specifically the Illinois Pollution Control Board (IPCB). Appendix T of the application states that all turbines are located to meet IPCB audible noise requirements for all non-participating residential structures at all times of day and night.

C. Will not be injurious to the district in which it shall be located.

(POSITIVE) The project locations included in the application are in the Agriculture (AG) zoning district. Per the application, the permanent footprint of the turbine platforms and access roads will take up about 0.3 percent of the total leased acreage. The land surrounding the turbines will remain in agriculture production. Therefore, the special use should not be injurious to the district in which it is located.

D. Will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the districts.

(POSITIVE) Surrounding property is identified for agriculture in the Woodford County Future Land Use Map. Wind power installations are generally compatible with agriculture, and the special use should not interfere with current or future agriculture uses. Therefore, the special use should not impede the normal and orderly development and improvement of the surrounding property for uses permitted.

E. That adequate utilities, access roads, drainage and/or other necessary facilities have been or are being provided.

(POSITIVE) Per the application, all adequate utilities, access roads, drainage, and other necessary facilities will be provided.

F. That adequate measures have been or will be taken to provide ingress and egress so designed as to minimize traffic congestion in the public roads.

(POSITIVE) Per the application, all necessary ingress and egress will be provided. After construction is completed, traffic generated by the project should not attribute to traffic congestion on public roads.

G. Is consistent with the Woodford County Comprehensive Long Range Plan.

(POSITIVE) The Woodford County Comprehensive Plan offers the following principles relevant to the case.

- Agriculture is preserved and supported through mutual respect and balance among agriculture, development, and the environment.
- Diversification in the agricultural economy is encouraged by supporting non-traditional and value-added agricultural products, and agriculture-related industry.

Both principles listed above relate to agriculture, from a conservation viewpoint and an economic viewpoint, respectively. Approximately 21,916 of the 22,000 acres leased as part of the project will be preserved for agriculture. The approximately 84 acres of farm ground removed from production will provide an alternative source of revenue for property owners while not interfering with agriculture activities on the remaining acres. Therefore, the special use is consistent with the principles of the Woodford County Comprehensive Plan.

IV. OTHER COMMENTS

Section 28 of the Woodford County Zoning Ordinance lists regulations pertaining to WECSs. Subsection 5 includes seventeen (17) requirements for a WECS. They are listed below with the applicant's responses.

1. **Design Safety Certification.** Panther Grove will illustrate compliance with this requirement in the building permit application. Furthermore, the wind turbines that Panther Grove will install in the

Project will be manufactured by General Electric, Vestas, or Nordex, whom are all top tier wind turbine manufacturers.

2. **Installation Certification.** Panther Grove will comply with this requirement and will illustrate compliance in the building permit application.
3. **Controls and Brakes.** Panther Grove will illustrate compliance with this requirement in the building permit application.
4. **Electrical Components.** The underground cables connecting the wind turbines or wind turbines to the substation will all be a minimum of five (5) feet below grade and at least one (1) foot below any agriculture drain tiles that are encountered in the construction of the Project. All electrical components that are installed in the Project including but not limited to the wind turbines, substation, underground electrical cabling, and overhead electrical cabling, will be designed, installed, and operated in a manner to conform to all applicable local, state, national, and international standards. Compliance with this requirement will be further illustrated as part of the County permit application.
5. **Color.** All of the wind turbine's towers and blades that are installed in the Project will be a non-reflective white color that is standard on most all utility scale wind energy projects.
6. **Lighting.** Panther Grove commits to installing the Aircraft Detection Lighting System ("ADLS"), similar to the Terma ADLS product to which its specifications are provided for in Appendix GG. The ADLS system will replace the traditional wind turbine FAA lighting that typically blinks on and off all night with a system that only begins blinking if an aircraft is within 3 miles (the "warning zone") of the Project, as per the FAA standards. The ADLS system will reduce the lighting at night all while maintaining proper aviation safety to FAA standards. The ADLS system consists of an on-site radar system which communicates with the FAA lights on top of the wind turbine nacelles. The lights remain on as long as there is a valid target within the warning zone. For the rare chance the radar loses the target while inside the warning zone, the FAA has a 30-minute "time-out penalty" to which Panther Grove would have to adhere to. Meaning, the lights must stay on for a full 30 minutes to ensure the plane has enough time to exit the wind project. By FAA regulation, the lights enable automatically and remain lit if there's any glitch detected in the system, whether it be the radar itself, the lights, or in the communications.
7. **Compliance with FAA.** To date Panther Grove has received Determinations of No Hazard Permits ("DNHs") for a height of 649 feet from the FAA for the following wind turbine locations included in this Application:

Wind Turbine Locations: T5, T11, T12, T13, T15, T16, T17, T18, T19, T20, T22, T24, T25, T26, T27, T28, and T29.

To date Panther Grove has received DNHs at a height of 699 feet within 1,000 feet from the FAA for the following wind turbine locations included in this Application:

Wind Turbine Locations: T2, T8, T10, T14, T19, T24, T32, T35, T37, T38, T39, T40, T41, T42, T43, T45, T46, T52, and T62. Panther Grove has filed for modifications to these DNHs to move them to their current location and down to a height of 698 feet. Panther Grove will supply these DNHs to the County once received which is expected to be in December 2020.

Panther Grove filed for DNHs for the remaining turbine locations included in this Application and not listed above for up to a height of 698 feet. Panther Grove will supply these DNHs once received which is expected to be in December 2020.

As described in Section 4.10 of this Application Panther Grove commits to installing the ADLS in the Project instead of traditional FAA lights. The ADLS lights will remain off unless a plane gets within 3 miles of a wind turbine. The FAA must approve the installation of the ADLS, which Panther Grove will supply as part of the building permit application.

8. **Compliance with Zoning Laws.** Panther Grove will comply with all applicable local zoning laws included but not limited to the conditions set forth in the Ordinance and this Application.
9. **Compliance with Additional Regulations.** See Section 9 for the permits that are required for the construction of the Project. Panther Grove will obtain all necessary permits that are required for the construction and operation of the Project and all preconstruction related permits will be supplied as part of the building permit application.
10. **Warnings.** Panther Grove will comply with this requirement.
11. **Climb Prevention.** The wind turbine tower access doors will remain locked at all times unless maintenance personnel are inside the tower. In addition, Panther Grove will install either a six-foot-high (minimum) fence or anti-climbing device around the tower. Further compliance with this requirement will be provided as part of the County building permit application.
12. **Setbacks.** See the Site Maps in Appendix D and Project Map in Appendix C and Tables 11-1 and 11-2 for compliance with the setbacks listed above. Further compliance with these setbacks will be provided with a field survey which will be provided to the County as part of the building permit application. In addition to the setbacks listed above Panther Grove will maintain the following setbacks:
 - Setbacks listed in Section 31 (§154.31) of the Ordinance, except for the wind turbines in the vicinity of the Unzicker fixed-wing RLA.
 - One thousand feet (1,000') from most of the participating residences
 - One thousand feet (1,000') from suitable bat habitat as defined in the Site Characterization Report that is provided in Appendix G and also shown in the Site Maps in Appendix D.
 - One-half (1/2) mile from the Illinois Natural Areas Inventory Site (Mackinaw River watershed) at the recommendation of the IDNR.
13. **Heights.** To date Panther Grove has received Determinations of No Hazard Permits ("DNHs") for a height of 649 feet from the FAA for the following wind turbine locations included in this Application:

Wind Turbine Locations: T5, T11, T12, T13, T15, T16, T17, T18, T19, T20, T22, T24, T25, T26, T27, T28, and T29.

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miles of a wind turbine. The FAA must approve the installation of the ADLS, which Panther Grove will supply as part of the building permit application.

14. **Roads.** Panther Grove initiated the road use agreements process with the County and Townships in February 2020. Barring any unforeseen events Panther Grove intends to have the agreements executed prior to the start of the public hearings in November 2020. The executed agreements including the approved local traffic flow maps showing the approved roads will be supplied to the County during the special use permit hearings.
15. **Migratory Birds/ Illinois DNR.** See Stantec's Bat Presence or Probable Bat Absence Survey in Appendix II, Stantec's Raptor Nest Survey in Appendix JJ, and Stantec's Avian/Eagle Use Survey Results in Appendix KK for the avian/bat study results that have been performed to date. Panther Grove intends to continue the preconstruction avian/bat studies until 2 years' worth of surveys are collected as per the USFWS typical recommendation, which will be until May 2021. The data will be presented to the IDNR for their review. In addition, Panther Grove will comply with the IDNR's 3 year post construction monitoring plan which is outlined in Stantec's letter that was drafted in response to the IDNR's EcoCat letter both of which are provided in Appendix J. Panther Grove will seek the IDNR's approval for this 3 year post construction monitoring plan and will present the IDNR's approval as part of the County building permit application. Panther Grove will also present its Bird and Bat Conservation Strategy Plan ("BBCS") at the permit public hearings.

Pursuant to this condition Panther Grove filed for consultation with the IDNR through the IDNR's online Ecological Compliance Assessment Tool ("EcoCat") on Sept 30, 2019. A copy of the EcoCat filing is provided in Appendix J. The IDNR responded with a letter addressed to Lisa Jording on January 24, 2020. A copy of this letter is included in Appendix J as well.

Panther Grove agrees to comply with all recommendations listed in the IDNR's letter. However, Panther Grove requests the County consider allowing Panther Grove to limit the fall bat migration (July 15 – Oct 15, dusk till dawn) curtailment to 4.0 m/s as compared to 5.0 m/s and when temperatures are above 50°F. Detailed support for this requested change is provided in Stantec's letter that's included in Appendix J. In addition, Panther Grove's 3 year's post construction monitoring plan is provided in Appendix J, which will be shared with the IDNR for their approval. The IDNR approved 3-year post construction monitoring plan will be provided to the County as part of the Project's building permit application. Panther Grove will also present its Bird and Bat Conservation Strategy Plan ("BBCS") at the public hearings.

16. **Shadow Flicker.** Panther Grove will maintain compliance with this requirement. See the Shadow Flicker Study prepared by Burns and McDonnell provided in Appendix M which lists a conservative estimate for the expected maximum shadow flicker hours that the Project is estimated to generate. A final shadow flicker report, illustrating shadow flicker levels at or below those found in Appendix M will be submitted for the final layout as part of the County building permit application. Panther Grove will maintain compliance with this requirement for non-participating dwellings existing as of the date of this Application.

17. **Agreement in Lieu of Taxes (AILOT).** Panther Grove will comply this requirement.

Section 28 of the Zoning Ordinance also includes provisions for the following.

1. Maintenance and Operation.
 - a. Annual Inspection.
 - b. Interference
 - c. Fire Risk and Emergency Response

- d. Waste
 - e. Field Tile
2. Noise Levels
3. Public Participation, Complaints, and Resolution
4. Certificate of Liability Insurance
5. Decommissioning Plan

V. RECOMMENDATION

In summary, the application meets the criteria adopted by the Woodford County Board and detailed in Section 28 of the Woodford County Zoning Ordinance, with the following conditions.

- Compliance with requirements #1-4 of §154.28.5, demonstrated in the building permit application.
- Approval of remaining Demonstration of No Harm permits (DNHs) for wind turbine locations and approval of Aircraft Detection Lighting System (ADLS) from the Federal Aviation Administration (FAA).
- Approval of the Archaeology and Historic Preservation study by the Illinois Historic Preservation Agency (IHPA).
- Execution of road use agreements the County Engineer and Township Road Commissioners.
- Annual submission of a report to the Woodford County Zoning Enforcement Officer certifying the completion of annual inspections, including a summary of inspection results for the operating life of the project.
- Compliance with all IDNR recommendations regarding conservation of wildlife and natural resources (Appendix J), and presentation of a bird and bat conservation strategy (BBCS) plan.

Although not required by the Zoning Ordinance, Woodford County might consider the following additional conditions of approval for the application:

- Submittal of a plan that certifies that the applicant will implement stormwater and erosion control Best Management Practices, based on IDNR guidance, along all access roads constructed for the projects.
- Submittal of a National Pollutant Discharge Elimination System permit by the applicant.

Respectfully submitted,

Tri-County Regional Planning Commission Staff

EFSEC-Public Comment-Horse Heaven Hills Wind Project-Section 10-1 Light and Glare
Dave Sharp #3 -Resident of Benton County
Subject-Aviation Lighting Mitigation-Aircraft Detection Lighting System (ADLS)

Discussion-In an earlier public comment, a case was put forth that the applicant has not made serious attempts to mitigate one of the biggest issues that residents have with this Wind Project; that is the FAA required flashing strobe lights.

The applicant continues to emphasize the requirement that there must be aviation lighting "as required by the FAA". That is entirely true, but they fail to bring forth that systems are commercially available to manage the lighting, leaving them off most of the time. These systems only activate lights when an aircraft is detected.

My discussions with the Scout Public Relations contact had previously yielded these positions by the applicant:

1. They are very expensive.
2. The Horse Heaven site is complicated and ADLS may not work.
3. Scout cannot commit to them until they know that the FAA will approve them.
4. Scout is looking at alternatives such as systems that dim the lights.

I listened to the applicant's presentation last night, and the only discussion about aviation lights was in the same context they have presented; aviation lighting is required by the FAA, but not about mitigation.

Since the applicant has not disclosed any of this to EFSEC, and probably never will, the following will act as a rebuttal to their reasons:

1. Expensive is relative- My investigation into costs is that a simple system with one radar unit would probably run around a million dollars, plus initial certification costs and periodic calibration cost. A more extensive site may require two radar units, but the cost does not necessarily double. The publicly stated cost of this project is 1.7 billion. Then the cost would be about 0.1% of the total project cost offset by less electricity used by the lights, and longer life of the lamps. What value does that bring to the 300,000+ and growing residents that will be under the spell of these light every night. This is a small price to pay.
2. HHH is a complicated site, and very well may need two separate systems; one for HHH East, and the second for HHH West. If the applicant refuses to even consider this system, none of us will ever know. However, these systems are becoming the standard for large scale wind projects as wind projects encroach upon populated areas.
3. The FAA recognizes the need for this type of system and has embraced the technology. I am confident that if the applicant seriously wanted to have these, or they were required to have the system. they would in short order have it done. I will provide a recent link where the FAA has certified an ADLS system for use with the taller towers.
4. Speaking for just myself, I want the skies dark. Right now, the Southern skies over the HHH give the best stargazing opportunities, I have not been able to find any literature about a dimming system. There is an approved technology now. Knowing what I know about how this applicant

has approached mitigation, or lack of mitigation, for residents, it appears to be a delaying tactic to be able to not do anything.

To be real, this project has changed, and the scope has grown significantly in just the last 15 months. The applicant wants a large, what I will term, general blanket approval for this project that is clearly not finalized. Because of that, they cannot apply for FAA approval because they do not have turbine heights, locations, numbers, etc., tied down enough to even apply. Last night in their presentation they were still talking about changing the solar arrays based something I could not hear clearly. This is the first EFSEC project I have followed, but a rhetorical question should be asked, "Has any other wind project come before EFSEC with so many moving parts not yet decided upon? Food for thought.

Attached is a PDF from an example County Planning Board in Illinois that describes the applicants commitment to installing ADLS, and notes about the state of FAA approval. It appears that the towers are even taller than the HHH project. This project is much smaller, 400 mw, and in a more rural setting with no close communities, yet the developer respected the residents enough, or the Planning Board pushed them enough to make the commitment to ADLS.

Please ask the applicant to specifically tell you why should not mitigate these lights.

If the HHH developer believes blanket approval with no conditions will be forthcoming, what incentive do they have to mitigate these types of issues. Thank you for reading this long write up.

From: [Jessie Riggle](#)
To: [EESEC \(UTC\)](#)
Subject: Scout Clean Energy plan benton county wa
Date: Wednesday, March 31, 2021 10:10:47 AM

Public Comment #0360
Horse Heaven Wind Farm
Docket #210011

External Email

In regards to the plan to install turbine on Horse Heaven Hills, I'd like to be noted as strongly opposing this plan and be informed of any chance to voice that opinion.

- Jessie Riggle

From: [Michael Harrington](#)
To: [EESEC \(UTC\)](#)
Subject: Wind Farm Bird Mitigation
Date: Wednesday, March 31, 2021 12:27:55 PM

Public Comment #0361
Horse Heaven Wind Farm
Docket #210011

External Email

As the confluence of three rivers occurs just north of the project, several birds find sanctuary in the waterways of the area.

What will be done to mitigate bird deaths?

From: cmdelegard@frontier.com
To: [EESEC \(UTC\): cmdelegard](#)
Subject: No to Scout Energy Wind Farm
Date: Wednesday, March 31, 2021 1:31:23 PM

Public Comment #0363
Horse Heaven Wind Farm
Docket #210011

External Email

Please register my rejection of the proposed Scout Energy wind farm south of the Tri-Cities.

The perceived contribution to decreasing Washington State's reliance on carbon-based energy is ephemeral as the Centralia coal-powered plant is soon to be decommissioned. Our Tri-City region already is embraced by renewable and carbon-free hydropower from the Snake and Columbia Rivers and contains the only nuclear power plant in the Northwest. It also has, within 30-100 miles, the lion's share of wind farms in the State.

People's views of nature naturally are drawn to the hills and mountains. Imagine the views of the Olympics and the Cascades - Mount Rainier, Mount Baker - from the Puget Sound Everett/Seattle/Tacoma/Olympia corridor. Would residents in those areas sacrifice their views for wind turbines?

Or imagine placing a wind turbine farm along Washington State's Pacific coastline where wind energy is nearly constant. Would the citizens of Washington State agree to a comparable wind farm in that treasured location?

No, this proposal is literally the definition of NIMBY. Ask anyone if they would want to sacrifice their favorite hometown vista for a wind farm and you will know why I do not want the wind farm besmirching my hometown vista.

Cal Delegard
41-year resident of the Tri-Cities

From: [Dave Sharp](#)
To: [EESEC \(UTC\)](#)
Subject: Public Comment-Horse Heaven Hills Wind Project
Date: Thursday, April 1, 2021 7:28:49 AM
Attachments: [Public Comment #4 Section 1.0 Light and Glare.pdf](#)

Public Comment #0364
Horse Heaven Wind Farm
Docket #210011

External Email

David Sharp#4General Section 1.10 Light and Glare

New Information-Both BLM and National Park Service recommend aviation lighting mitigation on wind projects.

EFSEC Public Comment Horse Heaven Hills Project
Section-General Information Section 1.10 Light and Glare, Mitigation

David Sharp#4-Resident of Benton County

Requested Outcome-EFSEC require the applicant to use Aircraft Detection Lighting to mitigate aviation lighting on the project.

Discussion- My earlier public comment pertained to Aircraft Detection Landing Systems. The applicant, to date, has been silent about that topic in the ASC, and in their presentation in the recent public meeting. The applicant references several published resources that are used as a guide to inventory visual resources. Because the applicant has made no disclosure to the Council, you have no knowledge of the system. The only way it would come up is public comment, and that not right. In Section 4.2.3 Aesthetics, the applicant has chosen to use the BLM Visual Resource Inventory Manual H-8410-1 and BLM Visual Contrast Rating Guide for their analysis of the Visual Impacts; which also include nighttime visual impacts covered under General Section 1.10 Light and Glare. These publications cited by the applicant were in 1986, issued well prior to renewable energy projects gaining the commercial foothold in our electrical infrastructure.

At that point in time, there were no mitigation systems for aviation lighting. While research was being performed for a future public comment for the Aesthetics Section of the ASC, the following more recent documents were discovered that were much more applicable to a renewable project. In these documents, both the BLM and the National Park Service recommend mitigation of aviation lighting to preserve Dark Skies. Of course, BLM lands and NPS lands are usually in non-populated areas, so Dark Skies for these documents are the most appropriate reason for the mitigation. In this projects case, it is not only our Dark Skies, but also the impact on population.

[Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands \(anl.gov\)](#) -2013 Bureau of Land Management

[Guide To Evaluating Visual Impact Assessments for Renewable Energy Projects \(anl.gov\)](#) -National Park Service 2014

These resource documents recommend AVWS (Audio Visual Warning System) to mitigate aviation lights and preserve Dark Skies. AVWS was a precursor to the ADLS that is now FAA approved, in commercial use, and is becoming standard for large projects. I am somewhat confused why the applicant would go all the way back to 1986 for resource. Based upon this most recent research, I am submitting my third public comment about ADLS and the need for it.

ADLS is proven technology. Based upon the local population impacted, not to speak of through night travelers on I-82, I-82A, and Highway 395, as well as preserving our Dark Skies, the ADLS system should be a condition of approval for this project. These are real people's lives that will be affected by this project. At least reasonable measures should be used to mitigate impacts.

From: [Chris wright](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Windfarm
Date: Thursday, April 1, 2021 7:57:35 AM

Public Comment #0365
Horse Heaven Wind Farm
Docket #210011

External Email

Information on turbine blade recycling or lack thereof.

<https://www.staradvertiser.com/2019/11/16/breaking-news/iowa-wind-farm-sending-many-giant-blades-to-landfills/>

Chris Wright
Sent from my iPhone

From: [Sarah Hahn](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Wind Farm
Date: Thursday, April 1, 2021 5:24:17 PM

Public Comment #0365
Horse Heaven Wind Farm
Docket #210011

External Email

I live in Burbank Heights and I am opposed to a large wind farm in the Horse Heaven Hills.

Driving east on Highway 12 now at night, the already existing windmill blinking red lights in the east make me very nauseous. I do not want my night driving to be limited in other areas around the Tri-Cities.

With subsidies, these windfarms will profit people outside the Tri-Cities more than it will improve anything here. The very few farmers who stand to directly benefit are greatly outnumbered by the people who will be negatively impacted.

-Sarah Hahn
Burbank, WA

From: carl.golightly@yahoo.com
To: [EESEC \(UTC\)](#)
Subject: Horse Haven Wind Farm Project
Date: Thursday, April 1, 2021 7:44:25 PM

Public Comment #0366
Horse Heaven Wind Farm
Docket #210011

External Email

I would like to register my objection to the licensing of a wind farm in the Horse Heaven Hills area. I do not believe that we have to spoil the scenic countryside with wind turbines in order to make an out-of-state company rich. There are other alternatives such as additional nuclear capacity that does not require spoiling hundreds of acres of land. The ecological and economic damage that the proposed wind farm would inflict on Benton County is unacceptable.

I urge you not to approve permitting of the new facility.

Thank you,

Carl Golightly
Richland, WA

From: [Carol Larkin](#)
To: [EFSEC \(UTC\)](#)
Cc: [Carol Larkin](#)
Subject: Scout Clean Energy Proposed Turbine Wind Farm
Date: Thursday, April 1, 2021 10:00:00 PM

Public Comment #0367
Horse Heaven Wind Farm
Docket #210011

External Email

Dear council members,

I am strongly opposed to Scout Clean Energy's proposed turbine wind farm because it will provide very little benefit to the citizens of WA state, but it will result in tremendous harm to the Tri-Cities.

I personally hate the thought of marring our skies and skylines with humongous wind turbines (either 244, 500 ft. each or 150 at 670 ft. each) stretching 24 miles from Finley to Benton City. I grew up in Eugene, OR and love evergreen trees, woods, creeks, and lush green vegetation. When I moved to the Tri-Cities it took me a while to appreciate the beauty of this area. But I have come to love the expansive open spaces, the beautiful sky with spectacular sunrises and sunsets, the hills and ridgelines which provide an interesting frame, and the colorful desert flowers that brighten the natural habitat every Spring. I can understand that people living in the green West side of the state might not appreciate this beauty, but we deserve to have the unique beauty of our area preserved.

In addition, we rely heavily on the wine industry and the tourism it brings. This massive wind farm would seriously mar the beauty of the beautiful vineyards, rolling hills, and wide-open vistas and thus negatively impact tourism.

This proposed wind farm is counterproductive in reducing carbon emissions. There is little fossil fuel in Washington State, which is 70% hydro, 8% nuclear, 13% renewables (mostly wind), 5% gas and 4% coal, the latter from a single coal plant scheduled to be retired in 2025. This new Scout Clean Energy wind power will only displace hydro (another renewable) because the grid needs to be closely balanced.

In this area wind turbines produce only 27%-30% of total capacity. In contrast, the capacity factor for the Columbia Generating Station, our local nuclear plant, is 98%. Also, the wind farm would not provide any local benefit because electricity is needed on the hottest and coldest days of the year when the wind is not blowing.

The only reason Scout Clean Energy is trying to build the wind farm here is because they have seen that people on the West side of the state were able to block a proposed wind project. In 2011 Energy Northwest pursued a wind project on the west side, for the west side. The site centered on a former gravel quarry, alongside communication towers and commercial logging operations. The location had high winter winds and readily accessible transmission lines. But ecological studies estimated the proposed meager 27 turbines would kill one marbled murrelet every 2 years or 5 in a decade. The project was killed by requiring cost prohibitive mitigation strategies. It is not right to

put the wind farm here where it is not even needed and will do tremendous harm, just because people on the West side don't want it there.

This wind farm will mar the beautiful vistas of this area, have no effect on climate change or carbon emissions, will not replace fossil fuel at all, will harm tourism and the wine industry, will provide a trivial number of temporary construction jobs, and is unfair.

I ask you to deny Scout Clean Energy's application.

Sincerely,
Carol Larkin
Richland, WA

From: [Richard Yrjanson](#)
To: [EFSEC \(UTC\)](#); [DOR Benton County Leg Authority](#); [Brown, Sharon](#); [Klippert, Brad](#); [Boehnke, Matt](#)
Subject: The headlines in the Tri-Cities Herald
Date: Friday, April 2, 2021 9:06:22 AM
Attachments: [Screenshot \(232\).png](#)
[Screenshot \(229\).png](#)

External Email

The headlines in the Tri-Cities Herald today speak loudly of the future of electrical generation not only of Washington but for the nation as a whole. Thanks to the efforts of our congressional representatives both state and national a bipartisan effort has come together to develop the future of nuclear generation of electricity grid not only in the Northwest but a national grid is possible. Wind mills in the sky, wave generators in the ocean, and solar power will not destroy the beauty and skyline of the country or be necessary for a national grid of the future. Your efforts are appreciated and thank you.

Richard Yrjanson
Kennewick

Sent from [Mail](#) for Windows 10

From: [Richard Yrjanson](#)
Sent: Friday, March 26, 2021 10:12 AM
To: efsec@utc.wa.gov
Cc: [Sharon Brown](#); [Brad Klippert](#); matt.boehnke@leg.wa.gov
Subject: Scout Application for Site Certification Wind Farm please add the following information into application process.

Members of Site Approval for Scouts application:

In case the following information was not forwarded to you I would like to enter this into the application process.

The complete lack of concern of “we the People” who you represent to approve such a project with so many negatives it represents, unreliable peak supply, excess cost for rate payers, complete disregard for degrading the country side, impedes farm land, use of state lands, kills large and small birds, noise both heard and unheard health problems possible, excess cost for production of power / megawatt, prairie land loss that we enjoy here in the mid-state, being built on the hills where the “Goose Gap” has been hunted for years for geese. I could go on but this project is so “not needed” but is nothing more than the promise for more money on the backs of the rate payers. It is like approving Marijuana the only ones addicted to it are the users and the ability to collect taxes or receive funds. We pay for something that may leave the state both citizens and electricity. The truth is self evident wind, solar, and battery storage are no longer needed, build small nuclear reactors

whose foot print is small instead of the "SPIKED BOOT PRINT OF THE SCOUT WIND FARM"

Richard Yrjanson

5207 W. 14th Ave

Kennewick, WA 99338

509-783-2994 dyrjanson@hotmail.com

Sent from [Mail](#) for Windows 10

REACTOR

has operated since 1984, can produce 1,207 megawatts, enough electricity to power a city the size of Seattle and its metro area.

Energy Northwest brings the ideal site to the partnership and proven operating experience and nuclear expertise, said Clay Sell, X-energy chief executive officer and a previous Department of Energy deputy secretary.

The X-energy reactor is expected to be placed at a site previously licensed when Energy Northwest, then called the Washington Public Power Supply System, or WPPSS, planned to build three nuclear reactors north of Richland. Two of the plants were canceled.

The site has access to the transmission grid and utilities and has been well characterized for nuclear development, which should speed up the environmental review and current licensing requirements, Sell said.

NUCLEAR'S CLEAN ENERGY FUTURE

"As Washington state implements the Clean Energy Transformation Act — requiring 100% carbon-free electricity by 2045 — new sources of reliable, affordable and emissions-free electricity will be needed across the nation," said Sawatzke, Energy Northwest chief executive officer.

Grant PUD would distribute the power produced from the project to its local and regional customers.

"This partnership signifies our strong interest in advanced nuclear energy as one of the best, lowest-cost options to reliably serve Grant County's growing communities and support their continued

economic growth," said Kevin Nordt, chief executive officer at Grant County PUD.

Sell called Grant County PUD "a forward-thinking, resourceful and extremely well-run utility with an interest in new resources to meet growing demand."

The PUD, just upriver from the Tri-Cities and Hanford, owns two hydro-power dams on the Columbia River, and with other projects has the capacity to power a city the size of Seattle.

The Xe-100 reactor is planned to use off-the-shelf components that can be manufactured and shipped by road and rail to sites where they are needed. It could be expanded beyond the 320 megawatt four-pack, as needed.

X-energy was awarded \$80 million in October by the DOE Advanced Reactor Demonstration Program to help private industry demonstrate advanced nuclear reactors in the United States and maintain the nation as a global leader in nuclear energy technology.

It will pay for half of the project.

TerraPower, of Bellevue, Wash., also was awarded \$80 million, but Sell believes X-energy will have an advanced nuclear reactor commercially operating first.

"When the Department of Energy announced the awardees of the Advanced Reactor Demonstration Program last year, I called it a 'game-changer' for the Tri-Cities," said Rep. Dan Newhouse, R-Wash., at Thursday's signing ceremony in Richland.

"The Tri Energy Partnership is not only going to help shape the future of clean energy innovation



BOB STAWKEY Tri-City Herald

Rep. Dan Newhouse, left, R-Wash., watches Thursday morning as, seated from left, Brad Sawatzke, CEO of Energy Northwest; J. Clay Sell, CEO of X-energy; and Kevin Nordt, CEO of Grant County PUD, sign an agreement to build and operate the nation's first commercial advanced nuclear power reactor under a partnership in Richland.

for the Tri-Cities and Central Washington, but for the entire nation," he said.

The planned Xe-100 high temperature, gas-cooled reactor will use a design that eliminates the possibility of a meltdown and will require a smaller safety perimeter compared to traditional plants, the partnership said.

It will use a low enriched uranium fuel encased in ceramic to make it impossible to melt, Sell said.

"We believe we will build hundreds of (the Xe-100 reactor) in Canada and around the world in the next 20 years," he said. "But the first one will be here."

WHY RICHLAND?

A week ago, Sen. Maria Cantwell, D-Wash., promoted the Tri-Cities as an ideal place for the next generation of nuclear energy at a Senate Energy and Natural Resources Committee hearing.

"Today, over 12,000 nuclear skilled scientists, engineers and craft workers are working there in 100 different companies," she said.

"Columbia Basin (College) and Washington State University campuses offer bachelor's, master's, and PhDs in nuclear-related fields, and the region hosts a strong apprenticeship program," she said.

In addition DOE's Pacific Northwest National Laboratory in Richland receives about \$400 million a year for research and development in nuclear-related fields.

Sell, a witness at the hearing, said federal research funding to be matched with private sector funding was "a critical accelerator" to X-energy's investment in an advanced nuclear reactor that it plans to sell around the world.

X-energy specifically wanted to be in Washington state for its first pro-

ject and partner with Energy Northwest after seeing how Swatzke had dramatically improved operations of the Columbia Generating Station over the past decade, he said.

X-energy also looks forward to having a place in the Tri-Cities area's record of historic achievement in the nuclear field, Sell said.

"This community knows about nuclear power. This community has a proud tradition," he said.

As deputy energy secretary he worked to save the Hanford site's B Reactor and open it to the public. It was the world's first full-scale nuclear reactor, built during World War II.

Sell spoke at the same podium Thursday used by President John F. Kennedy when he visited Hanford in 1963 for the ceremonial groundbreaking that gave N Reactor, built as part of the nation's nuclear weapons program, a dual role as the largest nuclear

power plant in the world.

Now the Tri-Cities skilled workforce is building the vitrification plant, the largest nuclear construction plant in the world, he said. The \$17 billion plant will be used to treat radioactive waste left from producing plutonium for weapons from WWII through the Cold War at Hanford.

But the critical element in choosing partners in the Tri-Cities area was the way the market in the state is being shaped by the Clean Energy Transformation Act passed in 2019, he said.

"That is the most transformative thing that has happened in nuclear energy markets in the United States because it has created the commercial framework for nuclear to succeed and to succeed wildly," he told Cantwell last week.

Annette Cary:
509-582-1533,
@HanfordNews

Tri-City Herald

US's 1st commercial advanced nuclear reactor could operate near Tri-Cities under new deal

BY ANNETTE CARY
acary@tricityherald.com

RICHLAND, WA

What could be the nation's first commercial advanced nuclear power reactor would be built and operated near Richland under a partnership agreement signed Thursday.

X-energy, of Rockville, Md.,

will work with Energy Northwest of Richland and Grant County PUD to develop, build and operate an 80-megawatt reactor, the Xe-100, on land already leased by Energy Northwest at the Hanford nuclear reservation in Eastern Washington.

Advanced reactors are intended to be designed with enhanced safety features and a

smaller footprint for their modular design concept.

Their smaller size and ability to quickly ramp up and down makes them a perfect complement to intermittent renewable resources, such as wind and solar, that rely on weather conditions to generate power, according to the TRi Energy Partnership.

Such reactors can help the

nation transition from fossil fuels, it said.

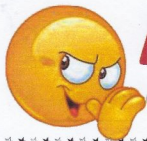
The TRi Energy Partnership could be operating a reactor within seven years, and the project could be scaled up to four-reactor, 320-megawatt power plant.

"We hold the future of nuclear energy in this country on our shoulders here at Energy Northwest and the Tri-Cities, along

with our partners," said Brad Sawatzke, Energy Northwest chief executive officer.

Energy Northwest now operates the Northwest's only commercial nuclear power reactor, the Columbia Generating Station, 10 miles north of Richland in Eastern Washington. The reactor, which

SEE REACTOR, 8A



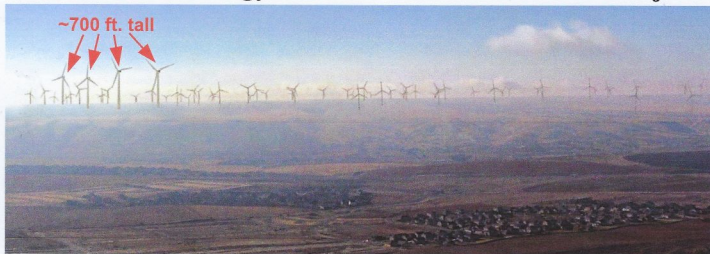
MUTTERINGS...

Keeping Benton County Voters Informed



March 24, 2021 Vol. 7 Special Edition

Scout Clean Energy-Horse Heaven Hills Wind Project



Here is a simulation from Scout Clean Energy. However it is phony for two reasons.: 1)There are only about fifty towers shown; whereas the project "includes up to 244 turbine locations and two solar arrays," plus two battery energy storage systems." Further, the elevation difference from the valley floor to the front ridge tops is approximately 500 feet. Scout mentions 500 foot towers with a second option with wind turbines of 657 to 671 feet tall. The planned turbines will be two to three times taller than those shown in the picture and matching the elevation change of the hills as shown. The added four towers at the left better demonstrate the height and demonstrate the towers won't fade into the background quite like shown because the hills under the back rows of turbines are 200 to 600 feet higher than the front rows of hills. For a very complete overview of the project go to

Save Our Ridges at http://save-our-ridges.org/?page_id=16

This Mutterings is dedicated to providing information concerning the proposed Horse Heaven Hills Wind Project so that readers can be informed of the nature of the project, it's status, various impacts on adjoining environment, population and habitat, and the opportunities for public input. The following will serve to guide the reader to the page where information of interest is to be found,

Map and siting of wind turbine farm	2
Impact on county economy, and uselessness of wind turbines	3
County comprehensive plan, poor wind efficiency	4
Poor soils for building will add to upkeep costs	5
Things we won't be told	6
Letter from EFSEC	7&8
In Summary	9

This newsletter is published and distributed by Karen Batishko, the current precinct committee officer for Benton County Precinct 1365. It's purpose is to keep PCOs and voters informed of legislative activity, and how their own elected officials are representing their interests. Karen may be contacted by email at BigLouie@pocketinet.com, or by phone at 509-628-8442.

In Summary

THREE EVENTS

Application for Site Certification (ASC)
EFSEC Docket No. EF-210011

The Public Information Open House

March 30, 2021, 5:00 – 5:30 PM
EFSEC staff will be available to answer questions about the Project and the EFSEC review process.

Informational Public Meeting

March 30, 2021, 5:30 – 7:30 PM or last speaker, whichever comes first:
Also, Counsel for the Environment, an Assistant Attorney General will be introduced and will explain the duties of this position.

Public comment will be taken. To sign up to speak at this meeting please send an email to

efsec@utc.wa.gov or
call EFSEC staff at (360) 664-1345
before 5:00 pm on March 30, 2021.

Land Use Consistency Hearing – March 30, 2021,
7:30 or last speaker, whichever comes first:
UNTIL – 9:00 PM.

NOTE for those unable to attend: If you are unable to attend the meeting please send your comment in writing to efsec@utc.wa.gov or at the mailing address below.

Energy Facility Site Evaluation Council
Sonia Bumpus, EFSEC Manager
621 Woodland Square Loop P.O. Box 43172,
Olympia, WA, 98504-3172

For more information submitted by
Scout Clean Energy-Horse Heaven Hills Wind Project:
<https://tinyurl.com/yzxht7mn>

This page includes links to the following and more

Read about how many roads and corners will have to be rebuilt at our expense:

<https://apiproxy.utc.wa.gov/efsec/GetDocument?docID=31&year=EFSEC&docketNumber=210011>

Appendix A – Decommissioning Plan

Appendix E – Turbine and Access roads Permanent disturbance acreage for: 1) maximum potential number of Turbines (244 total, each with a tower base of 5,278 square feet (73x73)), 2) associated Turbine access roads (104.5 miles total of 16-ft wide access roads), 3) met tower sites (all 13 possible locations with a base of 1,764 square feet), and 4) access roads to the met towers (2.8 miles total of 16-foot-wide access roads). The acreage per parcel accounts for spatial overlap of features. Pursuant to Benton County Code 11.17.070(t)(11), “wind turbine(s) and all associated service roads may not displace more than five (5) percent of the area of that parcel(s) on which they are located.” [The above four items **DO NOT** include: proposed solar arrays, battery storage, transmission (lines, transformers, etc.) or maintenance, management and/or storage facilities.]

Appendix L - Habitat Mitigation Plan

Appendix O additional information - Baseline Sound Survey

Appendix M – Bird and Bat Conservation Strategy

“An Application for Site Certification (ASC) may be eligible for expedited review when the EFSEC Council finds (1) the environmental impacts of the proposed project are not significant or can be mitigated to non-significant levels and (2) the Project is consistent and in compliance with city, county, or regional land use plans.”

See informational materials posted at
<https://www.efsec.wa.gov/>

It would appear obvious that environmental impacts will be significant for wildlife, migration, loss of fertile soil, human living conditions, loss of agriculture productivity, tourism. It will be interesting to see how 60,000 acres of “slowing the wind down” will change the local micro-climates and resettle the blowing sand. It is not plain that the towers will stand up well to the electrical storms common in our area or that they can stay upright without bedrock under their platforms.

The contract has already been issued:

<https://www.efsec.wa.gov/>

“It is our belief that a competitive contractor with experience would not have the level of knowledge of the EFSEC siting and permitting processes, unique design features of the project and experience with the Washington Administrative Procedure Act (APA) necessary to complete this work in a timely manner, so an intent to Sole Source is being sought.

The contract will be issued on or about March 19, 2021. The dollar value is estimated at \$100,000.

Offerors contemplating the above requirements are required to submit capability statements detailing their ability to meet the state’s requirements by March 11, 2021. In the absence of other qualified sources, it is the state’s intent to make a sole source award of the contract.”

To facilitate this remote meeting, EFSEC would like to invite speakers to sign up ahead of the meeting. Anyone wishing to speak during the public meeting please notify EFSEC by phone at (360) 664-1345 or email at efsec@utc.wa.gov before 5:00 pm on March 30, 2021.

Open House – March 30, 2021, 5:00 – 5:30 PM: The Applicant and EFSEC staff will be available to answer questions about the Project and the EFSEC review process.

Informational Public Meeting – March 30, 2021, 5:30 – 7:30 PM or last speaker, whichever comes first: As required by RCW 80.50.090 (1) and WAC 463-26-025 EFSEC will hold a Public Informational Meeting. At this meeting, the Applicant and EFSEC staff will make presentations. Also, at this meeting, Counsel for the Environment, an Assistant Attorney General appointed by the Washington Attorney General will be introduced and will explain the duties of this position. Public comment will be taken during this meeting. To sign up to speak at this meeting please send an email to efsec@utc.wa.gov or call EFSEC staff at (360) 664-1345 before 5:00 pm on March 30, 2021.

Land Use Consistency Hearing – March 30, 2021, 7:30 – 9:00 PM or last speaker, whichever comes first: As required by RCW 80.50.090 (2) and WAC 463-26-050 and 463-26-060 subsequent to the informational public hearing, at approximately 7:30 PM EFSEC will hold a Land Use Hearing. During this hearing, the public will be given an opportunity to provide testimony regarding the proposed Project's consistency and compliance with land use plans and zoning ordinances. To sign up to give testimony at this hearing please send an email to efsec@utc.wa.gov or call EFSEC staff at (360) 664-1345 before 5:00 pm on March 30, 2021.

Note: The Land Use Consistency Hearing will begin no later than 30 minutes after the conclusion of the Informational Public Meeting, which may end before 7:30 PM.

For information regarding the Project please contact Amy Moon, EFSEC Site Specialist at (360) 664-1362. If you have special accommodation needs or need language translation services to provide your comment, please contact EFSEC staff at (360) 664-1345 or send an email to efsec@utc.wa.gov.

Energy Facility Site Evaluation Council
Sonia Bumpus, EFSEC Manager
621 Woodland Square Loop P.O. Box 43172,
Olympia, WA, 98504-3172

March 9, 2021

**State of Washington
Energy Facility Site Evaluation Council**

Scout Clean Energy-Horse Heaven Hills Wind Project – EFSEC Docket No. EF-210011

**NOTICE OF INFORMATIONAL PUBLIC MEETING AND LANDUSE
CONSISTENCY HEARING MARCH 30, 2021**

**5 PM
Virtual Meeting**

Description of Proposal: On February 8, 2021 Horse Heaven Wind Farm, LLC (Applicant) submitted an Application for Site Certification (ASC) to the Energy Facility Site Evaluation Council (EFSEC) to develop, construct and operate the Horse Heaven Wind Farm Project (Project). The proposed Project location is in Benton County south of Kennewick and will have a maximum generating capacity of 1,150 Megawatts (MW). The Applicant has requested review under EFSEC expedited process for the ASC. **An ASC may be eligible for expedited review when the EFSEC Council finds (1) the environmental impacts of the proposed project are not significant or can be mitigated to non-significant levels and (2) the Project is consistent and in compliance with city, county, or regional land use plans.**

The ASC and other materials are posted on the EFSEC website: www.efsec.wa.gov. Copies of the ASC will also be provided to the Washington State Library and to local libraries.

Proponent: Horse Heaven Wind Farm, LLC, 5775 Flatiron Parkway, Suite 120, Boulder, CO, 80301.

State Environmental Policy Act (SEPA) Lead Agency: EFSEC

SEPA Threshold Determination Required: A threshold determination is required to determine whether an Environmental Impact Statement (EIS) is required. The threshold determination will be made based on the probable project impacts identified in the information presented in the ASC. A threshold determination of non-significance (DNS) may be issued if the SEPA responsible official (EFSEC Manager) determines there will be no probable significant adverse environmental impacts. An EIS is not required if a DNS is issued.

Public Comment –Public Comment will be accepted during the Public Information Meeting and Land Use Consistency Hearing. If you are unable to attend the meeting please send your comment in writing to efsec@utc.wa.gov or at the mailing address below.

Meeting Location – The Public Information Meeting and Land Use Consistency Hearing will be held virtually due to public health concerns related to the spread of the novel corona virus (COVID-19). We appreciate your participation and thank you for your patience and understanding.

You may attend the meeting via Skype online or via phone at:

- <https://lync.wa.gov/utc.wa.gov/meet/joan.owens/DPSH9WFT>
- 1 (360) 407-3810 ID: 6702140#

[continued on page 8]

Things we won't be told

Effects of "Ice Throw" and "Shadow Flicker" are addressed in this paper **Turbine Health Impact Study**
<https://puc.sd.gov/commission/dockets/electric/2018/EL18-003/testimony/dakotarange/rExhibit7.pdf>
Notice the EFSEC paper of Mar 17 "Appendix O, Baseline sound Survey" makes absolutely no comment on the noise that will be created by putting a wind turbine on top of Horse Haven Hills. See:
<https://www.efsec.wa.gov/energy-facilities/horse-heaven-wind-project>

These resources mostly out of Europe expose the truth: Wind turbines appear to be at the apex of producing human discomfort, annoyance, and harm, in particular, infrasound and low-frequency noise (ILFN) harm because of impacts unique to this concoction of noise.
<https://stopthesethings.com/2019/05/07/far-out-german-study-finds-pulsing-wind-farm-infrasound-20-kilometres-from-turbines/>
<https://www.masterresource.org/wind-power-health-effects/infrasound-growing-liability-windpower/>

Industrial wind turbine infrasound is not the best weapon, but it is a weapon. This German video documents the harmful effects of the infrasound produced by industrial-sized wind turbines.

The dangers of infrasound have been known since the 1980s when the U.S. military heavily invested in infrasound (below 20 Hz) as a weapon. It looked like it had great promise, according to Col. John B. Alexander who was involved in weaponizing it.

The military gave up on infrasound as its effects on people were too random: some potential targets were seriously debilitated; others not so much. This video presents various studies by acoustical engineers and other scientists showing infrasound's affect on the ear, the heart, the brain and other organs.

A component of the cacophony of low-frequency, amplitude modulated noise generated by these things occurs in frequencies meant to be below what humans can ordinarily hear. But that does not mean that they can't sense what's referred to as 'infrasound.'

The evidence proving the unnecessary damage done to wind farm neighbours by the noise generated by giant industrial wind turbines is mounting by the day: Germany's Max Planck Institute has identified sub-audible infrasound as the cause of stress, sleep disruption and more (see our post here); and a Swedish group have shown that it's the pulsing nature of low-frequency wind turbine noise ('amplitude modulation') that is responsible for sleep problems in those forced to live with it (see our post here.)

Refer to this for entire transcript.

(continue top-right column)

... evidence of wind noise harms accrue. A recent Finnish assessment, scientifically valid and reproducible, found that infrasound (IS) only began to really attenuate after 15-20 km.

The pilot study does not show any significant reduction in damage caused by infrasound until over 15 kilometers from wind farms

The pilot study carried out in Satakunta and Northern Ostrobothnia in Finland shows that the damage caused by infrasound from wind power plants will only decrease significantly more than 15 kilometers away from wind turbines. The study was carried out by the Finnish Association for Environmental Health (SYTe) in the spring 2016.

It has been noticed from experience that after the construction of wind power plants, usually within a few months, people in the surrounding area have begun to get a wide range of symptoms, says Markku Mehtätalo, Chairman of the Finnish Association for Environmental Health.

<https://www.masterresource.org/wind-power-health-effects/infrasound-growing-liability-windpower/>

All bats and some birds interpret sounds surrounding them using their ears, and emit ultrasonic sounds of such high frequencies, that a human ear can't even hear them. Scout tells us in their survey of bats and birds that they inventoried eight different species of bats in their project area by using two frequencies of ultrasound which would call the bats to them for counting. What Scout didn't tell us is that these same ultrasound frequencies are among the mechanical sounds emitted from their wind turbine structures.

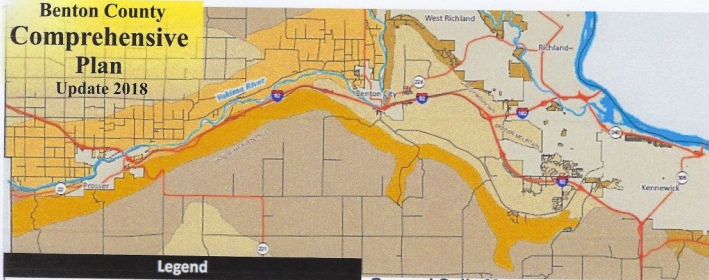
Before destroying more cropland Spend your Energy Money to Get Texas Cleaned Up There were 14,000 dead, standing wind turbines in the USA before the Storm

I did notice these comments about the hazardous materials used at the HHWF which need special handling:

During decommissioning, hazardous materials will be temporarily stored and utilized. These hazardous materials may consist of fuel, lubricating oil, hydraulic oil, propylene glycol, and other materials required for the decommissioning. Also, decommissioning will require the removal of pad-mounted transformers that contain large quantities of cooling fluids, likely consisting of mineral oil. BESS components may contain hazardous materials such as lithium. Due to the presence of hazardous materials during decommissioning, there is the potential for spills and/or leaks. The primary concerns associated with these spills and/or leaks are the potential

impacts to surface and ground water resources and the potential for soil contamination. A Spill Prevention, Control, and Countermeasure Plan (SPCC) will be created for decommissioning. The SPCC Plan will detail the appropriate storage, cleanup, and disposal of hazardous wastes to ensure potential impacts are avoided. Any wastes generated will be handled and disposed of in accordance with state and local rules and regulations, and the site-specific SPCC Plan. Any monitoring, transportation, or handling of materials will be conducted by trained and qualified personnel utilizing established procedures and proper equipment.

Benton County Comprehensive Plan Update 2018



General Soils Map - Benton County Comprehensive Plan Update Appendix A: Map Folio / February 2018 MainDocApxA129020130020718PM- 1.pdf. 4.3.2 – 4.3.4 Soil Construction Limitations

The ordinance requires that developments avoid or maintain setbacks from potentially unstable areas or adequately assess the degree of instability and locate, design, and engineer the development to address the level of hazard.

Soil ratings developed by the Natural Resources Conservation Service are used to indicate the potential degree of limitations for different types of development on different soil types. For example, a soil type might be rated as having slight, moderate, or severe limitations for the development of roads or dwellings. A variety of criteria are used in making such determinations, including such factors as depth to bedrock, shrink-swell potential, permeability, and slope.

It should be noted that even a "severe" rating does not preclude construction from occurring. Rather, it means that the potential limitation should be recognized and that the construction techniques employed may have to take the special soil conditions into consideration. In all cases, Natural Resources Conservation Service emphasizes that an on-site inspection or soil survey would be necessary before it can be determined for certain if such soil characteristics are present.

Agricultural production is expected to continue to be a major activity and to play a vital role in the Benton County and Washington State economies. Population growth in the region will require proper management of soils and agricultural resources to protect them from development-induced erosion, contamination, and other impacts.

Because of their importance to the local and state economy, agricultural lands of long-term commercial significance should continue to be protected from future development, while promoting agricultural viability, will encourage conservation practices such as erosion control measures that will protect and enhance agricultural soils.

<https://bentoncounty.municipalcms.com/files/documents/2017CompPlanUpdate-Feb2018MainDocApxA129020130020718PM.pdf>

There is no plan from Scout that mentions gaining an understanding of which soils and where will be safe building sites. Building on unstable and particularly easily wind-borne soil will be 5 thoughtless negligence for future endangerment.

<https://bentoncounty.municipalcms.com/files/documents/2017CompPlanUpdate-Feb2018MainDocApxA129020130020718PM.pdf>

How Long Do Wind Turbines Last?

The cost of operation and maintenance (also known as O&M costs) make up a sizeable proportion of the total annual costs of a wind turbine. These costs vary depending upon the age of the asset, but average out at around 20-25% of the total levelised cost per kWh produced over the lifetime of the turbine. For a new turbine, these costs may be only 10-15%, but can increase to 20-35% towards the end of the turbine's lifecycle.

How long do Wind Turbines Last?

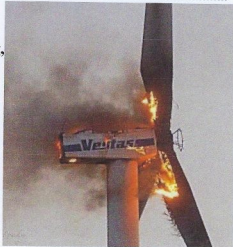
<https://www.twi-global.com/technical-knowledge/faqs/how-long-do-wind-turbines-last>

They may have planned for Decommissioning,

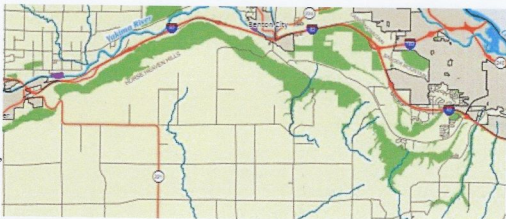
but there are NO plans so far for disposing of 732 turbine blades

200 feet long. The blades, which are mostly made of fiberglass, carbon fiber, resin, and balsa wood, can't be melted down and remanufactured like recycled

aluminum cans or glass bottles. Blades get "recycled" by being shredded and mixed into construction materials or burned for cement production. Otherwise, they get hauled off to landfills. (Burning oils and epoxy are also toxic.)



Benton County Comprehensive Plan Update 2018



LU [Land Use] Goal 2: Follow controlling Law and constitutional Requirements, both state and federal, to ensure the appropriate protection of private property rights. **Policy 1:** Prevent regulations that create undue adverse economic impacts, or unnecessarily restrict the use of private property.

LU Goal 5: Identify the location, site planning, and density of new non-farm development outside of UGAs [Urban Growth Area] to protect existing agriculture from incompatible adjacent land uses. **Policy 1:** Establish compatible land uses adjacent to areas designated as GMA Agriculture to minimize conflicts associated with farm activities such as spray, dust, noise, odors, and liability.

NR Goal 1: Conserve and maintain agricultural land of long term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy. **Policy 1:** Conserve areas designated "GMA Agriculture" in the Comprehensive Plan for a broad range of agricultural uses to the maximum extent possible and protect these areas from the encroachment of incompatible uses.

Policy 2: In the event of a conflict between residential uses and normal and routine practices of commercial agriculture on lands designated as GMA Agriculture, support the agricultural use where it is evident that the agricultural practice is consistent with or equivalent to recognized Best Management Practices.

ED Goal 3: Provide areas for the location of light and environmentally acceptable heavy industrial uses, while minimizing impacts on surrounding rural uses. **Policy 1:** Establish industrial sites on lands designated for industrial use to protect from incompatible uses by using performance and/or site design criteria. **Policy 2:** Do not locate non-agricultural related industry on "GMA Agriculture" designated land.

Soils and Agricultural Resources Benton County has highly productive agricultural soils with over \$900 million generated by Benton County crops and livestock per year (BERK Consulting 2017). Designated agricultural resource lands make up a majority of the County. (See Appendix A: Map Folio, Figure 4 and 5 for existing and proposed Land Use Designations Maps and Appendix L Agricultural Resource Land Reclassification Memo.) The soils in Benton County are generally suitable for both agriculture and structural development, with localized constraints relating to slope, geology, and pockets of sandy soils and fines. **Soils in the region are very susceptible to wind and water erosion once stripped of their natural cover. However, in undisturbed condition, the indigenous shrub-steppe and bunch grass vegetative cover has adapted to hold basin soils in place. When stripped of natural cover, prevention of erosion requires the application of deliberate and aggressive management techniques.**

 **Priority Habitats and Species**

There is no plan from Scout that will mitigate the losses to Wildlife Habitat Conservation Areas!



bpa.gov/transmission

According to Dr. Jim Conca, **the real problem is that Scout Clean Energy is building this wind farm in the wrong state.**

Tornado Alley is the optimal place for wind turbines in the United States (where average wind speeds exceed 6.5 m/s), pushing capacity-factor-a-measure-of-reliability to > 50%, and has made wind the second largest generator of electricity in Kansas, South Dakota and Iowa, where they actually displace coal power.

The capacity factor is the percentage of the time a system is supplying its nameplate or installed capacity. The nameplate capacity times the capacity factor equals the actual output of the generating system. According to the Scout Clean Energy plan the new farm's nameplate capacity will be 1,150 MW. **Since the capacity factor for this wind farm is only 30%,** the generation will actually be only 345 MW operationally. Wind turbines in this area have an average capacity factor of only 27%.

In comparison, the capacity factor for the Columbia Generating Station, our local nuclear power plant, is 98%. With a nameplate capacity of 1,207 MW, it's producing about 1,180 MW continuously, over 3 times that of the similarly-sized proposed wind farm.

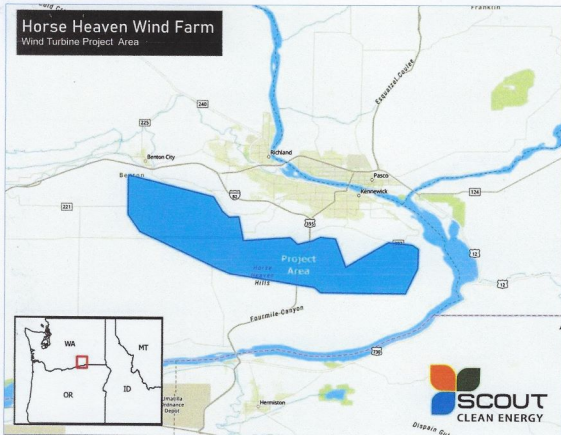
This new Scout Clean Energy wind power will only displace hydro, another renewable, thus having no effect on carbon emissions, no matter where the energy ends up. We know this because it's what happens all the time in this state. The [mentioned] figure below is an example of a weekly electrical load map from the Bonneville Power Administration, who is the main system operator in the Pacific Northwest.

Every megawatt of electricity generated by windmills in the Mid-Columbia must be backed up with dispatchable generating sources to ensure electricity when the wind is not blowing but demand is high during the hottest days or coldest nights of winter. Wind energy is not a reliable energy resource until we have the capacity to store huge amounts of electricity.

The Generation diagram from BPA is at: <https://transmission.bpa.gov/Business/Operations/Wind/ba1twg.aspx>

Horse Heaven Wind Farm

Wind Turbine Project Area



**Horse Heaven
Wind Farm
destroys 60,000
Acres of farm land.**

**60,000 acres
equals one tenth of
Benton County
Farm Land Acres.
(613,530 acres)**

**The Market
value of the
agricultural
products sold
in 2017 was over
one billion dollars,
\$1,005,288,000.**

**It is a major part
of our economy.**



Mr. Christian is a commissioner of the Texas Railroad Commission, which regulates the state's oil and gas industry.

"Regardless of your thoughts on climate change, last month's storm made painfully clear that climate catastrophists have an oversize influence on public policy. An obsessive focus on reaching the unattainable goal of zero carbon emissions led to decades of poor decisions that prioritized and subsidized unreliable energy sources (wind and solar) at the expense of reliable ones (natural gas, coal and nuclear). Texans now know that reliable energy is essential to our everyday lives.

"The catastrophists' oversize influence has produced a dangerous hypocrisy. Greens say that wind and solar can replace natural gas and coal to meet our energy needs while reducing carbon emissions. But when "renewables" fail, greens claim they aren't to blame. "Wind power was expected to make up only a fraction of what the state planned for during the winter," according to the Texas Tribune. Which is it?

Ratepayers and taxpayers don't have unlimited funds to invest in energy infrastructure. One choice always comes at the expense of another. The problem with wind and solar power is that investment in unreliable renewable sources has displaced investment in electricity generation from reliable energy sources. Worse, these investment decisions weren't made voluntarily by individuals in the free market. They were forced on Texans by politicians in Washington.

"According to the nonprofit Texas Public Policy Foundation, for every 39 cents the oil-and-gas industry received in federal taxpayer subsidies from 2010 to 2019, the wind industry received \$18.86, 48 times as much, and the solar industry received \$82.46, 211 times as much.

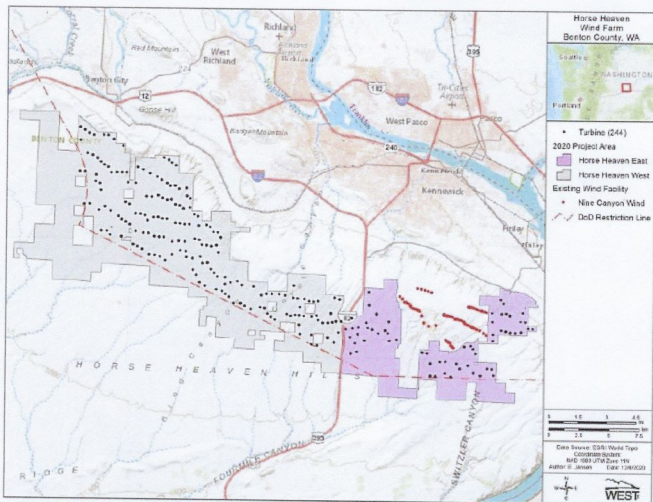
Credit: By Wayne Christian
The Wall Street Journal March 19, 2022: www.wsj.com
"The Grid Nearly Failed Because Of An Energy Mix Weighted ..."
See <https://www.wind-watch.org/news/2021/03/20/texas-blackouts-blew-in-on-the-wind/>

By 2029 Texans will have spent \$2.5 billion subsidizing wind and solar farms through local property-tax abatements and \$14 billion building the Competitive Renewable Energy Zone's transmission lines through their electricity bills. While most businesses must pay to bring their product to market, wind and solar get a free ride from Texas taxpayers.

If you add it all up, Texas taxpayers and ratepayers will shell out an estimated \$36 billion by the end of the decade to subsidize wind and solar energy. These subsidies have tripled wind and solar capacity in the Lone Star State in the past 10 years, but as Texans learned first-hand during the storm, there is a huge difference between capacity and generation.

"Instead of seeking solutions that increase reliable generation, several Democrats in Congress have suggested the answer lies in connecting ERCOT, Texas' independent electricity grid, with the rest of the nation. As someone who lives in East Texas, one of the few parts of the state not served by ERCOT, I can tell you first-hand this wouldn't have prevented the blackouts—we lost power too. "Having a grid that could have drawn more power from other states would have done little to ease the crisis," Loren Steffy wrote in Texas Monthly. "With most of the country also facing bitterly cold temperatures, the rest of the U.S. wouldn't have had much to spare anyway.

"Texas can't afford to come within minutes of total system failure ever again, and the only way to ensure it never happens is to reverse policy choices that have tilted the state's energy mix in favor of inefficient and unreliable sources. The mix needs to be rebalanced, with an emphasis on cheap, plentiful and reliable sources such as natural gas, coal and nuclear."



Save Our Ridges

http://save-our-ridges.org/?page_id=20 also found at

<https://www.forbes.com/sites/jamesconca/2021/03/08/wind-turbines-on-washingtons-horse-heaven-hills-how-not-to-pursue-a-green-new-deal/?sh=7eb49a6c508d>

Please note: Talk to your County Commissioners. I (Karen) talked to the Planning Commission. They tell me they are not welcome to voice an "opinion." Support your County Commissioners in standing against this proposal.

Will.McKay@co.benton.wa.us
Jerome.Delvin@co.benton.wa.us
Shon.Small@co.benton.wa.us

At first the public is told: "The Horse Heaven Hills Wind Farm is a project planned by Scout Clean Energy of Boulder Colorado. The wind farm will be on 60,000 acres of farmland consisting of up to 244 wind turbines, each one from 500 foot to 671 feet tall. The turbines will be in up to 6 rows along 24 miles of our Western [Southern] skyline.

"EFSEC [Energy Facility Site Evaluation Council] is the state board charged with the siting of major energy facilities, and will review the application for environmental, **social and fiscal impacts** [these words disappear in any further communications]. The review process will ensure robust public involvement opportunities and participation by Benton County, who will also review the application for consistency with local land use and zoning laws."

(Please, see page 4 & 5 discussing Benton County Comprehensive Plan.)

Then we are told: State of Washington Energy Facility Site Evaluation Council

"The State of Washington Energy Facility Site Evaluation Council (EFSEC or Council) provides a "one-stop" siting process for major energy facilities in the State of Washington. EFSEC coordinates all evaluation and licensing steps for siting certain energy facilities in Washington. EFSEC specifies the conditions of construction and operation. **If approved, a Site Certification Agreement is issued in lieu of any other individual state or local agency permits.** EFSEC also manages an environmental and safety oversight program of facility and site operations."

From: [Chris Gamache](#)
To: [EFSEC \(UTC\)](#)
Subject: Horse Heaven Hills wind turbine project
Date: Friday, April 2, 2021 8:36:28 PM

Public comment #0369
Horse Heaven Wind Farm
Docket #210011

External Email

To Whom it May Concern,

I want to voice my opposition to the huge wind farm project being considered for the Horse Heaven Hills area. While many say it is clean renewable energy, there are more reasons that make it harmful.

Building those huge turbines and blades comes at a huge price. Transporting them to the sight is also a huge expense of time, money and energy. These turbines harm and kill many of the large birds, and put these birds in danger of depleting their numbers to the point of making them an endangered species. Also, when these turbines and blades are worn out, no landfill wants to take them because they are toxic and will not biodegrade. They become a huge environmental problem all over again.

The energy produced by them is very inconsistent, and it takes precision balancing the ebb and flow of the power created and matching it with other power sources.

The dams we have do a marvelous job of creating consistent and clean power.

In addition, these wind turbines can be an eye sore for many people living in the area. They oppose this wind farm.

Please say no to this project.

Thank you,

Chris Gamache

From: [Jacob LaRiviere](#)
To: [EFSEC \(UTC\)](#)
Subject: RE: Request to comment on Scout Clean Energy Plan
Date: Sunday, April 4, 2021 3:25:37 PM

Public comment #0370
Horse Heaven Wind Farm
Docket #210011

External Email

Hi Joan-

Recent economic research shows that local windfarms seems to impose [negative impacts on property prices proximate to the windfarms](#). Other research shows the reason for the price decrease is limited to [homes that have a view impacted](#) by windfarms. These localized costs lead to NIMBYism for many renewable projects thereby increasing the cost of reducing carbon emissions in the electricity sector.

Policymakers have a couple of options to remedy this issue. One is to bow to NIMBYism and drive up carbon abatement costs. A second is to proceed with the projects and alienate local residents. A third option creates a win for all parties and involves correcting the local negative externality on property prices imposed by windfarms. Here are the characteristics of this third options:

1. Assess which existing homes will have a view of the windfarms.
 - a. It is possible to have gradients of views from severe to minor.
2. Each home with a view gets a local property tax reduction in perpetuity applied to their property.
 - a. The decrease can be a full zeroing out for severe view impacts to something more modest for minor view impacts.
 - b. For example if local property taxes were 1% and changed to 0%, then a home worth \$300,000 would go from paying \$3,000/year to zero dollars.
 - c. The endowment of the local property tax exception increases the value of the home by something like 6-12 times the local property tax exception so that the homeowner's wealth is roughly unchanged (call this the **discounted endowment impact**).
3. The sum of the lost revenue to local city and county property taxes would be made up by taxing the electricity generated by the local windfarm.
 - a. A clause can ensure that county/city revenues increase as a result of the windfarm.
 - i. As an example, say that 10,000 homes with an average value of \$300,000 would have a decrease in value of 4%. The aggregate wealth impact of the windfarm would be $10,000 * .04 * \$300,000 = \$120,000,000 = \$120M$.
 - ii. If the **discount endowment impact** is 6 (very, very low and probably closer to 12) then the annual additional revenue required to tax the windfarm would be $\$120M/6 = \$20M$.
 1. In the more reasonable case, it would be $\$120M/12 = \$10M$.
 - iii. Assuming the windfarm has 1000MW capacity, a 30% capacity factor, and earns \$25/MWh, that is \$65.7M in annual revenue.
 - b. With impacts at this level, there still might be room to build the windfarm and make

the local community whole.

3. If the windfarm still finds it profitable to build with the local property value correction tax imposed, they build.
 - a. Alternatively they can propose an alternative design which has lower capacity, lower capacity factor, or lower local property taxes.

This type of creative policy maker would make Washington a leader in crafting policy that gets by NIMBYism and turns it to YIMBYism by aligning global and local incentives to let the market work. This type of policy would garner international media coverage for Washington state for creative and efficient policy making.

I normally charge \$1000/hour for consulting projects. I'm glad to put my time where my mouth is: I'm willing to provide 40 hours of free consulting to talk with local policymakers, state policymakers, community leaders and business leaders to advise and help craft policy along these lines to create more support for this project at the local level so that all parties benefit. Having published over 20 papers in peer reviewed academic journals specializing in the energy sector, as a co-editor of the top journal in environmental economics, and working with Microsoft's internal electricity procurement team for wind purchase power agreements, I have the experience and knowledge to get to a win-win-win here for business, the local community, the global community in a way that reflects well on Washington state.

Can you please confirm receipt of this email? I hope to hear that you'd like to engage on this potential collaboration.

Kind regards,

Jacob LaRiviere, PhD
Senior Principal Research Manager, Microsoft
Affiliate Faculty, Department of Economics, University of Washington
Coeditor, *Journal of the Association of Environmental and Resource Economists*
www.jacoblariviere.com
858.531.5170

From: Owens, Joan (UTC) <joan.owens@utc.wa.gov> **On Behalf Of** EFSEC (UTC)
Sent: Thursday, April 1, 2021 8:55 AM
To: Jacob LaRiviere <Jlariv@microsoft.com>
Subject: [EXTERNAL] RE: Request to comment on Scout Clean Energy Plan

Good morning,

Please send your written comments to this email address at any time, no particular format is needed.

Thanks,

~Joan Owens

Energy Facility Site Evaluation Council

Secretary Supervisor

Email: joan.owens@utc.wa.gov

Phone number: (360) 664-1920

EFSEC Email: efsec@utc.wa.gov

EFSEC phone number: (360) 664-1345

Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172

Mailstop/P.O. Box: 43172

www.efsec.wa.gov

From: Jacob LaRiviere <jlariv@microsoft.com>

Sent: Wednesday, March 31, 2021 7:10 AM

To: EFSEC (UTC) <EFSEC@utc.wa.gov>

Subject: RE: Request to comment on Scout Clean Energy Plan

External Email

Hi-

Thanks again for organizing the public forum to provide oral comments. I was schedule to speak yesterday as the 10th speaker but childcare responsibilities got in the way and I wasn't able to make it. I was hoping to submit a written comment instead. When are written comments due, where do I send them and do they need to be formatted in any particular way?

Best,

Jacob

From: Jacob LaRiviere

Sent: Tuesday, March 23, 2021 11:38 AM

To: efsec@utc.wa.gov

Subject: Request to comment on Scout Clean Energy Plan

Hi-

My name is Jacob LaRiviere. I am born and raised in the Tri-Cities but currently live in Seattle where I am [affiliate faculty at University of Washington](#), Department of Economics, [Senior Principal Researcher and Research Manager in the Office of the Chief Economist at Microsoft](#), and [co-editor of the Journal of the Association of the Environmental and Resource Economists](#), the highest impact environmental economics journal. I have [published over 20 articles on environmental economics](#) including articles on the economics of efficient siting of windfarms.

The proposed project has diffuse benefits in terms of reduced CO₂, lower wholesale electricity prices and a productive use of space currently used for dryland farming (not to mention jobs). However, there are localized costs: property values with a view of the windfarms will decrease wealth. Recent economics literature finds effects on the order of 2-10% when a property looks at a windmill relative to natural landscape. This explains fierce NIMBYism and local opposition to the windfarm.

I'd like to comment to encourage policymakers to think creatively about how they might change property taxes for homes with a view of the windfarms to offset the decrease in property values from the windfarms. This property tax decrease when combined with appropriate taxation of the sales revenue from the windfarm and effective spending on public goods which benefit affected homes so that they are better off on net despite having to look at windmills. Indeed Alaska already does something like this through the oil revenue payout to all Alaskans. I think this is not just an important project but a chance for local and state policymakers to be leaders on creative policymaking.

Thanks,

Jacob LaRiviere, PhD

www.jacoblariviere.com

858.531.5170

From: [Richard Dorsett](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Wind Farm
Date: Monday, April 5, 2021 6:16:57 PM

Public comment #0371
Horse Heaven Wind Farm
Docket #210011

External Email

We are Richard and Rose Mary Dorsett and we own a one-seventh interest in 640 acres under contract with Scout Clean Energy that is part of the current proposed project. Our property is located in the eastern portion of the proposed wind/solar project.

We are not and never have been in support of this project. We do not believe it is needed in order to meet our local energy needs. We believe that our local current energy infrastructure including our dams in the Columbia and Snake Rivers along with other sources of energy production including nuclear energy generation and others sources of energy production is adequate to meet our energy needs here in Eastern Washington currently and for the foreseeable future.

We have many concerns regarding environmental damage. These concerns include the damage that will be done to our view scape, damage to habitat for birds and other wildlife. We are concerned as to who and at whose cost will these "improvements" be removed and the land restored after there is no longer need or desire to have the windmills and or solar projects in operation.

In our opinion this project will hamper the growth of our communities by restricting future developable land for homes and businesses and negatively impact agricultural opportunities.

In our opinion this is an unwise direction to take our communities.

Thank you for including our input in your decision process.

Richard A. & Rose M. Dorsett
Prosser

From: [David Dorsett](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Wind Farm Proposal
Date: Tuesday, April 6, 2021 10:06:48 AM

Public Comment #0372
Horse Heaven Wind Farm
Docket #210011

External Email

To whom it concerns,

I am writing this morning in opposition of the proposed wind/solar farm. Not only is this project being proposed with out the consent of the local community but it is an extremely inefficient producer of energy. Again, I am extremely opposed to this project and hope you will listen to the local community and not allow it to move forward.

Thank you for your time and consideration.

David Dorsett
(509) 302-7667

From: [S.P](#)
To: [EFSEC \(UTC\)](#)
Subject: Horse Heaven Hills Windfarm
Date: Wednesday, April 7, 2021 11:43:45 AM

Public Comment #0373
Horse Heaven Wind Farm
Docket #210011

External Email

To Whom It May Concern:

We live on the Horse Heaven Hills plateau in Benton City, Wa. We are opposed to the proposed windfarm project by Scout Clean Energy. Our home is only a few miles from the proposed sites of turbines, actually on the plateau. Although there is research that says these are fine for people to live around, we do not agree. We have done extensive research and found many testimonies of people who have had similar health problems from the large turbines near their homes. Studies have shown that close proximity to wind turbines can affect health including disturbing sleep due to noise, with chronic sleep disturbance being a severe health risk. These turbines are going to be close to thousands of homes and residential neighborhoods and the constant noise and flickering lights can be a severe source of stress to some. Wind farm turbines have been seen to adversely affect wild birds and bats, directly and indirectly due to collisions, noise pollution, habitat loss and reduced reproduction. This will affect the number of destructive insects, negatively impacting our large agricultural sector and adversely affecting our economy. Wind turbines are not a really a true green energy source as they use oil and many of the parts to make them are imported and use massive amounts of fossil fuels to make, transport and install. They can be a fire hazard if the turbine fails, again adversely affecting many aspects of our environment. The blades do not decompose so they will be a hazard to the environment for countless years to come. Finally, the unique Tri-cities skyline will be destroyed by huge man-made machines and will mar the scenic vistas of the beautiful Horse Heaven Hills horizon.

We agree with the majority of the people who commented on the town hall meeting on March 30th, 2021 who opposed this.

Thank you for your time and consideration and for allowing us to give our input on this alarming situation.

Sincerely, Scott and Corinne Sohler (509) 947-6384
sohlerpower@amerion.com

From: [Jackie Aman](#)
To: [EFSEC \(UTC\)](#)
Subject: Horse Heaven Wind Farm Project
Date: Wednesday, April 7, 2021 12:47:22 PM
Attachments: [image002.png](#)
[image003.png](#)
[EFSEC.pdf](#)

Public Comment #0374
Horse Heaven Wind Farm
Docket #210011

External Email

Jackie Aman
City of Kennewick
City Manager's Office
O: 509.585.4238
jackie.aman@ci.kennewick.wa.us





Leading the Way

April 6, 2021

Energy Facility Site Evaluation Council
Sonia Bumpus, EFSEC Manager
621 Woodland Square Loop, PO Box 43172
Olympia, WA 98504-3172

Re: Horse Heaven Wind Farm Project

Dear Ms. Bumpus,

The Kennewick City Council would like to voice our opposition to the Scout Clean Energy's Horse Heaven Wind Project proposed to be located in unincorporated Benton County and directly adjacent to the City of Kennewick. The strong opposition in our community is not surprising when measuring the false premise of reduced carbon emissions and making money for out-of-state investors against the significant harm this project poses to our regional economy and the damage it would bring to our beautiful vistas.

The City of Kennewick is home to 85,000 residents and part of a community within Benton & Franklin Counties, consisting of over 300,000 residents. The citizens in our community value the wonderful parks, hiking trails, and many other outdoor recreation and amenities. Located in the heart of Washington Wine Country, our region relies on the tourism economy. The Red Mountain American Viticulture Area is home to rolling vineyards and estate wineries with incredible views of the Horse Heaven Hills.

The proposed project is located only 4 miles south of the City of Kennewick and the greater Tri-Cities Region, one of the largest urban areas in Eastern Washington. We have heard from our citizens that they do not support this project. They have expressed a wide range of concerns including, the project will negatively affect our environment; specifically the natural area enjoyed by our region, loss of habitat and agriculture, negative impacts to wildlife, concerns relating to health and noise, our history and the detrimental impacts on our tourism economy for years to come. Our community cares about preserving the ridges and skylines that we enjoy, which also support our tourism industry.

Additionally as concluded in the Wind Power and Clean Energy Policy Perspectives report dated July 14, 2020 prepared by Benton PUD, the City of Kennewick's electric provider; wind power is not needed or beneficial for our community. Wind and solar projects are intermittent energy resources that do not provide any firm energy capacity. The City of Kennewick customers expect reliable energy resources and the City concurs with the technical aspects of the Benton PUD's wind policy perspective.

Office of the Mayor

210 W. 6th Ave • PO Box 6108 • Kennewick, WA 99336-0108
(509) 585-4238 • Fax (509) 585-4445 • go2kennewick.com



Leading the Way

Benton PUD's current power supply is hydro and nuclear based and is over 93% non-emitting by Washington State standards. Our community is committed to clean energy development, we simply do not believe the Horse Heaven Wind Project is the right fit for our community or the regions energy needs. Our focus should be for new firm electricity need in the coming decade to ensure resource adequacy rather than unreliable wind energy.

The Kennewick City Council appreciates the opportunity to comment on this project and share our concerns that the Council and our community do not support this project. We concur with Benton County's assessment that this project is not consistent with Benton County's comprehensive plan or the Critical Area Ordinance for Benton County. For all the reasons stated above, please consider this letter as our formal opposition to the Horse Heaven Wind Project.

Respectfully,

Don Britain, Mayor
City of Kennewick

Office of the Mayor

210 W. 6th Ave • PO Box 6108 • Kennewick, WA 99336-0108
(509) 585-4238 • Fax (509) 585-4445 • go2kennewick.com

From: [Margaret Hue](#)
To: [EFSEC \(UTC\)](#)
Subject: Re: Testimony Against the Scout Clean Energy - HHH Wind Machine Project
Date: Wednesday, April 7, 2021 1:18:27 PM
Attachments: [Testimony Against Scout Clean Energy-HHH Wind Project.pdf](#)

Public Comment #0375
Horse Heaven Wind Farm
Docket #210011

External Email

I saved this as a pdf so hope you can review this. As for the Batelle Meteorology Report, the WSDA funded it and has the report.

Margaret Hue

> On Mar 31, 2021, at 3:57 PM, EFSEC (UTC) <EFSEC@utc.wa.gov> wrote:
>
>

Margaret Hue, PhD
29204 S 816 PR SE
Kennewick, WA 99338

March 28, 2021

Energy Facility Site Evaluation Council
Sonia Bumpus, EFSEC Manager
621 Woodland Square Loop P.O.Box 43172
Olympia, WA 98504-3172

Dear Ms. Bumpus and Energy Facility Site Evaluation Council,

Thank you for allowing my written testimony to speak against construction of the Scout Clean Energy-HHH (Horse Heaven Hills) Wind Project.

In my testimony I want to address these topics:

1. This wind energy is to replace fossil fuels that we don't use so why the consideration as it is no benefit for Washington State or Benton County.

According to James Conca, "This wind farm will have no effect on climate change or carbon emissions, will not replace fossil fuel at all, will mar the beautiful vistas of this area, provide a trivial number of temporary construction jobs, and preferentially kill raptors and migratory birds in the great Northwest Flyway Zone". Conca, James. "Wind Turbines On Washington's Horse Heaven Hills - How Not To Pursue A Green New Deal." *Forbes*, Forbes Magazine, 8 Mar. 2021, www.forbes.com/sites/jamesconca/2021/03/08/wind-turbines-on-washingtons-horse-heaven-hills--how-not-to-pursue-a-green-new-deal/?sh=357bd41a508d.

Thirty five years ago a few of us farmers discussed the idea of some individual wind machines to help with energy cost and irrigation power alternatives, but we were told that an Environmental Impact Study would be denied due to the Harrier Hawks native to nesting in the canyons on HHH that were on the extinction list and the migratory birds. The past years we have Harrier Hawks that return to nest as well as Sand Hill Cranes that stay near the irrigation canals. Has there been an Environmental Impact Review completed? It seems this would be important information to share. I request a copy please.

The Kennewick Irrigation District plans to build a huge reservoir in the center of Badger Canyon it will likely become a refuge for some of the many migratory birds as well as some that will stay. We have numerous Sand Hill Cranes and Pelicans that stay along the KID canal in Badger Canyon for the spring and summer. Have these residents and the KID reservoir been given consideration?

2. The Washington State Department of Agriculture (WSDA) contracted Batelle NW to do a "Comprehensive Meteorological Analysis of a Pesticide Drift Incident". This incident was a herbicide drift of Paraquat on one farm that allowed paraquat to drift over 400 square miles of Tri-Cities August 10, 1988. However, the meteorology report determined that the Horse Heaven Hills are unique only to Benton County as no where else in the USA has the topography, elevations flowing into the canyons, inversions moving air and draining into Badger Canyon, Kiona, Benton City, Tri-

Cities and Finley which demonstrated the air flow dispersing chemicals over 400 square miles. Aside from the topography of Horse Heaven Hills flowing into Badger Canyon and Kiona, the area has the height and size of the 7 separate hills within 1/2 -1 mile on the opposite side of the Badger Canyon floor that changes movement and the sound and air movement bouncing off or lifting off in the air flow next to these hills. All of this adds to the unpredictability of air movement. "Glantz, C.S., S.D. Whitman, E.D. Skillingstad, M.N.Swartz. 1991. "Comprehensive Meteorological Analysis of a Pesticide Drift Incident: A Case Study." 20th Conference on Agricultural and Forest Meteorology, September 10-13, 1991.

3. **The air movement off Horse Heaven Hills into the canyons, and the terrains where the wind machines are proposed will also carry the sound of "whir whir whir" from the wind machines for up to 3 miles.** Family in Iowa living near wind machines much farther apart and fewer than this project proposes will validate the sound of the blades and turbines "whir whir whir" will carry 3 miles over FLAT Iowa CORN FIELDS. At their public meetings the wind machine company said they wouldn't be heard after a kilometer. Using the map on page 7 of the Scout Clean Energy , it references in pink receptors non-compliant (is that the residents as it has pink blocks where residential areas are but it neglects to show a lot more who live in the areas). Using their scale almost 65% of the proposed 140 machines from their ML-2 site going toward Kiona are within 3 miles of residential areas. Their map doesn't name roads, sections and all the canyons (like the largest watershed in Benton County that is the true Badger Canyon that flows into my farm and neighborhood). There are 40 machines proposed within 3 miles of my farm and 32 neighbors that live next to where the air flow drains into the true Badger Canyon off HHH. Furthermore the majority of machines are proposed to be located within the ridge peak approximately 2000 feet but flowing down to 500 ft. so all the sound will echo within Badger Canyon which is about 13 miles long and varies in width of 3/4 mile to 1 1/2 miles in width. Approximately 140 machines will be above Badger Canyon where the most drainage is funneled into Badger Canyon which is a concern as per the Battelle Report previously mentioned. **There is no consideration for the volumes of machines placed and the mass contamination of noise and sounds echoing in the many canyons in this report and draining into Badger Canyon as evidenced by the Batelle Report that air flow will drain into this area that is unique and not like any other location in the USA.**
4. **Sound travels and bounces back off the other side of Badger Canyon hills or carries from the canyon like a vacuum sucks the air down.** Ask residents where the coyote howls come from that are a mile or more away that sound like in our back yard. It is the echo of the canyon. Ask if we hear the farmer working his wheat field stubble or planting 2 miles away. During the herbicide drift era with WSDA monitoring aerial permits, it would sound like flying on the ridge in no fly zones and the planes were 5 1/2 miles back but drained into the Badger Canyon flowing into our farm. Another example of sound carrying is my son's wedding and a small band was playing and someone over a mile away complained, so the sheriff came by and thought he had the wrong location as he couldn't hear a band playing in front of our house, but I told him that the canyon that drains into our farm carries it away from the front of the house but we were surprised it carried that far and seemed louder than at our house. As mentioned before one can judge the same as it has too many variables changing it in Badger Canyon / Kiona and HHH. For people not familiar with Badger Canyon, it used to be the Yakima River before the Montana Floods rerouted it to where it is currently and changed it a lot. It is unique with its echoes and noises but in the summer the balmy breezes are cooling and

the sounds of frogs in the ponds and canals, the coyotes howling and the big milky way and sky appear. **Somewhere in that view is not the desire to see 140 blinking red lights in our skyline looking down the canyon toward Rattlesnake Mountain. Neither is the WHIR WHIR WHIR sound of these machines echoing within Badger Canyon 24 hours a day for 7 days a week for 35 years or 12,783 days.**

5. **The Batelle Report contracted by the WSDA following the 1988 Paraquat drift was important to residents of Tri-Cities because it explained why and how the herbicides had been drifting off Horse Heave Hills for the previous 40 years and why these hills are so unique and unpredictable.** Through positive analysis by WSDA of Paraquat August 1988 over the 400 square miles of Tri-Cities. Art Losey, WSDA Manager over the Pesticide Division stated in August, 1988, "this follows the same drift pattern off HHH we've seen for 40 years." that began with the first airplane application on HHH of 2-4-5T. That first application caused damage to grapes and symptoms never seen before on grapes was in 1948 with 2-4-5T with the first aerial sprayer on HHH.

Over time the grapes were slowly killed off in Benton County near the Tri-Cities area. It was Dr. Walter Clore, who studied the grapes and damage from herbicides. Washington State Department of Agriculture (WSDA) documented these symptoms on farms, doing aerial studies, wind studies yet never identified one source. Part of this reason was applications were made over thousands and sometimes up to 10,000 acres a day in numerous areas of HHH so it was impossible to track to one source. It was in the 1960's when some grape growers expanded to wine grapes at the recommendation of Dr. Clore....our Benton County was unique because of the HHH terrain, the Montana Floods, the volcanos and ash....it was perfect for the expansion of wine grapes especially on Red Mountain. But Red Mountain struggled as well as Badger Mountain, Finley and Kennewick areas. But grapes, even wine grapes struggled because of 2-4-D drift.

In the early 1980's experimentation on Dupont's sulfonyl ureas and Monsanto products mixing 2-4-D and Roundup products started affecting all diversified agriculture. During the early to mid 1980's Alfalfa grew less than half the height and went to seed early. These Dupont products attacked our diversified crops stopping the terminal growth (where the new growth grows) and stopping and stunting and eventually killing the root growth. In 1987 we planted asparagus as the top producing crop at that time in Washington State on 1/3 of our farm as our alfalfa wouldn't grow enough for even 50% production. In 1988 we had jumbo sized spears but less than a month later the field turned yellow and the Asparagus Association said our 1 year old field was now a "PLOW OUT" field. In other words the 4 year loan for planting it was our burden and the field will never produce. We didn't understand. We called WSDA and learned that orchardist lost cherry trees, a complete peach orchard in and extensive damage in Kiona; then another lost all her grafts on 100 acres of cherries in Finley off 9 Mile Canyon Rd. All of us diversified agriculture with devastating losses. My asparagus never produced and the majority of our stand died after turning yellow in 1988. We lost 75% of our stand the first year. We had hearings in Tri-Cities for the public to speak held by WSDA requesting changes to HHH application and restrictions on some of these chemicals for aerial spray. Every 3-6 months changes were made and more studies. EPA tested and verified the sulfonylureas were causes of damage to orchards, particularly cherries and peaches. WSU found plant bioassays sensitive to chemicals were often exposed at 9 Mile Canyon, Badger Canyon, Kiona and even WSU Experiment Station was not immune from drift. WSU finally determined that combinations of repeated repeated and repeated exposure

over and over weakened the immune system of the plants and they died or didn't produce as life shortened. The Dupont Sulfonyureas were the biggest threat but also the 2-4-d on grapes and the roundup mixes. The products were applied by aircraft with minimal water (1 gallon per acre) that left minute particles floating in the air to disperse into Badger Canyon, Tri-Cities Finley and Kiona. These lands proposing the wind machines are the same farms that drifted pesticides on Badger Canyon/Kiona Benton City/Finley and Tri-City residents, children, farmers, orchardist and grape growers/vineyards and that caused drift and residues from DuPont products in our soils for 50 years 1948-1998 before crop productions started coming back and grapes came back. Many of us lost our farms due to them killing our crops and not paying us for them. So now these same farmers want to contaminate our air space with monstrosities 650ft in the air and 240 of them blinking red eyes at us for them to make money after contaminating 400 square miles of Tri-Cities. We put up with their drift and it was proven but took 45 years for regulation changes. These machines are another 35 years of noise pollution and environmental pollution in our skyline disturbing the most beautiful site in TriCities....the view and hills.

6. **The farmers on HHH impacted downwinders for 50 years with their chemicals and residues from chemicals that lasted til the late 1990's.** Tri-Citians Against Chemical Trespass represented farmer and residents of Tri-Cities. They didn't want to take their farming away, they simply asked them to **"Keep Your Chemicals At Home!"** on their own property; even after they saw and heard how many farm families and friends lost their farms and homes over those 50 years. Well, today we will say **"Keep your Wind Machine Sound of the Whir Whir Whir at Home"** but the farmers and Scout Clean Energy will say that they can't control the sound. This is the same thing that chemical trespass did...the wheat farmers didn't care about drifting on neighbors they didn't know from 1948-1998, just like they don't care about polluting their sound, air space and view for the next 35 years or the expense of tearing them down when they quit or are not used. So our advice: **'KEEP YOUR WIND MACHINE SOUND OF THR WHIR WHIR WHIR AT HOME!' If you CAN'T....DON'T BUILD THEM!**

7. **Who is Scout Clean Energy? Are they are financially backed by an Australian company and use Chinese made products.** In Iowa and Nebraska they have dealt with companies who come in backed by foreign companies and use cheap products made in China for the towers, blades, motors that are short lived and generators have to be replaced within a few years. In Iowa my brother said that the Towers within a few years of age all needed new generators. Some sit idle until repaired which may be sometime. What my brother in Iowa has found was that the products are cheap and the original companies sell off the contracts after they are built and the products start failing. The new companies ask to redo the contracts to pay less monies to those holding contracts. Furthermore, the power never goes to Iowa residents but is sent to Chicago or Gary, Indiana. But my brother cautions that it isn't just the wind machines to be aware of but the many roads and power lines. So I would venture to say that the roads will probably be minimally maintained over 72000 Acres on HHH and what about power lines to connect power? Will they be above or below ground? Knowing HHH and the potential for dust storms with our unpredictable winds who is going to eat the dust? These machines "micrositing is over 12000 acres" inside the peak ridge flowing toward Badger Canyon, Kiona/Benton, Tri-Cities and Finley. **Who is maintaining and watering the dust from the hundreds of miles of roads, construction and maintenance?** Is this daily 24/7 responsibility of the farmer or the power company or Scout Clean Energy who sells off the contract after built? Who do we call for dust control? How long will it take them for water

trucks to be there? How fast is something done, because complaints have to be verified the dirt is blowing and the dust may be on Tri-Cities and wind stopped so no fine, no write up or warning as one county inspector can't manage the local complaints. So what is the protocol going to be? What is required on roads? Maintenance for 35 years?

8. **What is the origin of the proposed products to be used? There should be no products used that are not made in America.** If they are not and we want to create jobs in the USA then companies need to start up and make them in the USA, not buy from China and contract their products out. This project probably has some of our USA grant monies (our taxes) used for this funding. We need to ask, "Why would we want our tax monies leaving our country and going to an Australian company to buy Chinese products?" As for the solar panels and batteries we should also be using USA companies not affiliated with other countries. We have local training on solar and batteries right here. We need to promote American Companies to keep all the monies for design, materials for quality products and the building, construction and maintenance kept in America. It should not have any part of it going to Australia or any foreign country. **My solar panels in 2018 had to be made in "Washington and installed by a licensed Washington Dealer.** Scout Clean Energy does not fit that description. Or is Scout a middleman and builds nothing, subcontracts out. We don't need them. **We need to demand and support "Made in America" and profits need to "Stay in America".** But in reality Tri-Cities residents do not want the beauty of the ridges taken away. Perhaps the sole purpose of Scout Energy is like wind farms in Iowa where they didn't benefit locals but sold the power to Chicago and Indiana. Maybe all they want is to sell power at Benton County's expense to benefit California or another state. If so, put them in Nevada or Idaho where there are other locations far away from huge residential areas that will not be impacted with the eyesore and the constant noise of whirl whirl whirl. Or take them to Tornado Alley in the midwest where fossil fuels are used and need replaced, but if so they should still be made with American products no matter where they are built; and not Chinese products and any project should not be affiliated with foreign countries as Scout Clean Energy is associated. Americans need to take a stand and put USA first!
9. **What is the Future growth of Kennewick, Finley and Badger Canyon as growth in Benton County moves to HHH?** Using Scout Energy and their scale it appears that the the majority of the wind machines are 1/2 mile to 3 miles from residential areas, less are between 3-4 miles from Tri-cities, yet many residents will be within 1/2 miles of these whirring turbines. **Iowans said no matter what these wind machine companies say with their charts and diagrams, the reality is the whirl whirl whirl sound is heard on the flat Iowa fields for 3 miles.** People will not want homes next to the wind machines so perhaps Benton County needs to look at their urban growth plan with new eyes for the next 50 years. Benton County should keep growing but residents may not want to live with whirl whirl whirl of the wind machines. If Benton County can't keep growing will we loose the growth of Tri-Cities to growth in Franklin County as they won't have the wind machines? Does Franklin County want the growth? How will they hurt property values? Real Estate?
10. **Vote No to Scout Clean Energy-HHH Wind Project.** As a resident for over 40 years in Badger Canyon residents in Kiona, Badger Canyon, Tri-Cities, and Finley are all impacted with HHH terrain, canyons, air flows, our history, our uniqueness of good and bad to HHH, but this is our home. **The past 70+ years of Benton County, Badger Canyon, Finley, Kiona/Benton City, Red Mountain,**

Badger Mountain and its relationship with HHH history has taught us things about air movement, topography, meteorology and lessons that can't be ignored and should not be.

The Batelle Study can teach us a lot and shouldn't be forgotten either. Due to chemical drift or chemical trespass off HHH and into Badger Canyon and Tri-Cities, these hills have probably been researched more than any other in the country, don't forget it and what it has taught us when it comes to a decision that may sound environmentally sound...putting chemicals on with airplanes was faster and cheaper for the farmer, but it hurt others and the burden of proof was on the victim. The burden of proof should not be on the victim receiving the noise and ugly site of 240 wind machines. The burden is really wind machines that are not needed and should not be recommended in our county...it isn't good for residents living with these machines towering over our lands and heads living below them, residents view, Benton County or Washington State. The only ones benefitting are the dozen or so farms that want the money. Wow! A dozen vs. over 3000,000 residents.

11. **If it is considered that these wind machines are so important, then I formally request numerous public hearings held in Tri-Cities, Kiona/Benton City and Finley to allow in-person public testimony from the approximate 300,000 people in Tri-Cities area.** Just like our lives have waited for COVID-19 vaccines for a year and have put our lives on hold then time for hearings should be made after covid vaccines make it safe to attend hearings. *There should be no rush or hurry on this as it impacts over 300,000 people. They should have the right and ability to speak to this in person. Skyping is not in everyones vocabulary or ability to use that technology.* It isn't for me! I have called some friends if they are aware of the wind machines and 10% (1 in 10) knew something. Others were concerned but didn't know how to testify. But this issue is huge and I imagine most of Tri-Citians are not informed and don't know what to do if they do know something. So I request public hearings for all Tri-Citians to have a voice and to have it announced well ahead of time for testimony and locations. **The first I saw in the local newspaper was printed March 16 and testimony by March 30.** *Hardly enough time to do research on Scout Clean Energy, research locations of proposed machines and no idea except looking at terrain and trying to identify location as no section number, range, township provided. And why did they bypass hearings in Benton County and go directly to the state? Were they trying to avoid the local people impacted perhaps from testifying, writing in, and not wanting to address us, or maybe making Benton County residents mad at our state and Governor Inslee for having these hearings from Olympia vs. Benton County.* **Give us our public hearings even if it is in 2022 when it is safe to meet and testify in person. You will find Tri-Cities residents do not want them. I believe this is why the county was bypassed in this step as they know the public did not want it.**

Thank you for allowing this testimony to reject the Scout Clean Energy HHH Wind Machine Project. I hope considerations will be given to the history of our unique, complicated terrain and the beautiful setting of HHH and topography to Badger Canyon and the Tri-Cities Area. It is important to maintain its beauty and respect nature and to listen to the hills, canyons, valleys and their voices. I would like answers and these concerns addressed and copies mailed to me. The fact Badger Canyon is unique to the topography it especially cannot be compared to other regions and areas as noted in the Batelle Report. It is its own rare beauty and must be protected.

Sincerely yours,

Margaret Hue, PhD

Margaret Hue, PhD

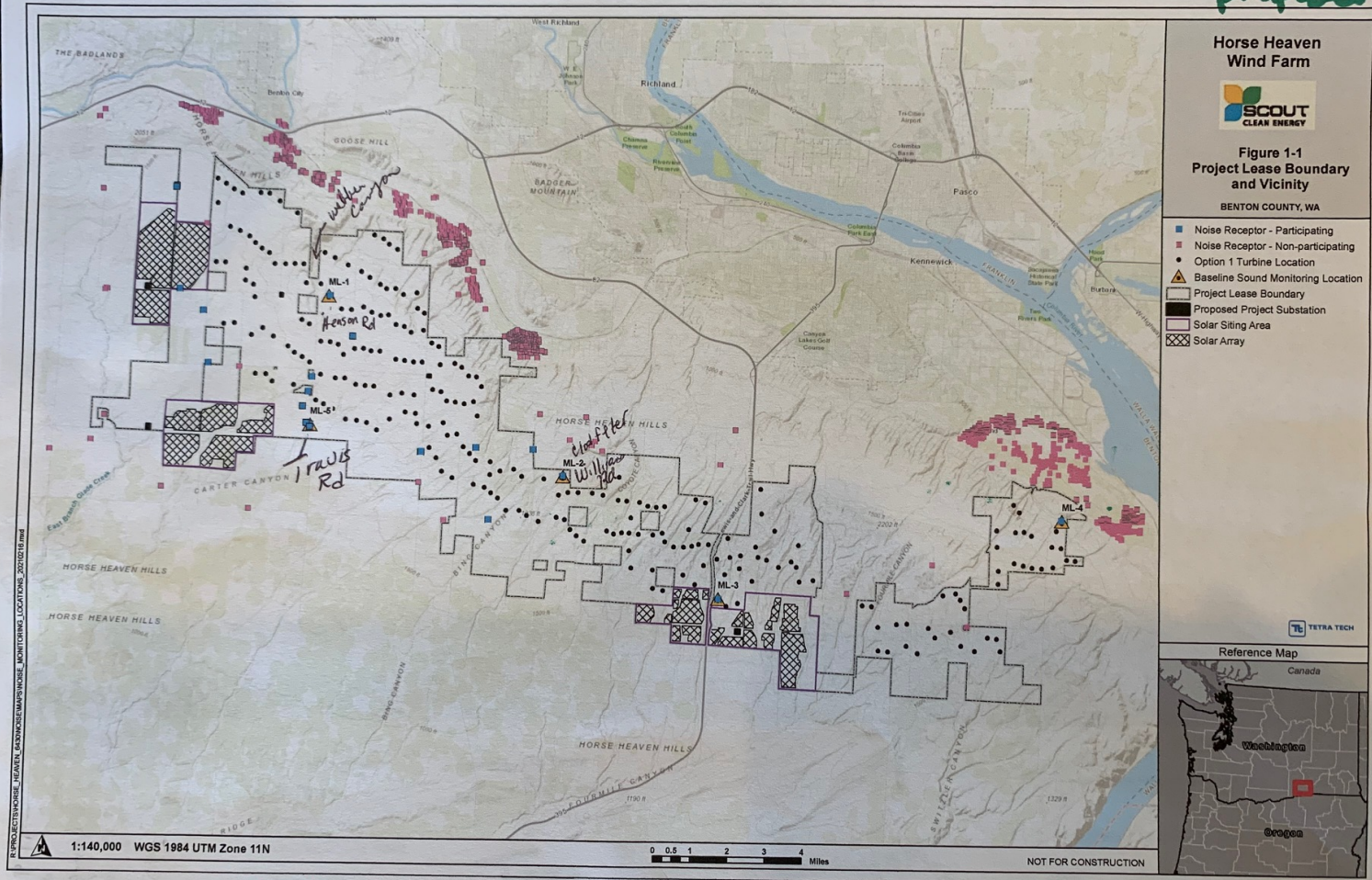
m.hue39@gmail.com

509-528-0925

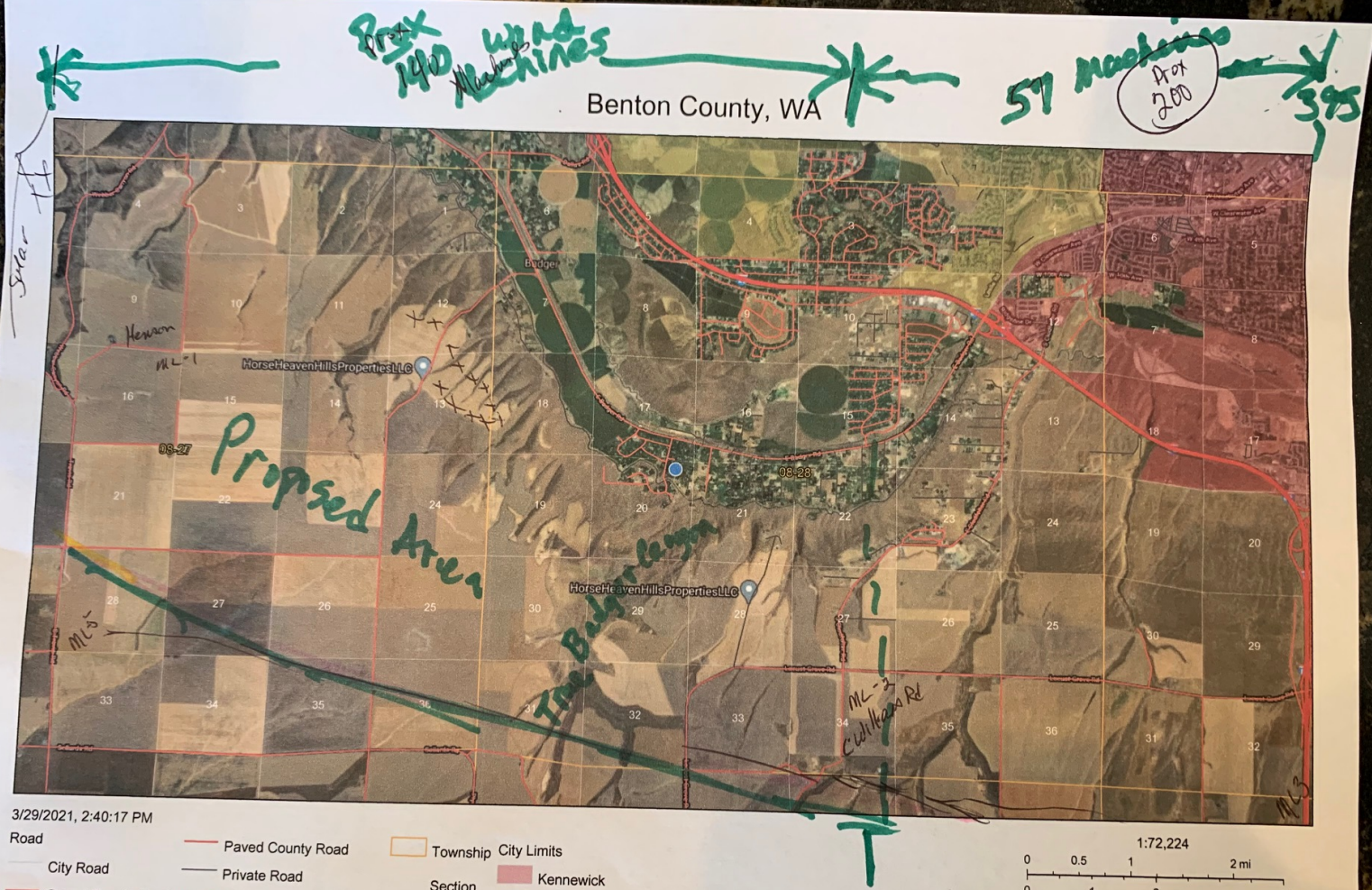
Attachments:

- A). Scout Clean Energy P. 7 of proposal showing all the locations of the wind machines
- B). Layout of area Proposed above Badger Canyon from Kiona to Highway 395 with location of 200 wind machines.

Attachment A P.7 Scout E/Proj proposal



What does pink receptor - non participating mean?
Are they residential. Why are some Residential not shown



Attachment B: True Badger Canyon
 Layout of area proposed above Badger Canyon.
 Largest Water Shed in Benton County

Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172

RECEIVED

APR 15 2021

ENERGY FACILITY SITE
EVALUATION COUNCIL

RE: Horse Heaven Wind Farm, EFSEC Docket Number: EF-210011

Dear Washington Energy Facility Site Evaluation Commission,

My name is Marjorie J Moore
and my husband and I have owned
land and produced crops in Benton
County for over 66 years, however
my husband's family have been
here for many more years. I am
a participating land owner in the
Horse Heaven Wind farm and support
the proposal for many reasons.
Building a Wind farm in the Horse
Heaven Hills will bring positive
economic impacts to the local
Community, including increased tax
revenues for the County and good jobs
during Construction and operations.
Creating new good jobs during Construction
and operations. Creating new source
of renewable energy is an excellent way
to protect the natural environment and
keep energy prices low. The project will
also help diversify our farms revenue
stream and help keep the land in our
family for future generations.
(over please)

Sincerely,

Please approve this project so that
the local Community can start reaping
the many benefits it will provide

Sincerely,
Mayora J. Moore
901 Parkside Dr.
Prosser, WA 99350



Marjorie Moore
901 Parkside Dr.
Prosser, WA 99350

SPOKANE WA 990

29 MAR 2021 PM 1 L



Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172

98503-103699



April 1, 2021

Public Comment #0377
Horse Heaven Wind Project
Docket #210011

Dear EFSEC,

Hello. My name is
Suzie Speer. I live in the Tri-Cities.

I'm writing to you about the
idea to build the wind turbines
in Horse Heaven Hills, in
Benton County.

The wind turbines are a
catch 22.

They're clean, compared to
the coal burning plants.

Unfortunately the wind
turbines kill the birds.

Sincerely,
Suzie Speer
1506 Birch Ave.
Richland, WA 99354
509-946-5661

RECEIVED

APR 15 2021

ENERGY FACILITY SITE
EVALUATION COUNCIL



Field of Daisies

Lisa Hill ~ Watercolorist

509-869-6715

Richland, WA

LisaHillWatercolorist.com

Reproduction of an original watercolor by Lisa Hill

© 2013 Printed in Richland, WA

my opinions
are not an
April Fools
joke.

Sincerely
Suzie Speer

Suzie Speer
1506 Birch Ave
Richland, WA 99354

SPOKANE WA 990

1 APR 2021 PM 4 L



EFSEC
P.O. Box 47250
Olympia, WA 98504

98504-



WILKERSON RANCHES

Lori and Larry Wilkerson
132016 Locust Grove Rd., Kennewick, WA 99338
wranches@aol.com

Public Comment #0378
Horse Heaven Wind Project
Docket #210011

Lori (cell): (509) 539-5837 • Ranch: (509) 783-8569 • Larry (cell): (509) 539-9239

March 15, 2021

APR 15 2021

Hello,

ENERGY FACILITY SITE
EVALUATION COUNCIL

I am Larry Wilkerson, I farm in Benton County on land my family has farmed for 120 years. Some of my land will be in the Horse Heaven Wind Farm. I feel the wind farm is the right project to participate in, it will help a need of having renewable power production. It will also provide jobs, tax revenue and help protect the environment.

I support the Horse Heaven Wind Farm and ask you to approve and permit it.

Sincerely,

Larry Wilkerson

SPOKANE WA 990

16 MAR 2021 PM 3 L



Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172

98503-103699



March 12, 2021

RECEIVED

APR 15 2021

ENERGY FACILITY SITE
EVALUATION COUNCIL

Attn: Kathleen Drew, Chair
Energy Facility Site Evaluation Council (EFSEC)
621 Woodland Square Loop SE
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

RE: Application for Site Certification (ASC) Horse Heaven Wind Farm

As thirty-year Benton County residents and owner of Thomas Farms, (a farm & wheat producing operation), and therefore as stakeholders, We are writing to express our strong support for the approval of the Horse Heaven Wind Farm LLC application.

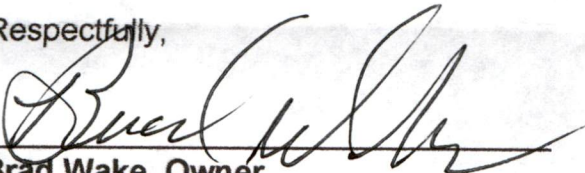
As we know, the Application for Site Certification from Horse Heaven Wind Farm, LLC, received by EFSEC on February 8, 2021, proposes the construction and operation of a renewable energy generation facility in Benton County that would have a generating capacity of up to 1,150 megawatts for a combination of wind and solar facilities as well as battery energy storage systems. The first phase could possibly be built by the end of calendar year 2023.

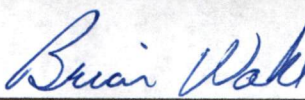
It is our understanding that Horse Heaven Wind Farm, when completed, will utilize wind turbines and solar photovoltaic (PV) panels to convert energy from the wind and sun into electric power which is then delivered to the electric power grid.

After consideration of the issues, we have come to believe the project has the potential to be a far-reaching community asset, beneficial not only from the aspect of energy production, but also for the resulting jobs and tax revenues that will ensue. The minimal intrusion into agricultural production plus the potential to generate extra farm income from the turbines is an added value to the individual Benton County landowner.

Thank you for your consideration.

Respectfully,


Brad Wake, Owner


Brian Wake, Owner

Thomas Farms Inc.
62611 S. Piert Rd
Kennewick, Washington 99337

March 14, 2021

Attn: Kathleen Drew, Chair
Energy Facility Site Evaluation Council (EFSEC)
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

RE: Application for Site Certification (ASC) Horse Heaven Wind Farm, LLC

As a fifty-year resident of Benton County, Washington, and owner of Wake Family Properties in Kennewick, I want to endorse the proposal of Horse Heaven Wind Farm, LLC as submitted to EFSEC on February 8, 2021.

In general, the vision of clean and renewable energy is a very welcome shot-in-the-arm in an area of the country that has not always put a priority on pristine environmental concepts.

The idea that this project can convert the energy from the wind turbines and solar panels into electric power which is then delivered to the electric power grid seems quite beneficial to the community.

The fact that these turbines can co-exist with agricultural activities is a priority to our farm, as it is to many farmers in the area. The minimal intrusion on our farming property of a half acre (including an access road) is offset, in our estimates, by the diversification and the extra income that results from wind farm use.

My consideration of this project has also taken into account the value added to the community from the resulting jobs, with the increase in our tax base just when it is sorely needed for, among other items, school funding.

For these reasons, I strongly support the project and respectfully request the approval by the EFSEC Council of this application.

Thank you for your consideration.



Patricia Wake

Wake Family Properties LLC
62611 S. Piert Rd.
Kennewick, Washington 99337
509.586.3462

SPOKANE WA 990

25 MAR 2021 PM 4 L



Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172

98503-103699



RECEIVED

March 26, 2021

APR 15 2021

Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Olympia WA 98504-3172

ENERGY FACILITY SITE
EVALUATION COUNCIL

RE: Proposed Horse Heaven Hills Wind Farm Project

To Whom It May Concern,

As a life-long resident of Kennewick Washington, I would like to express my strong opposition to the proposed wind farm project along the Horse Heaven Hills.

The project has been objected to by the Benton PUD, all of our local State Representatives, several environmental/recreational organizations, and a multitude of local citizens.

Wind turbines dotting our ridgelines would be a complete eyesore for the entire Tri-Cities. I can't help but think that this is a punishment by the Democratic state administration on the Tri-Cities. No one wants to have our beautiful ridgelines ruined by these wind turbines. One only has to drive between Pasco and Walla Walls to see the blight that wind turbines place on the once-beautiful landscape.

Many folks from the West side like to visit our region to enjoy the warm climate, play golf, visit our wineries, and admire the panoramic views of our ridges and hills. They probably don't want to see a forest of whirling blades and blinking lights. Residents like me would be distraught to see that visual noise every day.

Our Governor claims to be a friend of nature; if that is so, then surely he will stop this destruction of her beauty.

This destruction of scenery and the natural beauty of our landscape must stop. Do not turn our beloved Horse Heaven Hills into the Horse Hell Hills.

Please do not authorize or proceed with this Project!

Sincerely,

Lori Weidner, P.E.
1100 S Roosevelt St
Kennewick WA 99338
(509)521-0916

LORI WEIDNER
1100 S ROOSEVELT ST
KENNEWICK WA 99338

SPOKANE WA 990

27 MAR 2021 PM 3 L

BLACK HERITAGE



ENERGY FACILITY SITE EVAL COUNCIL
621 WOODLAND SQUARE LOOP
PO BOX 43172

OLYMPIA WA 98504-3172

98504-3172



From: [Owens, Joan \(UTC\)](#)
To: [EFSEC \(UTC\)](#)
Subject: FW: Burrowing Owl
Date: Wednesday, April 14, 2021 8:44:25 AM
Attachments: [image006.png](#)

Public Comment #0381
Horse Heaven Wind Project
Docket #210011

Thanks,
~Joan Owens

Energy Facility Site Evaluation Council
Secretary Supervisor
Email: joan.owens@utc.wa.gov
Phone number: (360) 664-1920
EFSEC Email: efsec@utc.wa.gov
EFSEC phone number: (360) 664-1345
Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172
Mailstop/P.O. Box: 43172
www.efsec.wa.gov

From: Bumpus, Sonia (UTC) <sonia.bumpus@utc.wa.gov>
Sent: Wednesday, April 14, 2021 8:44 AM
To: Owens, Joan (UTC) <joan.owens@utc.wa.gov>
Subject: Fwd: Burrowing Owl

Joan,
See below- Please include in the record for Horse Heaven.

Thanks,
Sonia

Sent from [Workspace ONE Boxer](#)

----- Forwarded message -----

From: Barry Bush <atomicbt@charter.net>
Date: April 13, 2021 at 11:26:14 AM PDT
Subject: Burrowing Owl
To: Bumpus, Sonia (UTC) <sonia.bumpus@utc.wa.gov>

External Email

Sonia,

Are you still taking comments for the Horse Heaven Hills Wind Project? If so, I want to add the Burrowing Owl to the discussion. The WDFW states that this owl is declining in the region that has been proposed. Please provide this information to those on the EFSEC committee.

<https://wdfw.wa.gov/species-habitats/species/athene-cunicularia#desc-range>

Burrowing owl (*Athene cunicularia*)



Adult burrowing owl

Category: Birds

Ecosystems: [Shrubsteppe](#)

State status: [Candidate](#)

Vulnerability to climate change ([More details](#))

Low
Low-
Moderate
Moderate
Moderate-
High
High

If you see this species, please share your observation using the [WDFW wildlife reporting tool](#) or email us at wildlife.data@dfw.wa.gov. Be sure to include a photo of the species for verification and location (latitude/longitude coordinates) of your observation.

The population size of burrowing owls in Washington is low. This species is associated with shrubsteppe and grassland habitats, and has experienced a contraction of its range and decline in numbers due to loss of habitat and persecution of mammalian species that provide earthen burrows that owls use.

Description and Range

Physical description

The burrowing owl is a small, ground-dwelling owl. Its total length is 7.5 to 10 inches. Both male and female are mostly similar in size and appearance. The head is round, lacking ear tufts. This owl has bright yellow eyes with distinct broad, buffy-white eyebrows. Its wings and legs are relatively long, and its tail is short. The tail, wings, back, and head are brown with buffy white spots. During the breeding season, females are generally darker than males.

Ecology and life history



Baby burrowing owls huddle in eastern Washington

An adequate supply of prey, with enough diversity to meet the food needs of the owls throughout its life cycle, is critical -- generally, a healthy mix of arthropods, small mammals, birds, and reptiles. For owls to over-winter on or near their breeding

grounds, the prey base needs to be adequate throughout the year. Insects are the most frequent prey in the diet, but vertebrates comprise the majority. Invertebrates include scorpions, beetles, grasshoppers, giant water bugs, dragonflies, moths, earwigs, termites, caterpillars, worms, sun scorpions, and crustaceans. Vertebrates include songbirds, blackbirds, waterbirds, young ducks, frogs, toads, salamanders, lizards, snakes, turtles, bats, mice, voles, shrews, ground squirrels, small weasels, and even young burrowing owls.

The burrowing owl is an uncommon breeder in eastern Washington. For nesting, they use abandoned mammal burrows, such as those made by ground squirrels, yellow-bellied marmots, and American badgers. Each spring, pairs return to the same burrows they inhabited previously, if still available. They defend the immediate area around the burrow entrance from other burrowing owls.

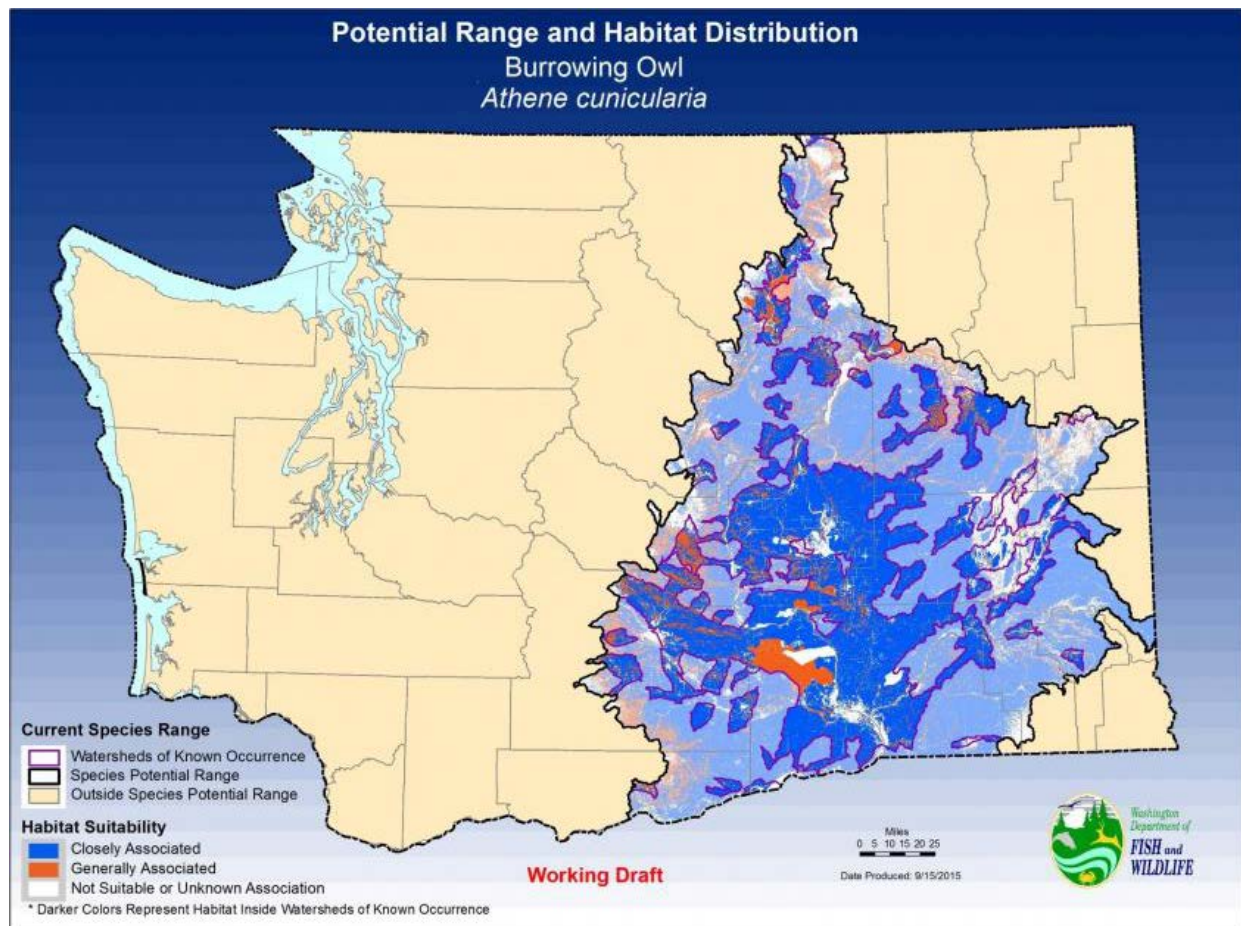
The burrowing owl is extremely rare during migration in western Washington.

Geographic range

Burrowing owl breeding records exist from most of the non-forested low elevation areas of eastern Washington, but historical information suggests that their range in Washington has undergone a significant contraction in recent decades. Burrowing owls have become uncommon to rare outside of Benton, Franklin, Grant, and western Adams counties. A portion of the Washington population winters in the Columbia Basin.

The burrowing owl has been declining in large portions of its range, which has contracted, particularly in northern and eastern regions. It is listed as an endangered species in Canada, a threatened species in Mexico, and a species of concern in several states. A reason for the population decline in Washington may be the reduction in numbers of ground squirrels, yellow-bellied marmots, and badgers, but loss of habitat to the intensification of agriculture and development has also affected the species. Burrowing owls seem to be attracted to agriculture due to high prey abundance, but surveys shows natal recruitment and adult return rates are lower, suggesting that agricultural areas may constitute a population sink.

The map illustrates potential range and habitat distribution of this species in Washington. For a map of worldwide distribution and other species' information, check out [NatureServe Explorer](#).



WDFW State Wildlife Action Plan

Climate vulnerability

Conservation

Species & Habitats

Barry A. Bush
709 S. Hawaii St.
Kennewick, WA. 99336
(509) 460-1051
atomicbt@charter.net

www.gofundme.com/f/save-our-horse-heaven-hills

<https://m.facebook.com/SaveOurRidgesTC/?tsid=0.1271890715724434&source=result>

<http://save-our-ridges.org/>

<https://www.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<https://www.efsec.wa.gov/>



This is a picture of what our view to the South will look like if the Horse Heaven Hills Wind Farm is approved by the state. Is this what we want for the Tri-Cities and our Horse Heaven Hills?

From: [Rikki Dawnn](#)
To: [EESEC \(UTC\)](#)
Subject: I support the Horse Heaven Wind Farm
Date: Wednesday, April 21, 2021 3:29:13 AM

Public Comment #0384
Horse Heaven Wind Farm
Docket #210011

External Email

To Whom It May Concern,

I support the Horse Heaven Wind Farm proposed in Benton County just south of the Tri-Cities. This project will bring many benefits to our region including affordable, clean energy, new jobs, and increased tax revenue. Benton County has a long history of energy development and generation, and I support this new opportunity.

I understand that the project will create hundreds of jobs during construction, as well as long-term family-wage positions once the facility begins operations. Further, the developer estimates that property tax revenues over the life of the project will generate millions of dollars for the local community. Under current allocations, the largest proportion of those funds would support local schools.

Please help us make these opportunities a reality by supporting the Horse Heaven Wind Farm.

Respectfully,

Rikki Dawnn

, PA 16134



2015 South Ely Street
Kennewick, WA 99337
Phone 509-586-9111
FAX 509-586-7663
www.kid.org

March 16, 2021

RECEIVED

MAR 23 2021

OFFICE OF THE GOVERNOR

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Dear Governor Inslee,

On behalf of the Kennewick Irrigation District's Board of Directors, I write to express serious concerns about the Horse Heaven Hills ("H3") Wind Project. Horse Heaven Wind Farm, LLC ("HHWF") is the project component of the H3 Wind Project, a project of Scout Energy, which is an electricity broker based in Colorado and owned by foreign investors.

The Kennewick Irrigation District ("KID") delivers irrigation water to over 20,200 acres in the Tri-Cities area. KID serves both a productive agricultural community, and a growing, dynamic residential base.

Over the last several years, Scout Energy has approached KID on multiple occasions with proposals to purchase KID lands to construct the first transmission line segment to interconnect their project to the Bonneville Power Administration transmission grid at the Red Mountain Substation. KID considered HHWF's proposal in good faith, but could not come to an agreement that would be to the benefit of KID ratepayers and our community.

As you know, on February 8, 2021, HHWF submitted an application for site certification ("ASC") to the Energy Facility Site Evaluation Council ("EFSEC") to develop, construct, and operate the H3 Wind Project. The ASC proposes the construction of a massive wind, solar, and battery storage facility in Benton County. HHWF proposes to construct hundreds of wind turbines with heights exceeding 500 feet across 6,500 acres of the Horse Heaven Hills above the Tri-Cities.

KID appreciates efforts to advance a diverse renewable energy portfolio in Washington State. Fortunately, however, central Washington already benefits from such a portfolio. The dams along the Snake and Columbia Rivers, and the Columbia Generating Station generate reliable, carbon-free electricity, the baseloads of which enable the integration of the following intermittent sources of electricity into the region's grid: the Nine Canyon Wind Project, which includes 63 wind turbines south of Kennewick; the Horn Rapids Solar Project; and the White Bluffs Solar Station.


Right now, there is a proposal in the U.S. Congress to remove the Snake River dams. KID relies on the region's inexpensive, clean electricity to run its pump stations. KID has serious concerns about the introduction of a large amount of intermittent power into the local grid, when at the same time, a large amount of the region's reliable baseload may be removed. While the H3 Wind Project has been in works for some time, it is hard not to see the opportunism in HHWF's filing of the ASC on the heels of the dam removal proposal.

HHWF has requested review under EFSEC expedited process for the ASC. KID opposes an expedited process. The EFSEC needs to fully investigate the implications of introducing intermittent sources of electricity into our region at the expense of reliable, carbon-free hydropower.

Scout Energy and its foreign investors no doubt see the H3 Wind Project as an opportunity to exploit the U.S. tax code to ensure a significant return on their investment. That investment, however, may not provide such a return to our community here in the Tri-Cities.

KID respectfully requests a full and thorough investigation into long-term effects of this project on our community's environment and electrical grid.

Sincerely,



Gene Huffman
KID Board President

C: KID Board of Directors
Charles Freeman, District Manager



KENNEWICK IRRIGATION DISTRICT

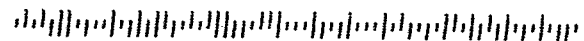
2015 S Ely Street

Kennewick, WA 99337

SPOKANE WA 990

17 MAR 2021PM 3 L

98504-0002



From: [Vince Shawver](#)
To: [EFSEC \(UTC\)](#)
Subject: Horse Heaven Hills Windmill Project
Date: Saturday, May 29, 2021 3:20:55 PM

External Email

EFSEC,

I am opposed to the Scout Energy Horse Heaven Hills wind and solar power project. This will cause asthetic pollution, environmental damage, lower property values, hurt the growing wine industry and kill many birds. It is unwanted by our community. A more efficient power source that doesn't take up as much land mass would be a better choice or move it to a less offensive location.

Sincerly,

Vin Shawver
West Richland

Comment

Public Comment #0387
Horse Heaven Wind Farm
Docket #210011

Mike Duncan

Owner

[Notes](#) [Contacts](#)**Comment Information****CONTACT INFORMATION****Name** Mike Duncan**Contact Method** Email**Email** duncanmr50@charter.net**Business Phone****Mobile Phone****Address 1: Street 1** 2072 Anna Ave**Address 1: Street 2****Address 1: City** Richland, WA**State/Province** WA**Address 1:
ZIP/Postal Code** 99352**Details****Comments** Don't ruin the skyline views of the hills. They are an asset to the state. There are other alternatives that could be effective in providing energy.**Source** Web**Open Date****Filing Support** Yes**Web Create Date** 3/30/2021**Exclude From
Comment Summary** No**Closed Date****Related Case Information**

Case Number**Case Title****Owner**[Notes](#) [Contacts](#)**Staff Case Lead****Themes**

Name	Created On
No Theme records are available in this view.	
0 - 0 of 0 (0 selected)	Page 1

Public Comment #0388
Horse Heaven Wind Farm
Docket #210011

RECEIVED

April 10, 2021

APR 22 2021

Energy Facility Site Evaluation Council
621 Woodland Square Loop
P.O. Box 43172
Olympia, WA, 98504-3172
ATTN: ERSEC Manager

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Sonia Bumpus,


Please do not allow the "Horse Heaven Hills Wind Farm" to destroy the natural habitat and farmland in Benton County. I looked up this company and found they are from Colorado. They do not have the best interests of Benton County in mind. They are only thinking about fattening their pockets. They are deceiving the people in Kennewick, acting as if they are a local company that has the best interest of the community. They are spending a lot of money on Radio Commercials in which they present themselves as a local company that will do wonderful things for everyone. They are trying to brainwash the community into welcoming them with open arms.

I was raised on the Nicoson ranch in the Horse Heaven Hills. I own property that was left to me by my father and grandmother. My family is here and I visit here often. I plan to return to this area in the next 5-10 years. I resent the fact that this company went around Benton County because they know the land owners have rejected other wind farm proposals. We don't want to give up our beautiful hills just to allow them to make money and sell energy. We have plenty of clean energy resources in beautiful sunny part of Washington and more in production that will not ruin the beauty of the area.

It would be wrong to allow this group to disfigure the beautiful rolling hills wonderful view of the valley. It's sad and upsetting to drive through the Columbia River Gorge and see the hundreds of Wind Turbines standing still. In the evening they all flash bright red lights in unison it must have an affect on the natural habitat, it's creepy! I'm happy to send you video to prove my point.

We don't need a wind farm that will spoil the natural view and the natural habitat of the birds and other creatures that live in the Horse Hills. Only a handful of farmers will benefit from the rental income. The rest of us and Kennewick will loose.

Sincerely,


Cynthia Sawada
cynthia.sawada@msn.com
16400 NE 63rd Circle
Vancouver WA 98682
509-551-9647

SAWADA
16400 NE 63RD CIR
VANCOUVER WA 98682

SPOKANE WA 990

12 APR 2021 PM 3 L



Earth Day
April 22nd 2021



FOREVER / USA

ATTN ERSEC MANAGER
ENERGY FACILITY SITE EVALUATION COUNCIL
621 WOODLAND SQUARE LOOP
OLYMPIA WA 98504-3172

98504-3172



Public Comment #0389
Horse Heaven Wind Farm
Docket #210011

RECEIVED

APR 22 2021

ENERGY FACILITY SITE
EVALUATION COUNCIL

April 8, 2021
Energy Facility Site Evaluation Council
621 Woodland Square Loop P.O.Box 43172
Olympia, WA, 98504-3172
ERSEC Manager

Dear Sonia Bumpus,

I was shocked and saddened to receive a letter from your agency about the Horse Heaven Hills Wind Farm that was proposed by the company from Colorado. I lived on a wheat ranch in the area and still have property that will be badly impacted if you allow this group to disfigure the beautiful rolling hills of farmland south of Kennewick and the wonderful view of the valley.

I resent the fact that this company made an end run around Benton County because they know the land owners have rejected other wind farm proposals. Please remember that our state has hydro-power furnished by our dams. We endured the nuclear plants that helped win WW11, and we have the highest cancer rate in the state.

Now the government is going to build another nuclear plant north of Richland and that will be another source of clean energy. We don't need a wind farm that will spoil the natural view and the natural habitat of the birds in the Horse Hills. Only a handful of farmers will benefit from the rental income.

Sincerely, 

Patricia C Dixon
712 N Reed Place
Kennewick, WA 99336
pcdixon@msn.com



Patricia Dixon
712 N Reed Place
Kennewick, WA 99336-2315

SPOKANE WA 990

12 APR 2021 PM 3 L



Earth Day
April 22nd 2021

FOREVER / USA

Energy Facility Site Evaluation Council
c/o Sonia Bumpcas
PO Box 43172
Olympia, WA 98504-3172

98504-3172



From: [Drew, Kathleen \(UTC\)](#)
To: [EFSEC \(UTC\)](#)
Subject: FW: Horse Heaven Wind Project
Date: Thursday, April 22, 2021 3:43:47 PM
Attachments: [image002.png](#)
[FINAL WIND FARM LETTER.pdf](#)

From: Stephanie Swanberg <Stephanie.Swanberg@tricityregionalchamber.com>
Sent: Thursday, April 22, 2021 3:22 PM
To: Drew, Kathleen (UTC) <kathleen.drew@utc.wa.gov>
Subject: Horse Heaven Wind Project

External Email

Dear Kathleen,

I hope this letter finds you well. Please let me know if you have any questions.

Thank you,

Stephanie Swanberg
Government & Regional Affairs Director



Office: 509.736.0510 | **Direct:** 509.491.3233 | **Cell:** 509.546.1613
7130 W. Grandridge Blvd. Ste. C, Kennewick, WA 99336
Stephanie.Swanberg@tricityregionalchamber.com





April 22, 2021

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

EFSEC Chair, Kathleen Drew
State of WA Energy Facility Site Evaluation Committee
621 Woodland Square Loop SE
PO Box 43172
Olympia, WA 98504-3172

RE: Horse Heaven Wind Project – Public Opinion Survey Results and Chamber Position

Dear Governor Inslee and Chair Drew,

As the fifth largest chamber in the state, with a Board of Directors representing 37 businesses ranging from sole proprietors to the largest employers in Benton and Franklin Counties, the Tri-City Regional Chamber of Commerce (TCRCC) recently responded to the concerns of community stakeholders and Tri-Citians by engaging the region in a Public Opinion Survey to determine community sentiment regarding the Horse Heaven Wind Project and to identify issues of greatest interest and concern.

The three-question survey elicited 2,220 responses over a two-week period. Results show considerable opposition (78.5%) to the Horse Heaven Wind project. The principal reason is because the negative environmental impacts of the project are believed to far exceed the potential benefits. According to survey results, the top five areas of greatest negative impact include:

- **Viewshed** - Destruction of a wide swath of the natural land and view scape
- **Decommissioning and Turbine Disposal** - Waste disposal problems
- **Tourism** - Obstructed views are detrimental to tourism
- **Birds and Wildlife** - Obstructed migratory bird path and wildlife damage
- **Flashing Lights** - Light pollution via red, flashing, aviation warning lights at night

Also, 80% of survey respondents think local government (Benton County) should be part of the Horse Heaven Wind Project approval process. Survey comments on this topic reflect differing levels of frustration that the voice of the community is not being heard or considered on a local

project – especially one that has such great regional impact. For these reasons, the Chamber requests that EFSEC include Benton County in any decision-making regarding the Horse Heaven Wind Project.

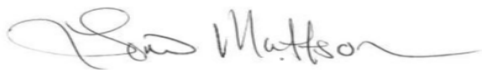
And finally, survey participants voiced overwhelming opposition to the Horse Heaven Wind Project with over 78% of responses indicating that the project was not worth the personal, environmental, and economic impacts the project would have on the region.

The Chamber fully supports the development of clean energy. Our region is the beneficiary of abundant hydroelectric and nuclear power production. This project, however, would not displace carbon-based energy production but would only compete with already-clean sources. Also, our commitment to the community includes creating a vibrant and thriving quality of life for all Tri-Citians. The Chamber's efforts to enhance livability, draw new talent and attract new business to the Tri-Cities begins with protecting and preserving our most valuable asset - the beautiful and expansive vistas and views.

For these reasons, the Tri-City Regional Chamber of Commerce urges you to respect the voice of the local community by not approving the development of the Horse Heaven Wind Project.

Thank you for your consideration.

Sincerely,



Lori Mattson, IOM
President & CEO,
Tri-City Regional Chamber of Commerce



Jim Arneson
President, Community First Bank
Chair, Local Government Affairs Committee

cc: Scout Energy, Benton County Commission, Benton PUD

2021 BOARD OF DIRECTORS

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Andy Stirling, Chair Elect, Numerica Credit Union

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Amy Basche, Mission Support Alliance

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Matt Sweezea, Primerica Advisors

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Roschel Bladow, AgriNorthWest

Paul Carlisle, elevate

Andrew Chung, Gesa Credit Union

Greg Cullen, Energy Northwest

Chaune Fitzgerald, Salon Remedy/TressFX Beauty

Dee Gray, CHPRC/JACOBS

Dave Haller, Basin Pacific Insurance and Benefits

Jodi Henderson, Benton PUD

Wendy Higgins, Lodge at Columbia Point

Trish Herron, Battelle

Charles Laird, Tippet Company

Dave Lajeunesse, Carbitex

Whitney LaMarche, Veolia Nuclear Solutions

Antonio Lopez, Tri-City Dental Care

Vicki Monteagudo, Century 21 Tri-Cities

Brian Moreno, Moreno & Moreno

George Rangel, Bechtel National, Inc

Brad Rew, Gale-Rew Construction

Jessica Schneider MD, Empowered Health

John Solheim, Trios Health

Derrick Stricker, StrickerCRE

Karthik Subramanian,
Washington River Protection Solutions

David Tobias, Tyson Foods

Cynthia Vaughn, Magnolia Music Studio

Ryan Weld, Tire Factory

Stephanie Williams, KADLEC

From: [Julie LaPierre](#)
To: [EESEC \(UTC\)](#)
Subject: Horse Heaven Windfarm
Date: Saturday, April 24, 2021 2:49:05 PM

Public Comment #0391
Horse Heaven Wind Farm
Docket #210011

External Email

As a Benton County resident I am writing in support of the Scout Clean Energy Windfarm. I believe this is an important step in our collective efforts toward clean renewable energy and will benefit our communities greatly.

Thank you
Julie LaPierre

From: [Carla Chiotti](#)
To: [EESEC \(UTC\)](#)
Subject: Scout Wind Farm Project in Benton County SUPPORT
Date: Friday, April 30, 2021 8:47:51 AM

Public Comment #0392
Horse Heaven Wind Farm
Docket #210011

External Email

Hello,

I am writing **IN SUPPORT** of Scout Energy's proposed wind farm project in Benton County. I live in Richland, Washington, in Benton County.

I am an avid environmentalist belonging to many national and local environmental and conservation groups. I have helped build and finance open space and trails in our area and enjoy hiking the ridges, birdwatching, and viewing wildflowers in the spring. I am not concerned about the "look" of wind turbines on the ridge tops; I actually think they are interesting looking and sure beats covering our ridgelines with houses.

Due to the fact of climate change, we need alternative energy and time is running out for our planet. It is not the time to nitpick "is this is the best place" or "ruining the view". I hate the not-in-my-backyard attitude of many in the Tri-Cities area who say they are in support of alternative energy, yet object to this project.

I hope this project is approved. We need more like this.

Carla Chiotti
1909 Dogwood Pl, Richland, WA 99354

From: [Christina Caprio](#)
To: [EFSEC \(UTC\)](#)
Subject: Concern for Endangered Species & Shrub Steppe Habitat from Scout Clean Energy for HHH Wind Project
Date: Friday, April 30, 2021 12:38:48 PM

Public Comment #0393
Horse Heaven Wind Farm
Docket #210011

External Email

I would like to say that I see the following endangered animals near my HHH home all the time and I do not want to see a windfarm kill them:

Birds:

American White Pelican, threatened (so many!)
Bald Eagle, sensitive (one nests in my neighborhood)
Burrowing owl
Ferruginous Hawk, threatened (2 active nests in the proposed area)
Greater Sage Grouse, threatened
Loggerhead shrike
Sage thrasher
Sagebrush sparrow
Sandhill crane, endangered (1000s!)

Not endangered but so many:

1000s of ducks
1000s of geese
1000s of snow geese
Many local hawks
Many! Chukar
Pheasants
Many! Quail

Mammals:

Black tailed jackrabbit
Pygmy rabbit, Endangered
Sagebrush lizard
White-tailed Jackrabbit
Gophers
Western Toad
Washington Ground squirrel

Insects:

Island marble butterfly
Taylor's checkerspot butterfly

Not endangered mammals but many:

White tailed deer
Cougar
Antelope (some)
Bats
Coyotes

Please protect our Pacific NW Flyway, native mammals and birds and precious shrub steppe habitat that includes:

Kincaid's lupine, threatened
Golden paintbrush, threatened
Nelson's checker-mallow, threatened

Showy stickweed, endangered
Spaulding's catchfly, threatened
Utah Desert Buckwheat, threatened
Ute ladies-tresses, threatened
White bluffs bladderpod, threatened

Thank you,

Hailey Caprio

Sent from my iPhone

From: [Merle Bush](#)
To: [EESEC \(UTC\)](#)
Subject: I support the Horse Heaven Wind Farm
Date: Friday, April 30, 2021 1:01:59 PM

Public Comment #0394
Horse Heaven Wind Farm
Docket #210011

External Email

To Whom It May Concern,

I support the Horse Heaven Wind Farm proposed in Benton County just south of the Tri-Cities. This project will bring many benefits to our region including affordable, clean energy, new jobs, and increased tax revenue. Benton County has a long history of energy development and generation, and I support this new opportunity.

I understand that the project will create hundreds of jobs during construction, as well as long-term family-wage positions once the facility begins operations. Further, the developer estimates that property tax revenues over the life of the project will generate millions of dollars for the local community. Under current allocations, the largest proportion of those funds would support local schools.

Please help us make these opportunities a reality by supporting the Horse Heaven Wind Farm.

Respectfully,

Merle Bush
2029 Venturi Ct
Richland, WA 99352

From: [Mark Bauer](#)
To: [EESEC \(UTC\)](#)
Subject: I support the Horse Heaven Wind Farm
Date: Wednesday, May 5, 2021 11:18:28 AM

Public Comment #0395
Horse Heaven Wind Farm
Docket #210011

External Email

To Whom It May Concern,

I support the Horse Heaven Wind Farm proposed in Benton County just south of the Tri-Cities. This project will bring many benefits to our region including affordable, clean energy, new jobs, and increased tax revenue. Benton County has a long history of energy development and generation, and I support this new opportunity.

I understand that the project will create hundreds of jobs during construction, as well as long-term family-wage positions once the facility begins operations. Further, the developer estimates that property tax revenues over the life of the project will generate millions of dollars for the local community. Under current allocations, the largest proportion of those funds would support local schools.

Please help us make these opportunities a reality by supporting the Horse Heaven Wind Farm.

Respectfully,

Mark Bauer
6903 Isaac Ct SE
Auburn, WA 98092

From: [Barbera Buckmaster](#)
To: [EFSEC \(UTC\)](#)
Subject: Wind Farms in Badger Canyon
Date: Saturday, May 8, 2021 12:46:35 PM

Public Comment #0396
Horse Heaven Wind Farm
Docket #210011

External Email

Dear EFSEC,

Please say no to Scout Clean Energy Coming to our area and distorting our most beautiful Horse Heavens. I personally was approached by Scout Clean Energy to allow a transmission line run along my property line. I have two hundred acres that I have worked so very hard to own. The quite, naturous beauty of our hills will be lost forever if you allow this. The thought of these big monsters running along the bluff above my property (and the community) of the Horse Heaves just frankly sinful. I believe the majority of this community does not want to see this. Please have them go else where. We have hydro, solar, and nucular power at our finger tips. Our community should not have to sacrifice our beautiful landscape to help provide out of State consumers with their power.

Have Scout go to their door step! PLEASE SAY NO.

Sincerely yours
Barbara Buckmaster
Richland, WA.