



Respondent No: 5

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Responded At: May 19, 2025 19:14:13 pm

Last Seen: May 19, 2025 19:14:13 pm

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Q1. Name	Karen Brun
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Q3. Are you part of an Agency or Organization?	Yes (please specify) Tri-Cities C.A.R.E.S.

Q4. Share any comment

Date: May 19, 2025 To: Energy Facility Site Evaluation Council From: Tri-Cities C.A.R.E.S. Board Subject: Comments.-
.Addendum to the Final EIS Horse Heaven Wind Farm After a review of the documents posted related to the Gould Well, TCC offers the following comments. Because of the transfer of water rights location, and changing to a lease arrangement with the Applicant, and the change from use of a public water supply to groundwater for construction, operation, and the O&M facility, the issue should be handled with a Supplemental EIS as a major change. 1. In your Notice of Addendum to the Horse Heaven Wind Project Final Environmental Impact Statement (letter from Sonia Bumpus to Interested Persons dated 5/5/25). Per this letter, Ms. Bumpus has reviewed environmental Information submitted by the certificate holder, Scout Clean Energy, LLC, related to the use of Gould Well as a water supply for construction and operations for the Horse Heaven Wind Project. It is stated that "The addendum describes minor new information, and the supporting documentation evaluates any potential impacts." TCC Comment: The criteria for determining that this addendum constitutes minor new information has not been included. TCC Comment: Delegated approval authority documentation from the EFSEC Council to Ms. Bumpus is missing. 2. In the Staff Memorandum from EFSEC Director of Siting and Compliance to EFSEC Director Sonia Bumpus Regarding the Proposed Addendum (email from Ami Hafkemeyer to Sonia Bumpus dated 5/5/25), Ms. Hafkemeyer notes on Page 1 that "Horse Heaven Wind Farm would lease water and land under contract." But on Page 2, she states "Well upgrades would also serve other users, such as the farmer who leases the DNR land on which the well is located who will be able to use the well and water supply to irrigate the surrounding land." TCC Comment: It appears that two entities (HHWF and the farmer) are leasing the same land which is not legally feasible. "New overhead distribution line, to be owned and operated by Benton Rural Electric Cooperative." TCC Comment: The documents that describes this new overhead distribution line and the approval are absent from the record. TCC Comment: Where is the documentation that analyzes water usage for decommissioning? On Page 4 of the Memorandum, Ms. Hafkemeyer writes "Although use of water sourced from wells fed by regional aquifers was identified in the Final EIS (see e.g. Final EIS, p. 4-69), the EIS analysis did not specifically address use of the Gould Well nor any construction associated with the Gould Well site. The Final EIS also stated, "The new elements presented in the September 2023 final ASC have not been evaluated as part of this final version of the EIS." Gould Well was identified as one of those new elements². Footnote 2 states: Section 2.2.9 of the Final EIS states "New and unevaluated disturbance and water use, including the use of a nearby water well, have been omitted from analysis within this EIS. For new and unevaluated components to be included as part of the Project, supplemental analysis would be required prior to EFSEC authorization [emphasis added]." Then Ms. Hafkemeyer goes on to rely on the assessment of the proposed Gould Well water source under evaluation by the Benton County Water Conservancy Board and outlines the DNR-owned water right G3-22306 Gould Well as justification for allowing an industrial entity the use of water that has traditionally been reserved for agricultural purposes. In the first paragraph of Page 5, Ms. Hafkemeyer states "The Final EIS Section 2.2.9 Potential Use of DNR Gould Well indicated the Certificate Holder was exploring various options for water supply to the Project during construction and operations to minimize the transportation and environmental impact and no new and unevaluated disturbance and water use. However, use of the Gould Well as a water supply, and any construction/site development for using that supply, was not specifically evaluated and was identified as an Unevaluated Project Component in the Final EIS Section 2.2.10 [emphasis added]." Under the Summary of Previous Environmental Analysis on Page 5, Ms. Hafkemeyer states "The Gould Well site as the water source was not included in the Final EIS analysis. This environmental review is specific to the new information associated with a water source at the Gould Well site and the construction associated with that water source." Then under A. Environmental Record and Exhibits, she states "The environmental review conducted by EFSEC consisted of analysis based on the following documents" and lists six documents that are supposedly available at Horse Heaven SEPA | EFSEC - The State of Washington Energy Facility Site Evaluation Council." TCC Comment: On Page 4-72 of the FEIS, the following statement appears: "Project construction would not use groundwater resources [emphasis added], and it is unlikely that the Project would affect groundwater quantity, quality, or flow direction (Horse Heaven Wind Farm, LLC 2022). Water required for Project construction would not be sourced from groundwater resources on site but would be acquired from a public water supply and transported by truck to the site (Horse Heaven Wind Farm, LLC 2022)." This contradicts what is stated in the FEIS Section 2.2.9. These are two diametrically opposing statements and EFSEC has chosen to use one to justify their decision and ignored the other. TCC Comment: None of the supporting documentation within the link above was made available to the public until now. This concerns us. TCC Comment: There does not seem to be any documentation that shows the environmental analysis, nor Ms. Bumpus' decision letter, were reviewed and approved by the EFSEC Council.

Q5. Upload your document (optional)	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/78b169b583af486b80055995042602e84893cac3/original/1747707226/e146bcd9b5d15aa0dc3ea8e6a683b3c8_TCC%20Response%20to%20FEIS%20Addendum-Gould%20Well_5.19.25.docx?1747707226
Q6. Upload a picture (optional)	not answered
Q7. Did you also share a video?	No
Q8. What is the title of your video?	not answered

**Respondent No:** 6**Login:** Anonymous**Email:** n/a**Responded At:** May 19, 2025 21:40:18 pm**Last Seen:** May 19, 2025 21:40:18 pm**IP Address:** n/a

Q1. Name	David Sharp
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Q3. Are you part of an Agency or Organization?	Yes (please specify) Tricities CARES

Q4. Share any comment

Date: May 19, 2025 To: Energy Facility Site Evaluation Council From: Dave Sharp on behalf the Tri-Cities CARES Board
Subject: Comments-Addendum to the Final EIS Horse Heaven Wind Farm After a review of the documents posted related to the Gould Well, TCC offers the following comments. Because of the transfer of water rights location, and changing to a lease arrangement with the Applicant, and the change from use of a public water supply to groundwater for construction, operation, and the O&M facility, and the need to analyze whether the Project will provide ample clean energy to the State, the issue should be handled with a Supplemental EIS as a major change. Comment-Beneficial Use of Water and Renewable Energy TCC believes it is more appropriate to have a Supplemental EIS than an addendum for the reasons listed above. The expected benefit is renewable energy for the State made possible by the use of the water. Rationale-Ground water extracted from Washington is the property of the State, managed by the Department of Ecology, and beneficial use is required. Supporting documentation for the EIS Addendum recognized the beneficial use emphasizing the production of renewable energy for the State of Washington. See 1. and 2. Below: 1. Aspect Engineering Hydrogeologic Investigation - DNR Gould Well Pending Water Right Change Application, dated August 9, 2023, states: "This change is requested to supply temporary construction and ongoing operational water use for the Horse Heaven Clean Energy Center (Energy Center), which will combine wind, solar, and battery storage to produce renewable energy for the region and the State of Washington". [Emphasis added.] 2. Department of Ecology Review-The September 5th, 2024, technical review for Benton County Conservancy Board decision BENT-24-01 states: "The proposed change of use is to facilitate operations of the Horse Heaven Clean Energy Center which would combine wind, solar and battery storage to produce renewable energy for the State of Washington". [Emphasis added.] The Governor, responding to the EFSEC recommendation of April 29, 2024, clearly expects the project to deliver substantial clean energy to Washington. The Governor's letter approving the Site Certification Agreement emphasized the State's clean energy needs. He used the project maximum nameplate and stated Washington would need 20 projects of that size. 3. 20240523_HH_GOV_ResponseLetter_0.pdf 4. 20241018_HH_GovernorsResponseLetter.pdf In Kathleen Drew's memorandum to the Governor, dated September 17, 2024, Subject: Subject: Horse Heaven Wind Farm Project – Summary of Proposed SCA Changes and Council Reconsideration she stated the following: Instead, the Council balances the general statutory directive to provide for abundant clean energy at a reasonable cost with the impact to the environment and the broad interests of the public. There is a range of policy discretion in how that balance is struck, and with this revised SCA, the Council has given deference to your directive that more weight be placed on the abundant energy side of the scale. It is clear that Washington desires "abundant clean energy". ASC, FEIS, and SCA Language Deficiencies ASC Section 1.3 Pressing Need, the language states: "...however, the Project would supply renewable energy to help the state of Washington meet its goal of making its energy supply carbon neutral by 2030". This ASC language does not commit any significant renewable energy directly to Washington. There are no guardrails in place to ensure Washington will substantively benefit from the project. Washington could very well end up with de minimis renewable energy benefits from the project. The ASC and the SCA, as written, allow that to happen. The ASC provides no limitation regarding destination of the renewable energy. Environmental Impact Statement and Site Certification Agreement are silent on the subject. Beyond the Horse Heaven Project, the proposed addendum sets a concerning precedent as the Columbia Plateau is projected to be the center for renewable energy development, particularly solar, which requires ongoing and permanent use of water. We do not believe the addendum is a "minor" change, and a Supplemental EIS would be more appropriate. If Washington land, water, and other resources are being used to develop renewable energy projects, the State should expect to receive renewable energy.

Q5. Upload your document (optional)	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/b1bf817471d26194c52500dd259de9e48126fcd7/original/1747715644/335643d101fb84cbc57971eb9f9869ce_Final%20Gould%20Well%20Response%20Document_5.19.25-Dave%20Sharp.pdf?1747715644
Q6. Upload a picture (optional)	not answered
Q7. Did you also share a video?	No
Q8. What is the title of your video?	not answered

