

From: [Christy](#)
To: [EFSEC mi Comments](#)
Subject: Horse Heaven Ecocide Project Public Comment
Date: Monday, October 13, 2025 11:07:10 AM

External Email

To: EFSEC Council Members Subject: Public Comment on Resolution 357 – Horse Heaven Hills Wind and Solar Project Date: October 13, 2025

Dear Council Members,

I am writing to express my strong opposition to the proposed mitigation actions outlined in Resolution 357 for the Horse Heaven Hills Wind and Solar Project. This project — in both its scope and siting — represents a profound misstep in environmental stewardship, community planning, and climate strategy. I urge you to reconsider its approval and implementation for the following reasons:

1. Proximity to Communities and Wildlife Is Irresponsible

The Horse Heaven Hills project spans over 70,000 acres and places up to 244 wind turbines — each between 500 to 671 feet tall — along a 29-mile ridgeline from Finley to Benton City. Over 100,000 residents live within six miles of the project, and more than 250,000 will see these turbines daily. This proximity to Tri-Cities, Kiona, and Benton City is unprecedented and deeply concerning.

Equally troubling is the project's proximity to sensitive wildlife habitats, including nesting sites of the endangered **Ferruginous Hawk** (*Buteo regalis*).

EFSEC's decision to redact turbine locations under the guise of protecting these nests has the opposite effect: it prevents the public from understanding the full ecological footprint of the project. These turbines are behemoths, and their placement — hidden from scrutiny — likely affects not only hawks but a wide array of species that rely on the Horse Heaven Hills corridor.

Transparency is not a threat to conservation; it is a prerequisite for it.

2. The Project Does Not Deliver Sustainable, Long-Term Jobs

While construction may generate temporary employment, long-term job creation is minimal. According to Tri-Cities C.A.R.E.S., the project offers no significant economic uplift to the region once built. Benton County's own documentation confirms that the project bypasses local elected officials and offers little control over future growth. This is not a sustainable investment in our workforce or economy.

3. Wind Power's Hidden Carbon Footprint

Wind energy is often labeled "green," but its lifecycle carbon footprint tells a different story. Manufacturing and erecting turbines requires hundreds of tons

of steel, concrete, fiberglass, and copper — materials with high embodied carbon. Decommissioning poses additional challenges, especially with turbine blades that are notoriously difficult to recycle. While 90% of turbine mass may be recyclable, the remaining 10% — including blades — often ends up in landfills.

4. No Reclamation Plan for Decommissioned Turbines

Washington State has yet to implement a comprehensive reclamation plan for decommissioned wind infrastructure. House Bill 1960, introduced in February 2025, seeks to establish decommissioning standards, but it remains pending. Without enforceable policies, communities may be left with industrial waste and no clear path to restoration.

5. Modular Reactors Offer a Better Path Forward

Washington has already approved a modular reactor project led by Energy Northwest and Amazon, with plans to deploy Xe-100 SMRs near the Columbia Generating Station in Benton County. These reactors will integrate seamlessly into our existing carbon-neutral grid, which is already powered by nuclear and hydropower. Unlike wind, SMRs offer scalable, reliable, and low-impact energy generation — without sacrificing our landscapes.

6. Wildlife and Habitat Destruction Is Inevitable

The Horse Heaven Hills are home to a rich array of wildlife, including the endangered **Ferruginous Hawk**, listed by the Washington Department of Fish & Wildlife as a species of greatest conservation need. Other vulnerable species include **Sandhill Cranes**, **Prairie Falcons**, **Hummingbirds**, and multiple hawk species, as well as rare species of plants and lichens — all of which rely on this corridor for migration and foraging. The redactions in Resolution 357 obscure the true impact on these species, and EFSEC's refusal to provide a non-sensitive infrastructure map undermines public oversight.

7. Horse Heaven Hills Are a Climate Asset

Far from being expendable, the Horse Heaven Hills serve as a **carbon sink**, a **quiet and biodiverse ecosystem**, and a **migration corridor** for countless species. Their shrub-steppe habitat supports native plants and pollinators, stabilizes soil, and buffers climate extremes. Replacing this landscape with industrial infrastructure is not climate progress — it's ecological ecocide.

8. A Vital Recreation and Cultural Resource

The Horse Heaven Hills are a beloved recreation area for hiking, biking, photography, and nature viewing. They offer accessible wild space for nearby communities and serve as a living classroom for environmental education. For the **Yakama and Umatilla Nations**, these hills hold deep cultural and spiritual significance. The Yakama Nation has formally objected to the project, citing its

impact on ceremonial sites and Treaty-reserved resources.

9. Dodgy Process and Regional Double Standards

Throughout this process, Scout Energy has demonstrated a troubling lack of transparency, and EFSEC has failed to adequately respond to legitimate public concerns. The refusal to disclose turbine locations, the redactions that obscure environmental impact, and the dismissive handling of community input all point to a process designed to evade scrutiny rather than invite it.

It's telling that a similar wind project — Whistling Ridge in the Columbia River Gorge — was ultimately terminated after decades of public opposition, due to its threat to scenic and cultural resources. That project, located in Western Washington, was deemed incompatible with the surrounding communities. Yet here in Eastern Washington, where we already supply the bulk of the state's energy through a harmonious hydro-nuclear grid, we are being asked to accept a far larger and more disruptive project in our own backyard. This double standard is not just unfair — it's hypocritical. What would never be tolerated near Seattle is being forced upon the Tri-Cities, Kiona, and Benton County.

Conclusion: A Call for Integrity and Vision

This project is not the future Washington needs. It compromises our landscapes, wildlife, communities, and climate goals — all while offering minimal energy benefit and no lasting jobs. I urge EFSEC to reject Resolution 357 and demand a more transparent, science-based, and community-driven approach to energy development.

Let us protect the Horse Heaven Hills — not just for their ecological value, but also for the generations who deserve to experience their beauty, biodiversity, and cultural legacy.

Sincerely, Christy Hembree, Richland, WA