

October 13, 2025

Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Olympia, WA 98504

Via electronic mail: comments@efsec.wa.gov

Subject: Comment on Draft Resolution 357, Horse Heaven Hills Wind and Solar Project

Dear Acting Chair Brewster, Director Bumpus,

On behalf of the Port of Benton we submit this letter for official comment opposing EFSEC's partial approval in Resolution No. 357 to allow Horse Heaven Wind Farm, LLC to site primary infrastructure (turbines, solar, and BESS) within the 0.6-2.0 mile buffers surrounding most documented ferruginous hawk nest locations.

Our responsibility as a public port district is to provide safe, compatible, and sustainable economic development in addition to upholding adopted land-use frameworks in Benton County. We are deeply concerned that the Resolution creates two things: insufficient environmental review and mitigation under SEPA and material land-use conflicts that already have planned uses in our community. This will significantly impact our residents and employers because they rely on these landscapes.

If we allow energy infrastructure in these specific zones, it will undermine the goals of the local comprehensive plan for development. This large-scale facility in these areas will also raise safety concerns, specifically around wildfire risk, that directly affect our community. The SEPA challenge will defer critical mitigation planning until after approval, which is the opposite of SEPA's "earliest possible point" standard. With the pending litigation vs EFSEC and former Governor Inslee, we respectfully ask you to reject Resolution 357 and reaffirm EFSEC's original recommendation to limit the project scope and ensure meaningful protection for our community, cultural resources and environment.

Clean energy is essential, but we must align with responsible land use practices. We echo the concerns of many of our Tri-City community members and organizations. Please reconsider.

Sincerely,



Diahann Howard, PPM®, PPX® Executive Director

C: Port of Benton Commissioners