

To: EFSEC Comment Portal
Tri-Cities (TCC) Comment-Resolution #357
October 13, 2025
Dave Sharp

RESOLUTION NO. 357 HORSE HEAVEN WIND FARM SITE CERTIFICATION AGREEMENT

IMPLEMENTATION-Partly Approving and Partly Denying Proposal to Construct Primary Infrastructure within Two Miles of Documented Ferruginous Hawk Nest

TCC Comment-

The nest (Page 11 of the Facilitator's Report) in the "Decline to Decide" category (Resolution Page 17 of 17) should be recategorized to be consistent with the other four nests examined by the PTAG. As things stand, the Applicant could simply submit a request to amend Spec-5 for this nest at some future time.

Specifically, the Council should Deny approving primary Infrastructure within 0.6 and 2.0 miles from the recently occupied nest consistent with the other four clustered nests, rather than not deciding.

Discussion and Rationale-

The Resolution asks the Council to "Decline to Decide" for the single newly occupied nest, which has the same habitat characteristics as the other four nests in the "Deny" category.

The reason appears to be: "The certification holder is not requesting approval to site primary components within two miles of that nest". [Resolution Page 5 of 17].

TCC believes that formal intent is reflected in the Final ASC which sites primary infrastructure within two miles of that nest.

Parsing this single nest is inconsistent with SPEC-5 and considerations developed by PTAG

If the Applicant desires to make major changes to the project, there is an appropriate way to do it within the EFSEC process.