

From: paul@presari.com
To: [EFSEC mi Comments](#)
Subject: TCC Comments on EFSEC Council Approval of Resolution 357
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October 13, 2025

TCC Comments on EFSEC Council Approval of Resolution 357

TCC is requesting revisions to EFSEC Council Resolution 357 for a number of reasons described in detail in the comments/objection from our attorney Rick Aramburu submitted in a separate transmittal today, October 13, 2025.

We also offer the following additional observations and comments:

Inadequate Public Comment Review Time Before the Council Meeting

The time between the deadline for public comments at 11:59 PM on October 13, 2025 and the EFSEC Council meeting at 1:30 PM on October 15, 2025 is simply not long enough for the public comments to be read, seriously considered, and fully understood by EFSEC staff or the Council.

The shortness of this post-comment time frame makes it impossible for public comments to be meaningfully addressed by either staff or the Council and renders those comments meaningless.

Inadequate Evaluation of Buffers Required for Very Large Air Tankers (VLATs) for Aerial Firefighting in the Horse Heaven Hills

EFSEC's PTAG findings and Resolution 357 rely on the Spec-5 0.6–2.0 mile conditional buffers around hawk nests that focus on habitat metrics and approval/denial of siting requests but do not establish the operational, interagency, and enforcement protocols and elements necessary to preserve safe Very Large Air Tanker (VLAT) operations (DC-10, 727-class, 747 derivatives, MD-11).

The administrative record and intervenor activity show concern about VLAT impacts and that some detailed aerial firefighting expert material (which would have addressed VLAT performance and clearances) was stricken during adjudication, reducing VLAT-specific technical analysis in the admitted record. The government witness testimony during the public meeting on the original EFSEC Recommendation did not raise or address VLAT operational conditions and requirements. Public and legislative summaries note that the revised SCA and related materials include greater attention to aerial firefighter safety, but they do not replace the need for detailed, enforceable VLAT operational requirements that adequately protects the VLATs from collisions with proposed 500-foot-high wind turbines atop 2,000-foot-high ridgelines in the Horse Heaven Hills.

The absence of mandatory aviation coordination, defined contacts, and published VLAT run-in corridors risks firefighter safety and mission effectiveness and increases EFSEC's legal exposure. EFSEC must adopt aircraft-category specific conditions and impose clear operational responsibilities and contacts before any turbine commissioning inside the upper Spec-5 band is allowed.

Inadequate Evaluation of Buffers Required to Mitigate the Significant Adverse Visual Impacts Identified in the Final Environmental Impact Statement

EFSEC's PTAG findings and Resolution 357 rely on the Spec-5 0.6–2.0-mile conditional buffers around hawk nests that focus on habitat metrics and approval/denial of siting requests but do not establish and identify rationally and scientifically-based wind turbine locations needed to reduce and eliminate the significant adverse visual impacts acknowledged and described in the Final Environmental Impact Statement. The FEIS concludes with the following statement:

“... the Project would cause significant adverse visual impacts in many viewing areas, identifying effects during construction, operation, and decommissioning and documenting those impacts in an updated visual impact assessment prepared by SWCA.”

The FEIS describes the nature of impacts (scale, contrast, night lighting/glare, and cumulative visibility across the 100+ square-mile site), identifies Key Observation Points and viewing

audiences, and evaluates mitigation measures including turbine removal or redesign to reduce visual dominance.

The FEIS and related materials note potential adverse effects on regional communities and cultural resources and recognize that eliminating or relocating turbines is among the measures necessary to meaningfully reduce visual harm.

EFSEC Council's approval of Resolution 357 will result in total and absolute failure to identify, evaluate, and mitigate the visual and consequential economic losses to thousands of people and homeowners in Tri-Cities.

We recommend and encourage the EFSEC Council to decline to approve Resolution 357b and remand it back to EFEC for additional evaluation and the development of remedies and locations that take the visual and economic impacts into account reasonable and appropriately.

Respectfully Submitted,

Paul Krupin, Karen Brun, Pam Minelli and Dave Sharp
Board Members of Tri-Cities CARES