

January 12, 2026

Comment-

Horse Heaven Wind Farm Ferruginous Hawk Nest Mitigation Plan

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This comment is made based on the following:

- The Spec-5 Ferruginous Hawk mitigation plan com is compatible and complimentary to the Washington State and the USFWS Wind Energy Guidelines: collectively (WEG).
- The Horse Heaven Wind Project is still in the design phase.

Comment 1-Two-mile Buffer for Recently Active Nests-Ensure there is a 2-mile buffer between primary infrastructure and ferruginous hawk nests that have had activity within the last 10 years. For the sake of clarity, since the PTAG rules were established in 2025, the 10-year guideline would start from 2016.

Discussion-It is our understanding that a Ferruginous Hawk Nest located in the Badger Canyon drainage has had activity within the last 10 years. PTAG apparently disagreed regarding the habitat viability around nests, there was discussion, and ultimately consensus. Croplands and developed land were ultimately assigned no credit for habitat. That is just not realistic and not true. We see hawks nearly every day North of the HHH lease boundary, including over croplands (irrigated). It is reasonable to ask that for this particular nest a 2-mile radius be maintained, or consider an intermediate distance, perhaps a mile. We know, and the WDFW biologists know that the migration corridor all along the HHH escarpment is used for diurnal raptor foraging. At least keep that turbines further back from that escarpment near a recently active nest.

Comment 2-When considering future locations of turbines utilize existing Biological Survey Results to avoid high concentration foraging habitat.

Discussion-Following the guidelines of the WEG, a site is evaluated in a phased fashion using biological and wildlife surveys to determine suitability and to develop the project layout (turbine locations) to avoid and minimize avian impacts during the design phase. project is still in the design phase.

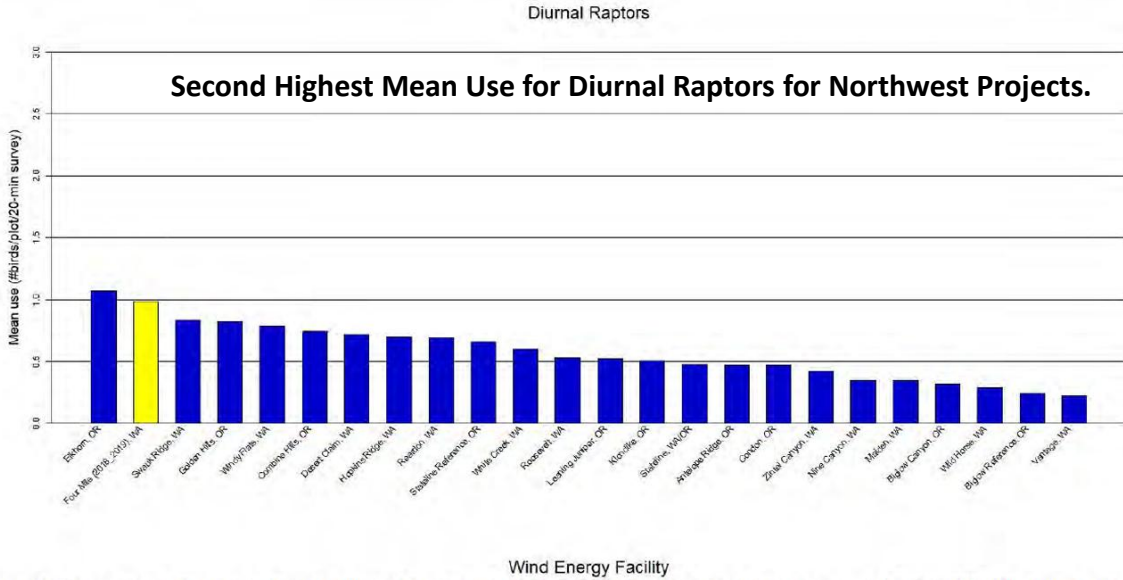
Existing biological reports show high avian use east of I-82

- The East portion of the Project, formerly called Four Mile East, had Avian Mean Use Surveys (AMUS) for diurnal raptors among the highest of surveyed projects in the Northwest. See **Attachment 1** from Appendix K-Four Mile Avian Use Report.
- The area in vicinity of I-82 was under surveyed. See **Attachment 2** from Appendix M Bird and Bat Conservation Strategy showing lack of surveys in the central project area.

- The single survey point immediately east of I-82 shows the highest buteo and diurnal raptor use across the entire site. See **Attachment 3**, also from Appendix K -Four Mile Avian Use Report. This shows the flight path activity of Buteos just East of I-82. For whatever reason, that area is heavily used for foraging. The Four Mile area also had high populations of American White Pelican, snow geese, sandhill cranes, and other species under protection of the Migratory Bird Treaty Act.
- The Applicant may place turbines in new locations to gain back turbines lost by mitigation exclusions. The WEG should be followed to provide a revised design that does not increase avian mortality.
 - New locations must be within existing surveyed micrositing corridors and should avoid high mean use areas. If the relocation results in higher density of turbines in areas of high avian mean use, an accredited collision modeling study using UFWs guidelines should be performed. The existing Wildlife Collision Risk Appendix 4.6-1 in the FEIS is not a collision model. However, that Risk model did show that the under 500' large diameter rotor model preferred by the Applicant has the highest risk of all of the turbine models.
 - Should the Applicant decide to install taller turbines existing corridors must be used.
 - The tall turbine option presented by the Applicant is based upon the premise that there will be less turbines required to provide a project wide mortality rate equivalent to that of the smaller turbine and equivalent to Nine Canyon results. Absent collision modeling, nameplate ratio should be utilized. If a 6.0mw nameplate turbine is substituted for a 3.0mw turbine, only half the larger turbine should be allowed. Example: 140 smaller turbines are in the design after mitigation exclusions, the larger turbine limit should be 70.
 - If taller turbines are selected, PTAG should recognize that the area just East of I-82 in the Johnson Butte area as mentioned above are high mean use for Buteos.
- The recent FAA application, since withdrawn, for taller turbines overloaded the area East of I-82 with turbines. As mentioned earlier, the Four Mile area stood out as the most used by avian species compared to West of I-82. PTAG should not allow that situation.

PTAG SPEC-5 mitigation is aimed at ***“avoiding, minimizing, and mitigating impacts on the state endangered ferruginous hawk (*Buteo regalis*) during facility construction and operations”***. PTAG is also responsible for coming to consensus for design level decisions that affect Ferruginous Hawk viability because the project is being designed. There is no question that the area around I-82 is used heavily for foraging.

Without careful mitigation, and use of existing biological reports that have been performed, the HHH project could be the example of how not to site and design a project.



Wind Energy Facility

Figure 6. Comparison of estimated annual diurnal raptor use during fixed-point large bird use surveys at the Four Mile Wind Project from June 5, 2018 – May 29, 2019 and diurnal raptor use at other Oregon and Washington Wind Resource Areas with similarly collected data.

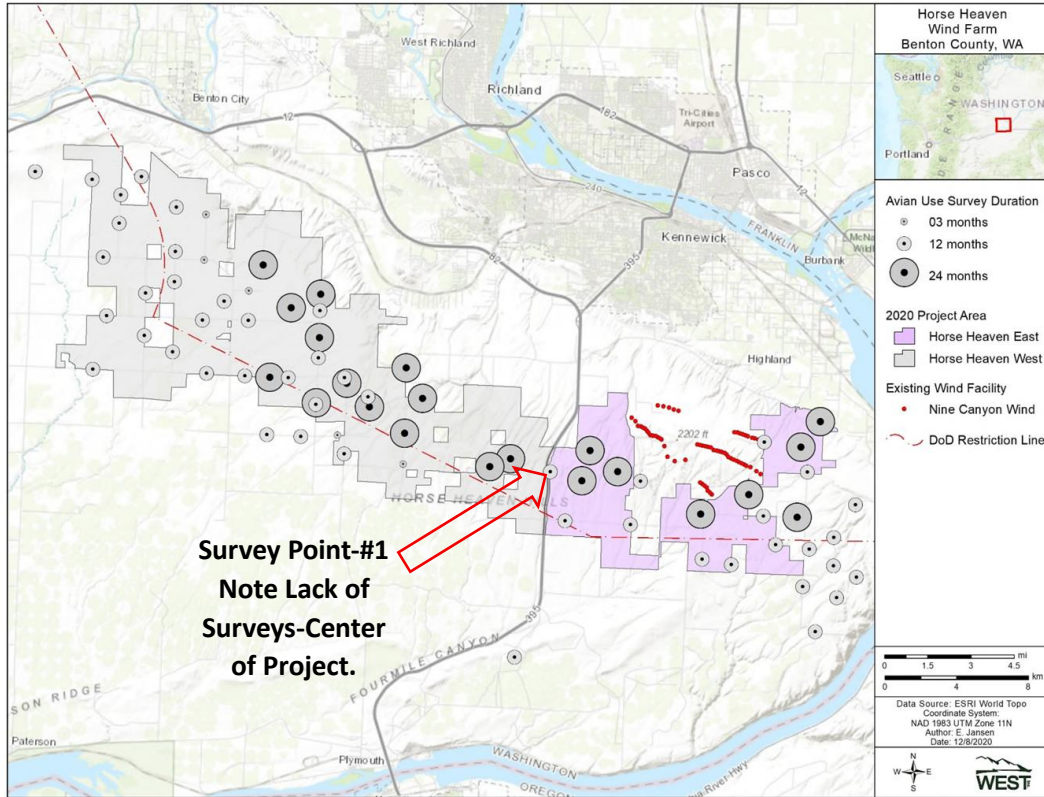


Figure 4. Fixed-point avian use points and survey duration from 2017 – 2020 at the Horse Heaven Wind Farm, Benton County, Washington.

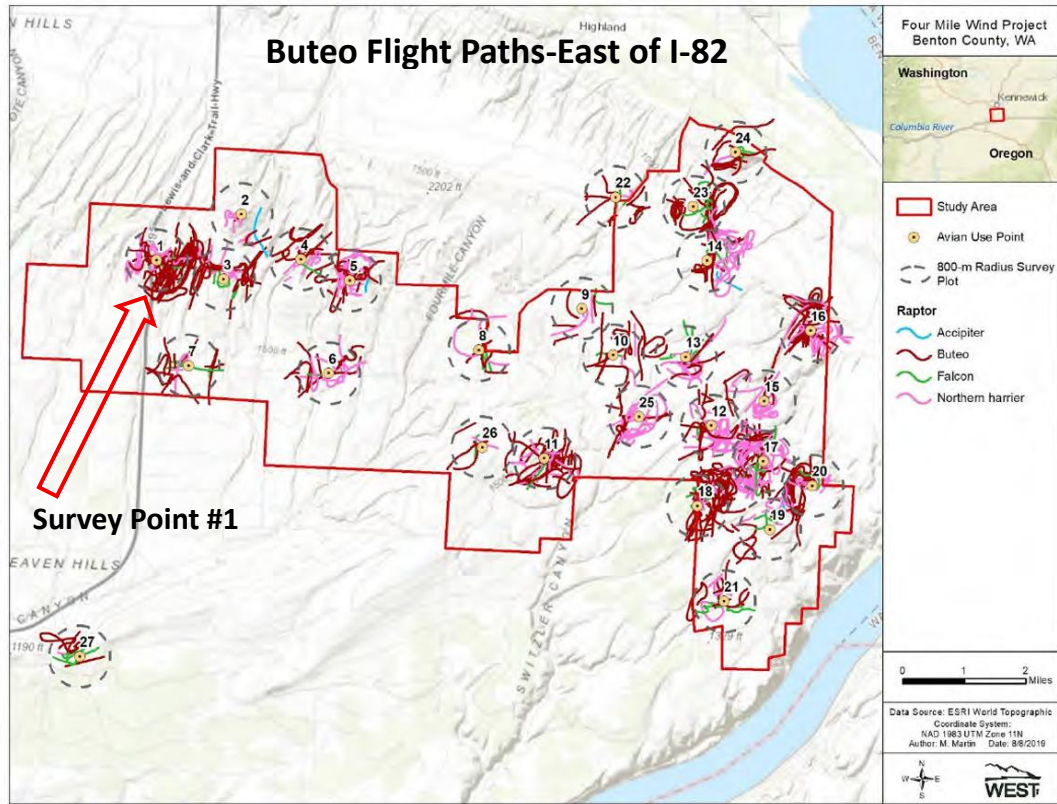


Figure 5b. Flight paths of diurnal raptor subtypes recorded during large bird surveys at the Four Mile Wind Project Study Area from June 5, 2018 to May 29, 2019.

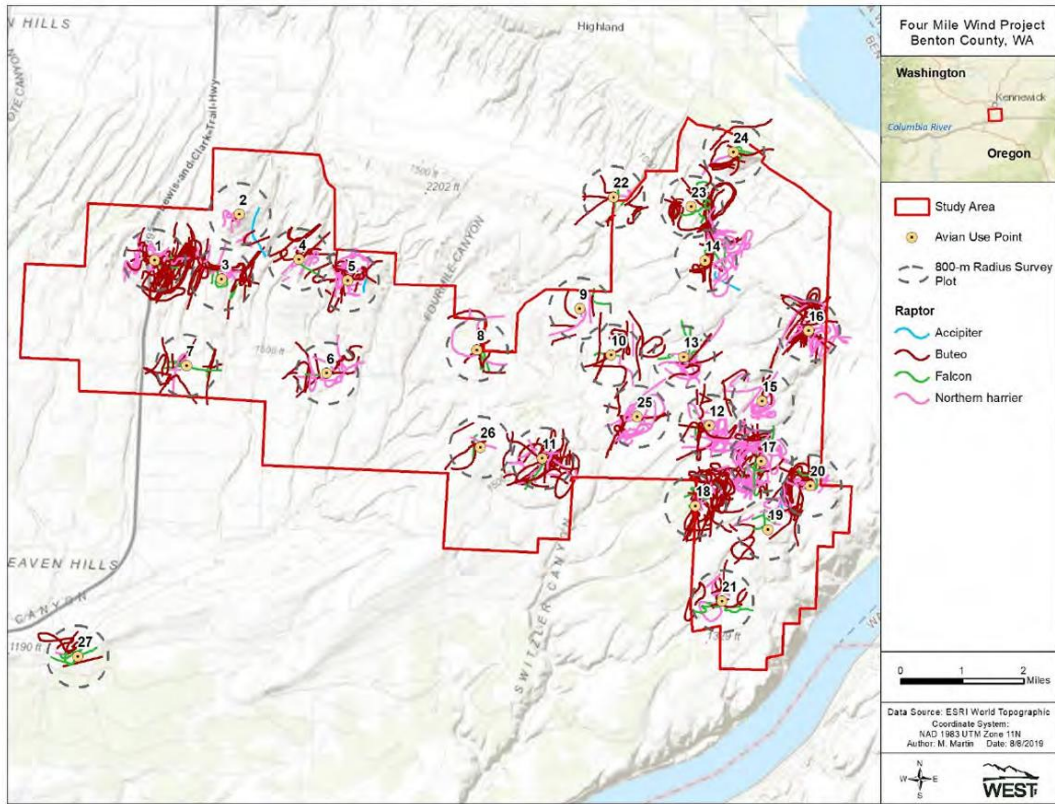


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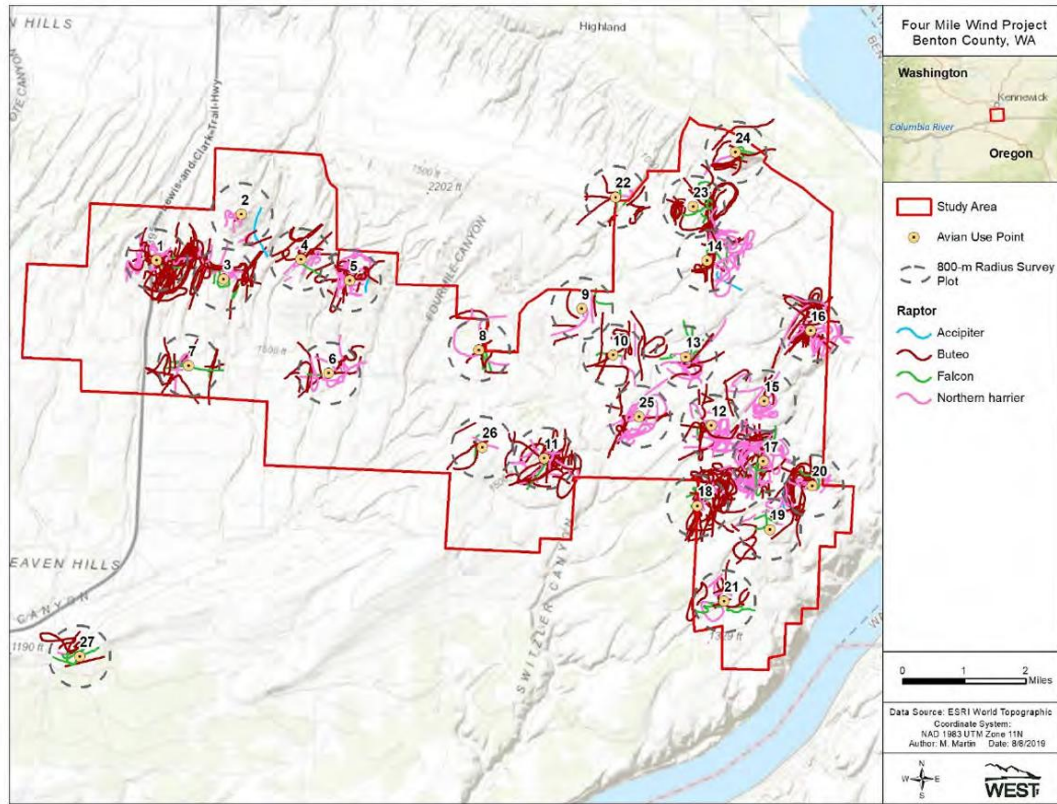


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