

Horse Heaven Wind Farm

Pre-operational Technical Advisory Group

Facilitator Report:

Hab-1 Wildlife Movement Corridor Mitigation Plan

Prepared for:

Horse Heaven Wind Farm, LLC.

Prepared by:

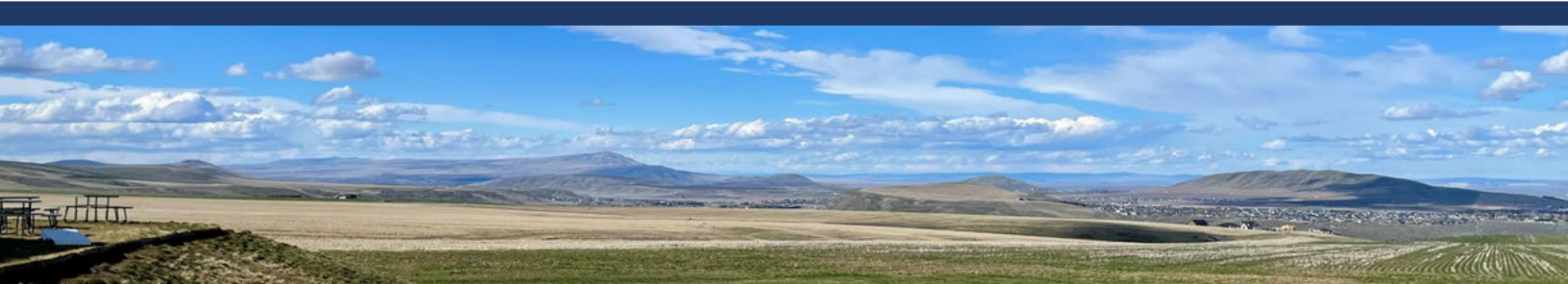
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1.0 Introduction

On behalf of the Horse Heaven Wind Farm Pre-operational Technical Advisory Group (PTAG), this Facilitator Report is being submitted to summarize coordination that has occurred between the Certificate Holder, Horse Heaven Wind Farm, LLC (Certificate Holder), and the PTAG related to the Site Certification Agreement (SCA) measure Hab-1 “Wildlife Movement Corridor Mitigation Plan,” as required by SCA measure Hab-4 “Establish PTAG and Technical Advisory Committee (TAC),” and to formally submit the required materials outlined in Hab-1 to the Energy Facility Site Evaluation Council (EFSEC) for review and approval.

2.0 Purpose and Need

The SCA includes Hab-1, which reads:

Hab-1 Wildlife Movement Corridor Mitigation Plan: *The Certificate Holder shall provide rationale to EFSEC for siting any Project components within movement corridors modeled in Washington Wildlife Habitat Connectivity Working Group (2013) as medium to very high linkage, and a Corridor Mitigation Plan shall be required that describes:*

- *Extent of direct and indirect habitat impact within the movement corridor*
- *Proposed measures to be implemented to reduce potential impacts on movement corridors (e.g., habitat enhancements to promote continued use of corridors)*
- *Proposed features (e.g., open-bottom culverts) to accommodate wildlife movement for linear Project components (e.g., roads, powerlines)*
- *Proposed restoration in movement corridors following Project decommissioning*
- *Performance standards to assess the effectiveness of mitigation measures and restoration*
- *Methods to monitor and measure performance standards*

The Corridor Mitigation Plan shall be developed in consultation with the PTAG and reviewed and approved by EFSEC prior to implementation. Results of corridor monitoring shall be reviewed annually with the TAC to evaluate the effectiveness and apply additional measures if necessary. Data shall be provided to EFSEC with additional mitigation measures for review and approval prior to implementation.

To meet the intent of Hab-1, the Certificate Holder has prepared the Horse Heaven Clean Energy Center Wildlife Movement Corridor Mitigation Plan (Hab-1 Plan) as Attachment 1.

3.0 Summary of Wildlife Movement Corridor Mitigation Plan

The Hab-1 Plan requires that the Certificate Holder assess all proposed infrastructure that will occur within wildlife corridors that have been modeled by the Washington Wildlife Habitat Connectivity

Working Group and are rated as Medium, High, or Very High. The Wildlife Movement Corridor Mitigation Plan summarizes the permanent and temporary impacts anticipated from proposed infrastructure and provides details on how the Certificate Holder will minimize and mitigate impacts to wildlife movement that may occur during construction and operation of the Project. The mitigation strategy outlined in this Hab-1 Plan aligns with the mitigation plan approved by EFSEC and WDFW in the Horse Heaven Wind Farm Wildlife and Habitat Mitigation Plan, which includes a siting criteria for mitigation that will support regional wildlife movement (Horse Heaven Wind Farm 2023).

4.0 PTAG Coordination

An overview of the Hab-1 Plan concepts was introduced to the PTAG during the meeting on October 23, 2025. Following the meeting, this Hab-1 Plan was circulated to the PTAG for review and comments. This Hab-1 Plan was then revised in response to PTAG comments and recommendations. A revised version of this Hab-1 Plan was sent to the PTAG as an attachment to this Facilitator Report for final review and approval. The PTAG agreed to advance this Hab-1 Plan to EFSEC for review and approval.

5.0 Next Steps

Under the recommendation of the PTAG, the Certificate Holder formally submits this Hab-1 Plan to EFSEC for review and approval, to meet the requirements outlined in Hab-1.

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Attachment 1

Horse Heaven Clean Energy Center

Wildlife Movement Corridor Mitigation Plan

Prepared for:

Horse Heaven Wind Farm, LLC

Prepared by:



February 2026

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1.0 Introduction

The Washington Energy Facility Site Evaluation Council's (EFSEC) Site Certification Agreement (SCA) for the Horse Heaven Wind Clean Energy Center, which has been proposed by Horse Heaven Wind Farm, LLC, included a mitigation measure (Hab-1 Wildlife Movement Corridors) aimed at avoiding, minimizing, and mitigating impacts to wildlife movement corridors during facility construction and operations. Hab-1 requires a Wildlife Corridor Mitigation Plan detailing the extent of habitat impacts within modeled wildlife movement corridors, measures to minimize impacts, features to facilitate wildlife movement, restoration plans post-decommissioning, performance standards for mitigation effectiveness, and monitoring methods. This plan must be developed in coordination with the Pre-operational Technical Advisory Group (PTAG), be approved by EFSEC before implementation, and include annual monitoring results reviewed with the Technical Advisory Committee (TAC). This approach aims to reduce barriers to wildlife movement while enabling ongoing monitoring and adaptive management. As described in Hab-1, the plan shall include:

1. Extent of direct and indirect habitat impact within the movement corridors
2. Proposed measures to be implemented to reduce potential impacts on movement corridors (e.g., habitat enhancements to promote continued use of corridors)
3. Proposed features (e.g., open-bottom culverts) to accommodate wildlife movement for linear Project components (e.g., roads, powerlines)
4. Proposed restoration in movement corridors following Project decommissioning
5. Performance standards to assess the effectiveness of mitigation measures and restoration
6. Methods to monitor and measure performance standards

2.0 Overview of Modeled Wildlife Corridors in the Project

According to the Washington Wildlife Habitat Connectivity Working Group (WHCWG 2012) report, Priority Core Areas and Linkages are identified by models as essential pathways that facilitate wildlife movement between Habitat Concentration Areas (HCAs). These are the wildlife corridor data sources that EFSEC identified should be used when assessing potential impacts on wildlife corridors. Within the Project, there are two locations where modeled wildlife corridors occur (Figure 1). The first modeled area is along the [REDACTED] of the Project. The wildlife corridor essentially runs from the city of [REDACTED]. This modeled corridor is comprised of Medium to Very High-quality linkages. The second modeled wildlife corridor runs [REDACTED], essentially from just [REDACTED] [REDACTED]. This modeled corridor is comprised of Medium to High-quality linkages, which are connected (Figure 1).



Figure 1. Wildlife Movement Corridors within the Horse Heaven Clean Energy Center

3.0 Minimization Through Project Design

The Project design changed as a result of EFSEC Council decision on Resolution 357, *Horse Heaven Wind Farm Site Certificate Agreement Implementation* (Resolution 357), which defined where primary infrastructure can be built relative to ferruginous hawk nest locations. No solar facilities will be built within wildlife movement corridors. As a result of The original layout proposed 31 wind turbines in modeled wildlife corridors, which is down to 7 wind turbines remaining in Medium-quality corridors, and no wind turbines in High-quality or Very High-quality wildlife corridors (Figure 1). The reduction in the number of turbines proposed in modeled wildlife corridors is due to restrictions placed on where primary infrastructure can be built. The EFSEC SCA requires setbacks of infrastructure in order to protect cultural resources, provide setbacks from residences, or avoid development in areas historically prone to fire risk. In addition, EFSEC created additional setbacks for primary infrastructure around historical ferruginous hawk nest locations, as described in SCA Spec-5 and finalized in Resolution 357.

Following the implementation of those setback requirements one wind turbine remains located in a Medium-quality wildlife corridor along the [REDACTED] (Figure 1). Six other wind turbines remain in Medium-quality wildlife corridors in the center of the Project, [REDACTED] (Figure 1). These wind turbines are along the western edge of the modeled north-south wildlife corridor. The wind turbines that remain in modeled wildlife corridors are outside of the setbacks required for cultural resources, residences, locations historically prone to fire risk and locations restricted by Resolution 357. In addition to wind turbines, secondary infrastructure is proposed to pass through modeled wildlife corridors. In all locations where wind turbines are proposed, there would also be associated service roads and electrical collection lines. These would be located within the micro-siting corridors shown in Figure 1. There is also a proposed overhead transmission line that runs east-west through the Project, carrying electricity to the substation, which is located just [REDACTED] (Figure 1). The east-west overhead transmission line passes through Medium and High-quality modeled wildlife corridors which run north-south through the Project. Because there is a need to move electricity from wind turbines on the west side of the Project to the substation, there is no viable alternative to avoid placing the overhead transmission line in the modeled wildlife corridor.

4.0 Habitat Loss and Mitigation

The SCA requires the Certificate Holder to quantify the amount of habitat that will be removed by Project infrastructure, in order to allow the PTAG and EFSEC to evaluate whether any habitat loss is adequately mitigated.

4.1 Summary of Habitat Loss in Priority Linkages

Impact calculations include both permanent and temporary impacts and are summarized by vegetation type, in order to allow for an examination of whether the impacts would result in habitat loss in the wildlife movement corridor and needed mitigation (Table 1). The majority of impacts that could occur within modeled wildlife corridors are in agricultural land, which is similar to the Project as a whole. Permanent impacts could result from installation of wind turbine foundations and pads, as well as new roads accessing those pads for construction and operations. Temporary impacts could result from excavation related to underground electrical lines or temporary access roads or crane walks used only during construction.

Table 1. Acres of Disturbance Within Modeled Corridors by Vegetation Type

Vegetation Type	Medium Quality Corridor		High-Quality Corridor	
	Permanent Disturbance (Acres)	Temporary Disturbance (Acres)	Permanent Disturbance (Acres)	Temporary Disturbance (Acres)
Agricultural Land	17	163	0	2
Developed/Disturbed	0	1	0	0
Grassland ¹	3	44	4	55
Shrubland ²	3	26	6	70
Total	23	234	10	127

¹ Includes eastside grassland, planted grassland, and non-native grassland

² Includes rabbitbrush shrubland and sagebrush shrub-steppe

4.1 Measures to Reduce Potential Impacts on Modeled Corridors

With a few exceptions, primary infrastructure has been relocated outside of modeled wildlife movement corridors. This will reduce the impact from construction activities because there will be fewer construction personnel and vehicles working for extended periods within modeled wildlife corridors – for example, to erect a turbine. Impacts to wildlife will be minimized from the secondary infrastructure that will pass through the modeled corridor [REDACTED] through Project design and minimization measures.

Overhead transmission lines should not impede wildlife movement. If natural land cover or other landscape features (e.g., drainages) are discovered during pre-construction surveys, in locations where overhead lines are planned, the Certificate Holder will consider how to minimize impacts in those locations and will strive to site poles away from those locations, whenever practical, in order to reduce creating new perching opportunities for ravens and raptors that may prey on species using the wildlife corridor. In addition, power poles located in natural habitat within modeled wildlife corridors could be fitted with devices that dissuade perching, or possibly putting portions of the overhead line

underground, provided it does not create additional ground disturbance that would result in the removal of natural habitat.

Regardless, underground and overhead lines will be located alongside roadways whenever possible, in order to consolidate impacts on the landscape. This will reduce habitat loss overall and reduce the distribution of impacts across the landscape, which would otherwise have a larger cumulative effect within the modeled corridors. Also, once the underground collection lines are buried, the trenches will be covered and revegetated according to the revegetation plan for the Project, unless the underground lines are buried in the roadbed.

Roads that would be located within the modeled corridor would be similar to roads that currently exist in the Project. They would be packed gravel roads large enough to accommodate construction vehicles, which are similar to existing roads in the Project which are built to accommodate farm machinery and heavy trucks during harvest. No new fencing would be needed for the secondary infrastructure that would be located within the modeled corridor [REDACTED].

Whenever possible, construction activities would be scheduled during the day to avoid the use of worksite lights. The Project is required to adhere to SCA Appendix 2 Item 10. Noise and Vibration (N) Mitigation: N-2 Large Equipment Noise and N-3 Nighttime Noise, which addresses Project noise during construction and operations.

A worker environmental awareness training will be held for all construction and operations personnel. During that training workers will be made aware of the presence of modeled wildlife corridors within the Project Area and the typical wildlife that could be encountered while working. Speed limits will be posted and enforced for all construction- and operations-related vehicles in order to reduce the potential for vehicle strikes within the Project area, particularly within modeled wildlife corridors.

5.0 Wildlife Use of Modeled Corridors

Wildlife are expected to continue to use modeled wildlife corridors in generally the same fashion that they have prior to construction and operation of the Project. The majority of modeled wildlife corridors are in active agricultural lands, with smaller components of grasslands and shrublands. The function of agricultural lands relative to wildlife movement will be similar during and after construction.

5.1 Features to Accommodate Wildlife Movement in Priority Linkages

Hab-1 contemplates the use of crossing structures, such as bottomless culverts in locations where secondary infrastructure such as roads would cross drainages within the modeled corridors. There are no significant water features within the modeled corridor [REDACTED]; therefore, no crossings would be needed. However, if a roadway within the modeled corridor crosses a waterway, the Project would be required to obtain a Hydraulic Project Approval from the Washington Department of Fish and Wildlife. That process entails the consideration of water flow through the waterway and requires the

crossing to be designed in a fashion that does not impede that water flow. Any approved design would also be wildlife-friendly and designed in a way that would not impede wildlife movement. This would include properly sized culverts and likely bottomless culverts, if a crossing of that size is necessary. Other secondary infrastructure, such as underground collection lines or overhead transmission lines, would avoid waterways by either boring under them or spanning them, respectively.

In addition, underground collection facilities would not impede wildlife movement within a corridor. In most cases, collection lines are co-located with roadways. Whether they are separate from or within roadways, the only impact they would have on wildlife movement within a modeled corridor is a temporary disturbance to the landscape, while construction is occurring, but following construction the area over the underground lines will be revegetated and once again suitable for use by wildlife. Overhead transmission lines result in a relatively small amount of permanent disturbance on the landscape, limited to the footings of poles and towers. Land use under current and proposed future transmission lines is either farmland (e.g., wheat) or grazed grassland or shrubland. The existence of low growing vegetation, or in some cases planted crops that are routinely harvested, will not grow tall enough to compromise the overhead lines, and will therefore not require ongoing vegetation removal (e.g., tree trimming or clearing). Overhead transmission lines that may be built as part of the Project are similar to those that already exist in the Project Area and therefore would not notably change the suitability of the modeled wildlife corridor or impede wildlife movement once constructed, though any addition of new power poles will create new perching opportunities for ravens and raptors which can prey upon species using the wildlife corridors. Section 4.2 describes measures to minimize perching potential.

5.2 Monitoring Wildlife Corridors

Monitoring of wildlife use of modeled wildlife corridors will in part be evaluated using data collected from the Horse Heaven Pronghorn Study, which will include placing GPS collars on a subset of the local pronghorn herd. Use of the modeled wildlife corridors pre- and post-construction can be evaluated to determine whether there are changes in pronghorn use of these areas that result from the Project.

Additionally, an element of the ongoing worker awareness training during construction and operations will include information about the presence of the modeled wildlife corridors within the Project and the need to be conscientious when working within them. Any wildlife that are struck by vehicles during construction or operations by Project personnel will be documented and provided in reports to the PTAG or TAC.

6.0 Restoration of Habitat Following Decommissioning

A draft initial site restoration plan was provided as part of the Application for Site Certification (ASC). The requirements for site restoration following decommissioning are included in that plan. In summary, following decommissioning, Project infrastructure will be removed, potentially with the exception of some roads that will be retained for farm use or long-term fire management and control. Once Project infrastructure is removed, the land will be returned to pre-project conditions, except in

cases where that would be incompatible with land use at the time of decommissioning. In most cases, this will result in the land being returned to an agricultural condition, but in locations where non-agricultural land uses or vegetation types were removed by the Project, those vegetation types will be restored.

7.0 Evaluating Mitigation and Restoration Effectiveness in Modeled Corridors

Mitigation of habitat loss in Priority Linkages will be consistent with mitigation outlined in the Horse Heaven Wind Farm Draft Habitat Mitigation Plan (HMP), provided as Appendix L in the Project’s ASC. The Draft HMP includes mitigation ratios for each habitat type and specifies that the mitigation will occur in a location that is within the modeled corridor area.

Mitigation is to be carried out in areas that significantly enhance landscape-scale habitat connectivity, as described in the HMP. This includes locations identified as important in statewide studies completed by WHCWG (WHCWG 2012) and the Arid Lands Initiative (ALI) (ALI 2014), as well as areas identified as Biodiversity Areas and Corridors in WDFW’s Priority Habitat and Species database (WDFW 2026), or areas identified in the Washington Habitat Connectivity Action Plan (Michalak et al. 2025). This could include areas adjacent to other federal, state, or privately protected lands that are managed for conservation purposes to expand and buffer those habitats; this could also include a location adjacent to notable landscape features such as ridgelines and draws, which are important for wildlife movement but are not at risk of development, in order to increase the overall size of those protected habitat blocks and create a buffer against unprotected areas.

Table 2. Summary of Mitigation Acres by Vegetation Type Needed to Offset Habitat Impacts in Modeled Wildlife Corridors

Vegetation Type	Permanent Impacts Mitigation Ratio ³	Permanent Impact Mitigation Acres	Temporary Impacts Mitigation Ratio ³	Temporary Impacts Mitigation Acres	Total Mitigation Acres
Agricultural Land	0:1	0	0:1	0	0
Developed/Disturbed	0:1	0	0:1	0	0
Grassland ¹	1:1	7	0.1:1	10	17
Shrubland ²	2:1	18	0.5:1	48	66
Total	--	25	--	58	83

¹ Includes eastside grassland, planted grassland, and non-native grassland

² Includes rabbitbrush shrubland and sagebrush shrub-steppe

³ Ratios are consistent with those approved by EFSEC and WDFW in the Habitat Mitigation Plan

Implementation of habitat mitigation activities will be accompanied by a monitoring program. The monitoring program will aim to document the effectiveness of mitigation actions over time in order to ensure that the impacts of habitat loss are fully offset. In existing shrubsteppe and grassland habitats monitoring will include documentation of management activities, such as ongoing invasive species control, maintenance of fire breaks, and any overseeding of existing habitat in order to increase vegetation cover or diversity. If areas are restored from agricultural uses to shrubsteppe or grassland, monitoring will include changes in vegetation cover and diversity over time, ongoing invasive species management, any necessary reseeding in locations that were less successful, and documentation of changes in wildlife use as the landscape transitions from agricultural use to more natural grassland or shrubsteppe habitat.

8.0 Reporting

Results of mitigation monitoring shall be reviewed annually with the PTAG or TAC to evaluate the effectiveness and apply additional measures if necessary. Initially, this will include verification of the permanent and temporary impacts described in this document, post-construction. Once the final impact numbers are known and a mitigation project is executed, annual reports provided to the TAC will include management and monitoring activities that occurred each year, the results of monitoring, progress towards reaching the success criteria outlined in the HMP, and any planned changes in management or monitoring through adaptive management.

9.0 References

- Arid Lands Initiative. 2014. Spatial Conservation Priorities in the Columbia Plateau Ecoregion: Methods and data used to identify collaborative conservation priority areas for the Arid Lands Initiative. Available at <https://www.sciencebase.gov/catalog/folder/52050595e4b0403aa6262c64>.
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