

Energy Facility Site Evaluation Council
PO BOX 43172
Olympia WA, 98504-3172

sent via email: comments@efsec.wa.gov; and web form: https://comments.efsec.wa.gov/

March 13, 2024

RE: COMMENT ON HORSE HEAVEN WIND FARM – DOCKET 210011

Dear Chair Kathleen Drew and Council Members,

Brookfield Renewable offers the following comments to support a balanced site certification of the Horse Heaven Clean Energy Center (Horse Heaven). The applicant for this project, Scout Clean Energy, is a portfolio company of Brookfield Renewable. After our review of the Energy Facility Site Evaluation Council (EFSEC) certification process and recommendation for Horse Heaven, we have concerns that the proposed novel conservation mitigation measures will unnecessarily and significantly reduce the size of the project and establish a precedent that could place at risk Washington State's established decarbonization goals.

The current EFSEC mitigation proposal for wildlife movement corridors, and the 2-mile setback zone around all active and historic ferruginous hawk nests, would reduce the Horse Heaven project by 74%. This dramatic reduction of the project presents a danger to not only the viability of the project itself, but also to broader renewable resource development in the state. If left unchanged, we are concerned that the recommendation could establish a precedent that may compromise Washington's goal of developing a reliable, carbon-free, electric system by 2045, pursuant to Washington's Clean Energy Transformation Act (CETA) (SB 5116, 2019).

Achieving Washington's energy decarbonization goals depends on maintaining a timely, balanced, consistent and, most importantly, data-driven certification process for renewable energy development. The proposed mitigation measures for the Horse Heaven project, and the timing in which they were introduced, represent a significant departure from the established EFSEC site certification process. Specifically, we are concerned that the proposed broad conservation mitigation measures for the ferruginous hawk nests were introduced after the Final Environmental Impact Statement was published and were based on an outdated (2010) and broad-scale wildlife corridor map in the Washington Statewide Habitat Connectivity Analysis. The Working Group who conducted the analysis states that additional fine-scale data and periodic data updates are necessary for comprehensive planning and policy implementation (175).¹

We therefore respectfully request that EFSEC reconsider the proposed mitigation measures for the Horse Heaven project. Specifically, for EFSEC to revert to the FEIS versions of Hab-1: Wildlife Movement Corridors and Spec-5: Ferruginous Hawk conditions, and to remove the Veg-10:

¹ Washington Wildlife Habitat Connectivity Working Group (WHCWG). 2010. Washington Connected Landscapes Project: Statewide Analysis. Washington Departments of Fish and Wildlife, and Transportation, Olympia, WA. Retrieved from: <https://waconnected.org/statewide-analysis/>.

Shrubland and Priority Habitat Avoidance proposed condition. We encourage EFSEC to maintain a balanced and reliable site certification process by vetting novel mitigation measures through a transparent and evidence-based public process that involves the council, its staff, the scientific community, and stakeholders. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "F. Mitchell Davidson". The signature is written in a cursive, flowing style.

F. Mitchell Davidson
Managing Partner
Brookfield Renewable
646-992-2473
fmitchell.davidson@brookfield.com