APPENDIX I

Comments on the Draft EIS

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Table I2 Issues Based on Draft EIS Comments

Written Comments

January 20, 2004 Public Meeting Transcript

Table I-1
Draft EIS Comment Log

1. Comments from Agencies

Comment Record No.	Agency	Name of Source	Date of Record	Date Received	No. of Comments
1	Washington Department of Fish and Wildlife (WDFW)	Ted Clausing Regional Habitat Program Mgr.	1-30-04	1-30-04	17
2	Washington State Department of Transportation (WSDOT)	Salah Al-Tamimi, PE Regional Planning Engineer	1-29-04	2-02-04	8
3	Kittitas County Public Works Department	Paul Bennett, PE Director of Public Works	1-30-04	1-30-04	9
4	Kittitas County Fire Marshall	Derald Gaidos Fire Marshal	1-29-04	2-02-04	10

2. Comments from Organizations

Comment Record No.	Organization	Name of Source	Date of Record	Date Received	No. of Comments
5	Kittitas Audubon Society	Keith Johnson President	1-28-04	1-30-04	16
6	Kittitas County Airport Advisory Committee	Shan Rowbotham Chairman	1-29-04	1-29-04	9
7	McCullough, Hill, Fisko, Kretschmer, Smith	Courtney Flora	1-30-04	1-30-04	2
8	The Phoenix Group	Debbie Strand, CecD Executive Director	1-30-04	1-30-04	1
9	Renewable Northwest Project	Sonja Ling Policy Associate	1-30-04	1-30-04	6
10	Residents Opposed to Kittitas Turbines	Ed Garrett	1-23-04	1-23-04	1

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Draft EIS Comment Log (cont'd)

3. Comments from Individuals

Comment Record ID	Individual	Date of Record	Date Received	No. of Comments
11	Loran and Judy Allen	Not indicated	1-30-04	12
12	Lee Bates	12-23-03/1-22-04	1-22-04	30
13	Jack Boyovich	1-22-04	1-22-04	1
14	Linda Brown	1-22-04	1-23-04	7
15	Emilia Burdyshaw	1-26-04	1-26-04	16
16	Lee and Chris Burtchett	1-10-04	1-20-04	15
17	Lee and Chris Burtchett	1-20-04	1-20-04	12
18	Chris Burtchett	1-25-04	1-26-04	5
19	Judy Corey	1-19-04	1-19-04	2
20	Shirley Dawson	1-10-04	1-20-04	4
21	Arthur DePalma	1-20-04	1-20-04	6
22	William Erickson	1-16-04	1-20-04	3
23	Randy Fischer	1-21-04	1-21-04	4
24	John and Barbara Foster	1-26-04	1-26-04	6
25	Ed Garrett	1-19-04	1-19-04	6
26	Ed Garrett	1-19-04	1-20-04	5
27	Ed Garrett and Rosemary Monaghan	1-29-04	1-30-04	73
28	Gene Johnson	1-29-04	1-30-04	4
29	Jill Kuhn	Not indicated	1-30-04	45
30	Eric Larsen	1-30-04	1-30-04	32
31	Janet Lee	1-19-04	1-19-04	2
32	Janet Lee	1-27-04	1-27-04	5
33	Hal and Gloria Lindstrom	1-30-04	1-30-04	8
34	Mitch Meffert	1-08-04	1-08-04	1
35	Mitch Meffert	1-19-04	1-19-04	2
36	Janet Nelson	1-29-04	2-02-04	19
37	Felicia Persson	1-20-04	1-20-04	5
38	Felicia Persson	1-25-04	1-30-04	120
39	Ray and Betty Ridenour	1-28-04	1-30-04	5
40	Mike Robertson	1-25-04	1-25-04	1
41	Michael and Elizabeth Robertson	1-19-04	1-19-04	36
42	Geoff Saunders	1-30-04	1-30-04	24
43	Linda and Charles Schantz	1-30-04	1-30-04	128
44	Al and Diane Schwab	Not indicated	1-20-04	18
45	Diane Schwab	1-22-04	1-22-04	2
46	Gloria Sharp and Boyd Rear	Not indicated	1-30-04	2
47	Jeff Slothower	1-30-04	1-30-04	12
48	Clem Staloch	Not indicated	1-29-04	9
49	Linda Waits	1-21-04	1-21-04	1
50	John Winbauer	1-30-04	1-30-04	5
51	Woody Woodcock	1-29-04	1-30-04	13

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Draft EIS Comment Log (cont'd)

4. Comments from Individuals (in identical form letter)

Comment Record No.	Individual	Date of Record	Date Received	Number of Comments
52	Kathleen L. Armstrong	12-31-03	1-22-04	2
53	Roy D. Armstrong	12-31-03	1-22-04	2
54	Dean Auve'	11-18-03	1-22-04	2
55	Rosemarie Auve'	11-08-03	1-22-04	2
56	Cynthia Bourasaw	11-18-03	1-22-04	2
57	David W. Bourasaw	11-19-03	1-22-04	2
58	David J. Boyovich Sr.	1-20-04	1-22-04	2
59	Patricia A. Boyovich	1-20-04	1-22-04	2
60	Keley D. Dormaier	11-24-03	1-22-04	2
61	Ellen B. Finch	11-20-03	1-22-04	2
62	Marvin G. Finch	11-18-03	1-22-04	2
63	Janet L. Gudgel	11-16-03	1-22-04	2
64	Jerry L. Gudgel	11-15-03	1-22-04	2
65	George Grigg	1-11-04	1-22-04	2
66	Karen V. Grigg	1-11-04	1-22-04	2
67	Jean L. Jackson	1-11-03	1-22-04	2
68	Robert Jackson	1-11-03	1-22-04	2
69	Eloise Kirchmeyer	12-10-03	1-22-04	2
70	Charles McCosh	12-08-03	1-22-04	2
71	Elizabeth F. Lasell-McCosh	12-06-03	1-22-04	2
72	Allison Muraites	1-11-04	1-22-04	2
73	Carl Michael	1-11-04	1-22-04	2
74	Teri Michael	1-11-04	1-22-04	2
75	Michael F. Thompson	12-06-03	1-22-04	2
76	Gaylen C. Waschell	12-23-03	1-22-04	2
77	Rozella Waschell	12-23-03	1-22-04	2
78	Gregory Willette	11-18-03	1-22-04	2

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5. Comments from January 20, 2004 Public Testimony

Comment Record No.	Individual	Number of Comments
T1	Phyllis Whitbeck	1
T2	Ginger Morrison	1
T3	Arthur DePalma	7
T4	Dwight Lee Bates	8
T5	Ed Garrett	4
T6	Jeff Howard	1
T7	Bertha Morrison	1
T8	Chris Burtchett	3
T9	Dana Lind	1
T10	David Sager	1
T11	Diane Schwab	5
T12	Jack Boyovich	6
T13	Holly Pinkart	6
T14	William Erickson	6
T15	Rocky Farrell	1
T16	Roger Weaver	1
T17	Eloise Kirchmeyer	2
T18	Michael Gossler	1
T19	Kirk Diehl	3
T20	David Lee	2
T21	Leslie White	1
T22	Linda Schantz	8
T23	Desmond Knudson	6
T24	Woody Woodcock	7
T25	Helen Wise	2
T26	Felicia Persson	3
T27	Keith Johnson	6
T28	Ron Nelson	2
T29	Chris Cole	4
T30	Dan Quinn	4

Table I-2
Issues Based on Draft EIS Comments

Issue Code	Summary of Issue	Corresponding Comments
	PROGRAMMATIC/POLICY ISSUES	
EIS	**SEPA/EIS Process and Scope**	
1	**General adequacy of DEIS content and analysis** Multiple comments relating to the overall adequacy of the material presented in the DEIS, as opposed to comments addressing page- or section-specific technical content in the DEIS. Comments in this category generally reflect one of four themes: (1) general criticism of the content and approach in the DEIS, such as statements that the DEIS minimizes the project's effects, that conclusions were hastily made based on other wind projects, or that the DEIS lacks quantitative and qualitative information on impacts; (2) comments related to the information sources used to develop the DEIS, such as comments that the majority of the studies cited were developed by wind energy proponents and that the DEIS should use other sources with information on impacts of existing projects; (3) comments concerning the level of site-specific detail in the DEIS, generally requesting identification of impacts to individual residences or from specific turbines; and (4) comments that were complimentary with respect to the approach and content of the DEIS.	6-1, 7-1, 9-1, 15-1, 17-1, 18-2, 19-1, 25-1, 27-66, 27-72, 29-1, 30-1, 38-117, 43-120, 43-125, 43-128, 45-1, 47-2, 51-13, T7-1, T8-1, T11-1, T29-1
2	**Geographic scope and scale of analysis** Comments about the appropriate range of the impact analysis, including statements that **Section 2.2.1.3** should indicate residences within one-half mile radius of project in order to clearly indicate the number of residences impacted by the proposed project; or that analysis should include residences up to 2 miles away.	38-15, 43-40
3	**Adequacy of maps provided in DEIS** General comments about the DEIS maps, including statements that maps indicating property ownership should have been included; maps need greater detail; maps are not legible, do not depict enough of the area; difficult to determine extent of impacts; **Figure 1.1** does not indicate roads; and **Figure 3.10.2** does not show the project location.	15-12, 44-6, 44-8, T11-2
4	**Evaluation of project against Kittitas County criteria for wind farm approval** Statements about and comparison of DEIS content with the general criteria (identified in the DEIS) to be used by the Kittitas County Board of Commissioners to determine the final land use approval decision for the project; suggestion that these criteria have not been met; and objection to perceived implication that DEIS indicates criteria are met.	16-2, 16-5, 16-6, 17-3, 29-2, 29-7, 29-8, 38-3, 41-3, 43-121, 44-4, 51-1, T8-2, T24-1
5	**Responsibility of Kittitas County** Comment that Kittitas County has a responsibility to ensure that potential impacts from the project are assessed in a complete and unbiased manner, mitigation measures are required and enforced, and a system to report problems and enforce mitigation will be in place.	30-32
6	**Time needed for a decision on the project** Comments relating to the timing of the EIS and/or the County decision, including requests to not make a hasty decision, take more time to analyze data on problems from other wind farms, and stall decision until BLM finalizes an EIS on wind power in the western states. Also includes a comment that it seems senseless to go through the review of the DEIS without the approval of the appropriate zoning requirements.	18-5, 24-5, 29-3, 29-4
7	**Need for project power/power market issues** Comments that the EIS has not shown a need for the project, contains inadequate discussion of current wind power production or how much capacity utilities are seeking, or does not adequately assess market for wind energy production in the state.	23-4, 41-30, 47-1

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Issues Based on Draft EIS Comments (cont'd)

8	**Need for subsequent environmental review** Includes a request to correct Fact Sheet to indicate that subsequent environmental review may be required, and statement that DEIS does not mention future expansion of the proposed project while the Desert Claim application leaves the door open for expansion.	27-5, 51-8
9	**Description of the applicant and/or its objectives for the proposed action** Comments addressing the DEIS description of the applicant; about existence of buyer for the power; whether energy from project would remain in Pacific Northwest; reference to site-specific criteria identified as needed for a wind facility; inclusion of statements considered to be marketing projections or political positions; lack of federal or state requirements to purchase wind power.	27-6, 38-4, 41-2, 42-1, 42-3
10	**Approach to mitigation in the DEIS** Comments relating to the general approach to mitigation as discussed in the DEIS, such as statements that contingency measures should be in place if the EIS is wrong about impacts; measures are not long-term in focus, do not obligate the applicant to corrective actions after construction; need comprehensive mitigation before construction; include a 24-hour hotline to address residents' concerns and impacts. Also editorial comments to use prescriptive wording on mitigation, replace certain words in the DEIS.	27-58, 27-67, 38-34, 38-118, 43-67, 44-16, 51-12, T11-5
11	**Number of wind farms proposed** Question why so many wind farms are proposed for this area, as impact would be significantly less with just one proposed.	36-4
12	**Unique aspects of the proposed project configuration** Comments that the disassociative properties of Desert Claim make it incomparable to either of the alternatives or the Kittitas Valley Wind Power Project, and create need to address impacts to "captive" properties.	37-5, T26-3
13	**Cost and accessibility of the DEIS** Comments about cost of hardbound copy of DEIS, how cost was derived, who paid the production/printing cost; difficult to analyze document on CD, but printed document was too costly to purchase.	11-12, 38-2, 51-3
14	**Selected EIS terminology** Requests to replace "wind farms" with "wind factories," "non-participating land owners" with "unwilling landowners" or "captive landowners."	37-4, 38-1, 43-122
15	**Editorial correction on page 5-2** Comment that DEIS incorrectly identifies project location as "King County" (p.5.2)	38-115
16	**Comments on Kittitas Valley EIS** Comment presented in testimony at the Desert Claim DEIS public meeting that was actually based on content of the Kittitas Valley Wind Power Project EIS.	T18-1
ALT	**Alternatives**	
1	**Definition of the No Action Alternative** Comments addressing the No Action Alternative as defined in the EIS. These comments generally fit one of three types: (1) consideration of other energy-supply actions that might be undertaken if the Desert Claim project were not developed; (2) characterization of future land use and development conditions in the vicinity of the project area if the project were not approved; and (3) objections to specific aspects of and/or requested specific changes to the EIS description of the No Action Alternative, including requests to strike specific entries.	5-4, 9-2, 9-3, 27-10, 27-11, 27-12, 27-17, 29-13, 30-4, 38-5, 38-7, 38-10, 42-6, 43-49, 44-1, 47-4, T11-1, T27-2
2	**Scale of Proposed Action** Question regarding determination of wind turbine quantity for proposal and suggestion that a smaller-scale project be considered.	14-6, 36-5

Table I-2
Issues Based on Draft EIS Comments (cont'd)

3	**Adequacy of Alternative 1** Comment that Alternative 1 is not a practical alternative.	29-11
4	**Adequacy of Alternative 2** Comments that Alternative 2 is not practical or viable; can't be evaluated.	29-12, 29-14
5	**Alternative generation technologies** Comments that DEIS does not, but should, discuss alternatives to wind power that could cut greenhouse emissions and reduce dependence on foreign oil (e.g., restructuring the power grid, conservation, solar power, hydrogen power, homeowner incentives).	36-1, 36-6, T14-5, T27-1, T29-4
6	**Alternative sites** Comments that EIS should consider other sites for the project where impacts to residents may be less, or alternative sites with potentially suitable wind (including several specific areas). Also includes more general comments that a proper location would be out of view or in an unpopulated area, and comments expressing skepticism that the proposed area provides adequate wind to support a project.	39-1, 48-1, 48-6
7	**Proximity to transmission lines** Comments that no alternate site was provided that was not already near existing transmission lines; offsite alternative locations that involved incurring the cost of transporting the power produced were not included.	41-4, 41-29, 41-31
PD	**Project Description**	
1	**General comments on specificity of construction description** Request for clarification of construction actions (e.g., use of blasting for foundations, earthwork, assembly of turbines); include cubic yards of earth disturbed/removed.	11-1, 43-43
2	**Description of operation and maintenance activities and schedules** Request for clarification regarding turbine operation and maintenance schedules; meaning of "controlling turbine operations to meet scheduled power deliveries." Also comment that O&M activities should include a process for complaint resolution and a wildlife monitoring program.	14-4, 27-4, 38-28
3	**Project decommissioning** Comments relating primarily to decommissioning of the project, including questions regarding decommissioning plan or responsibility for decommissioning; comments that decommissioning plan is not shown, need a plan with provisions for accelerating decommissioning if impacts are more adverse than contemplated, and a bond should be required; statement that re-powering should not be permitted without a formal process.	12-22, 14-7, 24-4, 38-31, 38-119, 51-4, T4-2, T28-2
4	**Specific quantities and locations for project facilities** Comments that the project description should include specific numbers for turbine heights, length of overhead cable, number and location of met towers, area of graveled roads; question why **Table 2-1** includes turbines larger than 1.5 MW; 23 miles of access roads should be included in permanent impact acreage; access road connections to public roads should be on **Figure 2.12**; and proposed connections to the Kittitas Reclamation District (KRD) access road are not clear.	16-3, 38-16, 38-20, 38-21, 38-91, 43-42, 44-3
5	**Energy production capacity of the project** Comments requesting revisions to statements regarding the capacity of the proposed wind energy facility, including that DEIS overestimates actual production by using the nameplate capacity of 180 MW, as actual production is usually less than 30 percent of capacity, and that project will, at best, only contribute 60 MW of intermittent power.	27-1, 27-8, 29-28, 30-3, 41-1, 42-2

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Issues Based on Draft EIS Comments (cont'd)

6	**Disposition of project output** Comments that project does not have a buyer for the energy; references to buyer and location should be revised; DEIS should state that power contracts do not exist; power will not go to Kittitas County; purchase agreements should be required for the EIS.	27-2, 27-3, 27-7, 27-9, 29-10, 42-4
7	**Use of hazardous materials** Comments that DEIS should list hazardous materials to be used, address their impacts.	43-45, T13-3
8	**Project power collection system and related facilities** Comments that DEIS should clearly identify location of transformers, electrical equipment, substations and O&M facility; identify location of collection lines and whether they encroach on adjacent property; explain cable installation on non-leased property; lines for communication network should be underground; concern regarding size and visual impact of collection lines; difference between Fact Sheet and Chapter 1.	27-51, 38-18, 43-41, 43-46, 50-3
9	**Configuration of the proposed project area** Comments that alternatives in DEIS do not realistically represent the project; project is unique in its patchwork appearance, is identified as 5,237 acres but encompasses many more acres; project is actually 4 or 5 micro-sites that surround unwilling landowners.	37-3, 38-14
10	**Description of Kittitas County objectives** Comment that only the County objectives specifically contained in KCC17.61A.010 or its appendices should be referenced in the DEIS (re page 2-41).	38-32
11	**Transmission interconnection point** Comment that DEIS identifies potential interconnection point at Woldale substation. Additional development, potential impacts and mitigation for this should be addressed.	38-19
12	**Project visitor center** Comments that DEIS does not address location and potential impacts of visitors center.	38-22, 43-44
13	**Phasing of project construction** Concern regarding potential for greater impact should the project be constructed in phases, and statement that option to construct project in phases should be removed.	38-23
14	**Use of local resources for project construction and operation** Comments that use of local contractors and suppliers should be quantified, as DEIS is vague on this point, and DEIS should provide actual number of local O&M staff.	38-24, 38-29
15	**Timing of restoration plans** Comment that plans for restoration should be determined prior to commencement of the project, and that reasonable deadlines and maximum impact limits should be set.	38-25
16	**Project traffic management plan** Comments that waiting for completion of project to repair roads is not acceptable; applicant should maintain roads in pre-construction condition throughout project construction; traffic plan should stress that community access cannot be compromised.	38-26, 38-27
	ELEMENT/RESOURCE ISSUES	
ER	**Earth Resources**	
1	**Impacts on Ellensburg Blue agate** Comment that DEIS does not mention impact on blue agate specific to area west of Ellensburg.	27-59
2	**Erosion impact analysis and conclusion** Comment disagreeing with the methods and/or conclusion of the erosion impact analysis.	29-15

Table I-2
Issues Based on Draft EIS Comments (cont'd)

3	**Landslide hazards and mitigation** Comments that landslide hazard discussion should be clarified; include site-specific geotechnical study and removal of turbines if risk cannot be acceptably mitigated.	29-16, 38-35, 38-36, 38-99
4	**Ongoing baseline impacts on earth resources** Comment that impacts of the proposed project neglect to include the same ongoing impacts addressed in the No Action Alternative (see also **Table 1-1**).	38-6
AQ	**Air Quality**	
1	**Dust impacts during operation** Concern that turbine operation would create/disperse dust clouds and pollen down wind.	12-30, 51-5, T9-1, T24-6
2	**Air quality impacts during construction** Comments relating primarily to dust from project construction, including comments that construction dust will adversely affect air quality; potential for cumulative impacts could be significant; impact would be major if mitigation does not work; request to remove statement referring to construction dust relative to other activities.	29-17, 38-40, 38-100, 43-50
3	**Mitigation for dust impacts** Comments that there is no mention of dust mitigation during construction or if turbine action results in increased dust; watering of road and soil surfaces during construction should be included; include reduction in speed limit to 20 mph; include more specifics on dust mitigation and indicate source for water needed for dust control.	38-37, 38-38, 43-26, 43-47, 43-48
4	**Greenhouse gases from backup power source** Comment that DEIS had no discussion of backup power that would be required to be on line when wind farm not producing electricity, resulting in more greenhouse gases.	36-3
5	**Air quality impacts under No Action Alternative** Comment that text should note current land use is both agricultural and residential, possible development of some other energy facility is remote and should be removed.	38-39
WR	**Water Resources**	
1	**Impacts on surface water resources and water supplies** Comments primarily concerning impacts of road and utility crossings of watercourses, including construction-related Best Management Practices (BMPs); potential to significantly impact residents' use of water for irrigation and stock; information on water use and discharge. Includes comments on permits related to surface water, i.e., that Hydraulic Project Approval (HPA) required from Washington Department of Fish and Wildlife (WDFW) and whether Washington Department of Ecology (WDOE) approval required for relocation of ephemeral or intermittent streams.	1-15, 15-3, 16-4, 29-18, 38-42, 43-51, T13-2
2	**Mitigation for potential surface water or groundwater impacts** Comments that DEIS does not address mitigation for impacts to groundwater and wells from blasting, other construction activities or operation; compensation should be provided; need 2000-foot setback; address mitigation for potential loss of water quality/quantity from crossings over watercourses; identify which water quality protections will be in place. Includes requests for assurances that water flow will not be changed from current conditions, turbine placement would not occur in areas where it would impact groundwater, and that blasting would not have adverse impacts on wells.	11-2, 27-39, 29-19, 42-22, 43-1, 43-2, 43-3, 43-52, 43-54, 43-56, 43-59, T12-2

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Issues Based on Draft EIS Comments (cont'd)

3	**Groundwater impact analysis** Comments indicating concern regarding analysis of potential groundwater impacts; well locations indicated on maps are not accurate, should be verified prior to turbine placement and blasting; need more information; disagreement with conclusion of no significant impacts; need to evaluate potential for concrete to leach minerals into the groundwater.	27-40, 38-41, 38-44, 42-23, 43-27, 43-55, 43-58, T8-3, T12-1
4	**Use of stream water for dust control** Comment that use of stream water for dust control should not be allowed.	43-53
5	**Impacts of surface water disturbance on wildlife** Questioning DEIS assertion of temporary disruption to priority habitat (p. 3-47).	38-43
PA	**Plants and Animals**	
1	**General adequacy of studies and information on plants and animals, particularly avian studies** Multiple comments primarily related to the overall adequacy of the plants and animals studies and analysis documented in the DEIS, particularly with respect to birds. One comment expressed general satisfaction with background studies and information collected on fish, wildlife and habitats, while most were critical. Multiple comments reflected a theme that the avian studies were inadequate to determine level of avian use of the project area and provide sufficient base for estimation of impacts. Some made general statements about the adequacy of the avian studies, such as the surveys were cursory and incomplete, models are inaccurate and expanded analysis should be done. Some comments questioned mortality estimates based on comparison with other projects due to inaccurate data for the other projects. A number of comments addressed specific aspects of the avian studies, including comments that a 2-year study period is needed; the study did not include nocturnal use or migratory pathways; area residents were not surveyed; use of radar to determine spatial and temporal distribution; aerial observations for active raptor nests are insufficient; DEIS fails to analyze weather conditions that could affect mortality; and there should have been an assessment of rodent populations. This issue includes comments relating to accountability for the studies and whether the studies should be redone.	1-1, 5-10, 5-15, 12-1, 12-3, 12-18, 15-5, 15-7, 15-10, 25-3, 26-2, 27-13, 27-15, 27-34, 27-68, 29-22, 30-5, 30-21, 30-24, 33-5, 36-10, 36-12, 38-47, 38-49, 38-102, 41-6, 41-10, 41-22, 41-32, 42-7, 43-5, 43-28, 43-60, 43-66, T5-2, T13-4, T27-3
2	**Determination of net impacts and associated mitigation** Comments that DEIS has inadequate presentation of net impacts and specific mitigation; project impacts can be substantially mitigated by employing measures discussed in the document, but confusion as to degree of efficacy which undermines conclusions in DEIS; revise analysis to clearly describe the net effect on the environment and unequivocally address which mitigation measures will be implemented.	1-2, 1-3
3	**Resource agency guidelines for wind projects** Request that DEIS incorporate WDFW guidelines for wind power projects. Also comments relating to U.S. Fish and Wildlife Service (USFWS) recommendations for wind projects, such as statement that project does not meet 6 of 10 USFWS criteria; project violates at least three guidelines; should state Desert Claim's level of compliance with USFWS guidelines.	1-4, 27-14, 41-11, 42-8, 43-123
4	**Role of Technical Advisory Committee in mitigation and monitoring** Comments addressing the Technical Advisory Committee (TAC) identified as a possible mitigation measure, including support for TAC; request that the formation and role of TAC be a binding measure; requests that TAC be in place for life of the project, and to describe authority and budget source, and indicate if data gathered by TAC would be available to public on request; request for membership in TAC.	1-5, 27-42, 30-28, 38-51, T27-6

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Issues Based on Draft EIS Comments (cont'd)

5	**Vegetation/habitat restoration and mitigation** Comments relating to restoration of habitat disturbed by project construction and/or measures to mitigate impacts through replacement habitat. Issue includes requests to include construction timing as mitigation to minimize impacts to soils/vegetation; conduct activities outside of project footprint during dry periods or on frozen ground if possible. Also includes comments that the DEIS should identify a standard for evaluation of site restoration success, specifications on seeding, temporary erosion control measures and a long-term protocol for establishing plant communities while excluding invasive species. Also includes comments relating to mitigation ratios for replacement habitat, based on existing vegetation types; location of mitigation site; enhancement on mitigation site. Also requests that the plan to acquire replacement habitat be explained in detail, and to consider use of the site for farming to replace area used by project roads and turbines.	1-6, 1-7, 1-8, 1-9, 5-7, 27-41, 43-4
6	**Mitigation for potential avian impacts** Comments relating to project design or siting features to mitigate avian mortality, including statements that met towers should be freestanding; reliability of bird flight diverters is questionable; recommendation to set turbines back from the windward edge of the ridgeline; and comment that the only mitigation is not to build turbines.	1-10, 1-11, 12-2, 27-44
7	**Post-construction adjustments in response to avian mortality** Comments that DEIS does not include contingency measures to address bald eagle mortality; should require conservation measures in App. C; concern that corrective action (e.g., removal of a turbine) in event of avian mortality may not be possible during operation; plan for post-construction adjustments was needed.	1-12, 5-9, 36-16, T27-5
8	**Additional upland bird species** Comment that sharp-tailed grouse and sage grouse should be discussed in the EIS.	1-13
9	**Big game impacts and mitigation** Support for management of big game and control of animal damage on project land; public hunting is WDFW's primary tool for minimizing damage by game animals; could include access control and weapon restrictions; measures to address game damage should be approved by TAC. Also comments that DEIS should provide more analysis of big game habitat, migration and displacement; impact estimates are not sufficient; address shadow flicker effects on deer and elk; include more mitigation measures. Comment that project studies using helicopters could have scattered elk and deer herds.	1-14, 11-3, 14-3, 15-9, 16-10, 17-10, 29-24, 30-22, 41-14
10	**Presence of fish species in project area waters** Comments that map inaccuracies exist and WDFW actually expects fish are present in Currier Creek and Reecer Creek and possibly their tributaries at times; comment that project must affect summer steelhead, but DEIS does not address presence or mitigation.	1-16, 29-25
11	**Impacts to wetlands, streams and riparian areas** Comments that wetland and watercourse impacts should be minimized; proposed access roads and foundations would affect native vegetation and wetlands; micro-siting should be used to reduce impacts; where impact cannot be avoided, turbine should be removed; discuss wildlife impacts near wetland and riparian areas; streambeds are critical areas, setbacks are required and filling/ relocating should not be permitted; show total wetland acreage for project area, as well as the percentage temporarily or permanently altered; comment expressing surprise that wetland impacts would be allowed.	1-17, 15-2, 29-21, 36-14, 38-46, 38-101
12	**Take of species protected under the Bald and Golden Eagle Protection Act** Comments that project could result in take of species protected under the Bald and Golden Eagle Protection Act (BGEPA) and/or the Migratory Bird Treaty Act (MBTA), including points that USFWS must authorize take level; DEIS does not say whether take	5-3, 5-11, 11-4, 16-9, 17-9, 27-33, 27-43, 29-23,

Table I-2
Issues Based on Draft EIS Comments (cont'd)

	application has been filed; DEIS should contain assurances against potential take. Includes questions why bald eagles were only species addressed and who would be the *enXco* official prosecutable under BGEPA if an eagle is killed.	36-15, 42-9, T5-4
13	**Mortality assessment for raptors, particularly bald eagles** Comments noting the potential for bald eagle and/or raptor mortality in general; wind farms should not be built in known eagle habitat; questions on reliability of comparative mortality statistics for other wind project sites; no discussion of raptor presence along ridgelines, other than in mitigation; reference to roosting areas and potential for multiple flights through the proposed site; displacement impacts; calving will continue to attract raptors and could threaten their safety. Also includes requests to strike statements that no bald eagle fatalities have been reported at wind farms in U.S.	5-14, 25-4, 26-4, 26-5, 27-32, 30-20, 38-48, 38-103, 41-5, 41-7, 43-62, 43-63, T12-3, T27-4, T29-3
14	**Impacts to non-endangered avian species** Comments addressing impact analysis and/or conclusions for non-endangered avian species, including concern for protection provided for non-endangered species present on the site; objection to characterization of estimated 220 bird kills per year as not significant; concern for known presence of great horned owl; and question whether the impact addresses the total or local avian population.	5-8, 12-4, 14-2, 17-7, 27-60, 38-50, 43-61
15	**Impact analysis methods and results for bats** Multiple comments relating to study methods and conclusions for bats, including request for thorough study of risk to bats; information from nocturnal studies; evidence of bat mortality at other wind facilities; estimates are not sufficient for determining significant adverse impacts would not be expected; no analysis of potential bat activity in relation to nearby forested area; assess bat populations using appropriate technology; reference to wind turbine project in Appalachians that caused a record number of bat kills.	5-12, 15-8, 33-6, 36-11, 38-52, 38-104, 42-10, 43-64
16	**Indirect avian impacts, particularly potential for viral outbreaks** Comments addressing possible indirect impacts of avian mortality, primarily questioning growth of mice or mosquito population and corresponding potential for viral outbreaks (e.g., hantavirus, West Nile virus).	15-6, 16-8, 17-8, 41-8, 43-65, T13-5
17	**Impacts to shrub-steppe vegetation and lithosols** Comments that primary vegetation in project area is shrub-steppe, which is in critical state of survival; loss of shrub-steppe could undermine habitat value; shrub-steppe habitat obligates bird species occupy this region during the breeding season; concern that lithosols would be disturbed; concern that project could impact plant communities used by raptors to hunt visible prey.	5-5, 5-6
18	**Vegetation and wildlife impacts in general** Comments expressing general concern over impacts of the project on existing vegetation, or impacts to wildlife without respect to specific wildlife types or guilds.	20-3, 29-20
19	**Impacts to threatened and endangered species** Comment questioning the acceptability of the DEIS conclusion of no significant impacts to threatened and endangered species.	29-26
20	**Monitoring of post-construction conditions** Comments addressing post-construction monitoring, including points that monitoring should be done by an impartial body; adequate monitoring and mitigation should be in place to document bird fatalities; project of this size could change overall ecology, so there should be monitoring of a test installation first; DEIS does not include follow-up studies of other wind farms to determine if they change the 'overall' ecology of a site.	30-25, 41-9, 41-25, 43-6
21	**Impact of turbine safety lights on avian mortality** Concern that lights on turbines could attract night migrating birds and should not be used since they are not required by the FAA.	36-13

Table I-2
Issues Based on Draft EIS Comments (cont'd)

22	**Adequacy of entries in Table 1-1** Comments that **Table 1-1** provides inaccurate comparisons between Desert Claim and White Horse, and fails to include the County's "zero net loss" policy on wetlands.	37-2, 38-8, 38-9, T26-2
23	**Classification of vegetation types** Comment that DEIS should include all uses of vegetative areas in **Section 3.4.1.1** or only include uses in the Land Use section.	38-45
ENR	**Energy and Natural Resources**	
1	**Impact of project on the supply and price of electricity** Comments that DEIS fails to evaluate potential impact on the broader energy picture, or disagreeing with **Section 3.5** conclusions about the project's effect on price and availability of electricity.	27-16, 27-35, 29-27, 38-11, 42-5
2	**Relative energy importance of the project and wind power in general** Comments addressing contribution of the project and/or wind power generally to energy supply, including statements that this and other proposed projects in the area would generate minuscule amount of power; include discussion of the relative importance of these wind projects to the whole energy picture; conservation could accomplish the same savings; there is no competent national energy policy; compare wind energy to hydroelectric power. Also objections to specific statements or comparisons in the DEIS addressing the amount of energy the project would produce.	12-19, 33-4, 36-17, 38-53, 38-105, 41-23, 48-3
3	**Scope of EIS energy analysis** Comment that discussion of other potential energy developments is outside EIS scope; project would not eliminate other energy facility proposals in local area or elsewhere.	38-54
4	**Quantification of resource use** Comment that DEIS should list quantities of resources to be removed or displaced.	43-69
5	**Energy loss through transmission** Statement that wind energy is best used in areas in close proximity to consumers, and concern regarding energy loss through long-distance transmission of power.	48-4
CR	**Cultural Resources**	
1	**Mitigation for cultural resource impacts** Comments that DEIS should provide specific mitigation that would be required; turbine or road sited in identified area of concern should be relocated; mitigation of retrieving scientific or cultural information from its location is unacceptable; would not be permissible to unearth artifacts; mitigation involving removal of artifact(s) would result in significant unavoidable adverse impacts.	29-29, 38-56, 38-57, 38-106, 43-72
2	**Nature and extent of cultural resource impacts** Comments specific to impacts, such as statements that DEIS is incomplete on cultural resource impacts; DEIS refers to possible transmission connection and actual impacts should be determined; six cultural sites are identified as potential impact areas.	12-16, 38-55, 43-71
3	**Impacts and consultation regarding traditional cultural properties** Comments that DEIS contains little information on cultural resources; suspects little consultation with Yakama Nation; need to include area(s) of the site pertaining to the Yakama Nation that would be affected and their value; need supplemental EIS per Section 106 of National Historic Preservation Act (NHPA); private property use is not identified, cannot be assumed.	12-17, 43-29, 43-70
LU	**Land and Shoreline Use**	

Table I-2
Issues Based on Draft EIS Comments (cont'd)

1	**Direct land use impacts/compatibility with existing uses** Comments addressing primarily the DEIS discussion of direct land use impacts and compatibility of the project with existing land uses. Comments reflect several common themes, including compatibility of the project with existing residential land use and lifestyle, particularly for residences within one-half mile; that the project represents an industrial use; and disagreement with the approach, accuracy and content of the analysis, including comments that the DEIS downplays impacts on residents, should provide evidence that impacts to existing activities are not expected, and that data on number of residences is inaccurate, inconsistent or incomplete. One comment stated that cumulative impact on all residences with a view was not adequately addressed in the DEIS.	15-15, 25-2, 25-5, 27-18, 27-61, 27-70, 29-5, 29-30, 38-58, 38-64, 38-107, 38-108, 38-110, 42-11, 43-74, 43-76, 43-78, 43-84, 43-91, 44-2, 44-5, 46-1, 47-12, T22-5
2	**Indirect land use impacts** Comments appearing to relate primarily to the DEIS discussion of indirect land use impacts, such as potential future effect on residential development near the project and/or continued agricultural use. Includes comments relating to compatibility with residential development and growth of Ellensburg. One comment stated the zoning change for project could indirectly result in increased bird mortality and destruction of shrub-steppe habitat.	5-13, 29-6, 36-8, 43-81, T22-7
3	**Possible relocation of existing area residents** Comments relating to the DEIS statement that area residents may choose to relocate if the project conflicted with their lifestyles, including general objection to or questioning of that statement or a similar statement that wind production is compatible with rural resources. Includes comment that for relocation option to be viable, property value analysis and mitigation would be necessary to give residents financial ability to relocate.	11-8, 12-28, 27-36, 30-26, 38-60, 43-83, 44-7, T4-8
4	**Compensatory mitigation for land use impacts** Comments that insufficient mitigation is proposed to protect rights of landowners; mitigation should include property purchase or other form of compensation.	11-9, 15-16, 27-47, 38-109, 43-80
5	**Setbacks from residences and property lines** Comments relating to land use aspects of turbine setbacks addressed in the EIS, such as objection to proposed setbacks from residences and/or property lines; setbacks relative to residences adjacent to central portion of the site; concern over potential limitations on use of land on adjacent properties within setback limits; statement that land use will be changed if setbacks do not address all potential impacts.	16-12, 17-6, 20-1, 25-6, 27-45, 38-63, 43-7, 43-30, 43-79, T22-6, T24-4
6	**Project consistency with Kittitas County Comprehensive Plan** Comments offering opinions on whether the project would be consistent with one or more provisions of the County comprehensive plan, including specific comments that every turbine would need to be located within industrial-zoned land; project would allow industrialization of scenic valley landscape; comment that if all three proposed wind farms are built, over 10,000 acres of land would be used for turbine development; disagreement that project would be consistent with the plan. Includes comments that project is not consistent with or does not discuss specific policies in the plan; project would violate "zero net loss" policy on wetlands; DEIS fails to consider the definition of rural lands and the type of activities compatible with this use classification.	27-19, 29-31, 30-7, 32-5, 33-2, 38-65, 38-67, 42-14, 47-3, 47-10
7	**Consistency of project with Growth Management Act** Comment that DEIS discussion of consistency with GMA is flawed by inaccurate conclusion that proposal would not involve significant amounts of buildings, structures, or impermeable surfaces, as development of 120 structures is considered significant.	38-68

Table I-2
Issues Based on Draft EIS Comments (cont'd)

8	**Compatibility of agricultural and residential uses** Comments objecting to DEIS statements on potential for conflicts between existing agricultural and residential uses, including statements that DEIS does not show such conflicts exist; suggestion that residential users compete with agriculture is not accurate; statement that agricultural activities would continue in project area is unsubstantiated.	38-12, 38-61
9	**Proximity of project site to transmission lines** Comment that DEIS statement indicates a means of transmission connection has been determined, which is not the case, and proximity of transmission lines is irrelevant.	38-59
10	**Impacts of power collection lines** Comments that off-site overhead power collection lines would increase adverse impacts to non-participating landowners; comment that one power collection line would adversely affect a specific property.	38-66, 50-4
HS	**Health and Safety**	
1	**Fire hazards** Comments relating primarily to the discussion of fire hazards in DEIS **Section 3.8.** Comments within this category generally addressed one or more of three primary topics, including the existing level of fire hazard in the project area, the fire hazards associated with construction and/or operation of the proposed project, and the possible mitigation measures related to fire hazards. Specific comments typically noted that the proposed project site is in an extreme high fire hazard area, expressed concern that the project itself could cause fires or expressed dissatisfaction with the DEIS coverage of fire hazards, or included statements that proposed fire mitigation measures were insufficient and/or that a fire fighting plan was needed.	4-1, 10-1, 11-6, 12-5, 12-29, 22-2, 23-1, 24-3, 27-21, 27-22, 29-33, 29-35, 38-72, 42-16, 43-24, 43-25, 43-92, 43-96, 43-105, 43-110, T14-2, T29-2, T30-1
2	**Impacts of mechanical hazards from machinery/structure failures** Comments primarily addressing possible mechanical hazards (other than fire) associated with wind turbines. Includes general statements, such as that turbines present health and safety hazards or impacts will drive property owners away, and comments more specific to technical analysis of blade throw and tower collapse provided in the DEIS.	12-11, 15-13, 27-48, 29-32, 43-8, 43-93, 43-94
3	**Ice throw impact analysis and mitigation** Comments similar to those in HS-2, but specifically related to the DEIS ice throw analysis and mitigation discussion, including statements that ice throw probability is not remote; comment that Bowers Field icing information could be used; question regarding period of record for icing conditions; comment that mitigation language in DEIS is inadequate; and several comments relating to potential use of ice sensors.	12-13, 27-50, 38-71, 43-104, T23-2
4	**Hazard mitigation through prescribed setbacks** Comments primarily addressing specific distances considered as setbacks to mitigate for mechanical hazards, such as general objections to distances contained in DEIS; suggestion that greatest setback distance determined for any hazard should be applied for all potential impacts; and various suggestions for specific setback distances ranging from 435 feet to 2,500 feet.	12-12, 12-14, 12-26, 15-14, 27-20, 38-17, 38-78, 41-35, 42-15, 42-17, 43-13, 43-95; 43-103, 43-108, 51-6, T4-6
5	**Potential interference with telecommunications** Comments that study should be required to address emergency responder communication and study of impact on TV and radio reception and mitigation needs to be conducted.	4-2, 11-5, 32-3, 43-99

Table I-2
Issues Based on Draft EIS Comments (cont'd)

6	**Electrical hazards, including lightning** Comments pertaining to safety-related electric hazards, including general statements that DEIS does not address electrical hazards, health hazards of electromagnetic fields or lightning impacts and several comments addressing potential issue of stray voltage.	29-36, 38-79, 43-10, 43-89, 43-90, 43-97, 43-98, 43-106, 43-109, 43-127
7	**Shadow flicker impact analysis and conclusion** Comments addressing methods used in analysis of potential shadow flicker impacts and/or the results of that analysis. Includes comments that DEIS contains insufficient assessment of impacts; does not assess traffic-related impacts; shadow flicker causes health problems; no site-specific assessments; shadow flicker impacts are unacceptable, are not unavoidable; nuisance trespass would occur to existing residences; and graphs do not provide substantive information. Also comments on specific aspects of analysis, such as definition of "receptor" and whether all potential receptors have been included, and model assessment of shadow flicker relative to fog or cloud conditions.	12-9, 27-23, 29-37, 30-8, 30-10, 38-73, 38-75, 38-76, 43-31, 43-100, 44-13, 44-14, T25-1
8	**Mitigation for shadow flicker impacts** Comments focusing on mitigation of shadow flicker impacts, including comments that inadequate mitigation for shadow flicker impacts is identified; EIS places burden of impacts on affected residents but it should be on applicant; turbines should not be allowed or should be removed where shadow flicker occurs; suggesting that residents be confined to their homes when shadow flicker occurs is not practical; and that **Table 1-1** conflicts with Chapter 3 regarding mitigation for shadow flicker.	12-10, 27-52, 30-9, 30-29, 37-1, 38-13, 38-74, 38-80, 38-114, 43-12, 43-32, 43-101, 43-107, 43-126, T26-1
9	**Spill/accident remediation** Request to contract for environmental remediation services, in the event of an incident.	4-3
10	**Liability for damage from hazards** Recommendations that applicant assume liability for any impacts as a result of project-related fires, as a condition for approval, or for project-related electricity damage.	22-3, 23-2, 43-11
11	**Need for engineering review** Comment that engineering review of design and construction standards be part of DEIS.	27-49
12	**Potential hazards from viral exposure** Comments addressing possible project relationship to viral hazards in reference to **Section 3.8**, including statements that DEIS does not analyze potential increased human exposure to hantavirus; disagreement with conclusion about hantavirus risk; no analysis provided for potential increased exposure to West Nile Virus.	38-77, 41-12, 41-13
13	**Description of existing hazard conditions** Comments about DEIS information on existing hazards in project area, including statements that paragraphs on residential and household electrical hazards should be removed and existing land uses listed in **Section 3.8.1.3** should include rural residential.	38-69, 38-70
NOI	**Noise**	
1	**Noise impact analysis methods, results and/or conclusions** Multiple comments relating to some aspect of the DEIS noise analysis. Includes general objections to/concerns over potential noise impacts and comments that the DEIS contains insufficient assessment of impacts; no statement that residents will experience increased noise; concern regarding potential for inaccurate noise calculations; suggested additional study; noise from wind farms is not comparable to existing rural noise sources. Also comments about specific noise components in the analysis, such as equipment running simultaneously, sound effect of turbine braking system, blasting and	12-21, 20-2, 27-24, 28-2, 38-30, 38-83, 38-84, 38-86, 38-111, 42-19, 43-33, 43-34, 43-111, 43-113, 43-115, 43-117,

Table I-2
Issues Based on Draft EIS Comments (cont'd)

	tonal noise; comments taking exception to conclusions about noise impact levels; comments addressing specific inputs to model analysis, including measuring noise at receptor's level (not based on a 5,200-acre site), using more than 4-8 mph wind speeds, using wind data from previous 2 years and that DEIS selected only 4 areas for noise modeling.	44-11, 44-12, 50-5, T11-4, T22-2
2	**Setbacks for noise mitigation** Multiple comments relating to what should be considered adequate setbacks to mitigate project noise impacts, including general statements that setbacks from properties should be increased and DEIS should look at other wind projects to assure adequate setback, and comments mentioning specific figures such as 2,000 feet or 2,500 feet, or basing the setback to ensure a maximum sound level of 35 decibels or 40 decibels at residences.	27-25, 29-38, 38-85, 41-36, 42-18, 43-14, 43-112, 43-114, 51-7, T22-4
3	**Other (than setbacks) mitigation for noise impacts** Comments involving noise mitigation other than setbacks, such as statements that DEIS does not include contingency measures if noise impacts are greater than projected; request that project be decommissioned if unbearable noise occurs; include soundproofing or buying out impacted owners; TAC should log noise complaints and resolve issues, including potential purchase of properties impacted.	27-53, 27-54, 30-12, 30-30, 43-35
4	**Noise standards appropriate to project/project area** Comments pertaining to the regulatory standards used in the noise impact analysis, including statements that industrial/agricultural noise standards should not apply or should be reduced, and to adopt noise standards based on actual use.	30-11, 38-81
5	**Impacts of low-frequency sound** Comments that DEIS should address low-frequency sound, which can only be mitigated by placing turbines well away from homes; cumulative effect increases with number of turbines; reference to article on effects on residents near turbines in the UK.	30-13, 40-1, 41-15, 41-27, 41-34, 43-15, 43-36
6	**Affected environment description** Comment that project area uses listed in **Section 3.9.1.3** should include residential.	38-82
ALG	**Aesthetics/Light and Glare**	
1	**General nature and magnitude of visual impacts from the project** Comments expressing concern over the visual impacts of the project or noting the magnitude of those impacts, including statements that view impacts would affect residents and visitors; do not want to see turbines; wind farms should not be located near Highway 97; painting turbines gray will not help; local views would be destroyed; quality of life (as interpreted visually) would be affected; large changes to rural landscape are unacceptable; world-class scenic views would be adversely impacted. Several comments specifically reference contribution of turbine lighting to visual impacts, mentioning impacts of flashing red lights; light pollution in Ellensburg and the valley; lighting impacts on stargazing and residents at higher elevations. One stated that change in visual character would be in direct opposition to Kittitas County's objectives.	12-6, 12-7, 12-8, 12-20, 14-1, 14-5, 21-3, 21-5, 30-16, 33-7, 38-88, 38-112, 41-17, 43-16, 43-17, 44-18, T1-1, T3-3, T19-3, T22-2
2	**Adequacy of the visual impact analysis and displays presented in the DEIS** Multiple comments relating to the visual impact methods and information materials documented in the DEIS. Many are comments critical of the photos and visual simulations, including statements to the effect that the photos and simulations are not accurate and/or are distorted, views selected were not appropriate and do not show turbines in front of the Cascades or views from affected residences. This category includes comments critical of the graphics and similar aspects of **Section 3.10**, including specific figures and tables, use of subjective scales in the analysis, the number of residents impacted, and presentation of conclusions about impact levels.	24-1, 26-3, 27-26, 27-69, 29-39, 30-15, 36-7, 38-87, 41-16, 41-18, 41-33, 43-118, 44-9, 47-5, 47-6, 51-9, T5-3, T17-2

Table I-2
Issues Based on Draft EIS Comments (cont'd)

3	**Blade glint and glare impacts** Comments that blade glint, glare impacts to road safety should be addressed; glare from multiple angles and surrounding turbines cannot be minimized; objection to impacts.	27-27, 29-40, 30-18, 42-20
4	**Mitigation for aesthetic impacts** Comments that DEIS does not provide adequate mitigation for visual effects or light and glare impacts; recommend moving turbines 20 miles away; inadequate guidance on mitigation; use of curtains and trees as mitigation is inadequate; use of screening vegetation. Several comments addressed compensation. One comment questioned whether it was possible to mitigate the visual impacts of the project.	27-55, 30-17, 30-31, 41-28, 43-37, 44-10, 47-8, 50-1, T11-3
5	**Source of shadow flicker** Comment on DEIS statement that shadow flicker can arise within or near houses.	38-89
RC	**Recreation**	
1	**Recreation impacts and mitigation** Comments relating to direct or indirect recreation impacts and/or mitigation, including comments disagreeing with assertion that project would not impact recreation; expressing concern regarding hunting rights; noting impact on snowmobiling, biking and other activities or impacts to non-participating landowners; or stating DEIS should reflect research done with realtors to reveal greater level of recreational benefit.	16-7, 17-4, 27-28, 27-56, 29-41
2	**Tourist interest in the project** Comment questioning a DEIS statement about the level of tourist interest in the project.	29-42
3	**Traffic disruption during construction** Comment noting that DEIS identifies traffic impacts to residents and visitors, and stating that traffic plan needs to address resident access as a priority.	38-90
GT	**Ground Transportation**	
1	**Baseline transportation conditions** Comments with additional information or clarifications to DEIS content on existing road network, including statements about highway classifications for I-90 and US 97, legal size and load limits and permits, an over-height restriction on eastbound I-90 at Exit 62, and upcoming WSDOT projects that might affect project-related transportation.	2-1, 2-2, 2-4, 2-7, 2-8
2	**Potential use of SR 970** Comment that if SR 970 is used for transportation of project components, this must be included in EIS with additional supporting analysis.	2-3
3	**Project-related transportation plans** Requests for WSDOT review of construction and tourism management plans as they pertain to WSDOT facilities, and a comment that tourism plan should be required prior to construction and be designed to minimize impacts to the environment and community.	2-5, 2-6, 38-92
4	**Emergency access route** Request that applicant construct a west-east road from Smithson Road to allow for improved fire control, emergency, and maintenance and operations access.	3-8
5	**Project tourist facilities** Comment that applicant should build, operate tourist kiosk along SR 97 or Smithson Rd.	3-9
6	**Road maintenance conditions** Comment that roads be maintained in current condition throughout construction process.	38-93
7	**Mitigation of construction dust impacts** Comment that DEIS makes no mention of mitigation of dust impacts from construction.	43-18

Table I-2
Issues Based on Draft EIS Comments (cont'd)

AT	Air Transportation	
1	**Potential impacts on VFR traffic pattern** Comments primarily addressing the potential project conflict with the Visual Flight Rule (VFR) traffic pattern identified in the DEIS, including specific statements that impacts to VFR airspace would be excessive; comment requesting clarification of reason for dramatic alteration of the CAT A&B airspaces; use of Bowers Field by 185 flight students, which results in 44,000 airport operations.	3-1, 43-19
2	**Mitigation options for VFR traffic pattern issue** Multiple comments primarily addressing mitigation measures for VFR traffic pattern conflict discussed in the EIS, including requests to confirm minimum possible change with FAA, clarify that reduction in airspace would be temporary, and include a condition for contingent removal of turbines. Also includes statements about the acceptability of the measures, such as impact on progress by Airport Advisory Committee and County to address airport planning concerns; modification of traffic patterns is not acceptable; project should not take priority over Bowers Field; remove 27 turbines or lower their heights; mitigation for air transport issues is unresolved.	3-2, 6-4, 12-25, 27-29, 27-57, 27-63, 29-43, 38-94, 42-21, 43-20, 43-21, 43-38, 43-119, T4-4, T22-1
3	**Potential impact on IFR operations** Comments about instrument flight operations, including that DEIS fails to address IFR operations with supporting documentation; analyze approved and proposed IFR operations; perform an Obstacle Evaluation; account for circle-to-land maneuvering; applications for new approaches have been submitted, are being designed by FAA.	3-3, 3-5, 6-5, 6-7, 6-8
4	**Status of air traffic review for Wild Horse project** Comment that DEIS incorrectly indicates FAA approval of the Wild Horse project, which is used throughout the DEIS to substantiate non-significant impact.	3-4, 6-6
5	**Resolution of air transportation issues** Comment that issues have not come to a reasonable determination, while additional research and discussions with FAA could resolve issues.	3-6
6	**Turbine lighting plan** Request for clarification on intent of shielding; concerns over lighting impacts.	3-7, 38-95, 43-22
7	**Additional air transportation issues** Comments relating primarily to aspects of air operations other than VFR traffic pattern and IFR procedures, including concern regarding impact on operational capability of the airport; inaccuracies regarding operation of the four runways; aircraft operating for other purposes than arriving, departing, operating in traffic pattern or executing instrument approaches; agricultural aircraft, helicopters or the CWU flight program; training and practice areas, minimum safe altitudes and margins of safety; small landing strip close to turbines; small plane activity.	6-2, 6-3, 6-9, 12-23, 12-24, 43-39, 44-15, 48-7, T4-3
PSU	**Public Services and Utilities**	
1	**Water supply for fire fighting** Request to provide a water supply for fire fighting beyond fire district boundaries.	4-4
2	**Fire protection service and coordination** Comments related to fire protection service to the project in operation, including several requests regarding fire service coordination, training, service agreements and plans for fire risk reduction; requests for information on fire fighting plans; comments regarding use of aircraft for fire fighting; and question on cost responsibility for fighting fires.	4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 11-7, 29-34, 43-9, 43-23, T13-1, T23-4
3	**Fire station location** Comments noting DEIS error on location of Fairview Fire Station.	22-1, 38-96, T14-1

Table I-2
Issues Based on Draft EIS Comments (cont'd)

4	**Project impacts to water supplies** Concern over impact to water supply from wells and lack of consideration for irrigation.	29-44
5	**Law enforcement services** Concern over increased calls to police as result of trespass by curious visitors.	41-20
PHE	**Population, Housing and Employment**	
1	**Project effects on tourism** Comments relating to **Section 3.15** discussion of project influence on tourism, involving expanded literature review and evidence of positive or negative effects on tourism.	27-30, 42-12
2	**Significance of population, housing and employment impacts** Statement that conclusion on population, housing and employment impacts in **Section 1.9.15** conflicts with those described for aesthetics, light and glare in **Section 1.9.10**.	27-64
3	**Housing impacts during construction** Comment that meeting the housing demands of construction workers would be difficult.	29-45
4	**Consideration of economic impacts** Comment that DEIS appears slanted, as only some economic impacts are considered.	38-113
FIS	**Fiscal Conditions**	
1	**Tax revenue benefits of the project** Comments relating to influence of the project on local government tax revenues and/or rates, including comments that DEIS sufficiently captures potential economic benefits, and additional information on new construction tax base and reduction in tax rates.	8-1, 9-4, T2-1, T23-3
2	**Time scope of fiscal analysis** Comments relating to the time scope of the fiscal analysis in the DEIS, including statements to include a full 30-year depreciated tax base analysis, and that accelerated depreciation leads reader to assume that tax revenue would be greater than in actuality.	27-31, 30-19, 41-21, 51-11
3	**Overall adequacy of the fiscal impact analysis** Comments relating to aspects of the fiscal analysis other than the time scope, primarily adverse impacts to local tax base and/or economy, such as fiscal impact of no action alternative; benefits of a wind plant vs. a fossil fuel plant; revenue loss from foregone home construction; need to consider property value increases and decreases; impacts to tax base/economic health if residential growth in project area is slowed or stopped.	9-5, 29-9, 31-1, 38-98, 43-82, T14-3, T20-2
4	**Project impact on utility rates** Comments to include estimates of increased utility rates to County residents; that savings in property tax rates would be lost by these increases; skepticism project would generate enough revenue to offset costs or that County would derive income from project tax base.	41-24, 48-2
	OTHER ISSUES	
NS	**Non-SEPA Issues**	
1	**Impact of proposed project on area property values** Comments addressing relationship of the project to values of property near the project area, primarily comments that property values would be adversely affected and/or that property values should be considered in the EIS. This category includes statements such as concern over housing resale value; DEIS contains insufficient discussion; potential domino effect could result in lower home sales, rodeo attendance and business revenues; should monitor impacts on property values; project will impact values of residential, agricultural and recreational lands; examine impact to property value for every home in	7-2, 12-27, 15-11, 16-11, 17-5, 18-4, 20-4, 24-2, 26-1, 27-71, 28-1, 30-2, 32-4, 36-9, 38-33, 38-62, 38-97, 39-3, 43-

Table I-2
Issues Based on Draft EIS Comments (cont'd)

	Northwest Valley areas 1A and 1E. Includes comments that DEIS should address compensation for loss in property values, and statement that groups who promote agenda of wind developers performed property value studies cited in the literature summary.	86, 47-7, 50-2, 51-10, T3-5, T4-7, T5-1, T16-1, T19-2, T22-8, T23-5, T24-5, T30-2
2	**Impact on the quality of life** Comments that the project would diminish the quality of life for the entire area.	21-4, T3-6
3	**Wind energy business practices and tax status** Comments that wind developers engage in unfair business practices; should be more affordable for individuals to engage in green energy; lawsuits against wind developers for take of species protected under the MBTA and for unfair business practices.	30-23, 34-1, 36-2
4	**Cost-benefit analysis** Comment that DEIS is inadequate on cost-benefit analysis and cumulative impact costs.	47-9
5	**Potential for legal action** Comments addressing possibility for lawsuits against County or applicant related to the project, with reference to aircraft accidents, land values and compensation fund.	35-2, 48-8
6	**Stress on residents and associated impacts** Comment that DEIS does not mention the unending stress already placed on non-participant residents by the proposal and the potential impacts, medical or otherwise.	30-27
S/O	**Support/Opposition**	
1	**Renewable energy** Comment expressing support for renewable energy systems in general.	5-1
2	**No Action Alternative** Comments expressing support for the No Action Alternative and/or requesting the County select this alternative.	5-16, 17-12, 36-19
3	**Wind energy** Comments referencing the benefits of wind energy, stating need for wind energy, or expressing support for wind energy over other energy sources.	9-6, T25-2, T30-4
4	**Alternative 1** Comments expressing support for Alternative 1, including statements that the Wild Horse wind farm in the Whiskey Dick area is more appropriate for this type of industrial development; this site has a greater area to accommodate project; Alternative 1 will not intrude on the lives of so many people; wind farm should be in a lightly populated area, such as east of Ellensburg.	13-1, 16-14, 27-38, 28-4, 43-57, 43-68, 43-73, 43-77, 43-87, 43-88, 43-102, 43-116, 43-124, T12-6
5	**Proposed Action/Desert Claim project/applicant** Comments expressing opposition to or support for the proposed Desert Claim project and/or to the DEIS as it relates to the project location, including statements that urge decision-makers to consider their decision as if the turbines were proposed near their homes; “we don’t want you here, you are not welcome”; do not allow project at this location; no reason for wind turbines to be located in populated areas such as the greater Ellensburg area.	16-15, 17-2, 17-11, 21-2, 23-3, 24-6, 27-73, 28-3, 32-1, 35-1, 39-5, 42-24, 46-2, T3-1, T4-1, T10-1, T13-6, T14-6, T15-1, T20-1, T21-1, T28-1

Table I-2
Issues Based on Draft EIS Comments (cont'd)

6	**Wind turbines in Kittitas County** Comments expressing opinions about the general acceptability of locating wind turbines in Kittitas County, including statements opposing wind turbines anywhere in the County, supporting wind turbines in the right place and suggesting all wind farms be located away from populated areas and out of view.	19-2, 52-1 (also letters 53 through 78), T6-1, T17-1, T24-7
V/B	**Value/Belief Statements**	
1	**Adequacy of federal and state wildlife protections** Comment expressing belief that federal and state legal provisions provide little protection for most avian species.	5-2
2	**Motivations relating to the project** Opinions about motives and behavior of the applicant and/or landowners participating in the project, including statements that project is all about money; applicant does not care about residents or environment; 8 landowners will benefit to the detriment of hundreds of others; non-participating landowners will incur all of the impacts of the project and receive none of the benefits; money promised to County is an unacceptable carrot, money motivation should not ride roughshod over obligations to protect the citizenry.	11-10, 27-37, 27-62, 27-65, 30-14, 33-8, 43-85, 44-17, T14-4, T19-1
3	**Opinions about the overall merits of the project** Multiple opinions about long-term effects of the project or its desirability, including statements that windmills will result in significant negative impact; wind farms will change the area forever; project threatens many residents have been in area for generations and worked hard to enjoy the lifestyle, ; assertion that project would not be detrimental to public health, peace, safety, or character is false; wind generation would be of no benefit to the County; impact and power generated are not worth the tax reduction; County would be better served with homes and ranchettes in the area; project would provide economic benefits.	11-11, 12-15, 16-13, 31-2, 36-18, 38-120, 48-9; 49-1, 52-2 (also letters 53 through 78), T23-1, T30-3
4	**Opinions about objectivity of the EIS and supporting studies** Comments expressing opinions about the objectivity of information in the EIS and/or the objectivity of the EIS preparers, without reference to points of substantive disagreement. Includes statements critical of wildlife consultant; that document is biased toward applicant, is constructed to support the project; studies and information in DEIS were provided by wind power advocates and taken at face value; apparent disinterest in comments during January 20 meeting; many comments are not based on reality, but a vision; comparisons change based on the intended result.	15-4, 16-1, 18-3, 30-6, 38-116, 45-2, 51-2
5	**Commentary on level of local support for or opposition to the project** Comments that the only long-time residents who support the project are those who would gain financially; majority oppose the wind farms; three groups are in favor.	18-1, 21-1, 33-1, T3-2
6	**Opinions on whose views and rights should have priority** Comments expressing opinions about how individual or group preferences or rights should be viewed in the decision, including statements that the feelings and judgments of residents who are impacted should have priority; wind turbines infringe on property rights of others nearby; 8 landowners should not be allowed to impact 350 others.	21-6, 39-2, 43-75, T3-7, T23-6
7	**Acceptability of impacts on non-participating landowners** Comments expressing opinion that no impacts from proposed project should cross property line of any non-participating landowner without permission; impact to neighboring, non-participating homeowners is enough to deny proposed project; if project could discourage residential use, this is reason not to site the proposed project.	41-13, 41-19, 41-26, 42-13

Table I-2
Issues Based on Draft EIS Comments (cont'd)

8	**Value of existing views** Comment that views in the Valley are one of the greatest resources of the County, are not renewable, and County Commissioners should protect views whatever the cost.	39-4
9	**Precedent for future wind energy development** Opinion that construction of one turbine in Valley will result in numerous wind projects.	47-11
10	**Kittitas County planning approach** Opinions relating to County planning efforts or how County might evaluate the project, including disbelief that Commissioners would harm so many and that position of County is to allow individual enterprise to dominate community interests.	27-46, 33-3
11	**Preference for nuclear power** Comment of disbelief that residents would be forced to pay increased electrical bills when capability exists to build nuclear plants, would welcome nuclear power.	32-2
12	**Need for electrical expertise** Comment that perhaps decision makers should be required to be electrical engineers, or should consult the experts on important decisions.	48-5

State of Washington
Department of Fish and Wildlife
South Central Region – Ellensburg District Office, 201 North Pearl, Ellensburg, WA 98926
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January 30, 2004

Clay White, Planner
Kittitas County Community Development Services
411 North Ruby, Suite 2
Ellensburg, Washington 98926

Subject: Comments on Draft EIS, Desert Claim Wind Power Project

Dear Mr. White:

The Department of Fish and Wildlife has reviewed the Draft EIS for the Desert Claim Wind Power LLC Project. We also discussed the project with the applicant and the applicant's consultants during the past two years to provide review, comments and recommendations regarding the project and background studies. Our comments below relate to the DEIS assessment of fish and wildlife, their associated habitats and the project's potential affects on these resources.

General Comments and Concerns

We are generally satisfied with those sections of the DEIS and appendices that provide background information and those sections which review the project and the potential impacts. The background studies and information collected on fish, wildlife and their habitats, are generally consistent with our discussions with and recommendations to the proponents and their consultants. We have enclosed specific comments and clarifications regarding some of this information. These comments do not greatly alter the background information presented in the DEIS, but warrant revisions in the Final EIS. 1-1 PA-1

We are disappointed with the presentation of net impacts and specific mitigation in the DEIS. The Desert Claim project has the potential to adversely affect fish and wildlife and their habitats to a significant degree, but these impacts can be substantially avoided and mitigated by employing measures and strategies discussed in the document and appendices. Unfortunately, the DEIS is confusing as to the degree of mitigation and thus the net environmental impacts to be expected. In a number of places the DEIS identifies possible significant mitigation to avoid or reduce impacts but it does not identify which measures – if any – would actually be implemented (or else the presentation is confusing as to intent), nor alternatively, does the DEIS 1-2 PA-2

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P.2

identify a predictable process for selecting and implementing "potential" mitigation measures where needed. The assessment of impacts, however, is generally presented as if all the mitigation measures were incorporated in the project. From our previous discussions with the proponent we would expect that the intent is to incorporate all the mitigation measures discussed in the DEIS into project. However, the DEIS presentation is not clear on this matter. The DEIS must unequivocally describe for reviewers and decision makers what mitigation measures will be included in the project and the net effect of the project on the environment. This shortcoming of the DEIS tends to undermine the analysis and conclusions of the document. 1-2 Cont. PA-2

We have a number of specific comments regarding the DEIS. These comments are provided on enclosed pages.

Conclusions and Recommendations

The DEIS needs to better clarify the analysis of impacts and mitigation. The document should be revised to clearly describe the mitigation elements of the project and the net environmental effect of the project when the mitigation is implemented.

The possible mitigation measures identified in the DEIS and its appendices are substantive and appropriate for the project. We recommend that these measures be unequivocally incorporated in the Final EIS as measures that would be implemented as part of the development and operation. 1-3 PA-2

Over the past year, WDFW worked with representatives of the wind power industry and proponents of renewable energy to craft state-wide guidelines for the protection of fish and wildlife resources when siting and operating wind power facilities. These guidelines are intended to support renewable wind power projects while concurrently preserving the public's fish and wildlife interests. We request that the DEIS incorporate these guidelines in the selection of mitigation measures for this project. I have attached a copy of these guidelines for your information. (A copy can also be seen at http://www.nationalwind.org/workinggroups/wildlife/washington_windpower_guide.pdf) 1-4 PA-3

Please keep us apprised of the status of this project and related Wind Development actions by your office. Thank you for the opportunity to review the DEIS. If you have questions or need additional information, please contact Brent Renfrow of my staff at (509) 925-1013.

Sincerely,

Ted A. Clausing

Ted A. Clausing
Regional Habitat Program Manager

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P.3

Enclosure: WDFW Comments and concerns related to project impacts and mitigation needs

Cc: David Steeb, Desert Claim Wind Power, Enexco
Brent Renfow, WDFW Ellensburg
David Mudd, WDFW Olympia

Washington Department of Fish and Wildlife Comments on Draft EIS for Desert Claim Wind Power Project

General

- **Technical Advisory Committee**: The formation of a Technical Advisory Committee to work with the proponent and the county on mitigation and monitoring is proposed as a possible mitigation measure. Such a technical committee would be a valuable asset to the project and we request that it be a requirement of the project. 1-5 PA-4

Shrub Steppe Plant Communities and Associated Wildlife – Impacts and Mitigation

- **Construction timing is an important mitigation measure:** Section 3.4.1.5 should include construction timing as a mitigation measure to avoid and minimize impacts to soils and vegetation. To the greatest extent possible, construction activities outside of the hardened footprint of the project (i.e. "temporary disturbance areas") should be done during the late spring, summer and fall when soil moisture is very low.

  For most of the project area, the time of year of construction will greatly influence the amount of long-term damage to soils and plants. The shrub steppe and grassland communities identified in the DEIS are very fragile when soils are wet. Even a single day of driving equipment on these sites when wet can result in substantial permanent damage. In contrast, during summer when soils are dry they can withstand traffic with minimal soil displacement and breakage of plant roots. Moreover, vegetation is more tolerant to damage during the dry period as the period of rapid growth has ended, many plants have completed flowering and setting of seed, and many are dormant. 1-6 PA-5

  Working in winter on frozen ground is possible but because the project area varies greatly in elevation and is on generally south-facing slopes, predicting frozen ground conditions will be impractical for all but work of short duration.

- **Post-Construction Restoration of Temporary Disturbed Areas - Standards for site restoration:** The DEIS should identify a reference standard (or a process to establish one) for evaluation of site restoration success. The standard could be based on a reference site selected within the project area for each vegetation type, the typical vegetation description for each soil type in the draft NRCS soil survey, or other agreed-upon standard. Post-construction restoration of temporarily disturbed areas should be sufficient to achieve site stability and agreed-upon 1-7 PA-5

similarity to the reference standard. Selection of reference standards should be done in consultation with WDFW and the Technical Advisory Committee.

Site restoration and reseeding should be done at a time of year when germination and establishment can be successful. The DEIS should specify that seeding will be done at the next suitable planting window following disturbance, and that temporary erosion control measures will be implemented as appropriate. 1-7 Cont. PA-5

- **Clarification of Grassland Vegetation Type**: The term "grassland" as used in the DEIS is a descriptive term for shrub steppe sites where the shrub canopy has been temporarily removed by fire or other temporal disturbance. The project area does not include "true grasslands" or CRP "managed grasslands". 1-8 PA-5

- **Proposed Acquisition of Habitat Mitigation Site and Clarification of proposed mitigation ratios**: The proposed habitat mitigation site should be strategically located with respect to other shrub steppe habitat in the landscape of the Kittitas Valley and be selected to achieve the mitigation goals. Enhancement of the site should be considered (e.g. grazing management plan, weed control, selective revegetation efforts, etc.) in consultation with the TAC.

  WDFW would apply the mitigation ratios presented in Section 3.4.1.5 such that "grassland" sites on this project would have the same ratio as shrub steppe. As a point of clarification, the term "grassland" as used in this DEIS is a descriptive term for shrub steppe sites where the shrub canopy has been temporarily removed. Over time the shrub canopy will recover naturally. Technically these sites are shrub steppe (refer to Daubenmire, Steppe Vegetation of Washington, 1970) and the mitigation ratio associated with shrub steppe should be applied. In the context of the mitigation ratios negotiated with the wind power industry, a lower ratio was established for true grasslands (such as the Palouse) and CRP grass plantings because of the relative difference in restoration success and length of time to maturity. The grassland ratios should not be applied to the Desert Claim project site. 1-9 PA-5

Wildlife - Direct Impacts and Mitigation

- **Meteorological Towers – Guyed Towers verses Free Standing**: The project proposes the installation of four meteorological towers. These towers should be free standing towers which are demonstrably less likely to result in bird mortality.

  It is well documented that towers with guy wires kill birds at a significantly greater rate than free standing towers. The DEIS notes that the typical avian mortality associated with modern wind turbines at comparable sites is about 2 birds per tower per year. In sharp contrast, the guyed meteorological towers at the analogous Foote Creek Rim wind project in Wyoming had a mortality rate of about 8 birds per tower per year. Thus, if unprotected guyed meteorological 1-10 PA-6

towers were used on this project instead of free-standing towers, annual avian mortality would be expected to increase by about 14-21%. The use of bird flight diverters has been proposed but there is no information provided as to the effectiveness of bird flight diverters in reducing avian tower strikes. Bird flight diverters have been used at many places in North America to deter large waterfowl from striking transmission lines near waterways. We have not been able to find documentation of successful use of bird flight diverters on tower guy wires to prevent avian collisions during either daylight or during night-time migrations. 1-10 Cont. PA-6

The use of free-standing towers is a demonstrated mitigation technique for reducing avian mortality. Bird flight diverters should not be used in lieu of free-standing towers unless their effectiveness can be demonstrated or their use is part of an approved adaptive management effort coordinated with WDFW and other natural resource management agencies, and the Technical Advisory Committee.

- **Ridgeline Setback for Turbines**: The project will place turbines along the ridge line above Reecer Creek in Sections 4 and 9. The DEIS identifies setting turbines back from the windward edge of the ridgeline as a potential mitigation measure to reduce potential impacts to raptors which use the updraft areas along the edge of ridges. This mitigation strategy should be incorporated into the project. 1-11 PA-6

- **Bald Eagles – Potential for Turbine Mortality and Contingency Plans**: The DEIS does not include contingency measures for addressing the potential of bald eagle mortality at the project. The DEIS provides a rationale as to why the risk to bald eagles is low but also concedes that some risk remains. The DEIS points out the lack of bald eagle mortality at other wind project sites (where bald eagles are relatively uncommon) but we are not confident that this is a good predictor of bald eagle impacts in the Kittitas Valley where bald eagles are relatively common during the winter. The DEIS Appendix C, Exhibit 1 (page C1-20) includes conservation measures for managing risk to Bald Eagles. These measures should also be incorporated as project requirements. 1-12 PA-7

- **Sharp-tailed and Sage Grouse Should Be Discussed in Section S.14 and Section 4.4.3.1**. Sharp-tailed grouse historically occurred in Kittitas County. Sage grouse occur in the county, though the population is a fraction of historic levels. The three proposals for wind generation facilities are sited in habitat that is suitable for one or the other of these species. Population recovery and reestablishing these two species in the state is an agency priority that may be affected by the cumulative effects of wind energy projects. 1-13 PA-8

- **Management of Big Game Animals, Hunting and Control of Animal Damage on the Project, Including Lands Acquired for Habitat Mitigation:** In our scoping comments and meetings with the proponents we noted that WDFW is liable for damages caused by dear and elk. Public hunting is the primary tool 1-14 PA-9

available to us to minimize damage caused by game animals. If hunting is precluded, there is potential for deer and elk to use project lands as a refuge from which to foray out to adjacent agricultural lands and cause damage to crops and irrigated pasture. The cost of big game damage can be a substantial burden. We requested that the project proponent not preclude public hunting as a means of dispersing animals or reducing herd size. The DEIS Section 3.11.2.2 currently reads that hunting on both private and public lands in the project will be precluded by contract or agreement with the proponent.

1-14 Cont. PA-9

Hunting can be arranged that would likely be compatible with the project objectives. For example, access control can ensure hunters are conscientious in their use of project lands, and choice of weapons (e.g. muzzle loader fire arms or archery equipment) can minimize risk to project facilities. WDFW requests Desert Claim allow public hunting to control big game numbers on the project, including mitigation lands, or otherwise control the big game population and use of those lands so as to prevent animal damage. The measures used to address big game damage concerns should be approved by the Technical Advisory Committee.

Stream and Wetland Impacts from Facilities

- The application notes a number of road and utility crossings of watercourses. All of these crossings will require construction techniques to prevent erosion and maintain water quality. Some of these watercourses support fish and crossings must be designed to maintain fish passage and instream habitat. An Hydraulic Project Approval (Chapter 77.55 RCW, WAC 220-110) from WDFW will be required for this work.

1-15 WR-1

- The DEIS reports that fish are not expected to be present in the project area based upon map information provided by WDFW. Regrettably the maps do not have sufficient accuracy and resolution for purposes of this project. (WDFW is working on correcting these deficiencies.) From prior field work we expect fish to be present in Currier and Reecer Creeks in the project area. Fish may also be present at times in their tributaries.

1-16 PA-10

Interestingly, it is possible for juvenile steelhead (listed as Threatened under the federal Endangered Species Act) to be present in streams in the project area because of the diversion of unscreened water from First Creek where steelhead spawning has been documented. Water diverted from First Creek conveys fish via a network of ditches and streams down Green Canyon to Dry, Reecer and Currier creeks. Thus it is physically possible for juvenile steelhead (which look like rainbow trout) to be entrained in the ditch in the Swauk subbasin and be transferred to the Reecer Creek subbasin.

- The DEIS notes some unavoidable permanent impacts to wetlands from facilities. Impacts to wetlands and watercourses should be minimized to the greatest extent practicable. Special consideration should be given to minimizing permanent impacts to wetlands associated with natural watercourses as these typically have the greatest functional value for fish, wildlife and water quality. Micro-siting of facilities should be used to further reduce these permanent impacts wherever possible. 1-17 PA-11

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Douglas B. MacDonald
Secretary of Transportation

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January 29, 2004

Community Development Services
Kittitas County
411 N. Ruby, Suite 2
Ellensburg, Washington 98926-6300

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KITTITAS COUNTY
CDS

Attention: Clay White, Planner II

Subject: Z-2003-01; enXco, Inc. – Desert Claim Wind Power, LLC
Wind Project – Reecer Creek Area
I-90, Exit 106 (US 97/West Ellensburg interchange) vicinity
US 97, MP 133.90-142.08 (I-90 to Smithson Road) greater vicinity
MP 134.16 (Dolarway Road/Cascade Way Extension) intersection
MP 142.08 (Smithson Road) intersection

We have reviewed the proposed project and have the following comments.

1. The project sites are not adjacent to any WSDOT-maintained roads, but U.S. Highway 97 and Interstate 90 will be used for access and delivery. I-90 is a rural interstate with a posted speed limit of 70 miles per hour. 2-1 GT-1

   US 97 is an Urban - Principal Arterial in the vicinity of the I-90 ramps and the Dolarway Road/Cascade Way Extension intersection, and is a fully-controlled limited access facility. North of the intersection area, US 97 is a Rural – Principal Arterial. Access to US 97 from the sites is proposed via existing public road intersections.

2. All loads transported on WSDOT rights-of-way must be within the legal size and load limits, or have a valid oversize and/or overweight permit. 2-2 GT-1

3. The applicant indicates the eastbound transport route would be from I-90 to US 97 via Exit 106. Presumably, the State Highway 970 from Cle Elum (I-90 Exit 85) to the junction of US 97, which would be a shorter route, will not be used as a transport route. If this is not the case, we request that it be included in the EIS and additional analysis be done. 2-3 GT-2

4. The proponent indicates that the transport of the turbine components may use either truck or rail. The proponent is advised that there is an overheight restriction on eastbound I-90 at Exit 62. All loads over the legal height (14'0") are required to exit at the eastbound ramp and reenter the interstate via the eastbound on ramp. 2-4 GT-1

5. The applicant proposes mitigating their construction traffic impacts by developing a Construction Traffic Management Plan. WSDOT will review and comment on this plan as it pertains to our highways. 2-5 GT-3

6. The applicant indicates that a number of turbine viewing sites could be developed. A Tourism Management Plan would be developed to identify how tourists viewing turbine sites would be accommodated. WSDOT will review and comment on this proposed plan if it affects our facilities. 2-6 GT-3

7. WSDOT has a number of projects that may impact the transport and/or operations of the proposed project:
   a) US 97: State Highway 10 to State Highway 970 (milepost 137.36 to 149.69). Pavement restoration project. Project awarded. Scheduled to begin in early spring of 2004, and be completed by summer 2004.
   b) US 97: Lower Green Canyon Road vicinity to Smithson Road vicinity (milepost 137.80 to 142.30). Guardrail update project. Scheduled ad date October 2004.
   c) I-90: Homestead Valley to Tinkham Road (milepost 37.00 to 45.00). Pavement replacement project. Scheduled ad date: April 2004.
   d) I-90: Gold Creek to Easton Hill (milepost 55.51 to 67.32). Pavement restoration project. Scheduled ad date: February 2004.
   e) I-90: Yakima River bridge (milepost 78.81 to 78.85). Deck repair project. Scheduled ad date: January 2006.
   f) SR 970: Cle Elum to Teanaway River (milepost 0.00 to 5.85). Pavement restoration project. Scheduled ad date: April 2004.

   2-7 GT-1

8. In Section 3.12.2.1 "Construction Impacts" (page 3-238), the sentence reading, "The first route would require a left turn from Cascade Way Extension onto SR 97." Actually, this left turn is all US 97. At the intersection, the west and north legs are US 97, the east leg is Cascade Way Extension, and the south leg is Dolarway Road. 2-8 GT-1

Thank you for the opportunity to review and comment on this proposed project. If you have any questions regarding our comments, please contact Rick Holmstrom at (509) 577-1633.

Sincerely,

Salah Al-Tamimi, P.E.
Regional Planning Engineer

SA: rh/jjg
cc: File #8, US 97
Rick Gifford, Traffic Engineer
Terry Kukes, South Central Area 1 Maintenance Supervisor
John Schloss, North Central Region

KITTITAS COUNTY
DEPARTMENT OF PUBLIC WORKS
Paul D. Bennett, P.E., Director

30 January 2004

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JAN 30 2004
KITTITAS COUNTY
CDS

Mr. Clay White
Kittitas County SEPA Responsible Official
411 N.Ruby Street Suite 1
Ellensburg, Washington
98926

RE: Comments for Desert Claim Wind Power

Dear Mr. White:

Thank you for this opportunity to submit DEIS comments on the Desert Claim Wind Power Project submitted by Desert Claim Wind Power L.L.C., a wholly owned subsidiary of enXco Inc. The intent of this letter is to address areas of the DEIS identify areas that need further review on behalf of the Kittitas County Department of Public Works and Bowers Field.

The DEIS has identified many of the areas that need to be explored. As the Kittitas County Public Works Director I would like to point out a few additional areas that need to be explored in theDEIS:

Air Transportation impact

The impacts to the VFR airspace seems to be excessive and seriously compromises the ability of the airport to operate in a safe and efficient manner. Please comment or clarify why the airspaces for CAT A&B have been so dramatically altered without any commentary. The impacts seem excessive and unbalanced. To restrict air traffic to the proposed airspace places an undue burden on the community from both a safety and noise imposition. The DEIS provides no justification for this impact. 3-1 AT-1 If there truly is an impact on 27 towers then have the DEIS confirm with the FAA as to what the minimum change in VFR airspace needs to be. If the airspace limitations could be significantly minimized (CAT D airspace moved south to the current CAT C northern boundary) then both the airport and the Wind Project could co-exist with a minimum of impact until such time that the CAT D traffic increases. The DEIS should specifically state that any reduction in airspace would be temporary and that at the end of the permitted time (30 years) that the towers are removed and the airspace is restored. A condition should be placed that if CAT D VFR traffic increases such that more than 50% of the traffic is diverted to the south then the offending towers shall be removed and the airspace reopened. 3-2 AT-2

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Ellensburg, WA 98926
TEL (509) 962-7523
FAX (509) 962-7663

The DEIS is lacking on specifically addressing IFR operations. The "not be affected" statement is not supported by documentation. Specifically analyze approved IFR operations as well as IFR operations currently applied for and under review by the FAA. Address the impact and propose mitigation. Since we currently do not have a Wild Horse application before the county I am unable to verify that the FAA has approved that project and therefore the "No affect" for this project should apply is not acceptable. Please include all approvals or denials for this project and provide the details that would justify the claims of non-significance. 3-3 AT-3 3-4 AT-4

The draft EIS discards the future instrument approaches to Ellensburg as hypothetical. The application for the approaches were submitted well before the Desert Claim application and should be evaluated as if they were approved and as if they were disapproved. 3-5 AT-3

I do not oppose the construction of the wind farms but feel all the issues have not been addressed to come to a reasonable determination. I think the DEIS is very close and with a limited amount of research and discussion with the FAA we can resolve these issues. 3-6 AT-5

Tower lighting issues still need to be resolved. If the lights are to be shielded, what do you hope to accomplish. The lighting needs to provide for safe aircraft operations and minimize the impact on the public. How would different shielding or light orientation minimize the impacts? 3-7 AT-6

Ground Transportation

A road to allow for fire control and emergency operations should be constructed to Uniform or International fire code standards subject to County, DNR, property owners and applicant approval. This construction of this road would greatly minimize the risk due to fire or other emergencies instead of requiring an 11-mile detour. This road would support immediate access for fire control during construction and subsequent maintenance and operations functions. This emergency access should be oriented west to east and connect Smithson Road and Wilson Creek Road at the intersection of Charlton road. 3-8 GT-4

A tourist Kiosk should be located along the SR97 corridor or along Smithson Road where the leased property abuts Smithson Road. The DEIS should identify the initial size and then require an increase based upon increased usage. O&M responsibilitieas are that of the applicant. 3-9 GT-5

Thank you for the opportunity to comment.

Sincerely,

411 North Ruby Street, Suite 1
Ellensburg, WA 98926

TEL (509) 962-7523
FAX (509) 962-7663

Paul D. Bennett, P.E.
Director of Public Works

411 North Ruby Street, Suite 1
Ellensburg, WA 98926

TEL (509) 962-7523
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Kittitas County
Community Development Services
411 N. Ruby St., Suite 2, Ellensburg, WA 98926
Phone (509) 962-7506 • Fax (509) 962-7682

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Date: January 29, 2004

To: Kittitas County

From; Derald Gaidos, Fire Marshal

RE: Comments on Desert Claim Wind Power Project

After reviewing the information provided I have the following comments and requirements:

Planning Phase:

- All of the proposed project scenarios lie in a extreme high fire hazard area as shown by the number of fires in the area in past years. Two state mobilized fires have been on the south end of the proposed area within the past eight years. These are the only two state mobilized fire every to happen in Kittitas County. 4-1 HS-1
- FCC style communications study or appropriate study to ensure emergency responders communications shall not be derogated by the wind generators thus eliminating or reducing all communications on site by any emergency responders. 4-2 HS-5
- To have an environmental clean-up company under contract to provide the needed services to protect the environment up and beyond the small incidents. This is to include planning, implementing and storing of all material consider to be harmful. 4-3 HS-9
- Water supply for fire fighting at locations up and beyond the contracted fire districts shall be provided as part of the mitigation plan in an attempt to keep the fire in a manageable size incident. This can be mobile, above ground, underground or enhanced natural water supplies. 4-4 PSU-1

Construction Phase:

- Addressing of sites will be important to the ability of Emergency Services to provide services. <u>All sites shall conform and be addressed according to Kittitas County Public Works Criteria prior to work starting on any stage of the project once approval is given.</u> 4-5 PSU-2
- The sites may be outside of established Fire Districts and Hospital Districts thus not requiring emergency responses to sites. <u>The proponents shall establish and have signed agreements in place to provide for emergency services, fire & EMS, with closest Fire/Hospital District or Department prior to work starting on any phase of the project once approval is given even if the sites are within fire district boundaries as to not impact taxpayers.</u> Agreements will provide for Emergency Services for the workers and protect the adjourning property owners. 4-6 PSU-2
- All workers shall be given a fire prevention introduction prior to starting work on site that is approved by the Kittitas County Fire Marshal and Fire Chief of contracted Fire Department to reduce the chance of accidental fire starts and inform workers of severe dangers of wildfires. To include but not limited to: 4-7 PSU-2
    - Designated smoking areas.
    - Communications for emergency calls.

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- Fire Extinguisher use.
- Hand tool use.
- Required fire extinguisher and hand tools per vehicle and or piece of equipment.
- Muffler and or spark arrestor requirement of every vehicle on site.
- Required shut downs due to industrial fire precautions.
- Hot work limitations and fire prevention procedures.

4-7 Cont. PSU-2

Operational Phase

- The proponent and or operators of this facility shall establish and have signed agreements in place to provide for emergency services, fire & EMS, with closest Fire/Hospital District or Department prior to work starting on operational phase of the project. Before power is generated agreements must be signed with appropriate agencies. Agreements will provide for Emergency Services for the workers and protect the adjourning property owners. This agreement must be in place for the term of the project and is to be looked at regular intervals (no more than three years) to assess incidents and prevention measures. 4-8 PSU-2
- Before operation of this project a long term plan for fire risk reduction must be approved with Kittitas County Fire Marshal and effected fire districts for all aspects of operations. 4-9 PSU-2
- Once a year the proponent and or operators of this facility shall provide emergency contact information to the appropriate agencies. 4-10 PSU-2

If any questions arise, please call.

Derald Gaidos
Fire Marshal
509-962-7000
derald@co.kittitas.wa.us

January 29 2004

Kittitas Audubon Society • P.O. Box 1443 • Ellensburg, WA 98926

To, Clay White
Kittitas County Planning Dept.
411 N Ruby Suite 2
Ellensburg, Wa. 98926

Dear Mr. White:

Kittitas Audubon Society [KAS], a chapter of the National Audubon Society, is an organization of 150+ members spread throughout all of Kittitas County.

The mission of Kittitas Audubon Society [KAS] is to develop an appreciation of nature through education and conservation, with a focus on birds.

Kittitas Audubon Society (KAS) supports renewable energy systems that are well planned and carefully installed. 5-1 SO-1

The relatively sudden emergence of wind power as a significant source of energy finds the public and those responsible for siting wind farms with little objective research information about potential impacts on wildlife. Moreover federal and state protections for non-game wildlife are focused on endangered species. This provides little protection for the vast majority of avian species that is of concern to KAS in the proposed wind farm site. 5-2 VB-1

Further, once a wind facility is installed, there appears to be no legal recourse to force changes to reduce mortality levels. Such is the situation at Altamont, CA where it is reported that as many as 50 Golden Eagles are reportedly killed annually without a single federal citation yet issued regarding what surely is a Take under provisions of the Bald and Golden Eagle Protection Act [16U.S.C. 668-668d]. KAS would like assurances through the DEIS that a similar situation will not occur in Kittitas County. 5-3 PA-12

To this end, KAS is writing to express concerns about deficiencies in the DEIS for the Desert Claim Wind Power Project

3.4.3.3 Impacts of the Alternatives
No Action Alternative
The paragraph of this section or any section that surmises other electric power generation will be required if this project is not built should be stricken from the document. Speculation on meeting the energy needs of the region should the DCWPP not be built is beyond the scope of 5-4 ALT-1

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this DEIS. At the very least, if this paragraph remains, a statement should be made that national and regional energy conservation policies could eliminate the 'need' for the DCWPP. 5-4 Cont. ALT-1

3.4.1.1 Affected Environment

DEIS states the primary vegetation is Shrub-Steppe [53.4%]. This vegetation is in critical state of survival and major loss of it in this project will not be of a benefit to this habitat.
Historically the shrub-steppe environment that makes up the major habitat type on the DCWPP proposed site is considered to have little value. The historical 89.2% of the Columbia Basin Ecoregion occupied by this habitat type is now 32.1 % of the same region (O'Connor, G., Wieda, K., *Northwest Arid Lands, an Introduction to the Columbia Basin Shrub-Steppe,* Battelle Press, 2001, p.28). The DEIS references 1996 data which lists 55.7% of the Kittitas Valley shrub-steppe as intact though not pristine. 5-5 PA-17

This reduction of habitat has left many isolated and fringe areas that are written off as having little value to the larger landscape. Several shrub-steppe obligate bird species were found to occupy this region during the breeding season suggesting that the fringe habitat is of value to them.

The most fragile of the shrub-steppe zones, the lithosols, generally occur near the top of the ridges and, therefore, will suffer destruction with the installation of the DCWPP. Little is known about the value of the lithosols, how they form or even their purpose in the greater scheme of things. This lack of knowledge also means that little is known about how to 're-grow' them. Since the lithosols often occupy the same ridgelines along which raptors soar the offset from the tops of ridges could also protect the lithosols. In addition, the plant communities in the lithosols tend to be the lowest growing of the shrub-steppe species. Raptors are prone to hunt in low growth areas where prey is the most visible. 5-6 PA-17

The DEIS specifies the intent to restore native habitat in areas disturbed by construction of the DCWPP. Shrub-steppe vegetation is very slow growing and allows invasive species such as cheat grass to easily become dominant in disturbed areas (O'Connor, G., Wieda, K., *Northwest Arid Lands, an Introduction to the Columbia Basin Shrub-Steppe,* Battelle Press, 2001, p. 27). The DEIS should specify the long-term protocol using methods such as supplementary water to help establish these plant communities and exclude the invasive species. 5-7 PA-5

Wildlife [Bird Kill]

DEIS states there is possibility of 220 Avian bird kill per year and that this loss is of no significance. KAS differs with this view as KAS feels any loss of Avian is a major significance. KAS feels this is true when the cumulative kill from all three Wind Farms will reach into the 720 per year range. 5-8 PA-14
The DEIS also fails to specify what action will be taken in the event a turbine proves to have an unacceptable impact on wildlife. Some corrective action should be taken – be it 5-9 PA-7

the temporary shut down or removal of the problematic turbine or specific counter measurers to direct birds away from the turbine. What constitutes an unacceptable impact should also be specified. 5-9 Cont. PA-7

Appendix C Exhibit 2
Baseline Avian Studies Report by WEST, Inc

Fig. 2 Bald Eagle Survey Routes Page 50
Fig. 3 Raptor Nests pg. 51
Fig. 8 Buteo flight & perch sites pg. 58
Fig. 9 Accipiter & Falcon flight & perches pg. 59
Fig.10 Other Raptors flights & perches pg. 60
Fig.12 Bald Eagle flight & perches pg. 62 5-10 PA-1

All of these figures indicate the presence of Raptors, Eagles, Accipiters and Owls in the turbine blade sweep areas and most likely to have a greater kill rate than specified in the DEIS. KAS finds this data to be very disturbing and contrary to our Mission Statement. It is apparent that if the studies are correct, there shouldn't be any turbines sited in the study circles due to the potential Bald Eagle presence.

Bald Eagles

The DEIS specifies Bald Eagle cumulative fatalities are classified as small at perhaps 1 Bald Eagle every 2 – 3 years cumulative over all three proposed wind farms.

The Bald and Golden Eagle Protection Act [16U.S.C. 668-668d] makes unauthorized take of one Eagle a violation of the law. The USFW must authorize the Take level of Bald or Golden Eagles prior to issuing a permit. There is no mechanism for authorizing individual take 'after the fact'. The DEIS does not specify whether an Eagle take permit application has been filed. 5-11 PA-12

Bats

Wind turbines kill bats as well they dispatch birds. While there are fatalities associated with many of man's activities and structures, it would be unconscionable to add yet another one without a thorough study and understanding of a site's potential risk to this animal.

There is increasing concern about the emergence of bat kills associated with wind turbine installations. This concern has been heightened by release of information about bat mortality at a West Virginia 40-turbine wind farm installation where some 475-bat carcasses were recovered in a 7-month period from April 2003 to November 2003. When corrected for searcher efficiency and scavenger loss, the number could be several thousand. (*Windpower Monthly,* October 2003.) 5-12 PA-15

The DEIS specifies that no nocturnal studies of wildlife, including bats, were performed and that bat kill rates were estimated based on other wind farm kill data. No analysis was made of how the nearby-forested areas may impact the kill of bats normally associated with the forest habitat.

The latest avian casualty report by WEST for the Stateline wind farm shows a total of 142 bat fatalities from July 2001 through October 2003. The WEST report states that the majority of casualties are most likely migratory species rather than resident, and sites the preponderance of silver-haired and hoary bats among the casualties. Silver-haired and hoary bats are forest dwellers and migrate from north to south. The DCWPP site lies southeast of the beginning of a forested area that extends continually into the Wenatchee National Forest. Bat populations, including migratory, need to be assessed for the project site if we are to be even reasonably assured of no bad surprises. 5-12 Cont. PA-15

The lack of night time wildlife assessments is a reflection of the newness of this emerging technology, the difficulty and cost of doing the necessary research, and the unfortunate fact that people don't know much or think much about bats and aren't sufficiently tuned into them to provide needed protection. Radar technology (such as BIRDRAD, other modified marine radar or acoustical methods) does exist for nighttime bat studies including migratory species, but instruments detecting echolocation won't work if migrating bats, as suspected they do, turn off this sensory apparatus during migration flight when they aren't hunting for food.

3.7 Land and Shoreline Use
Sec's 3.7.1—3.7.1.1

ZONING
The change from Ag 20 and Forest and Range to Wind Energy Resource Overlay Zone will result in harm to the environment in the form of Bird kill and destruction of Shrub-Steppe habitat. Two of the most important issues of the KAS mission statement. If the zoning change is not allowed, the Wind Farms will not be built and the bird kill and habitat destruction will not happen. 5-13 LU-2

Summary
During the 20 December 2003 Christmas Bird Count (CBC) by KAS, 6 of the 11 Bald Eagles sighted were in northern portions of the count circle [Reecer Creek and Fairview areas]. This was during a foggy, cloudy, snow covered day for a period of approximately 7-hrs and substantiates the Exhibit 2 pg.62, fig.12 Bald Eagle flight survey. Similar breakdown of CBC data is available for the last 26 years from Dr. Phil Mattocks, Biology Department, Central Washington University. 5-14 PA-13

On 8 January, 2004 Kittitas Audubon members reported four Bald Eagles (1 adult, 3 immature) feeding on a deer carcass on US Hwy 97 0.1 mile south of the SR 970 interchange. This is very near the proposed KVWPP and DCWPP on the side away from the river where the DEIS claims the Bald Eagles roost. These birds were observed at this location for more than one day. It is unknown whether they roosted near the

roadkill or returned to the normal riparian roosts and thus passed through the KVWPP and DCWPP proposed area multiple times. 5-14 Cont. PA-13

KAS is concerned that wind energy facilities can adversely impact wildlife, especially birds and bats. As more facilities with larger turbines are built, the cumulative effects of this rapidly growing industry may initiate or contribute to the decline of some wildlife populations. The potential harm to these populations from an additional source of mortality or adverse habitat impacts makes careful evaluation of proposed facilities essential. Due to local differences in wildlife concentration and movement patterns, habitats, area topography, facility design, and weather, each proposed development site is unique and requires detailed, individual evaluation. 5-15 PA-1

KAS urges that all possible and reasonable steps be taken based on scientifically competent wildlife studies to ensure that the site is safe for wildlife. KAS feels that the individual evaluations and wildlife studies that have been done for this Wind Power Project do not assure KAS that Eagle, Bird and Bat kill and habitat destruction will not be excessive. Therefore Kittitas Audubon Society recommends the [NO ACTION ALTERNATIVE] for this DEIS. 5-16 SO-2

Thank you for the opportunity to provide comments to the Dec. 2003 DCWWP DEIS.

Sincerely,

Keith Johnson
President
Kittitas Audubon Society

1/29/2004
Kittitas County Airport Advisory Committee
Shan Rowbotham Chairman
5461 Look Rd
Ellensburg, WA 98926

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Kittitas County Community Development Services
411 N Ruby, Suite 2
Ellensburg, WA 98926

Dear Sir,

The Airport Advisory Committee reviewed the Draft EIS for the Desert Claim Wind Power Project at our January 13, 2004 meeting, and during subsequent study sessions. Our committee specifically evaluated the sections concerning air transportation. Our conclusion is that the sections of the Draft EIS regarding impacts on air transportation are incomplete, contain inaccuracies, inappropriate assumptions, and therefore unacceptable. The following are examples of incomplete or erroneous information contained in the EIS; 6-1 EIS-1

1. No consideration is given to aircraft operating in the Kittitas Valley for any other purpose than arriving or departing Ellensburg Airport, operating in the traffic pattern, or executing instrument approaches. Agricultural aircraft and helicopter traffic, operating at altitudes at or below the levels of the proposed towers, are ignored in the EIS. In addition, the Central Washington University Flight program operating at the Ellensburg Airport results in one of the busiest flight training environments in the Northwest. These aircraft use designated practice areas to practice maneuvers. Some of these maneuvers are required to be performed at altitudes below 1,000 feet above the ground. The proposed towers would decrease the area of existing practice areas, effect minimum safe altitudes, and decrease margins of safety in the event of engine failures. 6-2 AT-7

2. Operations on each of the four available runways are stated as a percent of total operations. The statement is made that "Over the year it appears that approximately 60% of all Bowers Field aircraft operations occur on Runway 29." After further discussion regarding the remaining three runways, it is stated; "runway 25 which provides a westerly orientation for takeoffs and landings, is the most frequently used of these three runways." The actual percentage of total operations conducted on Runway 25 is probably less than 2%, not 20-30% as estimated, and the percentage of operations conducted on Runway 7 is very likely 40% or greater, a huge disparity form the estimate of the EIS of 5 to 10%. Since the "supposed" lack of traffic using Runways 7 and 11, is continually used as evidence of minimal impact of the project, this error alone invalidates the EIS. 6-3 AT-7

3. The Draft EIS claims that the only aircraft affected would be Category D aircraft, operating under Visual Flight Rules. One of the possible alternatives proposed to mitigate this issue, is to change the direction of aircraft operating in the traffic pattern from standard left traffic, to right traffic. The Airport Advisory Committee and Kittitas County in the last 5 years have worked to; adopt an Airport Overlay Zone, including evaluating noise levels, improve airport safety and security, plan future runway improvements, and air traffic impacts on residential properties. A major change in those dynamics would cause a subsequent major effort to modify all of the above. Specifically, changing to right traffic would limit pattern entry procedures and reduce safety in an environment where training is continuous. 6-4 AT-2

4. The Draft EIS claims that IFR operations to, from, and at the Ellensburg Airport would not be affected. That statement could only be supported if the FAA had performed an Obstacle Evaluation. As of January 15, 2004, the FAA had not received a request for the Desert Claim project. (Mr. Jim Lambert, ANM-520) Furthermore, Mr. Lambert stated that the Wild Horse wind power project did not receive FAA approval as proposed, due to interference with IFR traffic. Although the Wild Horse project is a separate project, it's supposed "acceptance" is used throughout the EIS to justify claims of non-significance of the Desert Claim project, both individually and cumulatively. 6-5 AT-3 6-6 AT-4

5. Consideration of existing instrument approaches at the Ellensburg Airport does not account for circle-to-land maneuvering to all runways. Contrary to the EIS, all aircraft are not expected or required to remain South or East of the airport, and would probably conflict with the project towers as proposed. Again, this is a determination that only the FAA may make. 6-7 AT-3

6. The Draft EIS calls future instrument approaches to Ellensburg "hypothetical", and hypothesizes that "any potential future procedure would likely involve an approach to Runway 7 from the west." Further, the conclusion is made that "the proposed wind turbines would not exceed the TERPS standards and there would not be a potential impact on protected airspace that might be associated with hypothetical future instrument approach procedures. There are instrument approaches being designed by the FAA at this time to each of the four runways at Ellensburg. It is not prudent to limit the options for access to the Ellensburg Airport, by allowing the placement of large obstacles in close proximity to approach corridors. 6-8 AT-3

In closing, the Advisory Committee has worked to preserve an irreplaceable piece of infrastructure through lower density zoning and trying to be a "good neighbor". It would be unfortunate to diminish any part of the operational capability of the airport for the sake of wind turbines whose location may not be compatible with operations on and around Bowers Field. 6-9 AT-7

Sincerely,

Shan Rowbotham

Shan Rowbotham
Chairman Airport Advisory Committee

Cc: Board of Kittitas County Commissioners
Kittitas County Director of Public Works

McCULLOUGH HILL FIKSO KRETSCHMER SMITH

A Professional Service Corporation

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January 30, 2004

By Facsimile (509-962-7697)

Clay White
Kittitas County Community Development
Services Dept.
411 N. Ruby, Suite 2
Ellensburg, Washington 98926

Re: Desert Claim Wind Power LLC
Wind Resource Development Permit No. Z-2003-01

Dear Mr. White:

We are writing on behalf of Development Services of America, Inc. ("DSA"), the owner of a large parcel of property that adjoins the proposed location of the Desert Claim Wind Power project (the "Project"). DSA's property is located south of the Project, near the intersection of Smithson and Howard Roads.

We have reviewed the Draft Environmental Impact Statement (DEIS) issued on December 15, 2003, and we believe it adequately addresses the probable significant environmental impacts of the Project. We remain concerned, however, about potential impacts on nearby property values. 7-1 EIS-1

The Huckell/Weinman Study commissioned by the County indicates that established wind farms in other areas do not tend to have negative impacts on area property values. This study is encouraging, but we urge Kittitas County to closely monitor this issue, and to impose appropriate permit conditions necessary to mitigate visual impacts on neighboring properties. 7-2 NS-1

Thank you for your attention to these comments, and please continue to keep us apprised of all permit-related activities.

Very truly yours,

Courtney E. Flora

cc. Development Services of America, Inc.

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At the Crossroads of Washington State

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PHOENIXGROUP
ECONOMIC DEVELOPMENT

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January 30, 2004

Mr. Clay White
Kittitas County Community Development Services
411 North Ruby, Ste 2
Ellensburg, WA 98926

Dear Clay:

The attached spreadsheets provide additional information for the draft environmental impact statement that was prepared for the Desert Claim Wind Power Project proposed by Enxco related to the tax impacts. As shown, some new tax revenue is generated and taxes are lowered for all taxpayers in the county.

The spreadsheets were prepared based on information obtained through the Kittitas County Assessor's office. The Economic Development Group of Kittitas County developed the spreadsheet. As noted in the DEIS, I-747 limited tax revenue in a district to a 1% increase per year but exempted new construction from this limitation. Therefore new construction revenue only produces new tax revenue. Based on capital investment information reported in the DEIS, this project will generate an estimated $189,048 of new tax revenue in year 1. 8-1 FIS-1

The construction of this $100 million project would result in a new tax rate that is lower for all taxing districts. The sheet labeled example shows the savings expected in three Tax Code Areas. As you can see substantial savings occur in the Tax Code Areas where the project is located but savings do occur in other districts. Lower property taxes would benefit all taxpayers in the community.

Sincerely,

Debbie Strand

Debbie Strand, CEcD
Executive Director

PO Box 598 Ellensburg, WA 98926-0598 (509) 962-7244 Fax (509) 962-7141 ebdainc@kvalley.com

Desert Claim Wind Power

Approximate value of project	$100,000,000	20% real property and 80% personal property
Net Revenue	$1,642,574	

20% of project in Tax Code Area 19
80% of project in Tax Code Area 22

District	Levy rate/1000	Assessed value	Project value in district	New assessed value	2003 Revenue	2003 Rev +1%	New construction	New construction revenue	New tax limit	New rate*
County CE	$1.3406	$2,529,668,841	$100,000,000	$2,629,668,841	$3,391,274	$3,425,187	$20,000,000	$26,812	$3,451,999	$1.3127
State School	$2.8847	$2,510,795,792	$100,000,000	$2,610,795,792	$7,242,883	$7,315,322	$20,000,000	$57,694	$7,373,016	$2.8240
Road #1	$1.6310	$1,639,796,093	$100,000,000	$1,739,796,093	$2,674,507	$2,701,253	$20,000,000	$32,620	$2,733,873	$1.5714
Hospital #1	$0.0029	$1,649,685,591	$100,000,000	$1,749,685,591	$4,784	$4,832	$20,000,000	$58	$4,890	$0.0028
School 401 - Ellensburg	$2.4368	$1,126,298,453	$100,000,000	$1,226,298,453	$2,744,564	$2,772,010	$20,000,000	$48,736	$2,820,746	$2.3002
Fire #2 (22 only)	$1.4455	$623,017,007	$80,000,000	$703,017,007	$900,571	$909,577	$16,000,000	$23,128	$932,705	$1.3267
					$16,958,593	$17,128,179		$189,048		

* New tax limit/(New assessed value/1000)

Bonds	Levy rate/1000	Assessed value	Project value in district	Yrly payment	New assessed value	New rate*	Yrly payment
Hospital #1	$0.4420	$1,632,096,771	$100,000,000	$721,287.00	$1,732,096,771	$0.4164	$721,287
School 401 - Ellensburg	$1.6562	$1,126,298,453	$80,000,000	$1,865,375.50	$1,276,298,453	$1.4616	$1,865,376

* Yearly payment/(New assessed value/1000)

Estimated Taxes District	Levy rate/1000	Project value in district	Taxes	Area 19 Levy Rates: Old levy rate	New levy rate	Change	Area 22 Levy Rates: Old levy rate	New levy rate	Change
County CE	$1.3127	$150,000,000	$196,906.85	$1.3406	$1.3127	$0.0279	$1.3406	$1.3127	$0.0279
State School	$2.8240	$150,000,000	$423,607.37	$2.8847	$2.8240	$0.0607	$2.8847	$2.8240	$0.0607
Road #1	$1.5714	$150,000,000	$235,706.29	$1.6310	$1.5714	$0.0596	$1.6310	$1.5714	$0.0596
Hospital #1	$0.0028	$150,000,000	$419.21	$0.0029	$0.0028	$0.0001	$0.0029	$0.0028	$0.0001
School 401 - Ellensburg	$2.3002	$150,000,000	$345,031.71	$2.4368	$2.3002	$0.1366	$2.4368	$2.3002	$0.1366
Fire #2	$1.3267	$120,000,000	$159,206.07				$1.4455	$1.3267	$0.1188
Hospital #1	$0.4164	$150,000,000	$62,463.63	$0.4420	$0.4164	$0.0256	$0.4420	$0.4164	$0.0256
School 401 - Ellensburg	$1.4616	$150,000,000	$219,232.68	$1.6562	$1.4616	$0.1946	$1.6562	$1.4616	$0.1946
Total Taxes			$1,642,573.81	$10.3942	$9.8891	$0.5051	$11.8397	$11.2158	$0.6239

Assumptions

80% of project in Tax Code Area 22 and 20% of project in Tax Code Area 19
Using levy rates for 2003
All districts taking maximum 1% increase
TAV (Timber Assessed Value) not included
Bond Payments for 2004 will be same as 2003
20% of project real property and 80% personal property
New construction is real property only
Entire value of project added into new assessed valuation

EXAMPLE

The following shows examples of savings in the three districts if the Desert Claim Project is built. Note that the project is located only in Tax Code Area 19 and 22. You'll further note that the rates are lowered substantially in the districts where is project is located, however there will be a savings in Tax Code District 12 which is outside the project area.

$100,000 House in Tax Code Area 19 - Ellensburg School District

	Old levy Rate	Tax at old rate	New levy Rate	Tax at new rate	Savings
County CE	$1.3406	$134.06	$1.2932	$129.32	$4.74
State School	$2.8847	$288.47	$2.7818	$278.18	$10.29
Road #1	$1.6310	$163.10	$1.5366	$153.66	$9.44
Hospital #1	$0.0029	$0.29	$0.0027	$0.27	$0.02
School 401 - Ellensburg	$2.4368	$243.68	$2.2292	$222.92	$20.76
(Bonds)					
Hospital #1	$0.4420	$44.20	$0.4047	$40.47	$3.73
School 401 - Ellensburg	$1.6562	$165.62	$1.4616	$146.16	$19.46
Totals	**$10.3942**	**$1,039.42**	**$9.7098**	**$970.98**	**$68.44**

$100,000 House in Tax Code Area 22 - Ellensburg School District

	Old levy Rate	Tax at old rate	New levy Rate	Tax at new rate	Savings
County CE	$1.3406	$134.06	$1.2932	$129.32	$4.74
State School	$2.8847	$288.47	$2.7818	$278.18	$10.29
Road #1	$1.6310	$163.10	$1.5366	$153.66	$9.44
Hospital #1	$0.0029	$0.29	$0.0027	$0.27	$0.02
School 401 - Ellensburg	$2.4368	$243.68	$2.2292	$222.92	$20.76
Fire #2	$1.4455	$144.55	$1.2709	$127.09	$17.46
(Bonds)					
Hospital #1	$0.4420	$44.20	$0.4047	$40.47	$3.73
School 401 - Ellensburg	$1.6562	$165.62	$1.4616	$146.16	$19.46
Totals	**$11.8397**	**$1,183.97**	**$10.9807**	**$1,098.07**	**$85.90**

$100,000 House in Tax Code Area 12 - Thorp School District

	Old levy Rate	Tax at old rate	New levy Rate	Tax at new rate	Savings
County CE	$1.3406	$134.06	$1.2932	$129.32	$4.74
State School	$2.8847	$288.47	$2.7818	$278.18	$10.29
Road #1	$1.6310	$163.10	$1.5366	$153.66	$9.44
Hospital #1	$0.0029	$0.29	$0.0027	$0.27	$0.02
School 400 - Thorp	$2.7537	$275.37	$2.7537	$275.37	$0.00
Fire #1	$0.8444	$84.44	$0.8444	$84.44	$0.00
(Bonds)					
Hospital #1	$0.4420	$44.20	$0.4047	$40.47	$3.73
Fire #1	$0.1934	$19.34	$0.1934	$19.34	$0.00
School 400 - Thorp	$1.2113	$121.13	$1.2113	$121.13	$0.00
Totals	**$11.3040**	**$1,130.40**	**$11.0218**	**$1,102.18**	**$28.22**

Renewable Northwest Project

917 SW Oak
Suite 303
Portland, OR 97205

Phone
503.223.4544
Fax
503.223.4554
www.RNP.org

Members

American Wind Energy Association
Calpine Corporation
Center for Energy Efficiency and Renewable Technologies
Citizens' Utility Board
Eurus Energy America
FPL Energy, Inc.
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GE Wind Energy
Green Mountain Energy
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Northwest Energy Coalition
Northwest Environmental Advocates
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Portland Energy Conservation, Inc.
Renewable Energy Systems
SeaWest
Solar Energy Association of Oregon
Vestas American Wind Technology, Inc.
Washington Environmental Council
Washington State Public Interest Research Group
Zilkha Renewable Energy

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Renewable Northwest Project

January 30, 2004

Clay White, Planner II
Kittitas County Community Development Services
411 N. Ruby, Suite 2
Ellensburg, WA 98926

Re: Comments on Desert Claim Wind Power Project DEIS

Dear Mr. White,

The Renewable Northwest Project (RNP) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed 180 MW Desert Claim Wind Power Project.

RNP is a unique combination of renewable energy companies, environmental organizations and consumer groups. RNP is an advocate for clean air and global climate change solutions through the implementation of solar, wind and geothermal resources in the Northwest.

Overall, we believe the DEIS examines the potential impacts of the proposed project and the mitigation measures. We are pleased to find that the potential impacts identified can be appropriately mitigated. We commend Kittitas County for putting together a comprehensive document that addresses all concerns. 9-1 EIS-1

We have two general comments—one is on the no action alternative and the other is on the economic development benefits.

No action alternative

Rural residential development is identified as the most plausible no action alternative. We believe that the impact of housing development should be assessed and included in the DEIS. For example, the DEIS should assess the impact of housing development on the rural nature of the area. We believe that more housing development will degrade the existing rural nature of the area, whereas wind projects, on the other hand, will help maintain the current agriculture use of the area. 9-2 ALT-1

Another no action alternative that should be mentioned is the development of a fossil fuel plant for electricity generation. The development of fossil fuels to 9-3 ALT-1

meet the region's future load growth is a possible no action alternative and we think the DEIS should assess this no action alternative and the significant adverse impacts. As we mentioned in our scoping comments, the burning of fossil fuels has adversely impacted the environment, human health and economy. 9-3 Cont. ALT-1

In comparison to developing a new gas-fired plant, developing a 180 MW wind power project, operating at 33% capacity factor would avoid at least 227,000 tons of CO2 a year and 22 tons of acid rain precursors a year. In terms of global climate change impacts, this is the equivalent of planting over 75,900 acres of trees.

Economic development benefits

We are pleased to see that the DEIS captures the potential economic development benefits to Kittitas County. As the DEIS indicates, property taxes are estimated at $1.1 million for the first year, and the revenues would be used to fund school districts, state schools, and other county services. 9-4 FIS-1 The DEIS should also assess the impact of the no action alternative—housing development. In comparison to the development of a fossil fuel plant, a wind project would still bring significantly more economic benefits to a county because it has higher capital costs. 9-5 FIS-3

As the County moves forward on the proposed project, we hope that it will bear in mind the many benefits of a pollution-free new renewable resource, such as wind. 9-6 SO-3

Thank you for considering our comments.

Sincerely,

Sonja Ling
Policy Associate

Clay White

From: Ed Garrett [garrett_ew@netos.com]
Sent: Friday, January 23, 2004 3:41 PM
To: mjohnston@kvnews.com; Clay White
Cc: rmonaghan@icos.com
Subject: enXco incident

Hi Mike,

In the DEIS for enXco, they still downplay the fire hazard issue. Chris Taylor still repeats the montra that no one has ever died because of a windfarm. 10-1 HS-1

Let's see how enXco can explain this and keep it out of the DEIS.

Best Regards,

Ed Garrett
ROKT

RECEIVED
JAN 23 2004

****
>November 18, 2003
>
>by Paul Gipe
>
>Burn Fatality at Enxco's Altamont Site
>
>On September 19 at 7:30 pm Marty Evans died of burns received the previous
>day at a wind farm managed by Enxco says California's Division of
>Occupational Safety and Health (CalOSHA). Evans (34) was "performing a
>switching operation when an explosion occurred" at about 11:00 am on the
>18th. The explosion burned Evans over 80 percent of his body and started a
>grass fire. The East Contra Costa Fired Department responded. CalOSHA has
>opened an investigation of the accident and will exam Evans training,
>qualifications, and work assignment as well as interview his colleagues to
>determine the cause of the accident. No other details are available.
>
>Enxco says the accident occurred when Evans was switching a pad-mounted
>transformer. There are literally thousands of such transformers on
>California wind farms and switching them is a common activity.
>
>Enxco is a large diversified developer and operator of wind power plants.
>The company is part of SIIF, the unregulated subsidiary of French
>utility giant Electricite de France.
>
> -End-
>Paul Gipe
>208 S. Green St., #5
>Tehachapi CA 93561-1741 USA
>+661 822 9150
>+661 822 8452 fax
>pgipe@igc.org
>www.wind-works.org

Loran & Judy Allen
19480 Reecer Creek Rd.
Ellensburg, WA 98926

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

TO: Kittitas County Community Development Services
ATTN: Clay White

Enclosed are our comments concerning the Desert Claim Windpower Project Draft EIS.

Vol. 1 p.2-35 When constructing the turbine foundations, will Desert Claim be blasting with dynamite? Being extremely rocky in some areas, can heavy equipment such as a backhoe dig deep enough without blasting? What type of safety precautions are in place if blasting is necessary? 11-1 PD-1

What if our domestic water wells become contaminated or run dry due to construction of the wind farm? How will landowners be compensated? We did not see any information on these issues being addressed. 11-2 WR-2

Vol. 1 p.3-95 Impacts to Big Game from Construction and Operation More study needs to be done on Big Game habitat. This project will definitely have an impact on Big Game(such as deer and elk) in the area as they become displaced. There is very little information in the EIS about elk that live in and migrate through the area. We frequently see them from our place. Desert Claim claims once the project is completed, displaced deer will return. We disagree. What about the elk? If these animals are too pressured, they will leave the area for good. On p.3-96, comparing this wind farm to an oil well drilling operation in 1996 is not adequate. It is hard to believe that deer and elk would willingly return to an area with 393ft. turbines, whirling blades, and blinking lights. 11-3 PA-9

While on the subject of wildlife in the area, just last week we had 3 golden eagles perched in the cottonwood tree on our property. It is common to see these great birds this time of year. Do you really think they will come back once these giant windmills are installed? They come here because nothing bothers them out here. It is hard to imagine them feeling as secure once the wind turbines are up and running. We feel very privileged to view these wild animals in their natural environment out here throughout the year - that's part of the reason we chose to live here. Once the wildlife is disturbed or displaced by these wind farms, there is no guarantee they will ever return. 11-4 PA-12

In the EIS we haven't read any information concerning the impact of the wind turbines regarding our T.V. and radio reception. We do not have cable out here nor do we have a satellite dish. We rely on our antenna for T.V. and radio reception. We presently have good reception. What if the wind turbines affect our reception? How is Desert Claim going to resolve it? 11-5 HS-5

Loran & Judy Allen
19480 Reecer Creek Rd.
Ellensburg, WA 98926

Regarding the possibility of wildfires in our area, if a fire breaks out in the wind farm area, aren't the rotating blades just going to fan the flames harder and make a fire spread faster and be harder to bring under control? Would planes or helicopters be able(or be permitted)safely to swoop in with fire retardant or water to douse the flames in a wind turbine area? A couple of years ago there was a fire just a few miles down the road from us during a hot, dry summer. It started near Pheasant Lane road and spread extremely fast with the wind blowing it toward Sun East. Without the hard work of the fire-fighters along with aircraft assistance, it could have easily reached homes nearby. A few years before that, another fire started near hwy 97 west of us and quickly headed in our direction. This was a large fire and difficult to put out due to dry conditions. Without aircraft assistance, they would not have been able to get it under control before it could have reached our homes. We haven't seen any specific information in the EIS on this issue. 11-6 HS-1 11-7 PSU-2

Vol. 1 p.1-35 under Land and Shoreline Use, Desert Claim states that residents in the proposed wind farm area might seek to relocate if the wind farm conflicted with their lifestyles. We find this statement offensive, with no regard for the time, money, and labor that residents have invested in their homes and property, not to mention the personal enjoyment landowners have in choosing to live here. Such as, beautiful views, peace and quiet, wildlife viewing, and recreational enjoyment. So you are saying if we don't want our present lifestyles disrupted by wind turbines just get out?! We don't think so. 11-8 LU-3

If we are forced to live amongst, and have to drive by, these towering monoliths on our way to and from work each day, the very least Desert Claim can do is compensate the landowners in the form of a yearly monetary compensation for having to put up with them. Why not? The landowners that are allowing them to be placed on their land will be compensated quite well, the same should apply to the residents forced to live with them. 11-9 LU-4

We urge all the County officials who are involved in reviewing the EIS to seriously "read between the lines" concerning environmental impacts that the EIS is trying to downplay. This project will have a huge impact on our beautiful valley. Unfortunately it's all about money. We're not fooled into believing that they really care that much about the environment or the people who reside in the area. These giant windmills will have a significant negative impact on the environment and the people who live in this area. Wind farms will change the area forever. Once it has begun, there will be no turning back. 11-10 VB-2 11-11 VB-3

Thank you for reading our comments.

sincerely,

Loran & Judy Allen

Note:
We felt that the draft EIS should have been mailed to all landowners near the site, free of charge. The disk is very time consuming and inefficient to use in reviewing the documents. 11-12 EIS-13

12
P.1

Clay White

From: lee bates [bateslee@eburg.com]
Sent: Saturday, January 17, 2004 3:15 PM
To: Clay White
Subject: Desert Claim DEIS Comments

Dwight Lee Bates

1509 Brick Road

Ellensburg WA

98926

(509) 925-5055

bateslee@elltel.net

JAN 17 2004

December 23, 2003

Clay White

Planner II

411 N. Ruby St.

Suite 2

Ellensburg WA 98926

Dear Mr. White,

This letter contains my comments on the Desert Claim DEIS.

Bird Kills

The summary of projected mortality of birds (pages 4-6, 4-7) shows the research for this DEIS is incomplete. Studying other studies and giving estimates does not substitute for doing an actual two year study of the turbine sites near Ellensburg. The species listed (pages 4-6, 4-7) offers a reason for a thorough study. 12-1 PA-1

Bird Kill Mitigation

No mitigation methods were given (pages 4-6, 4-7).

The real problem is the 20 RPM blades cause bird kills. The estimated number of kills in Altamont Pass, California is 44,000 birds in 20 years. The only mitigation is to not build turbines period. 12-2 PA-6

Study on Bird Kills

The mortality rates (pages 4-6, 4-7) are not good enough! A two year study is needed before even writing this Draft Environmental Impact Statement (DEIS). We should halt this process until the two year study is done. Pages 4-6 and 4-7 show a complete two year study needs to be done. 12-3 PA-1

Bird and Bat Kills

The estimated 740 kills of Passerine birds (page 4-6), 15 raptor kills per year (page 4-7) and the estimated 782 kills of bats (page 4-7) are unacceptable for the minor amount of 12-4 PA-14

electricity generated by these bird and bat killing turbines. 12-4 Cont. PA-14

Fire

No fire mitigations (page 4-12) are given. Fires fanned by the wind have occurred in the area in the past. I live down wind and do not want to lose my house like happened in the California fires. A Quick Response Plan by the Department of Natural Resources is needed. It goes without saying that a Fire Prevention and Suppression Plan is needed. Without this Plan which should have been submitted in the DEIS, this process should not proceed further! 12-5 HS-1

Page 2

Visual Impact of Turbines

The DEIS states (page 4-17) people would likely experience repetitive views of numbers of wind turbines through their local travels. People might perceive a substantial change to the overall character of the Kittitas Valley landscape with the development of multiple wind farms. This is true! The 410 foot high turbines (Figure 2-2 in the Sagebrush Power DEIS) are too high. They will impact the scenic view I have out my front windows. I retired here for the scenic views of the valley. I do not want to look out my windows and see these 410 foot monstrosities with flashing lights all hours of the day. 12-6 ALG-1

Highway 97 (page 4-14) a Scenic Byway is surrounded by these 410 foot monstrosities. These turbines should not be located anywhere near Highway 97. Wind farms are not scenic. Do not give me it is in the eye of the beholder crap! 12-7 ALG-1

They may interesting at first but this soon fades. I have seen wind farms at Stateline, Tehachapi and Palm Springs so I know what I am talking about. 12-7 Cont. ALG-1

The simulated views of turbines (pages 4-15, 4-16) are ugly. I do not want to see 410 foot monstrosities out in the country where I drive to relax! You people have no right to destroy a scenic valley I retired to for the scenery. The only reason you want to destroy the scenery with ugly turbines is your greed for the Federal Subsidies. Painting the turbines gray will not help. I do not want to see any turbines at all. 12-8 ALG-1

Shadow Flicker

The DEIS (page 4-13) states that some residents that are close to

Page 3

turbine locations for the Desert Claim or Kittitas Valley projects

would be subject to shadow flicker for varying numbers of hours

per year. These impacts would be limited to a number of discrete locations that are well separated from each other and would not constitute a cumulative impact from these two projects. This is not true! There will be definite shadow flicker problems. 12-9 HS-7

People living near these monstrosities report health problems which should be studied at these turbine sites. People living near the Lincoln Township Wisconsin Wind Farm stated in a survey (

available upon request or call Dale Massey, Lincoln Township Clerk on 920-837-7298 for a copy) that shadow flicker causes a strobe effect throughout their houses causing headaches and sick to stomach cases. Also this shadow flicker lowers property values. Where is the study in this DEIS on the effect these turbines have on lowering property values? Where is the shadow flicker mitigation in this DEIS? 12-9 Cont. HS-7 12-10 HS-8

Blade Throw

The DEIS states (4-12) that blade throw would have remote probabilities of occurrence. This is not true! Blades and ice could be thrown 1000 feet in a high wind. To ensure safety a 2000 foot set back from residents and roads is needed. No listed measures to reduce blade throw (page 4-12) are given. What report can the public see to ensure inspections take place on a regular basis? Why is not a maintenance plan included in this DEIS? No mitigation for blade throw is given. Why not? 12-11 HS-2 12-12 HS-4

Page 4

Ice Throw

The DEIS states (4-12) that ice throw would have remote probabilities of occurrence. This is not true! 12-13 HS-3

A mitigation measure (page 4-12) to locate these monstrosity turbines 2000 feet from residences should be added to ensure safety. Who monitors sensors to make sure the system shuts down in icing conditions? What about a set back from public roads (page 4-12) to ensure it is safe enough to prevent a 12-14 HS-4

passer by on the road from getting hurt. A 2000 foot set back is needed to ensure safety. A major injury law suit could shut down the project. 12-14 Cont. HS-4

Tax Savings

As stated in the DEIS, the tax savings for this project (page 4-26) is one percent per year due to the Initiative 747 cap. The impact on the environment and the small amount of power generated by these monstrosity turbines is not worth a one percent tax reduction promised in the DEIS (page 4-26). Does not the writer know the impact of these monstrosities in the Kittitas Valley for years to come? 12-15 VB-3

Impact on Historical Culture

The DEIS states (page 4-10) the direct and indirect effects of each project on cultural resources are not known with precision.

No information was given on the impact of this project on Historical Culture. Stating it is unlikely that the combined effects of the project would represent a significant cumulative impact on the cultural resources of the region (page 4-10) is ludicrous! There was plenty of time to study this. This DEIS is insufficient, incomplete and lacking data. It should be redone. The respect for 12-16 CR-2

Page 5

the Yakama Tribe is lacking. The tribe's culture depends upon preserving Historical Sites. A Supplemental EIS needs to be done per Section 106 Regulations of the National Historic Preservation Act (NHPA). 12-17 CR-3

Wildlife

The mortality rates (pages 4-6, 4-7, 4-8) given for wildlife and birds are estimates. A complete two year survey needs to be done before we can reasonably evaluate this DEIS. The species (page 3.2-24 in the Sagebrush Power DEIS) are listed as potentially occurring in the project area. This is a good reason to do a two year survey of wildlife and birds. 12-18 PA-1

Power Generated

The level of generated power is not listed (Chapter 4). These monstrosity turbines generate only a minuscule amount of power. The beauty of a scenic valley is not worth destroying for so little power generated. Studies show that five tenths of one per cent of Washington power needs is all these monstrosity turbines will generate. We now sell our power to other states due to our dams high output. We do our part to generate national electrical power. Let other states do their share by building efficient dams in their 12-19 ENR-2

states as we have done. Wind farms are not the answer!

Lights

Statements were made in the DEIS (page 4-14) on light and glare. The DEIS (page 4-14) states the most significant visual impacts would be from the Northwest Valley Assessment Unit.

These turbines will cumulatively contribute to increased nighttime lighting in the Kittitas Valley (page 1-18 of the Sagebrush Power DEIS). 12-20 ALG-1

Page 6

These lights are likely have an adverse cumulative effect on views from residential properties in the Kittitas Valley (pages1-18, 2-20, 3.9-47) are quotes from the Sagebrush Power DEIS.

This is unacceptable! I retired here for the scenic view out my front windows. I do not want to see these horrible monstrosities with their flashing lights day and night. The low power output does not justify building these monstrosities anywhere. They are not cost effective. 12-20 Cont. ALG-1

The mitigation measures (pages 1-28, 3.2-58 in the Sagebrush Power DEIS) for lighting demonstrate how horrible these lights will be. I hate the lights we now have on the obnoxious cell phone towers in Kittitas County. The turbine red and white flashing lights (20,000 candela, page 3.9-47 in the Sagebrush Power DEIS) are too intense and will ruin views.

Noise

No statement was given in the DEIS that the residents will experience elevated noise levels (page 4-13). The Lincoln Township Wisconsin Survey shows that residents can not stand the constant noise from the turbines and have resulting health problems. The noise level of 108 dBA (page 3.12-8 in the Sagebrush Power DEIS) for these monstrosity turbines will affect the local residents. The 50 dBA noise level (Table 3.12-5 in the Sagebrush Power DEIS) will affect the health of local residents as the Lincoln Township Survey shows. The Lincoln Township Wisconsin Survey showed 67% of people near the wind farm were awakened by wind turbine noises. 12-21 NOI-1

Page 7

Decommissioning

A Decommissioning Plan (Chapter 4) is not shown. This DEIS is incomplete! How can the writers of this DEIS expect us to trust them when they make promises? The Decommissioning 12-22 PD-3

Plan should be in the DEIS. This project should stop and the DEIS should be redone. To give an incomplete DEIS is an insult. Where is the information on a bond Desert Claim should post so we can tear down the turbines when they result in being eyesores, inefficient and a waste of taxpayer money? I think Desert Claim will be long gone having sold the wind farm when we tear them down. 12-22 Cont. PD-3

Aircraft Safety

I disagree with the DEIS statement (page 4-21) that the turbines would not present conflicts or adverse impacts on air transportation resulting from these projects. I am a Private Pilot who flies in the Kittitas valley and these monstrosity turbines are in the way. They are too close to the Flying Rock Ranch grass air strip near Reecer creek which I land on. Midstate Aviation at Bowers field trains CWU students to fly in the valley. The monstrosity turbines are dangerous and unsafe for these students. The very fact that the Federal Aviation Agency requires lights (page 3.10-16 of Sagebrush Power DEIS) proves these monstrosity turbines are a hazard to flight. The DEIS (page 1-59) states: "Consequently a change to a right - hand VFR traffic pattern for runways 7 and 11 would likely cause a negligible shift in aircraft operating patterns and an imperceptible change in noise experienced with the community." This is not a normal departure and causes a great inconvenience. It puts more noise in the community. 12-23 AT-7 12-24 AT-7 12-25 AT-2

Page 8

The wind farm's estimated amount of traffic using runways 7 and 11 is way under the actual. Runway 7 is the no-wind runway for Ellensburg. When winds are light this is the prevailing runway in use. I estimate that it accounts for approximately 40% of the traffic for Ellensburg, with the exception of the winter months when runways 7/25 are closed (and even then, if there is no snow on the runway, runway 7 is often still used by local traffic).
There are approximately 120 flight students from the CWU Flight Technology program who utilize the Bowers Field airport. I'm not sure what the estimates are for average number of operations per day, but with 19

airplanes, and with each student scheduled for 3 flights per week, I estimate the average number of operations to be in excess of 300 per week, with many of these operations entailing practice take offs and landings. I estimate the number of take offs and landings to be about 1000 per week by college students alone. Any aircraft that has left the traffic pattern needs to re-enter it in an orderly fashion. Midstate Aviation has instituted a procedure to allow for an orderly flow of traffic into the pattern. These procedures have been approved by the Spokane FAA. They include, in addition to the normally accepted 45 degree entry to the downwind leg, procedures for entering the pattern from the upwind side. The practice is to enter on a 45 to the upwind, then cross the airport on the crosswind leg to enter the downwind. In this manner aircraft can enter the pattern from the opposite side. If the proposed changes are made to accommodate the wind farm,
the complexity for entering the pattern will increase thereby increasing the potential for midair collisions. Upwind entries could still be made, which would mean the obstruction clearance would still be insufficient if the proposed windmills are erected. Furthermore, the FAA is currently drafting a new advisory circular for pattern entries which would include a crossover from the upwind side (at a 90 degree angle to cross over the runway at midfield). Either way, if the proposed FAA procedure is implemented or the Midstate 45 to upwind is continued, the windmills will still be in the way.
I strongly object to the proposal to change the traffic patterns. 12-25 Cont. AT-2

-

Setbacks

The DEIS (Chapter 4) did not address set backs.

Page 9

Set backs should be 2000 feet from roads and residences due to shadow flicker, flashing lights, noise, ice throw and blade throw to ensure safety. This is especially true in our litigation society. 12-26 HS-4

Property Values

The DEIS (Chapter 4) does not state there will be a reduction of property values due to these wind farms. Regardless of the untruths in the local Daily Record Newspaper that property values would not be affected, the results of the Lincoln Township Wisconsin Survey show that turbines within one mile 12-27 NS-1

lower property values by 26% and 74% of the people would not buy within a quarter mile of turbines. Real estate people in Kittitas County have stated that wind farms will affect property values. The DEIS (page 1-35) states : " Some nearby residential users might seek to relocate if they felt that wind facilities individually or collectively conflicted with elements of their lifestyles." This made and me other residents very mad. We were here first. How can you invade our beautiful valley and tell us to move? Who would want to live next door to these monstrosity turbines? Where is the impact on the Kittitas County property values stated in the DEIS? This is another reason why this DEIS is incomplete and needs to be redone. I awaited anxiously for this DEIS. I was grossly disappointed in the quality of this DEIS! Is this DEIS an example of the quality of the turbines they build?

12-27 Cont. NS-1

12-28 LU-3

Page 10

Dwight Lee Bates

1509 Brick Road

Ellensburg WA

98926

(509) 925-5055

bateslee@elltel.net

Page 11

12
P.13

Clay White

From: lee bates [bateslee@eburg.com]
Sent: Thursday, January 22, 2004 5:13 PM
To: Clay White
Subject: Desert Claim DEIS Comments

The Tues the 21st hearing on the Desert Claim DEIS made me afraid my house will burn down from wind farm created fires and Ellensburg will be covered in a cloud of dust from the upstream wind farms. What is the County going to do about these issues? 12-29 HS-1 12-30 AQ-1

JAN 2 2 2004

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JAN 22 2004
KITTITAS COUNTY
CDS

Mr. Max Golladay
Kittitas County Board of Commissioners
205 W. 5th Ave.
Ellensburg, WA 98926

22 January 2004

Dear Commissioner Golladay,

Please find enclosed a copy of a letter sent to Governor Gary Locke.

It is hoped that you feel as we do that the proposed wind farms of Zilka and Desert Claim are unsuited to the areas of Kittitas County in which they are planned. The Wild Horse wind farm in the Whiskey Dick area is more appropriate for this type of industrial development. There is much more area there to accommodate them and they will not intrude on the lives of so many people. 13-1 SO-4

Sincerely,

Jack Boyovich
18830 Reecer Creek Road
Ellensburg, WA

Mr. Bruce Coe
Kittitas County Board of Commissioners
205 W. 5th Ave.
Ellensburg, WA 98926

22 January 2004

Dear Commissioner Coe,

Please find enclosed a copy of a letter sent to Governor Gary Locke.

It is hoped that you feel as we do that the proposed wind farms of Zilka and Desert Claim are unsuited to the areas of Kittitas County in which they are planned. The Wild Horse wind farm in the Whiskey Dick area is more appropriate for this type of industrial development. There is much more area there to accommodate them and they will not intrude on the lives of so many people.

Sincerely,

Jack Boyovich
18830 Reecer Creek Road
Ellensburg, WA

Mr. Perry Huston
Kittitas County Board of Commissioners
205 W. 5th Ave.
Ellensburg, WA 98926

22 January 2004

Dear Commissioner Huston,

Please find enclosed a copy of a letter sent to Governor Gary Locke.

It is hoped that you feel as we do that the proposed wind farms of Zilka and Desert Claim are unsuited to the areas of Kittitas County in which they are planned. The Wild Horse wind farm in the Whiskey Dick area is more appropriate for this type of industrial development. There is much more area there to accommodate them and they will not intrude on the lives of so many people.

Sincerely,

Jack Boyovich
18830 Reecer Creek Road
Ellensburg, WA

Governor Gary Locke
Office of the Governor
P.O. Box 40002
Olympia, WA 98504-0002

RECEIVED
JAN 22 2004
KITTITAS COUNTY
CDS

22 January, 2004

Dear Governor Locke,

The Zilka Company of Houston, TX and Desert Claim Wind Power, LLC are preparing to build two wind farms in Kittitas County with over 400 wind turbines. Each turbine will be over 400 feet tall with whirling blades and flashing strobe lights.

The effect these towering monstrosities will have on Kittitas County is disastrous. The views of the property owners in area will be destroyed. The constant thump, thump of the whirling blades will be an annoying and detrimental part of our everyday life. The strobe lights will invade our homes during hours of darkness. Those of us who would choose to not live with this invasion of our lives will be forced to take terrible losses if we try to sell our homes and properties due to the reduction in property values that the wind farms will bring. Some say that they believe the turbines to be "beautiful" or "works of art". Those are the people that will not have to live with them 24 hours a day, seven days a week, 365 days a year.

The DEIS submitted by the Washington State Energy Facility Site Evaluation Council (EFSEC) states that the combined raptor mortality rate for the wind power projects will be 14 to 15 fatalities per year. It has been found however, that in California's Altamont Pass area there have been over 22,000 fatalities in the past ten years. That is over 2,200 birds killed each year. The area where Zilkas' wind farm is planed abuts the Yakima River corridor between Cle Elum and Ellensburg. Highway 97 follows the river here and has been designated as a scenic by-way. These huge turbines will certainly detract from the beauty of the area and it will no longer be "scenic".

The Desert Claim wind farm is planned for area near Reecer Creek. It will have the same effect on wildlife as Zilkas'. Deer and elk will be displaced from their normal ranges and wintering grounds as stated in the DEIS.

Bald Eagles, Ospreys, Turkey Vultures, Red Tailed Hawks and other raptors inhabit the valley here as well as other species of wild birds.

Bald Eagles are an endangered species. The DEIS states that the cumulative impacts on Bald Eagle will be low but there will be risk of collision. Any Bald Eagle fatality will be felt by a recovering species. The DEIS also states that between 430 to 740 passerines will be killed each year. That is a large number of birds that will no longer be around to eat the mosquitoes and other harmful insects that inhabit the area. How many of the nestlings will perish due to the parent bird coming into contact with a whirling giant propeller?

Zilka also says that the excavation needed to construct the turbines will be done with back-hoes and bulldozers. The ground in this area is full of rock. Some of that will need to be removed by blasting. What effect will this have on the water wells in the area? Subterranean subsidence could change the flow of underground water possibly drying up or reducing the amount of water in our wells.

We have been to California's Altamont Pass and seen the wind farms there. Half the turbines have been abandoned and are sitting idle. They dominate the view to such an extent that your eye is drawn to them and nothing else. They are just plain ugly and a blot on the countryside. Washington State does not need the small amount of power generated by these turbines. The electricity produced will be sold out of state to the highest bidder. The only ones to profit will be the wind farm owners who will be paid to allow them to be placed on their land.

The attorney for Zilka has now threatened to go to EFSEC and to your office to request pre-empting Kittitas County zoning laws. It is outrageous that they would threaten the county this way unless it "cooperates". A pre-emption would allow Zilka to proceed with this abomination without the necessary re-zone of the Highway 97 area. The great majority of Kittitas County residents and visitors are opposed to these looming, intrusive monstrosities being placed here when there is a better location the eastern end of the county. We think it would be better suited in the Reygrass Wildhorse-Whiskey Dick area. We respectfully urge that you not pre-empt Kittitas County in this matter.

Sincerely,

Jack Boyovich
18830 Reecer Creek Road
Ellensburg, WA

1-22-04

Clay White Planner II
411 N. Ruby St.
Ellensburg WA 98926

JAN 23 2004

Re: Wind Farm

Yes I am concerned with our view. But I am more concerned about the impact it will have on our large bird population that also share are space. 14-1 ALG-1

We live at Reecer Creek & Hungry Junction. Since we have been here I have observed a very large number of birds. In the spring as many as 10-15 bald eagles can be in the skies at one time. In the fall the new flocks of geese learning to fly to the open fields for the first time, are in the thousands. The herds of Elk that migrate 14-2 PA-14 14-3 PA-9

#2 Wind Farm

down the Reeser Ck area heading to the Clackamas are also a concern. 14-3 Cont. PA-9

While in Calif. a couple years ago the San Jose newspaper had a very extensive write up on their wind farms. Main concerns: dead bird carcasses littering the ground. Maintenance - parts never available, having to barrow from other wind mill farms because parts where not available. The fact that when the wind reaches certain sustained speeds, they either have to shut down or they break the shear pin. I have not heard if this would apply. How many actual days of the year could they run? What about June when you can have sustained winds up to 25-30 mi for a whole month. 14-4 PD-2

#3 Wind Farm

Yes I am concerned about the flashing red lights at night that will stand out like Christmas tree lights across the Valley. 14-5 ALG-1

Why do we have to start with so many. Why not start small at Whisky Dick. Let the people see on a small scale if this is what they want in their Valley. 14-6 ALT-2

According to Discover Dec 2003, with the on coming of nuclear fussion in the near future Hydro coal & wind could be come outdated. Will we have dead mills on our hands twenty years down the road? Will the wind farm people remove them if they are no longer used? 14-7 PD-3

Yes I am concerned.

Linda Brown
5711 Reecer Ck Rd PO Box 755
Ellensburg WA 98926

Clay White

From: Emilia Burdyshaw [ecarmelagb@hotmail.com]
Sent: Monday, January 26, 2004 1:38 PM
To: Clay White
Cc: garrett_ew@netos.com
Subject: Comments on DEIS for DCWWP

JAN 2 6 2004

Comments on DEIS for DCWPP

The Desert Claim Wind Power Project DEIS tends to minimize the project's permanent affect on the current environment. It fails to adequately address the actual impact on the human, animal, and natural environment of the area. 15-1 EIS-1

The proposed access roads and tower foundation locations would disturb native vegetation and jeopardize wetlands. "Permanent roads placed within streams or riparian areas would result in relocation of the stream bank or riparian area."(pp. B-27) "Tower foundations placed within streams or riparian areas would result in permanent filling-in of the feature in the area."(pp. B-26) These streambeds are designated as Critical Areas by the County and setbacks are required to protect these areas; therefore filling-in or relocating these areas is not permitted. To say that farming practices have altered wetlands is not a justifiable excuse for destroying these areas. Conservation practices could easily be implemented that would restore any sensitive areas to their natural condition. Also, proposed access roads that would cross 15 streams could affect surface and ground water by spillage of toxic fluids from vehicle traffic and wind turbines resulting in contamination of well water and downstream fish. 15-2 PA-11 15-3 WR-1

West, Inc. is the company hired by most wind farm developers to do bird studies since they tend to minimize fatalities from turbine blade collisions. As an example, this company underestimated fatalities when they did the bird studies for the Altamont Pass wind farm some 20 years ago. Because an adequate study was not done for the Desert Claim site, the estimates of bird fatalities are mainly speculative. Other wind farm locations were used rather than constantly monitoring this site for avian activity. "Using mortality estimates from existing wind plants with similar habitat and bird use…fatalities per year."(pp. 1-32) Threat of the spread of the hanta virus from deer mice, who are kept in check by raptors, is dismissed as being unwarranted although it is admitted that raptor mortality is expected to be higher at this site compared to other wind farms. It is also mentioned that West, Inc. does not know why raptor mortality rates are so high at the Stateline wind project to the east. I wonder if West, Inc. was also hired for the bird fatality studies for the Stateline project. 15-4 VB-4 15-5 PA-1 15-6 PA-16 15-7 PA-1

The project's affect on other wildlife in the area is also speculative since either other wind farms were used for comparisons or no comparisons were made because information was lacking. "Due to the lack of knowledge, ... it is difficult to access …impacts of wind plants on …bats." "Fatalities of these species occur at existing wind plants …fatalities are unavoidable."(pp. 3-101) "There is limited information regarding wind plant effects on big game species." "The potential effects of wind plant development on mule deer are even less well known."(pp. 3-95) Since knowledge was lacking, speculation was mere guess work. Because other wind farm locations were used for bat fatalities, rather than an actual study of the area, the results have no merit. To suggest that elk or deer would continue to use the area after the wind farm is operational is ridiculous. These animals are highly sensitive to noise and movement and would definitely be permanently displaced. 15-8 PA-15 15-9 PA-9 15-8 Cont. PA-25 15-9 Cont. PA-9

Because speculation is not a valid replacement for an accurate study, other studies which include constant monitoring of the site should be required. These studies should be mandatory before the project is approved not after 15-10 PA-1

it is operational as suggested. "Such a study would be intended to provide information useful for future wind power planning and permitting, but would not affect mitigation requirements for the Desert Claim project."(pp. 3-101) The Audubon Society's designation of a two-year study period should be implemented before the project is allowed to proceed. 15-10 Cont. PA-1

Studies that were done to determine the impacts on land values are not reliable since other wind farm locations were used that had no similarity with the Kittitas Valley. 15-11 NS-1 Maps of the project area showing property lines with the names of ownership and the location of other properties near the site should have also been included on the CD for this DEIS. It is not sufficient to say that this information is on file with the County. Although the degree of impact on certain properties is difficult to assess when this information is omitted, an adverse affect on the area's property is still evident. 15-12 EIS-3

The project will create intolerable conditions for property owners since it introduces safety hazards and nuisances that are not currently present. Threat from tower collapse, ice throw, blade throw, and aggravation from shadow-flicker and increased noise levels will drive property owners from the area. 15-13 HS-2

Little consideration was given for current residences that would be 1,000 feet from a turbine; and neighboring properties without structures were disregarded since setbacks from these property lines are only 250 feet. Setback distances of 435 feet for tower collapse and 540 feet for blade and ice throw are suggested as a safety precaution because impact would result in damage, injury, or death. It is further mentioned that "facilities not be built within a distance from each tower....setback 435 feet" and "human access should be restricted and...facilities not built within a distance....540 feet."(pp. 3-163) This would restrict access to neighboring properties without current residences and limit options for future residential building sites. The DEIS assessment of the effects of shadow-flicker and noise level volumes is incorrect since some factors were not considered. It is stated that shadow-flicker impacts "would be limited to the immediate vicinity (approximately 2,000 feet) of the wind turbines" and that residences "could experience a noticeable change in the ambient sound level relative to baseline noise conditions...near the Desert Claim project."(pp. 1-37) If shadow-flicker creates an impact within a 2,000 foot radius, then turbine setbacks from property should be 2,000 feet and not 1,000 or 250 feet as is proposed. Because the turbines are dispersed throughout the project area, many owners will experience a magnification of sound levels much greater than has been determined. Thus, setbacks from all properties should be greatly increased to remove this condition. 15-14 HS-4

By classifying the area's use as mainly agricultural land, an attempt is made to downplay the true impact of the project. It is mentioned that the main usage of the area is for agricultural purposes that would be compatible with the wind farm. However, Desert Claim knows that residential development has been planned for the immediate area and surrounding vicinity. Reference is made to the Sun East community "The community is (just over one-half mile from the project boundary...)...consists of approximately 170 lots.."(pp. 3-124), to the subdivision near Reecer Creek Road "recent subdivision ...could include up to 209 units ..."(pp. 3-124), to the fact that there are currently 38 residences on the project site, and that up to 400 residences could be constructed in the immediate area. It is also aware of this project's adverse affect on residential living. "Wind turbines would be significantly greater in scale than nearby rural residential uses, and some degree of incompatibility or conflict would exist."(pp. 3-130) Furthermore, it has been suggested that residents that saw the wind farm as incompatible could relocate. 15-15 LU-1

No adequate mitigation is proposed to protect the area or the rights of property owners. Because these owners would be forced off their property if this project is built, a proper form of mitigation would be to purchase non-participating property in the immediate and surrounding vicinity. It would be necessary to acquire these properties at replacement cost so that 15-16 LU-4

15-16
Cont.
LU-4

comparable property can be purchased elsewhere. Unfortunately, this would not compensate the wildlife nor protect the environment from being compromised.

Emilia Burdyshaw
Ellensburg Land Owner

Current Address:
2806 SW Adams
Seattle, WA 98126

Find high-speed 'net deals - comparison-shop your local providers here.
https://broadband.msn.com

January 10,2004

JAN 2 0 2004

Clay White
Planner II,
411 N. Ruby Street,
Suite 2,
Ellensburg,Wa. 98926

Dear Mr. White:

I have read and reviewed the content of your Environmental Impact Statement, and I am appalled at the way it can be interpreted to meet your needs. In the opening statements of the summary it was stated that certain criteria had to be considered as essential before any positive recommendations could be issued. 16-2 VB-4

1. The project is essential or desirable to the public convenience.

I do not see where a project that will be obsolete within the next decade is essential. Hydrogen power is the wave of the future and should be where our money and developement skills are focused, not on 120 turbines 300+ feet high that will not produce anywhere the amount of power necessary to validate their existence. They will sit idle for at least 4 months out of the year, and will produce nothing during those months unless subsidary power is applied to make them run. In that case they will use more fossil fuels than produce " environmentally friendly" power. On top of that the months that they would sit idle would be in the winter, when the most power is needed. Addressing the other issue in that first statement I can guarantee you that those of us who will be living in the middle of your monstrous project do not consider your project desirable. You plan on making us live amid towers that whir night and day, with blinking white and red lights. They are taller than any other structure in the vicinity, and are supported on steel and concrete foundations up to 42 feet below ground. There is a transformer at the base of each tower that I know will hum also. There are plans to lay underground collection cables that crisscross the streams that we depend on for the life of the land. They will crisscross 17 streams, many of them more than once and your statement calls it a temporary disruption? On top of all that, as if the towers alone aren't disruption enough,you plan on building overhead cables on poles connecting the turbines to the project substation and more to connect these to the regional transmission system. Your statement varies the amount of above ground cable from a few feet to several miles. Which will you accept, feet or many miles? Your project roads will be 15 - 20 feet wide and provide vehicle access to the base of each tower. They will cross and crisscross 15 streams, 8 of them twice, and their

16-2 EIS-4

16-3 PD-4

16-4 WR-1

construction will overlapp 6 streams. You say that there will be no noticeable disruption and that it will all go away after the initial construction phase. Who are you kidding? Any disruption to the flow of the streams and the groundwater, will damage the fragile irrigation system that has been put in place by the people above the canal who have only natural; water flow to irrigate their land and water their livestock. As to what your " temporary " disruption will do to the water that runs to the Yakima river basin and how it will affect the water available in the canals for the rest of the valley remains to be seen. We've already lost a lot of our water rights to other projects and companies such as Trend West, and now with the proposed windfarms disrupting more of our precious water, we very well might revert back to desert and sagebrush. 16-4 Cont. WR-1

Statement 2 of your opening reads:

The project is not to be detrimental or injurious to public health, peace, or safety or to the character of surrounding neighbourhoods.

I and many others feel that the project is indeed detrimental and injurious to public health. If there was ever an instance where the effects that power lines and constant whirring and flashing lights have on peoples health could be measured, then your project definitely qualifies. As to what it will do to the peace of our neighbourhood, that should be self-evident. It will ruin our quiet and peaceful lifestyle forever. As far as safety, that remains to be seen. If we can avoid the blades that come loose, the ice they throw and the damage they do when they tumble then I suppose the only danger left is from the increased fire danger , vandalism, and soil and water contamination. I've personally been close to three fires in the 15 months that We've lived here and believe me when I say that it's been three too many. All of them came extremely close to destroying everything we've built and the fact that your project will increase that danger is totally unacceptable. The public is banned from your project area because of the danger of electrocution. What about those of us and our families that live right in the middle of your project. Do we now have to keep our animals in pens or chained up and our children indoors because of the associated dangers of your project? We've also been crime free in our neighbourhood and your rosy outlook for increased tourism, only makes me realize that now I'll have to lock my doors, keep my animals protected and my land secure from tossed trash and cigarettes. I trust my neighbours, I do not trust the general public who venture into a community and have no idea what they might be endangering. The little fire station on Reecer Creek Road can never handle the potential problems that your project will create. 16-5 EIS-4

Addressing part three of this statement, the county will suffer economic loss. Not at first because you promise oodles of money., You say the county will gain 16 million in income during the construction phase and 5.3 million annually thereafter. This includes the 4500 per turbine that you will be paying the landowners who have agreed to lease their land to you for your project. Only 3 of the 6 landowners live in the county. This town will never see any of their money. You say the county will receive 3.8 million in property tax for the first year alone. How much will they lose when residents move out, or abandon their land. If selling doesn't become an option, then as people age the 16-6 EIS-4

ranches will be abandoned because the new generation will not live here. You also admit that the towers depreciate and the taxes will lessen each year. What I read into your glowing financial report is that we the residents of Ellensburg and the surrounding area will never see any benefit from your project and the county will lose every year after initial construction. In the end all we'll ber left with is 120 ugly 300 foot towers that are obsolete and useless. 16-6 Cont. EIS-4

You say it will not affect recreational activities, and yet in the same paragraph you say that the public will be barred from the project area. You also state that hunting will in all likelyhood be abolished in the area. Is anyone aware how many people who live here enjoy hunting and fishing here? You are planning on taking away the right to hunt in our backyard. Many of us have done this for years and some of us moved here because these activities were close and easily accessable. 16-7 RC-1

You also state that the only birds that might be noticeably affected are the Passerines. (Starlings, Finches, Sparrows,etc.) You estimate 430 - 740 birds yearly, will die. These birds keep the insect population manageable. The hawks and crows that will be killed will allow the mice to multiply , creating a health hazard to humans and livestock. The crickets would become another plague if not kept under control. 16-8 PA-16

You also state that there are no documented cases of windmills killing Eagles. How many windmills have been built in the middle of a residential farming community. The eagles are here during calving season by the hundreds. You tell me that only 1 every 2 to three years will be killed? Even if your estimate is correct, which I highly doubt, it's one too many. Aren't Bald Eagles protected by the federal government? If you knowingly kill one is it not a crime punishable by fines and/or imprisonment? Who in your company is going to pay that price? 16-9 PA-12

You say that any migratory corridors disrupted will not matter, that the elk and deer will simply establish new ones. How can you even verify how many elk and deer are involved in your conclusion. The helicopters were buzzing the foothills all summer , scattering and confusing the herds. Did your ongoing study have anything to do with that? 16-10 PA-9

You state that housing impacts will be minimal. That may be true, but there will be many people who love it here who will try to sell their homes and farms and get out of this town. Whether they will be able to do so will be highly questionable, because I don't know anyone who would spend any amount of money to live in the middle of a windfarm. Would any of you? 16-11 NS-1

You also state that a 1000 foot sufficient. Where do you get the right to use my property in your setback requirements? Shouldn't you have to go from my property line? I never gave you permission to include my property in your setback , and I resent that you would take that kind of liberty. 16-12 LU-5

The other issues of course are the conflicts with the airport, and the destroyed view properties along the foothills. What right do you , as a private company, have to take away what we cherish and love about our surroundings? Many of the residents have been here for generations. They work hard to make a living and are here because they love the farming and ranching lifestyle. You and your company threaten to destroy all 16-3 VB-3

of that for those of us who live here. Go to your alternate sites in the desert, where the only residents you will disturb are the snakes and groundhogs. Go where you won't destroy the water, our lifeblood. Go somewhere else where there is no population to disturb and no neighbourhood to destroy. The noise and visual impact on our valley and the surrounding hills is unacceptable. We don't want you here and the money you promise to the county is a carrot that we can't and won't accept. 16-14 SO-4

We urge those of you that will make the final decision to not be enticed by the promises of big profits. They won't materialize and we'll be all left with an eyesore that although heralded as beneficial, will in the end hurt us all. 16-15 SO-5

Lee + Chris Burtchett
12611 Reecer Creek Rd.
Ellensburg, Wa. 98926
509-962-6009

JAN 2 0 2004

January 20, 2004

Dear sirs:

I have read and reviewed the content of your Environmental Impact statement. I may not have understood it all but one thing became crystal clear. Many of your determinations could be evaluated to suit any need. It is filled with statements such as: "cumulatively insignificant"" open to mitigation" having" minimal effect" " not measurable" and "temporary disruptions". Those of us who live in your project area do not deem any disruption as minimal and we resent the suggestion that the destruction of our way of life is cumulatively insignificant. 17-1 EIS-1

You, the Board of County Commissioners, will make the final permit decision for the Project. I ask that you adhere to your own criteria requirements and based on those you will surely deny Desert Claims application. 17-2 SO-5

In your criteria you state that your decision will be based on three criteria:
1. The Project is essential or desirable to the public convenience
2. The Project is not detrimental or injurious to the public health, peace, or safety, or to the character of the surrounding area.
3. The Project will not be unreasonably detrimental to the economic welfare of the county and will not create excessive public cost for public facilities and services.

I fail to see how the project is essential or desirable. Wind power is not necessarily environmentally friendly and is undependable at best. I would hope someone has noticed that the wind hasn't blown here for months. From what I understand this is normal from November through February and the wind is mainly present here in the valley in spring and summer. To me that means that the turbines would sit idle for at least 4 months of the year unless operated by subsidiary power. How can that be environmentally friendly or beneficial if other power may be needed to operate them? Addressing the other issue in your first statement, I can guarantee you that those of us who live in the middle of your monstrous project do not consider it desirable. You plan on making us live amid towers that whir night and day, have blinking white and red lights and obscure our view of the foothills and the valley. 17-3 EIS-4

Whether or not the project is injurious or detrimental to the public health remains to be seen. The jury's still out on what the long term effects to the populous will be of the increased power transmitted by your turbines to the surrounding power grid. As the editorial in the Daily Record stated we're facing some of that from the Bonniville Power Administration's plans to update their transmission lines anyway, but we don't need more of an increase from yours. You, of course, know that because that was one of the reasons you chose our county for your proposal. If there was ever an instance where measurable effects on peoples health that power lines and constant whirring and flashing lights have, then your project qualifies. As to what will happen to safety, I can

only imagine. Your statement again claims that the potential of ice throw, blades coming loose, towers collapsing and vandalism is all minimal and will have no significant impact. That's easy to say, but we've been relatively crime-free in the upper valley and your rosy outlook of increased traffic and tourism makes me realize that now I'll have to lock my doors, keep my animals protected, and watch that my land is secure from tossed cigarettes and trash, not to mention looking over my shoulder whenever I venture outside so that I 'm not injured by one of your towers. You have banned the public from your project area due to the dangers of electrocution. I say that is a definite safety hazard. The increased fire danger is also described as cumulatively insignificant. As far as I'm concerned, any increase in fire potential is too much. In the past year alone we've personally come close to at least three fires. They spread fast and are extremely hard to control. If your presence increases that hazard, then you are significantly disruptive and injurious to the surrounding area. As to the peace and character of the surrounding area that should be self-evident. The towers are taller than anything else in the vicinity and will predominate the landscape. There is a transformer at the base of each tower. There are plans to lay underground collection cables that crisscross the streams that we depend on for water to our land. They will crisscross 17 streams, many of them more than once and your evaluation calls it a " temporary disruption"? If the towers aren't bad enough you plan on building overhead cables on poles connecting the turbines to the project substation and more to connect these to the regional transmission lines. Your statement varies from the lenth of aboveground lines from feet to miles. That's a considerable variance. Your project roads will be 15 - 20 feet wide and provide vehicle access to the base of each tower. They will cross and crisscross 15 streams, 8 of them twice and their construction will overlap 6 streams. You say there will be no noticeable disruption and that it will all go away after the initial construction phase. Who are you kidding? Those of us who live here know how variable and precious the groundwater is. It lies just below the surface in many areas and goes deep in others. Any disruption to the flow of that groundwater or the streams will damage the fragile irrigation system that has been put in place by most of the farmers and ranchers and especially to those of us who depend on the natural flow for our land irrigation and stock water. The Yakima River water adjudication decisions aren't even all in place yet and you're already proposing to disrupt them. The whole valley also depends on wells for drinking water . What your project will do to the surrounding wells is never really addressed except to say that blasting and shaking will have insignificant impact on wells which supply drinking water. What if the impact is significant? Who will pay for drilling new wells and supplying us with water? Your whole DEIS was done in as little as 6 months after application in January 2003. How can you make such wide sweeping determinations without even evaluating the projects impact through all four seasons?

17-3 Cont. EIS-4

Addressing part three of your criteria, the county will suffer economic loss in the long run. It won't be noticeable at first because you promise oodles of money. You say the county will gain16 million in income during the construction phase and 3.8 million of that will go to labor. You also promise 1 million a year after that, depreciated over the life of the project. You do not however have a figure to track that depreciation. Of that yearly income 540,000 will go to the landowners who have leased their land to you.

Apparently you forget that at least three of those landowners do not live anywhere near Kittitas County and their share of your projected profits will never see the Kittitas County coffers. The increased costs of fire and police protection will eat up some of these profits also. We'll have to build a new Fire Station to secure the project area from fires. We the taxpayer will probably have to pay for it. You will also lose some of your revenue as local ranchers try to sell and leave the county. What you will be left with is a desert valley covered with windmills. They will of course become obsolete in far less than 30 years. I would estimate they become obsolete within the next decade. The Army is already converting to hydrogen, the energy source of the immediate future. Use of Hydrogen will dominate the energy scene and the windmills will have to be dismantled and removed. That of course depends on whether the money has been set aside for that purpose, and the company doesn't go bankrupt. If not, they will just mar the landscape forever, or you and I the taxpayer will have to finance their removal. In the end the county will see little money from the project, but will have expenditures for generations to come.
What I read into your glowing financial report is that we, the residents of Ellensburg and the surrounding area will never see any benefits from your project. In the end all we'll be left with is 120 ugly 300 foot towers that are obsolete and useless. 17-3 Cont. EIS-4

You also say that your project will not affect recreational activities, and yet in the same paragraph you say that the public will be barred from the project area. You also state that hunting will be abolished in the area. Is anyone aware of how many hunters live here? You are planning on taking away a major form of recreation . For many of us this is a big concern. I am also fairly sure that it will have an impact on snowmobiling , biking, and other outdoor activities in the area. 17-4 RC-1

You state that housing impacts will be minimal. I'm not sure that's true. There will be many people who love it here but will try to sell their homes and farms to get out of this town. Whether they will be able to do so will be highly questionable, because I don't know anyone who would spend any amount of money to live in the middle of a windfarm. Would any of you? As to land values? For tax purposes they probably won't change, but for resale, I predict a huge drop. People will lower their asking prices immensly just to get out. 17-5 NS-1

You also seem sure that a 1000 foot setback from the nearest residence is sufficient. My house is 400 feet from my property line. Where did you get the right to use my property as part of your setback? Shouldn't you have to start at my property line? You have effectively eliminated our plans to subdivide our 33 acres and give some to our children so they could build a summer home or retirement home here. I never gave you permission to include my property in your setback, and I resent that you would take that kind of liberty! 17-6 LU-5

Your DEIS also states that the impact on local wildlife and birds is cumulatively insignificant. You estimate 430 - 740 Passerines will be killed annually. That's a quarter of a million birds in your projected 30 years. I don't think of that as insignificant. 17-7 PA-14

These birds keep the rodent and insect population manageable. This combined with the hawks and crows that will be killed will allow the mice to multiply uncontrollably creating a health hazard to humans and livestock. You say there are no documented cases of Bald Eagles being killed by windmills. How many windfarms in the country are built in the middle of a residential and agricultural zone? I find that if even 1 is killed then federal laws for protection have been violated and someone should pay by fines and imprisonment. Who in your company will pay that price? 17-8 PA-16 17-9 PA-12

You state that any migratory corridors for elk and deer will only be temporarily disrupted and that the animals will establish new ones. How can you even verify how many animals will be affected and where they will go? The helicopters were buzzing the foothills all summer scattering and confusing the herds. Did your ongoing and rushed study have anything to do with that? 17-10 PA-9

In the end it all comes down to this. We don't want you here. You are not a welcome addition to our neighbourhood. What right do you, a private company, have to take away what I cherish and love about my surroundings? Many of the residents who live here have been here for generations. They work hard to make a living and are here because they love it here. You and your company threaten to destroy all that. The money you promise to the county is a carrot that we're not willing to accept. I think you definitely need to be " open to mitigation". The lives and properties you destroy will cost you . I hope you've planned for that. 17-11 SO-5

We urge those of you that will make the final decision , to not be enticed by promises of big profits. I predict they will not materialize, and we'll all be left wih an eyesore that although heralded as beneficial by some, will in the end be obsolete and hurt us all. I advocate that the No Action Alternative be selected as your final decision. 17-12 SO-2

Lee + Chris Burtchett

Lee & Chris Burtchett
12611 Reecer Creek Road
Ellensburg, Wash 98926

(509) 962- 6009

January 25, 2004

Clay White:

This is just a short update to the meeting that I attended January 20. I ran out of time to completely read the letter that I left with you that night. I just want to readdress certain issues.

The article in the paper the next morning mentioned some things that I feel were very wrong. It is true that some of us who now live in the county are new, but we're not the only ones who object to the proposed windfarm. The paper led us to believe that long time residents are for the proposal and that couldn't be further from the truth. The only long time property owners who are for the project are those who stand to gain financially from the windtowers. 18-1 VB-5

The other thing that I think definetely needs to be considered is the fact that the study was hastily done and was not site specific. Many conclusions were made by evaluating other windfarms, in other counties and states, and it was done so quickly that no honest conclusions can possibly have been determined. 18-2 EIS-1

Mr Richard Weinman looked to me and others that he was totally bored and disinterested with the comments presented and had no intention of reevaluating some of his firms conclusions. 18-3 VB-4

The comments by Roger Weaver regarding land values needs to be seriously considered. He was right when he said that land values in this county are based on residential, agricultural and recreational. All three of these factors will be impacted if you, the Planning Commission, allow this project to go forward. 18-4 NS-1

Please don't make hasty conclusions, just because Desert Claim needs to push this through to get the government subsidies by the end of the year. Your decision will impact this valley for generations to come. 18-5 EIS-6

Chris Burtchett
12611 Rieck Creek Rd.
Ellensburg Wa. 98926

JAN 26 2004
KITTITAS COUNTY
PLANNING DEPT.

Clay White

From: Judy Corey [tdcdonks@hotmail.com]
Sent: Monday, January 19, 2004 1:09 PM
To: Clay White
Subject: Wind Farms

RECEIVED
JAN 19 2004
KITTITAS COUNTY
CDS

Hello, Mr.. White;

I feel that the proposed locations of wind farms in Kittitas County is all wrong, and that there hasn't been adequate study on the environmental impact. 19-1 EIS-1

Why should wind farms be located so near to populated areas, when there is all the scab land on the eastern side of the county ? Seems like that would be a much more sensible location.
Also, it seems to me that the effects of many many flashing lights all night will definitely effect the wildlife, as well as people. 19-2 SO-6
All in all, I hope all 3 proposed wind farms will be relocated out of view of the majority of residents in Kittitas County. There must be better sites.

Judy Corey
2963 Schnebly Rd.
Ellensburg
(509)968-3699

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1-10-04

20
P.1

Shirley Duncan
Property owner
12440 Reuben Creek Rd.
Ellensburg, WA 98926
Home address
2011 Dry Hill
Ellensburg, WA 98926

JAN 20 2004

Clay White
Planner II

411 N. Ruby St.
Ellensburg, WA 98926

Re: Desert Claim Wind Power Project
120 - turbine proposed for 5,237 acre area North of Ellensburg.

I am the adjoining property owner on the N.E of this project.

I, My concerns are proximity of windmill turbines or any part of the projects - proximity (distance) to adjoining property owners. 20-1 LU-5

II Noise from turbines. 20-2 NOI-1

III Wild life in this area being protected, "nature". 20-3 PA-18

IIII. Property Values.

These people that are allowing (leasing) the property to this Company are being compensated well just for testing. Us people are not protected 20-4 NS-1

20-4
Cont.
NS-1

at all, air compensated!

I have been a property owner & my family has since early 1900's in this area.

Thank you
Shirley Dawson

would ask this be included in hearing comments.

Arthur DePalma
6991 Manastash Rd
Ellensburg, WA 98926

JAN 2 0 2004

January 20, 2004

Points to consider

1. Three groups in favor of wind farms * citing clean, green energy, which will save the planet from the effects of fossil fuels. Except the amount of electricity produced by wind power is miniscule and relies on fossil fuels to keep the turbines running.
    a. The first group * the energy companies EnXco and Zilka state how they want to produce clean energy. Yet if they were not getting hundreds of millions of dollars in federal subsidies from our tax dollars, there would be no projects; for wind farms are not economically viable. Once subsidies are gone that's the end of the wind farm and the turbines are left to rust.
    a. Another group are the landowners in the project area, who have contracted with EnXco and Zilka to receive thousands of dollars for each turbine built on their land. This is the one "mitigating factor" that changes minds to proclaim the wonders of wind energy. If it weren't for the money to be made, neither the energy companies nor the landowners would have any interest in turbines in Kittitas Co. So it really is all about money and not energy. 21-1 VB-5
    a. The third group consists of those who think wind energy is great since it's using a free natural resource * the wind. They are unswayed by the facts that fossil fuels are burned to keep the turbines powered when there is no wind; or that wind power produces insignificant energy. They are also unconcerned by those who don't want to live by hundreds of wind towers, and negate their concerns. It's easy for those who think they are not affected by the proximity of the turbines to vocally support wind farms. This group might have some credibility if they themselves lived in the wind farm area surrounded by turbines.

Although I live far from this project I am strongly against wind farms here because this scheme is outrageously unfair to the nearby residents. I am also opposed because of this proposal to build hundreds of huge towers a mere 8 miles from the city of Ellensburg, and near the pristine area of Table Mountain and Lion Rock. The Zilka project is just several more miles away along a scenic highway.

Imagine that the tables are turned and that it is proposed to build hundreds of these giant wind towers 8 miles from Olympia along Puget Sound They could use this same environmental impact statement with just different maps. Imagine also that several hundred 400 ft towers will be surrounding your property and home. What would you be thinking? Would it be "great, it's a sacrifice I'm willing to make for an insignificant amount of green energy"? Then visualize the company making deals and "mitigating the impact" with a few of your neighbors * by paying them thousands of dollars to move towers on their land. Now they think wind turbines close to Olympia, Puget Sound, or surrounding your land is a great idea. How are you feeling? Do you think your property 21-2 SO-5

values will be affected? 21-2 Cont. SO-5

I would like to emphasize four points.

1. The visual effect will ruin views and lower property values (notwithstanding the cited so called studies). 21-3 ALG-1
2. Hundreds of these huge towers will severely impact the quality of life for not only neighbors, but for much of the entire area because these towers will be built on rising elevation higher than Ellensburg and the Kittitas Valley. 21-4 NS-2
1. The constant daytime strobe light flicker, and hundreds of red beacons at night will not only make living near them untenable but will be visible for miles causing light pollution for Ellensburg and much of the valley. 21-5 ALG-1
1. It is easy to ruin **other** people's quality of life for little return. These industrial towers should not be built near homes period. The feelings and judgments of residents who are impacted should have priority in this decision. I urge you to make your recommendation as you would if these huge towers were proposed to be built surrounding your homes and properties, and just several miles from the city of Olympia. 21-6 VB-6

Thank you.

Arthur DePalma, M.D.

JAN 2 0 2004

Clay White, Planner II
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

January 16, 2004

Comments on the DEIS for Kittitas Valley Wind Power Project by Desert Claim Wind Power , L.L.C.

Dear Mr. White

1. Fairview Fire Station
The DEIS states the Fairview Fire Station is located on Highway 97. Last time I drove past it it was at the corner of Fairview and Brickmill Roads. 22-1 PSU-3

2. Fire Potential
The DEIS addresses the available fire fighting resources, but did not address the potential of a wind driven fire. The site is on a windy area or it would not have been chosen. When the wind blows it dries the foliage out. The area is brown most of the year. While the "experts" say "there is no need to worry about fires , all the safe guards will be in place" they can happen. Airliners are not suppose to go down or trains collide, but they do. When a project is new the potential for a fire is less. In 10 to 20 years and if the project is not producing the desired revenue, there is only one place to cut costs, that is maintenance. When maintenance is cut back , the potential for fire is increased. If a bearing would get too hot and start spewing hot metal and burning oil from a tower 300 feet high, it would start an wind driven inferno that would be difficult to stop. Remember Southern California fires in 2003? Why pick a site where there is a large populated area , homes and farms downwind that would be in the path of a fire? It doesn't make good sense. There are other sites where there are not homes in the wind path. To have a wind driven fire would have a major environmental impact. 22-2 HS-1

3 ~~2~~. Liability Insurance
I questioned my insurance agent about the possible increase of insurance premiums because of the increased risks. They said there should not be as the wind company should be carrying liability insurance.
I presume the L.L.C. in the name Desert Claim Wind Power L.L.C. means Limited Liability Corporation. I presume this means if there is a disaster caused by the turbines or transmission lines , they are only liable to the value of the corporation. If enXco,Inc. is allowed to develop the wind project, an all inclusive liability insurance policy needs to be in force for the replacement value of buildings, farms, businesses, crops, livestock, power lines, infrastructures, injuries, loss of life, etc.. Any losses over the insurance carried should become the liability of the developer, enXco , Inc. and its owners. This could be included in the conditional use development agreement. To have a wind driven fire that is caused by the wind project, but the losses are not covered by liability insurance would create an environmental impact. 22-3 HS-10

William Erickson
6980 Wilson Creek Rd.
Ellensburg ,WA 98926
Phone 509-925-1349

23
P.1

Clay White

From: Randy Fischer [randyjo@elltel.net]
Sent: Wednesday, January 21, 2004 8:43 PM
To: Clay White
Subject: Comments DEIS Desert Claim Project

JAN 21 2004

Comments concerning DIES for the Desert Claim Project

Respectfully submitted,

The DEIS for the Desert Claim Project does not completely address some important issues. One of them is wild fire.

In the past two years the area proposed for wind farm construction has sustained damage from wild fires. Only with the aid of outside help and resources were the fires able to be contained. If wildfire can happen when the area in question is used solely for recreation and private home ownership what will the consequences be during and after construction of a large industrial facility? Construction will undoubtedly entail the use of explosives, welding equipment, and metal cutting spark producing saws. The area is not in a county fire district so who will pay the bill if Enexcos' crews or equipment accidentally start a fire? What about loss of personal property, or worse, loss of life? 23-1 HS-1 23-2 HS-10

The most basic issue is that Zilkha and Enexco are trying to place this industrial facility in a place that impacts far too many people in negative and nonmitigable ways. There are better places to build this if it really has to happen. 23-3 SO-5

I believe it is this counties responsibility to deny wind farms in the location studied and offer them areas farther east as suitable options for construction sites.

I still, however, have not been convinced that this document has provided any public need for the insignificant amount of power that this facility is capable of producing. 23-4 EIS-7

Sincerely,

Randy Fischer
6440 Hanson Road
Ellensburg, Wa. 98926

24
P.1

Clay White

From: John & Barb Foster [bears@elltel.net]
Sent: Monday, January 26, 2004 3:35 PM
To: Clay White
Subject: Re: Desert Claim DEIS Statement

RECEIVED
JAN 2 6 2004
KITTITAS COUNTY

Dear Mr. White,

We are writing to express concerns about the Desert Claim DEIS. We do not believe the DEIS addresses the problem of the location of these wind towers which calls for placement in front of our beautiful Cascades. It does not provide a sufficient picture of the sheer ugliness of these mechanical monsters on our county's landscape. 24-1 ALG-2

There has been insufficient discussion of the devaluation of property assessments for homes in the area of the towers. There has been insufficient discussion of the harm to the public, including fires that may be caused by them, and of the harm to wildlife including birds. When the wind power company abandons the project, who will foot the bill for tower removal? Or will the towers be there forever? 24-2 NS-1 24-3 HS-1 24-4 PD-3

Problems caused by windfarms in other areas of the US and in other parts of the world are just now being realized. More time needs to be used to study these expensive providers of power. 24-5 EIS-6

We hope the county commissioners do not allow windfarms in this county because of their sheer ugliness to our landscape. The location of this project is of great concern to us. 24-6 SO-5

Sincerely,

John and Barbara Foster
2261 Killmore Rd
Ellensburg, WA 98926

Clay White

From: Ed Garrett [garrett_ew@netos.com]
Sent: Monday, January 19, 2004 11:29 AM
To: Clay White
Subject: enXco DEIS

RECEIVED
JAN 19 2004
KITTITAS COUNTY

Hi Clay,

This is not my formal submission, just my thoughts to you.

I finished reviewing the enXco DEIS and I agree with you, that it is much more detailed and less one sided than the Zilkha DEIS. 25-1 EIS-1

I actually found very little to comment on other than, like Zilkha, they downplayed the impacts of neighboring landowners and basically saying they are looked upon as collateral damage if this project is allowed. 25-2 LU-1 The bird analysis by WEST, Inc again is not acceptable: not long enough, no night studies, migratory pathways not analyzed, and proposing that "no bald eagle has ever been killed at a wind facility within the United States" justifies placing this project in an area with known bald eagle presence. 25-3 PA-1 25-4 PA-13

Section 3.7, Page 3-123 states that Kittitas County subdivision applications have been increasing since 1998.

Page 3-124 states, " rural residential uses predominate in the immediate area of the proposed site and to the south toward Ellensburg Urban Growth Area". Also, "majority of land within 1 mile of the proposed project area is privately owned and generally consists of rangeland and residences". The Sun East community alone has an estimated 83 residences. This is too many too close. I believe when David Lee testified last Tuesday at the EFSEC Public Meeting, he said he represented about 120 land owners at Sun East. 25-5 LU-1

Add this number to the 8 non-participating residences in the project area and 31 non-participating residences within 1000 feet of the project boundary area.

This shows major significant unavoidable impacts to neighbors just for the benefit of 8 landowners and their non-contiguous acreage.

The mitigations center again, around setbacks. 250 feet from neighboring property lines and public roads won't cut it. 1000 feet from residences is not adequate. 25-6 LU-5

Did you find anything else worth bringing up?

Best Regards,

Ed Garrett

Ed Garrett
19205 67th Ave SE
Snohomish, WA 98296

January 19, 2004

RECEIVED
JAN 20 2004

Clay White
Planner II
Kittitas County Community Development Services
411 Ruby Street
Suite 2
Ellensburg, WA 98296

RE: Testimony on Issuance for Draft Environmental Impact Statement
Wind Resource Development Permit Z-2003-01

Dear Mr. White,

My name is Ed Garrett, I reside at 19205 67th Ave. SE, Snohomish, WA 98296 and I represent myself and my wife, Rosemary Monaghan.

In reviewing this DEIS I have the following comments.

First, I'd like to comment on the document, Property Value Effects of Wind Power Projects: A summary of the Literature, prepared by Huckell/Weinman Associates Inc. Groups who promote the agenda of wind developers performed the studies presented. On page 9, it states, "One scoping comment for Desert Claim specifically suggested that a certified real estate appraiser familiar with the local market conditions be engaged to identify the effects of wind turbines on property values". However, it goes on stating, "This request was not pursued" because it is not an environmental issue and because of the absence of data on actual sales before and after construction of a commercial wind farm. 26-1 NS-1

I believe this to be a very pertinent part of the DEIS. The project area proposed includes 31 non-participating residences and landowners either in or as close 1000 feet of the boundary and many more non-resident landowners within 250 feet of their property lines.

Second, I'd like to comment on the wildlife studies prepared by WEST, Inc. This was only a limited 1 year study performed by several 30 minute point count surveys and only during the daytime. The Kittitas County Audubon has already stated at previous public meetings that this is inadequate. I will defer any other comments on this issue to one of the Kittitas Audubon representatives. 26-2 PA-1

Third, visual photographic simulations are not adequate. Most of the simulations were taken at a significant distance from the project area to minimize its overall effects. I would like to see visual simulations from each of the 31 residences of non-participating landowners within and out to 1000 feet from the project boundary as well as from the Sun East community. 26-3 ALG-2

Lastly, I have grave concerns about building this industrial wind project with such close proximity to nesting bald eagles along the Yakima. The proposed project is among the hunting and roosting grounds of bald eagles and other important raptors. WEST Inc. attempts to minimize this issue by stating the mantra throughout this document that there have been no documented bald eagle fatalities at any operating wind facility within the United States. I find that statement to be very irresponsible as well as unsubstantiated. I would submit that bald eagles, just like the golden eagles at Altamont, CA are being killed occasionally but swept under the carpet because of the bad publicity it would bring as well as it being a federal crime violating the The Bald Eagle Protection Act. 26-4 PA-13

WEST, Inc., in their analysis they had frequent observations of bald eagles within the project area. On page C1-20 of Appendix C, they make the following statement, "due to the nearby vicinity of important roosting and foraging areas, bald eagles might **regularly move throughout the wind plant increasing their exposure**". Page C1-16 states 78% of the flying eagles observed were within the zone of risk.

They propose to mitigate this fact by:

1. Establish and enforce reasonable driving speed limits within the wind plant to minimize the potential for road killed wildlife or livestock that may attract foraging bald eagles.

2. Remove and dispose of all carcasses of livestock and other large wildlife from within the wind plant that may attract foraging bald eagles.

3. Ensure that livestock calving areas of **participating** landowners remain outside of the wind plant. What about all the **non-participating** landowners with livestock? 26-5 PA-13

I would add one other mitigation measure, how about you just don't build these giant industrial cuisine-arts- of-the-sky in known eagle habitat and where inhabited by innocent human beings.

Thank you for the opportunity to comment.

Ed Garrett

Ed Garrett & Rosemary Monaghan
19205 67th Ave SE
Snohomish, WA 98296
(425) 483-9770

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

January 29, 2004

Mr. Clay White
Kittitas County Planner II
411 N. Ruby Str.
Suite 2
Ellensburg, WA 98926

RE: Desert Claim Wind Power Project DEIS Review

Dear Mr. White,

The following are our comments after reviewing the DEIS prepared by Hunkell/Weinman Associates:

FACT SHEET, page i, Proposed Action states, "The proposed action consists of development of a 180-megawatt (MW) wind energy facility". It should read: The proposed action consists of development of a ***nameplate capacity*** of 180-megawatt (MW) wind energy facility. It should also be added that on average throughout a year, actual produced energy is 25 to 30 percent of nameplate capacity, or about 60 megawatts. This should be added to every reference to their 180 Megawatt wind energy facility throughout this document. 27-1 PD-5

FACT SHEET, page i, Proposed Action states, "The applicant's objective is to develop a commercially viable wind energy facility with a nameplate capacity of at least 180 MW that would deliver renewable energy to the Pacific Northwest." This statement is misleading. EnXco has not yet found a buyer for the energy so it cannot say this power will stay in the Pacific Northwest. Therefore, "to the Pacific Northwest" should be deleted. 27-2 PD-6

FACT SHEET, page ii, Operation and Maintenance states, "Electricity generated by the project would be sold to power marketing entities, such as Bonneville Power Association, local and regional utilities, such as Kittitas County PUD and Grant County PUD; and/or regional investor-owned utilities, such as Puget Sound Energy and Avista." Again, misleading, since they have no buyer for the power. They can't state for a fact the power will stay in the area. Everything after "marketing entities" should be struck out. 27-3 PD-6

FACT SHEET, page iii, Operation and Maintenance lists bullet points for O&M activities for on-sight personnel. A bullet point should be added addressing ongoing study and complaint resolution of non-participating residences within 1 mile of the project area and working with the local Kittitas Audubon in monitoring and reporting **ALL** wildlife (birds, bats, etc.) fatalities. 27-4 PD-2

FACT SHEET, page vi, Type/Timing of Subsequent Environmental Review states, "No subsequent environmental review would be required for the development addressed in the EIS and the January 2003 development activities application..." It should read "***Subsequent environmental review MAY be required.....***" With a project this large and impacting so many neighboring landowners, any change enXco wants to make or "phase in" should have an open option to request additional environmental study and review. 27-5 EIS-8

Chapter 1, page 1-4, Summary, 1.3 Applicants Objective For Proposal states, "EnXco develops, builds, operates and manages wind energy projects throughout the United States". It should read, "EnXco, ***a French corporation,*** builds, operates, and manages ***several*** wind energy projects in the United States." Everything starting with the third sentence should be struck. Again, there is currently no buyer for their energy and the rest of this paragraph is speculative and misleading. There are currently no requirements at the state or federal level mandating purchasing of wind power. Currently, utilities can volunteer to offer wind power. Our State already produces 60% of our energy from hydropower, which is a renewable resource. Marketing projections and political positioning do not belong in this DEIS. The first two sentences say it all, they are a foreign held, private company and in the business to produce wind energy for a profit. 27-6 EIS-9

Chapter 1, page 1-5, 1.5.1 Proposed Action states, "...would deliver renewable energy to the Pacific Northwest" should be stricken. They have no buyer for their energy so they can't guarantee power will benefit the Pacific Northwest. This section should include the real production estimates (60 MW) along with their nameplate capacity. 27-7 PD-6 27-8 PD-5

Chapter 1, page 1-6, 1.5.1.3 Operations and Maintenance. Same changes as suggested in **FACT SHEET, page ii, Operation and Maintenance.** 27-9 PD-6

Chapter 1, page 1-7, 1.5.4 No Action Alternative. Strike the entire second paragraph as speculative and not helpful to this DEIS. The first paragraph has all the facts needed for the no action alternative. 27-10 ALT-1

Chapter 1, pages 1-9, 1-10, 1.6 Summary Comparison of Environmental Impacts, Table 1-1, Air Quality, No Action Alternative. The second paragraph should be stricken. There is no proof that if the wind farm was not built that a fossil burning energy would have to be built to replace lost wind energy. The first paragraph has all the facts. 27-11 ALT-1

Chapter 1, page 1-11, 1.6 Summary Comparison of Environmental Impacts, Table 1-1, Ground Water, No Action Alternative. The first paragraph should be stricken as speculation and not fact. The second paragraph has all the facts. 27-12 ALT-1

Chapter 1, page 1-13, 1.6 Summary Comparison of Environmental Impacts, Table 1-1, Wildlife, Birds states conclusions from studies issued by WEST, Inc. Many of these studies are incomplete and should not be accepted. Conclusions are based on a limited 1 year, several 30 minute visual observations at random locations all in daylight. No confirmations were made with local landowners and the local Kittitas County Audubon. Most results are produced "statistically" and not from actual observations.

No night studies were made and no confirmation of migratory pathways were studied. Documentation from other wind facilities has stated significant raptor and bat fatalities and these documents were not acknowledged. No bat studies were performed in the project area. The proposed project area is in confirmed bald eagle hunting and roosting areas. Bald eagles are protected at the Federal level by the Bald Eagle Protection Act. Raptors are protected by State law. Arial observations by helicopter for active raptor nests is insufficient. Some species of raptors are cavity dwellers, which cannot be seen from the air. 27-13 PA-1

No reference was made about being in compliance with: Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines, issued by the US Fish and Wildlife Service, dated May 3, 2003. 27-14 PA-3

Conclusion: The studies by WEST, Inc. should be deleted and a new bird study be commissioned involving local landowners and the local Audubon Society. WEST, Inc. has positioned itself to serve most - if not all - wind developers in the US. It's studies all have the same conclusion and they are never held accountable when their studies are blatantly wrong, such as in Altamont, CA. This is an obvious conflict of interest issue. 27-15 PA-1

Chapter 1, page 1-15, 1.6 Summary Comparison of Environmental Impacts, Table 1-1, Energy and Natural Resources, Proposed Action, Desert Claim Wind Power Project states, "The project would have little or no impact on the supply and price of electricity available to local consumers." This statement is in error in two ways. First, since enXco has no buyers for the power, they cannot say it will impact local consumers. Secondly, the addition of wind power, as currently promoted through green tag programs increases the cost of power to consumers. Utilities charge a premium for wind power and pass that cost on to consumers. Under the same heading, but under the, **No Action Alternative**, the second paragraph should be struck. It is conjecture that new supplies would have to be produced elsewhere. The first paragraph states the needed facts. 27-16 ENR-1 27-17 ALT-1

Chapter 1, page 1-17, 1.6, Summary Comparison of Environmental Impacts, Table 1-1, Land and Shoreline Use, Proposed Action: Desert Claim Wind Power Project, Land Use Patterns states in various paragraphs that project facilities are "not expected" to significantly impact existing activities, as well as changes to "land use patterns are not seen as significant". All these statements are conjecture and attempt to make the case that life will continue on as it has after the project is built. This is pure wind developer spin. 27-18 LU-1

The only statement of fact is the second paragraph. "Wind turbines would be significantly greater in scale than nearby rural residential uses, and 'some' degree of incompatibility or conflict would exist." That is the only factual comment in that column on that page. All the rest should be stricken as conjecture and not fact. 27-18 Cont. LU-1

Chapter 1, page 1-18, Summary Comparison of Environmental Impacts, Table 1-1, Proposed Action, Desert Claim Wind Power Project, Plans and Policies states, "The proposed project would be consistent with the land use and utilities policies of the Kittitas County Comprehensive Plan." To be able to make such statements, the Applicant must address three basic questions in order to obtain compliance for a Wind Resource Overlay Zone and become consistent with the KVCCP. Currently, they are not consistent.

1. The project is essential or desirable to the public convenience. It has not been determined essential or desirable thus far from the public scoping and public DEIS comment periods. In reviewing local newspapers, there appears to be building concensus that overall, the public is not in support of such a project.

2. The project is not detrimental or injurious to the public health, peace, or safety, or to the character of the surrounding neighborhood. It has been determined by the public, as well as sections in this DEIS, that the project will introduce potential injurious conditions (fire risk, ice throw risk, blade and tower failures, driving distractions, increased light and noise pollution, shadow flicker and blade glint effects) to the surrounding neighborhood. By placing giant 340 foot industrial towers as close to 250 feet from neighboring property lines and 1000 feet from neighboring non-participating residences will definitely change the character of the surrounding neighborhood. In the Applicant's Development Activities Application of January 28, 2003, Part D and E discuss the project area landowners and neighboring landowners. This defines the "immediate surrounding neighborhood" to be 8 landowners with non-contiguous parcels in favor of hosting giant wind turbines and 57 landowners owning parcels contiguous to the project area boundary who do not want to see the project developed. Also, the Applicant has not shown adequate proof with appropriate scientific backup to address the property devaluation issue of non-participants parcels and concern from local real estate agents. 27-19 LU-6

3. The project will not be unreasonably detrimental to the economic welfare of the county and not create excessive public cost for public facilities and services. Recreation and rural development are the growing major economic force for land ownership in Kittitas County. The Applicant has not established how the project will truly affect the economy and recreation dollars spent in the area. The introduction of 120 industrial machines capable of causing fires from either lightening or mechanical failure would put a strain on current fire suppression capabilities. Does the local fire district even possess the equipment needed to suppress a nacelle fire 240 feet in the air, possibly on a windy day?

Noting these three conditions, the proposed project **WOULD NOT** be consistent, nor could it be through mitigation measures to the KVCCP. 27-19 Cont. LU-6

Chapter 1, page 1-18, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Mechanical Hazards, Proposed Action states that turbine tower collapse and blade failure (throws) are extremely remote, but then states it has occurred in the past. However, this DEIS fails to mention that the record on the 1.5 MW turbines is only now being written. This is newer and larger technology with no real operational history. Prudence would dictate that established safety setbacks should be on the liberal side (minimum of 545 feet) but realistically in the neighborhood of 700 to 900 feet from public roads and non-participating landowners property lines. 27-20 HS-4

Same page, under No Action Alternative. The last sentence, "The project area would retain a high fire hazard" should be stricken as it is conjecture. If the project is not built, current uses could expand, most likely as residential development which could alter the nature of the land and reduce the fire hazard. 27-21 HS-1

Chapter 1, page 1-19, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Mechanical Hazards, Proposed Action states "the presence of the project would likely have little long term effects on the level of fire hazard". It also states "wind turbine machinery is designed with fire safety in mind". As stated previously, there is basically no operational history on these newer larger machines and to make the statement that these machines perfectly safe is irresponsible. A review of literature has shown that these machines do sometimes fail and do sometimes start fires. It is inconceivable that this comes from enXco. They recently had such a failure that is described below:

Burn Fatality at Enxco's Altamont Wind Farm Site
by Paul Gipe
20 November 2003 27-22 HS-1

On September 19 at 7:30 pm Marty Evans died of burns received the previous day at a wind farm managed by Enxco says California's Division of Occupational Safety and Health (CalOSHA). Evans (34) was "performing a switching operation when an explosion occurred" at about 11:00 am on the 18th. The explosion burned Evans over 80 percent of his body and started a grass fire. The East Contra Costa Fired Department responded. CalOSHA has opened an investigation of the accident and will exam Evans training, qualifications, and work assignment as well as interview his colleagues to determine the cause of the accident. No other details are available.

Enxco says the accident occurred when Evans was switching a pad-mounted transformer. There are literally thousands of such transformers on California wind farms and switching them is a common activity.

Enxco is a large diversified developer and operator of wind power plants. The company is part of SIIF, the unregulated subsidiary of French utility giant Electricite de France.

Why was this information of potential transformer failures not mentioned in this DEIS or reported by enXco? 27-22 Cont. HS-1

Chapter 1, page 1-20, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Shadow Flicker, Proposed Action plainly states "The distance threshold for shadow flicker impacts is approximately 2,000 feet." And, "38 receptors (residences) in the project area could be exposed". This fact is being described as an unavoidable impact, especially for non-participating residences and neighboring land owners out to at least 2000 feet. This is unacceptable. Exposure statistics in this section are missing the whole point. No non-participating landowner should be subjected to this effect, PERIOD. The whole purpose of successful siting of commercial wind farms is to eliminate it's effects from innocent neighbors. If enXco cannot position turbines to accomplish this, they are proposing it in the wrong area. 27-23 HS-7

Chapter 1, page 1-21, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Noise, Proposed Action states "project noise impacts would be rated at either low or medium, and would not be significant." It also states "tonal noise from turbine operation is possible, but cannot be predicted." In a review of literature, one of the most under rated impacts is that of noise. There is ample information about noise logs and complaints of being close to wind turbines on the Internet. Computer modeling and dB weighting is not an exact science and the current analysis using WindPro software does not take into account the many variables of each turbine placement in its environment as well as the cumulative effects of carried sound. 27-24 NOI-1 Bottom line is the same as for shadow flicker. A 2000 foot noise buffer at a minimum. No non-participating residence and neighboring landowner should have to endure industrial noise. If enXco cannot position turbines to accomplish this, they are proposing it in the wrong area. 27-25 NOI-2

Chapter 1, page 1-21, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Aesthetics, Proposed Action reduces this issue to "Visual Assessment Units". Any sane person can figure out that 120 gigantic 340 foot towers with blinking lights and moving 200 foot blades in your western viewshed will adversely affect views. The DEIS contains pictures of 16 key views all of which contain clouds and other objects to detract from the turbine simulations. This DEIS should contain simulation photographs from each affected non-participating resident within 2000 feet. 27-26 ALG-2

Chapter 1, page 1-22, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Light and Glare, Proposed Action states "Blade glint or glare can be noticed over distances of 6 to 9 miles and could be an occasional occurrence." This impact can affect the public driving on public roads out to 9 miles if the information is correct. A significant impact for public safety on the roads and further distractions for drivers. Drivers on Interstate 10 and 90 and Highway 97 should not be exposed to this effect thus the potential to cause accidents. If enXco cannot position turbines to accomplish this, they are proposing it in the wrong area. 27-27 ALG-3

Chapter 1, page 1-23, Summary Comparison of Environmental Impacts, Table 1-1, Recreation, Proposed Action states "Indirect impacts would be limited to minor audible and visual intrusion into nearby recreational areas". For the eight landowners who have signed up with this project, only they should be impacted by its operation. The 57 neighboring landowners should not have to be impacted, even if estimated to be minor. Recreational use of land is a basic right of the landowner and should not be infringed upon, especially for a project with dubious benefit to the overall community. 27-28 RC-1

Chapter 1, page 1-25, Summary Comparison of Environmental Impacts, Table 1-1, Air Transportation, Proposed Action states that 27 turbines would "likely be considered hazards to air navigation and a potential adverse impact on air traffic operations in the traffic pattern". Since Bowers Field has been in operation since WWII, they should not have to alter established travel patterns to 'accommodate' the construction and profitability of the Applicant. Those 27 turbines identified as hazards should therefore not be allowed and eliminated from the application. 27-29 AT-2

Chapter 1, page 1-27, Summary Comparison of Environmental Impacts, Table 1-1, Population, Housing, Employment, Proposed Action states "current research has generally found that wind farms have either no effect on tourism or a positive effect". An expanded review of literature should be performed. There is ample evidence that industrial commercial wind installations in view shed areas will ultimately reduce tourism in the long run. Initially, after becoming operational, the general public and educational institutions (i.e., school field trips) will make a point to visit the area to be amazed at how big these machines are. But after that, the novelty goes away. Very few people travel to an area just to look at a wind farm. 27-30 PHE-1

Chapter 1, page 1-23, Summary Comparison of Environmental Impacts, Table 1-1, Fiscal Conditions, Proposed Action states "Potential property tax revenues from the project are estimated at a maximum of nearly $1.1 million for the first year of operation. Tax revenues in subsequent years would be based on depreciated value of the project and have not been estimated". The important point here is that a table of depreciated value should be produced to show the accelerated depreciation method and actual estimated tax revenue throughout the 20 to 30 year operational period of the project. This can easily be produced and should be requested. 27-31 FIS-2

Chapter 1, page 1-32, 1.7 Cumulative Impacts, 1.7.4.3 Wildlife. All references to the statement, "To date, no bald eagle fatalities have been reported from wind plants in the US" should be stricken from this document. For WEST, Inc. to repeat this mantra and for Huckell/Weinman Associates to accept it on face value is irresponsible. There is ample evidence that these wind turbines have killed thousands of raptors including golden and bald eagles, especially at Altamont, CA. And WEST, Inc. was involved in that avian study and has never been held accountable for their 'miscalculations'. The Desert Claim as well as the Kittitas Valley Wind Power Project areas are in bald eagle hunting grounds. The Kittitas Valley Audubon has confirmed that fact. There is a high potential that these 27-32 PA-13 27-33 PA-12

two projects, if operational, will take a toll on our local eagle population. This is in violation of the federal Bald Eagle Protection Act. 27-33 Cont. PA-12

Same page under **Mammals**, it states, "based on experience at other wind plants, bat fatalities are likely to occur at all three Kittitas County projects". Yet, WEST, Inc. has done no formal bat studies to date at either project site. To suggest this impact will occur, but no study was done to investigate the overall impact, is irresponsible. Formal bat studies must be carried out as well as night studies on migratory birds for 2 years. 27-34 PA-1

Chapter 1, page 1-34, 1.7 Cumulative Impacts, 1.7.5 Energy and Natural Resources. After the sentence, "Assuming long-term operation of the three projects at a typical plant factor of 33%, the Kittitas Valley, Desert Claim and Wild Horse projects would produce approximately 180 average megawatts of electricity on a long term basis", should be eliminated. The rest of the paragraph is conjecture as none of the Applicants have a buyer for their proposed energy production. There is no guarantee that any of the power produced will stay in the local area or even in Washington State. Note that the Applicant admits that "although it (wind power) would represent a relatively small addition to the total regional electricity supply". The last sentence gives the impression that Puget Sound Energy will buy their power. The fact is PSE just has a RFP to look into renewable energy in all its form, wind power only being another form. 27-35 ENR-1

Chapter 1, page 1-35, 1.7 Cumulative Impacts, 1.7.7, Land and Shore Use states "it is possible that the proximate Desert Claim and Kittitas Valley proposals (together more than 12,000 acres) could cumulatively discourage residential uses to some degree in their general locations". It also states "some nearby residential users might seek to relocate if they felt that wind facilities, individually or collectively, conflict with elements of their lifestyle." This is absolutely preposterous! For the benefit of about 21 landowners, they feel they have the right to condemn 160 plus residences and landowners (on the project perimeter) and force them to abandon their property. How many other hundreds would be affected out to 1 mile of the project areas? This statement alone is proof that the wind developers do not care about being good corporate neighbors to citizens of Kittitas County. This is reason enough to not allow the wind resource rezone. 27-36 LU-3 27-37 VB-2

Chapter 1, page 1-35 - 1-44, 1.7 Cumulative Impacts. The rest of this chapter basically amplifies all the impacts previously discussed. These cumulative impacts are mostly from the close proximity of the Desert Claim and Kittitas Valley projects. Wild Horse, on the other hand, would add little cumulative effect due to its isolated location and only one resident within 1-1/2 miles to the project area. One could argue this is a prime location in Kittitas County for this type of industrial development. 27-38 SO-4

Chapter 1, page 1-48, Mitigation Measures, 1.8.3.2 Ground Water does not address mitigation measures in regard to damage to non-participating landowner's wells that could be damaged by the blasting techniques to create the 30x30x35 foot holes needed for each turbine base. T here could be silting or other water quantity or quality issues. The long-term effect of 120 of these giant concrete cubes deep in the ground has not been 27-39 WR-2 27-40 WR-3

evaluated in the long term (30 years). Concrete is known to leach minerals over time. What protections are in place for personal wells in the entire area for the next 30 years if water quality changes? 27-40 Cont. WR-3

Chapter 1, page 1-49, Mitigation Measures, 1.8.4.1 Vegetation, states "the project proponent would coordinate with the WDFW to mitigate for impacts to shrub steppe and grassland habitat. Mitigation is expected to consist of acquisition of replacement habitat at a 2:1 ratio for shrub steppe and 1:1 for grassland." What exactly does this mean? Once shrub steppe habitat is disturbed or destroyed, it is gone and cannot be returned by revegetation of native seed mixes. This mitigation measure and plan to acquire replacement habitat needs to be explained in detail. 27-41 PA-5

Chapter 1, page 1-50, Mitigation Measures, 1.8.4.3 Wildlife states, "A Technical Advisory Committee could be formed to implement and evaluate a mitigation and monitoring program and determine the need for further studies or mitigation measures once the project is operational." This statement is a very irresponsible way of saying the bird studies from WEST, Inc. say birds won't be killed, especially eagles, so it will be safe to build. And after becoming operational, and birds are proved to be killed (including a couple of eagles), they will form a committee to look at the problem. Reverse engineering at its finest. The Applicant is saying they could form a TAC, but will they? They mention that only a one year program be planned. The TAC should be in place for the lifetime of the project. They also don't describe or outline the authority the TAC will have on the wind farm operations. Will they have the authority to decommission turbines identified as excessive killers of birds or bats? Will they have the authority to shut the turbines down during migration seasons? How will those members of the TAC be compensated? Will they have an adequate budget to perform physical carcass counts on a regular basis (once or twice a week)? Will they be able to capture photographic evidence of bird and bat kills in a log PRIOR to disposing of casualties? Will that log be available to the public on request? 27-42 PA-4

And finally, if any golden or bald eagle becomes a casualty, who will be the accountable enXco official prosecutable under the federal Bald Eagle Protection Act? 27-43 PA-12

Same section, page 1-51, states, "guy wires on permanent met towers on-site could be equipped with Bird Flight Diverters to minimize the potential for avian collisions with guy wires." There should be no structures using guy wires. Permanent met towers should be constructed that are stable enough not to need guy wires. 27-44 PA-6

Chapter 1, page 1-52, 1.8.7 Land and Shoreline Use states, "Increasing turbine setbacks from the residences adjacent to the central portion of the site could reduce visual and proximity impacts to these residents. Other impacts discussed would not be significant and do not warrant mitigation." UNBELIEVABLE! 57 other residents living amongst and next to this industrial operation who will be subject to all the impacts previously discussed 'are not significant and do not warrant mitigation'. Hundreds of citizens WILL BE effected by SIGNIFICANT impacts, and enXco states: "Tough - if you don't like it you are free to move elsewhere." I cannot believe the Kittitas County 27-45 LU-5 27-46 VB-10

Commissioners would walk over their own constituents to harm so many citizens for the benefit of 8 landowners. 27-46 Cont. VB-10

If this project is permitted, I would like to have described exactly what enXco will do to mitigate impacts to residences and landowners within a mile of this project area. The Applicant stated previously that some people will not be able to live around the project area and may have to move. EnXco should have to buy those properties within a mile of the project area at today's market value. PERIOD! 27-47 LU-4

Chapter 1, page 1-53, 1.8.8 Health and Safety, 1.8.8.1 Mechanical Hazards states, "Wind turbine generators....are equipped with multiple safety systems as standard equipment." As previously mentioned, there is no track record with which to compare whether this design is the most reliable or the safest. These larger designs have not been in operation long enough to state, with any reliability, their sound design. Once the turbine leaves the factory, the manufacturer basically declines any responsibility or liability and put it on the wind developer. Contractors assemble these giant structures wherever the wind developer wants to place them. Are the contractors assembling these structures to the manufacturer's specifications? Will the maintenance schedules follow manufacturers instructions? Is the wind developer cutting corners to save money? Are all safety features installed correctly? There are many ifs and variables which is why enXco states 'humans access should be restricted within a distance of at least 540 feet away from each tower. 27-48 HS-2

Chapter 1, page 1-53, 1.8.8 Health and Safety, 1.8.8.1 Mechanical Hazards, Tower Collapse states that "the selected wind turbine generator / tower combination would be subjected to engineering review to assure that the design and construction standards are appropriate for the Kittitas Valley site." The engineering review described should be included as part of the DEIS. 27-49 HS-11

Chapter 1, page 1-53, 1.8.8 Health and Safety, 1.8.8.1 Mechanical Hazards, Ice Throw states, "in light of the few days of icing conditions expected at the Kittitas County site, it MIGHT be practical to shut down selected turbines when the danger of icing exists. Icing sensor systems are available and COULD be installed on specified turbines". No evidence was presented to back up the statement that, "in light of the few days of icing conditions expected," is true. Records are available at Bowers Field to identify how many icing days have been experienced in any recent year. The Applicant does not say if icing sensors WILL be purchased and utilized, only might be used. 27-50 HS-3

Chapter 1, page 1-54, 1-55, 1.8.8 Health and Safety, 1.8.8.1 Mechanical Hazards, Fire Hazard states, "Location of transformers and electrical equipment below ground would harden them against tower collapse, blade throw and vandalism, thereby reducing the fire hazard." But, on the **Fact Sheet Page ii** states "a transformer mounted on a concrete pad near the base of each turbine would raise the voltage from 575 volts to 34.5 kilovolts." Which do they plan to do? This issue needs to be specifically addressed in 27-51 PD-8

light of the recent death and grass fire at an enXco wind farm in California when the pad mounted transformer unexpectedly exploded with a similar turbine design. 27-51 Cont. PD-8

Chapter 1, page 1-54, 1.8.8 Health and Safety, 1.8.8.3 Shadow Flicker states: "Because shadow flicker can only occur…it could (in principal) be prevented by shutting down specific turbines…. Implementing this measure, in practice, would likely be quite difficult, however. One operational measure that might be feasible….would be to develop a telephone hot line system. Receptor locations ….. could be provided with a specific number by which to connect to project staff …to request temporary turbine shutdown …. The viability of this option with respect to project operational costs and flexibility has not been evaluated." Other mitigating measures suggest that residents affected put up drapes or blinds on their windows. Again, this is unacceptable. No non-participating landowner should have to be exposed to this impact. The Applicant's comments above conclude that shutting down the facility at sunrise and sunset for 10 or 15 minutes is not an option and putting in a hotline number will affect (profits) operational costs. They previously stated shadow flicker can extend out to 2000 feet from a turbine, let alone 120 of them. This issue has not been researched enough and the mitigation measures are inadequate. Placing the problem that the Applicant created on the backs of hundreds of affected residents is about as irresponsible as another corporate polluter. 27-52 HS-8

Chapter 1, page 1-55, 1.8 Mitigation Measurers, 1.8.8 Health and Safety, 1.8.9 Noise states, "Several noise mitigation measures were included in the project design." With these design features, no significant noise impacts were identified." The Applicant offers no mitigation measures if their WindPro computer modeling simulation is wrong and their project subjects unbearable noise pollution into the surrounding area. The noise impacts seem to be the most problematic of wind farms placed in close proximity to human inhabitants. There is ample evidence on the internet from the UK, Spain, Germany and other European countries that have established operational wind facilities. 27-53 NOI-3

A mitigation measure would be that if their project creates unacceptable noise into the community, it will be decommissioned in a timely manner. The TAC group formed to monitor avian and mammal fatalities, should also keep a log of noise complaints from the surrounding community and work on resolutions up to and including purchasing of properties effected. 27-54 NOI-3

Chapter 1, page 1-56, 1.8 Mitigation Measurers, 1.8.8 Health and Safety, 1.8.10, Aesthetics, Light and Glare. None of the proposed mitigation measures will do anything to reduce the wind turbines towering effects in the valley. They cannot blend in a 400 foot structure with a blade the size of a Boeing 747 spinning with flashing lights into the landscape. Adding 119 more with random flashing lights and unsynchronized spinning blades would present the visual blight of industrialization to the valley. 27-55 ALG-4

Chapter 1, page 1-57, 1.8 Mitigation Measurers, 1.8.8 Health and Safety, 1.8.11, Recreation states, "The impact analysis did not identify significant adverse impacts on recreation resources and no mitigation measures are required or identified for 27-56 RC-1

consideration." This DEIS does not even mention those landowners who have purchased real estate not intending to build a home, but purchased for recreation. I myself, am an amateur astronomer. If I owned property on the fringe of this project, I would not be able to recreate in my own manner. The shear size of these machines would block massive areas of the sky. The blinking lights would introduce light pollution so deep space observations would be impossible. I am also a bird watcher. As in the previous example, my bird watching would be reduced to watching birds being chewed up by these cuisine arts of the sky. Hunkell/Weinman Associates should not accept the word of the Applicant, and do their own research with realtors in the area who know why people buy and recreate in the proposed area. 27-56 Cont. RC-1

Chapter 1, page 1-58, 1.8 Mitigation Measurers, 1.8.13 Air Transportation, 1.8.13.1 VFR Traffic Pattern states, "As of this writing, the Applicant has not completed an evaluation of the feasibility of these possible measures or their impact....and has not indicated a preferred course of action..." Modification of established air traffic patterns for the purpose of enXco to have 27 more turbines should not be an option. The proposed project is not worth, nor does it have a priority over, Bowers Field and its operation. 27-57 AT-2

Chapter 1, page 1-60, 1.8 Mitigation Measurers, 1.8.15 Population, Housing and Employment states, "no mitigation measures are necessary to offset impacts to employment, population or housing." Again, this DEIS did not go into great detail on the overall impacts to the county. Mitigation Measures should be in place if the EIS is found to be wrong. Many of the studies and information were selectively provided by pro-wind power sources. What if, after the project is built, real estate values and sales plummet? What if the annual Ellensburg Rodeo attendance drops 50 percent? What if business owners start seeing a drop off of business because travelers now bypass Ellensburg from Interstate 90? What if a wind turbine gets struck by lightening, starts a fire and spreads through the project area destroying houses and wildlife, decimating the area? What would enXco do? All these are examples of impacts that could happen and should be addressed. EnXco should have to be held accountable for any negative impacts they created, and deceived the County by withholding the facts. Perhaps this is why wind developers form LLCs (limited liability corporations). 27-58 EIS-10

Chapter 1, page 1-61, 1.9 Significant Unavoidable Adverse Impacts, 1.9.1 Earth Resources. No mention was made of the impact to the destruction of the coveted Ellensburg Blue agate in the excavation and moving of tons of ground. This earth resource is specific to this area west of Ellensburg. Many businesses make their livelihood in selling Ellensburg Blue gemstones. 27-59 ER-1

Chapter 1, page 1-62, 1.9 Significant Unavoidable Adverse Impacts, 1.9.4.3 Wildlife states "The project would result in unavoidable impacts to birds, primarily in the form of mortality caused by collision with turbine blades. Consequently, impacts to birds would not be considered significant." How many deaths of innocent birds and bats would it take to be considered significant??? Bald eagles inhabit the project area and the WEST, INC study confirms the eagle sitings in the area. How many eagles have to die to be 27-60 PA-14

considered significant??? This is the greatest example of 'minimizing' I have ever read. This whole issue needs to be re-examined by another, impartial, avian expert. The implication that avian mortality at this site will be similar to other sites is ludicrous. Every area, even if within the same state, has differences. 27-60 Cont. PA-14

Chapter 1, page 1-63, 1.9 Significant Unavoidable Adverse Impacts, 1.9.7 Land and Shore Use states: "The scale of the wind turbines would be significantly larger than other land uses; this contrast is unavoidable because of the nature of wind facilities. Effects on overall land use patterns in the project area would not be significant. Impacts to residences located proximate to the turbines could be reduced, but not avoided through increased setbacks." Another amazing statement! It is obvious that this project is incompatible with current land uses. They use the word 'proximate', and I would define that to mean within 1 mile of the project. The immediate impacts can be avoided by building it in a more isolated location away from innocent landowners. This is a poor site, and the authors of this DEIS failed to examine successfully sited projects such as the Stateline Project on the Columbia and the Klondike project in Wasco, Oregon. Even the proposed Wild Horse project can probably be compared as a successful site as it appears it will have little opposition and no impact to neighboring landowners. 27-61 LU-1

Chapter 1, page 1-63, 1.9 Significant Unavoidable Adverse Impacts, 1.9.10 Aesthetics, Light and Glare states, "Development of the project as proposed would result in significant unavoidable adverse impacts to the visual environment, especially for nearby rural residents in the northern half of the Northwest Valley." That says it all! Eight landowners will benefit to the detriment of hundreds of others for the benefit of unreliable, expensive and minimal electrical energy to be sent out of state so that a French company can profit. Amazing! 27-62 VB-2

Chapter 1, page 1-64, 1.9 Significant Unavoidable Adverse Impacts, 1.9.13 Air Transportation states, "Selection of the mitigation approach for the airspace conflict remains an unresolved issue." This is a crucial issue that must be resolved before a formal EIS be issued. It is irresponsible that Huckell/Weinman would let this remain unresolved in a DEIS. Forcing Bowers Field to change their policies on airspace should not be an option. The priority and purpose in the community of Bowers Field far exceeds what enXco needs to be profitable. 27-63 AT-2

Chapter 1, page 1-65, 1.9 Significant Unavoidable Adverse Impacts, 1.9.15 Population, Housing and Employment states, "The population, housing, and employment impacts of the Desert Claim Wind Power Project are not expected to be significant, and would not likely be viewed as adverse." This comment is totally counter to **Chapter 1, page 1-63, 1.9 Significant Unavoidable Adverse Impacts, 1.9.10 Aesthetics, Light and Glare.** There WILL be impacts to many, and they WILL be adverse. This project does not justify destroying the Upper Valley so that eight landowners benefit financially as well as a French corporation. 27-64 PHE-2 27-65 VB-2

IN CONCLUSION:

This DEIS is better organized than what I have reviewed recently with the Kittitas Valley Project. It is, again, a document written to slant impacts to the developer. All industrial projects have a downside and Huckell/Weinman failed to realistically present that side. The document is littered with minimizing statements like, significantly insignificant, not expected to be significant, no significant adverse impacts, negligible significant adverse impacts, no high (i.e. significant) unavoidable adverse impacts, significant adverse indirect impacts are not anticipated, and adverse impacts are either not anticipated or would be insignificant. 27-66 EIS-1

Although this DEIS states obvious impacts, it does not go far enough to examine the long term effects. Mitigation measures are not long term and do not obligate the Applicant to pursue corrective actions after construction. 27-67 EIS-10

The wildlife studies by WEST, Inc are inadequate and fail to take into account night studies, bat studies and migratory flight paths. The issue of being responsible enough to adequately address the golden and bald eagle presence was minimized and basically ignored. WEST, Inc should stand by their studies and be held accountable along with the developer should their estimates be 'in error' or eagles are killed or injured. 27-68 PA-1

Visual simulations have been minimized and additional simulations should be done for each residence within 1000 feet in or around the project area. 27-69 ALG-2

Huckell and Weinman failed to address impacts to neighboring non-participating properties in a realistic manner. They also failed to make the connection with neighboring property owners and real estate values should the project be built. 27-70 LU-1 27-71 NS-1

The true impacts from a project of this scope and size were minimized, and selected information from the Applicant was not scrutinized but taken on face value. Many of the comments are not based on reality, but on a vision.

On my own review of literature, there is ample evidence on wind farm operations worldwide which demonstrates the problems created by this specific industry. The bibliography for this DEIS fails to show that an attempt to due diligence was carried out. Selected studies, mostly from wind energy proponents, dominated the list of references. 27-72 EIS-1

I can not accept this DEIS as submitted. With all the impacts examined, it proves that this project is poorly sited and that the benefit does not justify the end result on the citizens of Kittitas County. 27-73 SO-5

Respectfully Submitted,

Ed Garrett
Rosemary Monaghan

Clay White

From: Gene Johnson [johnsong@cwu.EDU]
Sent: Thursday, January 29, 2004 11:53 AM
To: Clay White
Subject: Wind farms

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

Dear Mr. White,

While I was initially not planning to respond during the wind-farm comment period, I believe that the issue is too important to ignore. My property on Wilson Creek Road abuts the proposed wind-farm area. When I built my house on the property in 1996, I did so because of the peaceful and quiet atmosphere. My house and property are the single largest investment that I have ever made. I plan to live there until I retire, sell the house and property, and move to smaller housing. It it hard for me to comprehend that anybody would want to knowingly move next to such monstrosities as the proposed windmills. So who would I be able to sell my property to? And if I could sell it, what type of price could I expect to get? My investment would prove to be a poor one and the quality of my retired life could suffer. I also am concerned about noise and damage to the environment and animals. I do not believe that these issues have been thoroughly addressed in reports. 28-1 NS-1 28-2 NOI-1

I wish to go on record at this time that I am OPPOSED to a wind-farm next to my property. I know that there are not many people in my position (with abutting property), but I hope the the county will look after my interests as I have the most to loose. 28-3 SO-5

Sincerely,

Gene Johnson
11401 Wilson Creek Road

PS...There are so many places east of Ellensburg where wind-farms would not disturb a soul. How about a recommendation to move there? 28-4 SO-4

Mr. Clay White, Planner II
Kittitas County Community Development Services
411 N. Ruby St. Suite 2
Ellensburg, WA 98926

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT-DESERT CLAIM

Attached are my comments for the draft Environmental Impact Statement for Desert Claim Wind Power, LLC. Project by enXco.

Unfortunately this DEIS lacks quantitative and qualitative information as to the effects this project will have and the methods that will be utilized to ensure compliance. The constant usage of the term "non significant" is used randomly without any determination of this except by the proposing company enXco. Thus, this DEIS is merely a "Statement of Non Significance" document based on the ideology of the enXco company. 29-1 EIS-1

As stated the intent of the proposed project as detailed is in direct defiance of the Kittitas County's objectives. This fact alone regardless of operation, maintenance, etc. is a defining factor in the disqualification of the proposed project and submitted draft EIS. 29-2 EIS-4

This project rests not only on the adoption of this EIS but that Kittitas County will adopt a site-specific rezone for the site area and a change to Kittitas County Comprehensive Plan. I cannot imagine an EIS even being proposed without the required rezoning. For the company and the community to go through the review of this draft t EIS without the approval of this zoning seems senseless. 29-3 EIS-6

As reported in Cape Cod Times, October 2003, "the U.S. Bureau of Land Management, which controls more than 261 million acres of government land, recently announced it will conduct a two-year "programmatic" environmental impact statement in western states to assess common issues and concerns associated with wind farm development" (Attachment C.). I would think that the County along with the State would stall decisions until this review is completed. 29-4 EIS-6

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

Sincerely,

Jill D. Kuhn (land and homeowner)
PO Box 926
Kittitas, WA 98936

NOTE: These comments will be postmarked by the January 31, 2004 5:00 pm deadline in addition to being e-mailed.

DRAFT EIS DESERT CLAIM WIND POWER, LLC..

The proposed project by en*Xco*: Desert Claim Wind Power, LLC. for a 120-turbine wind farm (180 megawatts) eight miles north of Ellensburg is totally misaligned with the zoning, objectives and basic character of the rural area. Even though the project is considered in a rural area the proximity to the City of Ellensburg, only eight miles away, is unjustified. It is not the mere turbines alone that would be disruptive but the construction of acres of roads, power collection cables, one or more substations, operations, and maintenance and storage buildings in addition to the storage repair areas. With the thirty year life span the project would definitely alter the entire town of Ellensburg and the Kittitas Valley for generations to come. They have been mention that the development of the wind farm will decrease growth of the area. There was a subdivision request just submitted for 400+ acres to be subdivided into 56 lots. Obviously even the prospect of the wind farm is neither stopping further growth nor the review and acceptance for such subdivisions by the county commissioners.

29-5
LU-1

29-6
LU-2

1.4 Kittitas County Objectives

Not only will there have to be rezoning of the property by the Kittitas County Commissioners but an amendment to the County Comprehensive Plan. The County criteria as stated in this section: "the project is essential or desirable to the public convinces.." This project is neither desirable by many nor vastly essential. This is proven by the fact that the electricity produced by this wind farm will not even be used within the county more or less the project area. The only Kittitas County residents that consider this "desirable" and for many of them even "essential" are those individuals already signed with en*X*co, Inc. for the lease of their lands. Thus, the residual profits from their leases are essential to then and to them only.

29-7
EIS-4

"The project is not detrimental or injurious to the public health, peace or safety or to the character to the surrounding neighborhood" The possible detrimental attributes of this proposed wind farm are not just those realized now but what is unfortunately unknown about the effect of wind farms on the physical health of residents. There have been claims made from active wind farms as to the noise, lights and electro magnetic reactions. Whether these are found to be accurate only time will tell. However, the legal responsibility for the county to accept such a project and the ramifications is tremendous. Of course the "peace" of the rural area will be disturbed. The mere mention above in the EIS of not only placement of the 120 turbines but the construction of access roads, control cables, power collection cables, the one or more substations, operation-

29-8
EIS-4

maintenance storage sheds and the storage repair areas is enough display that of course the "peace" of this rural area will be disturbed. The character of the immediate site surrounding, the town of Ellensburg and the whole valley will of course change. To presume otherwise is totally ridiculous. 29-8 Cont. EIS-4

The economic impact to the City of Ellensburg and Kittitas County is yet to be realized. I have not seen nor has this draft EIS documented the proposed incomes nor opposing costs. The mere usage of the existing roads without viable means of returning those costs to the city and or county would create a deficit. I would propose any deficit to the city and county would not be acceptable especially at this time. An exact recount of such cost per profit ratio should be studied. Also, if this project will limit otherwise sub dividable land and housing how will the loss of property taxes, etc. be off set by the proposed project? 29-9 FIS-3

1.5.1.3 **Operation and Maintenance**

Although Bonneville Power Administration, Puget Sound Power and Energy, Kittitas County PUD and Grants County PUD are mentioned as supposed buyers of the electricity there are no use agreements to guarantee such purchase. The economic feasibility of this project rests on these Purchase Agreements. Such agreements should be required as part of approval of this draft EIS. 29-10 PD-6

1.5.2 Alternative Site I Wild Horse Site

Yes, this could be a possible site. However Zilkha has already applied for a wind farm at this location. I sincerely doubt that with the proposed site acreage there would be adequate acreage for yet another farm by enXco Inc. So this is not a practical alternative. 29-11 ALT-3

1.5.3 Alternatives 2 Springwood Ranch

Springwood Ranch is mentioned as an alternative site. How can this site even be proposed when there has been no comprehensive, meteorological, on site review The Spring wood Ranch management has not even approved of such a "wind farm" site. Thus, no alternative is viably proposed. 29-12 ALT-4

1.5.3 **No Action Alternative**

This is by far the most comprehensible and reasonable statement throughout the entire EIS. Of course the proposed site will be subdivided. The County Commissioners are currently reviewing a subdivision request for a 400+ area to be subdivided into 54 lots. Of course none of us like the subdivision of rural land that eventually extinguishes the "rural character" of the area. However, this is a separate issue that needs to de 29-13 ALT-1

determined by the Planning Department in association with the County Planning Commission. Subdivision of this site will happen regardless. However with the increase number of residents the potential for physical harm, peace and safety of the area becomes even more in jeopardy. 29-13 Cont. ALT-1

1.6 **Summary Comparison of Environmental Impacts**

Table 1 showing the comparison of environmental impacts with the project and the two 78 proposed sites provides no information. The majority of the information provided is repetitious and since there have not even been site visits as recorded by this EIS at the Springwood Ranch I cannot see how this can even be regarded. 29-14 ALT-4

Earth: How can the impact of erosion be the same as it is now when there will be considerable construction during the development and construction of the project? Who will be the judge as to the impact of erosion? Due to the water table, steams and well systems, erosion, disturbance of this large amount of acreage, would of course have an impact. 29-15 ER-2 The location of turbines in already recognized "high land slide" areas should not even be permitted. 29-16 ER-3

Air Quality: The maximum construction especially of roads in the dry arid site will of course affect the quality of air. To what extend would be hard to predict. Hopefully this would be evaluated prior to jeopardizing the health of adjacent residents to construction areas. 29-17 AQ-2

Water Resources: As stated the proposed project would affect 15 streams in the construction of the towers and 18 streams would be crossed in collection of the power. Water is of extreme importance and of cautionary note especially in such an arid site. It is stated in the EIS that the constriction impacts would be "minor and temporary." Thus, enXco admits that there will be an impact. How temporary would this impact be? I would suspect that construction would happen during the spring and summer months when water tables can become increasingly low. 29-18 WR-1
It is admitted in this draft EIS that localized impacts to ground water quality are possible" but go on to say that this can be corrected by mitigation. The question is what specific mitigation? 29-19 WR-2

Vegetation: This project would occupy 78 acres of vegetation and 311 acres would be "temporarily disturbed." Unfortunately there is no such thing as "temporary disturbance" for vegetation. The vegetation is either disturbed or it isn't. The proposed construction could not be done without harming the vegetation. Yes, this vegetation may return but unfortunately it had been shown in many environmental cases that such "disturbance" disrupts more than the vegetation. The whole eco system that is supported by the vegetation and that it supports would be discomposed. The direct impact is to the animals of the region. 29-20 PA-18
16 acres of wetland would be temporarily disturbed by the projects construction and 9 acres of the enXco project would "permanently" be lost. Encroachment on designated 29-21 PA-11

"wertland" areas is extremely restricted if allowed at all. I cannot imagine that the State of Washington would allow the loss of 9 acres of "wetland." This could be yet another legal liability if approved by the county. 29-21 Cont. PA-11

Wildlife:

Birds: The information provide is based on conclusions drawn from studies issued by West, Inc. Many of these studies have been declared incomplete and thus should not be allowed as evidence. Also, these studies did not include information provided by actual residents of the area nor been the local Kittitas County Audubon Society. The site chosen is a warranted bald eagle roosting and hunting area. Since Bald Eagles are protected under United States Federal law (Bald Eagle Protection Act) I cannot I imagine disturbance of this site being acceptable. Even raptors in this area are protected by State law. How would Federal and State law be upheld when aviary harm is assured in the draft EIS, "3 to 4 raptor fatalities per year, 140-220 birds per year"? There can be no mitigation for the operation of 122 turbines that ensures bird kill as stated. But the EIS states that the "endangered species are not actually likely to use the area." Now that's ridiculous since it's already been proven that the species use this area (i.e. bald eagles, raptors). Why would these species all of a sudden not use the areas that they have used for centuries? Altamont Pass has documented the bird kill problem by wind turbines (refer to Attachment A. Washington Post Documents Bird Fatalities). 29-22 PA-1 29-23 PA-12

Other Wildlife: The EIS states that "impact to small l mammals are expected to be low and non significant." What studies have been conducted for that statement to be concluded? With disturbance to the vegetation and topography loss of small mammals would prove to be significant especially to the higher species that feeds off that chain. This of course holds true for the mentioned amphibians and reptiles. The WDFW has determined that this area is winter range for the mule deer and Quilomene Elk spring migration is adjacent and many times within the project area's north boundary. The EIS sounds like the loss of these animals would not be important to the environment and the residents of the area. May we be reminded that this area and surrounding adjacent lands are recreational hunting areas. Any losses would not be taken lightly. 29-24 PA-9

Fish: Federally threatened summer steelhead is in not only the Yakima River but also Reecer Creek. How can the proposed project not affect the survival of this species? There is no information given on any neither migration nor procedures to ensure protection. 29-25 PA-10

Consistently throughout the review of the environmental site no wildlife, fish or vegetation would be significantly impacted. There are many endangered species listed. Yet there are no methods addressed for the protection of theses species. Should it e garnered that there will be "no significant affect" just because enXco, a wind farm developer, private company for profit, states so? **This is neither guaranteed nor acceptable.** 29-26 PA-19

Energy and Natural Resources: "The project would have little or no impact on the supply and price of electricity available to local customers." How can this statement be made? How can local customers be impacted when the company, enXco has no documented buyers for the produced power? But in fact if the power were to go to local Kittitas customers the cost would be higher because electrical companies charge a higher rate for power that is considered "green." The electric companies have to pay premium for wind power and that is then passed to the consumers. Local consumers would certainly not benefit. Also, the 60-megawatt of power to be produced is certainly different than the 180 megawatts of power that was represented at the beginning summary of the project. This fact alone is very misleading and should be corrected through the EIS document. 29-27 ENR-1 29-28 PD-5

Cultural Resources: EIS goes on to say that development would be able to unveil "prehistoric and historic artifacts." This statement is preposterous. If any such artifacts were to be uncovered the project would be halted until certified archeologists and geologists would "clean" the site (University of Washington Archeological and Geological School of Studies). 29-29 CR-1

Land and Shoreline Use: Once again conjecture rules in this fictional tale. How can a project of this scope not impact existing activities and "changes to the land use patterns? To suggest such is ludicrous. Yet I do agree with the EIS statement that "Wind Turbines would be significantly greater in scale than nearby residential uses, and "some degree of incompatibility or conflict would exist." This is so very true. The one local wind turbine of 8 feet cannot compare with 120 turbines of 380 feet. Quite a startling difference and yes it would present incompatibility and conflict. 29-30 LU-1

Plans and Policies: The EIS states that the "proposed project would be consistent with the land use and utilities policies of the Kittitas Comprehensive Plan." As previously delineated this is not correct. In fact the project is indirect contradiction of the Kittitas Comprehensive Plan 29-31 LU-6

Health and Safety:

Mechanical Hazards: The EIS states that turbine tower collapse and blade throws are extremely remote. However, in the next statement admits that this has occurred previously. Since the designed turbines are new, of larger statue, there is no documentation for these exact turbines and potential hazards. Realistic setbacks would be hard to ensure with all of the existing lots and roads. Fire hazard seems not to be an issue. .However in such a high fire area site and with construction, operation and use of fuels this statement seems not justified. A review of the fires from previous years would give a good indication of the current fire danger. The fire danger would of course be increased. How will the local City of Ellensburg or the County handle such increased potential? How will the additional resources be paid for and what impact will that have on the residents need for fire protection? Such a mechanical failure resulting in a burn fatality occurred at enXco's Altamont Wind Farm site (Attachment B). 29-32 HS-2 29-33 HS-1 29-34 PSU-2 29-35 HS-1

Electrical Hazards: Although the EIS mentions no potential electrical hazards a mechanical failure resulting in a burn fatality occurred at enXco's Altamont Wind Farm site (Attachment B). A failure as this is no reported in this EIS. Has review of enXco's health and safety records been reviewed? And not those by the company but county records specific to the site? Unfortunately the effects of Electromagnetic Fields are still being reviewed. As with Seattle City Light would enXco have testers that are used in residential areas to ensure no activity? In case the turbines due interfere with reception and communications what mitigation will be warranted? 29-36 Cont. HS-6

Shadow Flicker: The EIS states, "The distance threshold for shadow flicker impacts is approximately 2,000 feet." And, "38 receptors (residences) in the project area could be exposed". This fact is being described as an unavoidable impact, especially for non-participating residences and neighboring landowners out to at least 2000 feet. This is unacceptable. Residents who are not leasing their land to enXco should not be subject to this effect. If the project cannot be sited where it does not present such potential problems than the project should be site elsewhere. 29-37 HS-7

Noise: The EIS States "project noise impacts would be rated at either low or medium, and would not be significant." In addition it states, "tonal noise from turbine operation is possible, but cannot be predicted." In a review of literature, one of the most under rated impacts is that of noise. There is ample information about noise logs and complaints of being close to wind turbines on the Internet. Once again residents who have not leased their lands to enXco should not have to bear the effects of this project. Once the turbines are built and if the noise is over powering will the turbines be removed? Of course not! This has the potential of becoming an industrial wasteland. 29-38 NOI-1

Aesthetics: There is no way that 120, 340 foot towers with 200 foot blades will not impact the aesthetics of the area. Since the site is mostly level the wished throughout not only the site but even as far as Lions Rock overlook will be dramatically affected. The blinking lights on each tower would further impair this. Unfortunately the 16 views presented in the EIS are not accurate simulations due to the photograpic quality of the pictures (i.e. impaired distractions in the picture. I would like to see accurate simulations from residential house that are contiguous to the project. Once again it seems that the majority off affect residents will of course be those who are not being paid subsidies/leases from enXco. 29-39 ALG-2

Light and Glare: The EIS states that "blade glint or glare can be noticed over distances of 6 to 9 miles and could be an occasional occurrence." Since the city of Ellensburg is a mere 8 miles away this would not only impact the city butt outside of the city limits. How will this glare interact with road conditions? I cannot imagine what impact this would have on aviation. With the Yakima Firing Range using this vicinity for practices I do not believe that that there would be compliance with the Federal Aviation Administration. The distance for possible glare would impinge on not only local roads but Interstate 10 and Highway 97. Due to this glare problems siting of the turbines is not correct/adequare.. 29-40 ALG-3

Recreation: Contrary to the EIS statement I believe that recreation would be greatly I impacted. The possible noise, glare and the potential loss of wildlife for hunting would ensure this site to be defunct. Large numbers of people recreate in the Wenatchee National Forest, Lion Rock area. There are many recreational sites there that directly overlook the Recer Creek site proposed. Yearly there is a "Stargazers" gather of thousands of people at Lion Rock to view the stars with their telescopes. This site was selected because of the pristine viewing area. If the Desert Claim Wind Farm went in this major event would be halted. Viewing of the sky cannot occur when there are 120+ blinking lights in the night sky. Again contrary to the believe of wind farm developers, wind farms are not tourist attractions (refer to numerous articles through the Internet). If there is a draw it is for first time curiosity. After that the facility will lay dormant. Do you remember that this same adage was used for the building of nuclear power plants (refer to article, Three Mile Island, Beyond Tourist Reach). There have similar effects reported by Skye Windfarm Action Group (http://www.sw-ag.org/).

29-41
RC-1

29-42
RC-2

Air Transportation: If there are 27 turbines that would "likely be considered hazards to air navigation and a potential adverse impact on air traffic operations in the traffic pattern" why would they be allowed?

29-43
AT-2

Public Services and Utilities:

Water Supply, Storm Water and Sewage: Since the majority of all residents and recreational water is supplied by wells the potential for detrimental impact is a viable concern. Especially since the site would interact with several streams and waterways, most importantly Recer Creek and the Yakima River. Considerations as to irrigation are not even presented which it important to such an "agricultural" area.

29-44
PSU-4

Population, Housing and Employment: En*X*co expects to hire 150 workers during the construction phase of the project. Housing still remains difficult for the mere college students at Central Washington University. Seeking an additional 150 rentals would be difficult especially during the summer, migrant season.

29-45
PHE-3

RECEIVED
JAN 3 0 2004
KITTITAS COUNTY
CDS

February 2, 2004

Mr. Clay White
Kittitas County Planner II
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

RE: Comments on Desert Claim Draft EIS

Dear Mr. White:

Please consider the following comments when determining the need for additional studies and before making any decision to allow EnXco's proposed "Desert Claim" Wind Power Project (Desert Claim) near Ellensburg, Washington.

The Desert Claim (Draft Environmental Impact Study)DEIS is certainly an improvement when compared to the Sagebrush Power Partners DEIS, which is the subject of cumulative impacts discussion in this DEIS. However both DEIS studies lack credibility with regard to the analysis of certain impacts that will be a result of both proposed projects. The Desert Claim DEIS does not adequately assess certain environmental impacts. However, despite that certain impacts are not adequately assessed, the DEIS still makes conclusions that there will be no resultant problems or that the problems are not significant enough to warrant appropriate mitigation measures for those impacts. This gives the DEIS an appearance of a biased public relations document. The most likely reason for this is because the community expects that an Environmental Impact Study (EIS) should be an objective scientific report, but the consultants and project proponents who supply much of the needed information regard the DEIS as simply a supporting document prepared as part of the procedure for gaining approval of the proposed project. 30-1 ESI-1

A completely objective EIS is never likely to result for the Desert Claim proposal because large investments, careers, political agendas, and business interests are at stake. The objectives and standards of those preparing and providing information for the EIS will therefore influence its contents and conclusions through the methods employed to collect, analyze, interpret, and

present scientific data. Since the EIS is prepared at a later stage of the overall planning process, EnXco has obviously already committed a considerable financial investment to the proposed project. Unfortunately and because of this, the DEIS becomes just another bureaucratic obstacle on the way to achieving their goal of project approval, and they will want to provide information that will emphasize the advantages of their project and to de-emphasize the disadvantages and impacts.

The DEIS prepared by Hunkell/Weinman Associates for the Desert Claim proposal is much more complete and less biased than the DEIS prepared for the Sagebrush Power Partners proposal. However, it still contains data deficiencies and flawed analyses that bias the reader away from or greatly underestimate the magnitude of environmental impacts posed by the project. Proposed mitigation is also deficient in some cases. The DEIS appears to make a genuine attempt to address concerns from previous public comment. It appears the main problems with the DEIS originate from reliance on information provided by EnXco's consultants that have designed their studies to support the objectives of the applicant as opposed to the environment and the non-participant residents. 30-1 Cont. EIS-1

SPECIFIC DEIS COMMENTS:

To reduce the length of this letter and minimize redundancy, I have confined my comments primarily to the fact sheet and summary sections of the DEIS document. My comments apply to all applicable supporting sections that describe the same information.

One other thing I did not find in the DEIS was a discussion of impacts to property values of adjacent landowners if the Desert Claim project is approved and built. This is a controversial subject because no wind farm of the size proposed has yet been constructed in the midst of a highly scenic area with existing residences and recreational properties. Property value studies that were used by the Sagebrush Power Partners DEIS to claim no adverse impacts would occur were biased, inadequate in scope, and incomparable to Kittitas County. While it may be a subject the Applicant or the County wants to avoid, it is a significant environmental impact that should be addressed in the DEIS document. 30-2 NS-1

FACT SHEET, page i, Proposed Action: This section describes the proposed project as "The proposed action consists of development of a 180-megawatt (MW) wind energy facility". The applicant is overestimating the actual production of the proposed facility by using the nameplate capacity of 180-megawatts (MW). Since actual energy production is usually less than 30% of nameplate capacity, this should be explained and added to every reference to their 180 Megawatt wind energy facility throughout this 30-3 PD-5

document. The applicant is using this as a way to make the proposed facility seem more significant in it's energy producing ability than is actually the case. 30-3 Cont. PD-5

Chapter 1, Section 1.5.4 - No Action Alternative: The second paragraph presents a discussion of various development scenarios that attempt to bias the reader that the area will be ruined by rampant residential development if the proposed wind facility is not built. The statement in the first paragraph that existing land uses will continue as they currently do is factual and sufficient. The entire second paragraph is biased, speculative and not material to the DEIS and should be stricken.

Chapter 1, Section 1.6 - Summary Comparison of Environmental Impacts, Table 1-1, Air Quality, No Action Alternative: The second paragraph attempts to bias the reader that if the wind farm is not built, a fossil-fuel burning energy would have to be built. This paragraph should be stricken because the first paragraph of the section is factual and sufficient. 30-4 ALT-1

Chapter 1, Section 1.6 - Summary Comparison of Environmental Impacts, Table 1-1, Ground Water, No Action Alternative: The first paragraph reference to 400 lots again attempts to bias the reader that residential development will occur. There is absolutely no certainty of this and the line should be stricken as speculation.

Chapter 1, Section 1.6 - Summary Comparison of Environmental Impacts, Table 1-1, Wildlife, Birds: The bird studies issued by WEST, Inc. are incomplete and should not be accepted. Conclusions are based on a very limited data set of short duration that is presented through statistical models that tend to confuse the average reader. No studies of nocturnal species or bats were made and no confirmation of migratory pathways were studied. Other wind facilities are having significant raptor and bat fatalities and these details were not acknowledged. The proposed project area is in confirmed bald eagle hunting and roosting areas. Bald eagles, golden eagles, and other raptors are protected by State and Federal law. The studies attempt to write off the issue as non-significant and offer no alternatives to document or address the problem of killing these species if it occurs after the project is built. 30-5 PA-1

The consultant WEST specializes in studies for the wind development industry, and is obviously prone to bias towards supporting their client's objectives. As a property owner in the area that would be affected by the proposed project, it is obvious to me the area is rich in birds and big game, yet WEST concludes impacts to these species will be minimal. I would be interested to know if they have ever concluded otherwise at a proposed wind farm site they were retained to study. 30-6 VB-4

Chapter 1, Summary Comparison of Environmental Impacts, Table 1-1, Proposed Action, Desert Claim Wind Power Project, Plans and Policies: "The proposed project would be consistent with the land use and utilities policies of the Kittitas County Comprehensive Plan." To make this claim the project must satisfy certain criteria, and this is not the case for the following reasons:

1. The project is essential or desirable to the public convenience. The project is certainly not essential and it has also not been determined unanimously desirable based on the public scoping and public DEIS comment periods.

2. The project is not detrimental or injurious to the public health, peace, or safety, or to the character of the surrounding neighborhood. The project will introduce numerous potential injurious conditions to the surrounding neighborhood that have been documented in the DEIS and public comment. The applicant attempts to evade responsibility for these conditions or downplay the impacts by ignoring certain facts, speculation, or biased interpretation of data. 30-7 LU-6

3. The project will not be unreasonably detrimental to the economic welfare of the county and not create excessive public cost for public facilities and services. Recreation and rural development are an important and growing major economic force for land ownership in Kittitas County. The Applicant has not established how the project will truly affect the economy and recreation use of the area.

Chapter 1, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Shadow Flicker, Proposed Action: "The distance threshold for shadow flicker impacts is approximately 2,000 feet." And, "38 receptors (residences) in the project area could be exposed". The DEIS shows significant shadow flicker impacts to existing properties and residences will occur. This equates to nuisance trespass and not acceptable. 30-8 HS-7 Mitigation must be required so that turbines are eliminated in areas in which impacts to residences are documented. There is also no information regarding potential traffic hazards caused by shadow flicker on public and private roads, or impacts to big game or domestic animals like horses, and proposed mitigation for such. 30-9 HS-8 30-10 HS-7

Chapter 1, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Noise, Proposed Action: "project noise impacts would be rated at either low or medium, and would not be significant." It also states "tonal noise from turbine operation is possible, but cannot be predicted." Most of the property in the proposed project area is 30-11 NOI-4

range land or residential that has little or no ambient noise or background noise. Allowing industrial/agricultural noise standards to apply at the property line is not acceptable. According to descriptive noise comparisons this would be the equivalent of going from the quiet of a library to the noise of busy traffic at the receptor. Mitigation should require soundproofing or buy-out option for properties impacted by intrusive noise from turbines. There is also no information as to the impacts of turbine low frequency noise on big game herds or domestic animals such as horses, and proposed mitigation measures for any identified impacts. This is one issue the developers know creates problems and attempt to downplay. No non-participant resident should be expected to allow degradation of their property for the benefit of EnXco and a few participating landowners.

30-11 Cont. NOI-4

30-12 NOI-3

30-13 NOI-5

30-14 VB-2

Chapter 1, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Aesthetics, Proposed Action: The Applicant's consultant has created a model to attempt to assess this issue with "Visual Assessment Units". The supporting Appendix G of the DEIS goes in to a lengthy discussion of various ways to model the area around the proposed project with respect to view. The photographs used to demonstrate what the landscape will look like after turbines are built are very misleading. The wide-angle lens used for these photos deliberately distorts the vertical exaggeration of the photographs. In most of photos the foreground and sky is entirely overemphasized, and the actual area on the photos where turbines are simulated is too small to even see them. I know where every one of the photos was shot and it does not look like that when you are standing there looking at the view. The cloudy sky used in many of the pictures also conveniently de-emphasizes the turbines, and the snow does a good job of hiding detail also. They will not be hard to see with the naked eye, in fact they will be so hard to ignore as to make this section of the DEIS unbelievably biased and evasive of the truth. This DEIS should contain simulation photographs from each affected non-participating resident's property within 2000 feet.

30-15 ALG-2

Regardless of the photo trickery utilized, it should be obvious to anyone that this area has world-class scenic views from almost anywhere you are. Trying to classify which views will be more impacted is meaningless. Construction of the project will forever change a beautiful landscape that has been the primary reason many people bought property here. The night time lighting will be hugely invasive to anyone residing within miles of the project, and unbearable to many who are living in one of the darkest areas around with world-class star-gazing opportunities. Mitigation measures like trees and curtains are totally inadequate to compensate for the loss this project will cause to the non-participant's enjoyment of their properties. It will be truly

30-16 ALG-1

30-17 ALG-4

unfortunate if mitigation of this impact is not adequately required and affected residents are forced to pursue legal avenues for relief. 30-17 Cont. ALG-4

Chapter 1, Summary Comparison of Environmental Impacts, Table 1-1, Health and Safety, Light and Glare, Proposed Action: "Blade glint or glare can be noticed over distances of 6 to 9 miles and could be an occasional occurrence." This impact has the potential to cause accidents on nearby roads and has not been adequately assessed, nor has mitigation been proposed. I suppose the applicant assumes this is just another risk the public will have to accept for the purported benefits of this proposal. 30-18 ALG-3

Chapter 1, Summary Comparison of Environmental Impacts, Table 1-1, Fiscal Conditions, Proposed Action: "Potential property tax revenues from the project are estimated at a maximum of nearly $1.1.million for the first year of operation. Tax revenues in subsequent years would be based on depreciated value of the project and have not been estimated". A presentation of the actual estimated tax revenue throughout the 20 to 30 year operational period of the project should be presented. The project will enjoy accelerated depreciation subsidies, therefore the statement is biased leading the reader to assume that the tax revenue will be greater than it actually will be. 30-19 FIS-2

Chapter 1, Section 1.7 - Cumulative Impacts, 1.7.4.3 Wildlife: The statement, "To date, no bald eagle fatalities have been reported from wind plants in the US" is repeated in the document several times, is a bad attempt at bias, and should be stricken from this document. In Appendix C that presents plant and animal studies, the DEIS goes to great lengths to downplay the estimated bird "taking" that will undoubtedly be a side-effect of the project. It is obvious that the project as proposed will kill many birds and that no mitigation measures can prevent this other than locating the project in an area less favorable to birds. Statements are carefully worded to say that no fatalities have been ***observed***, but not necessarily that they have not ***occurred***. The DEIS also states that the estimated risk of bald eagle fatalities is extremely low, but possible. This is contradictory to the other DEIS assertion that average raptor fatalities will likely be higher at the site than at other wind project sites. It is ridiculous to imply that one can predict how many of which raptor species will be killed, and none should be anyway according to State and Federal law. The bald eagle is listed as a threatened species, and zero should be getting killed because someone wants to build wind turbines in their habitat. 30-20 PA-13

Models were used for predicting impacts for birds, bats, and wildlife. It has been said that all models are wrong, and this is true. Models can provide a best estimate for making an informed decision, if enough information is 30-21 PA-1

present – otherwise a model will be "garbage in-garbage out". Based on the information in this DEIS, it is apparent that impacts to birds and wildlife posed by the Desert Claim project will not be known until it is operating. The avian study was not long enough, relied on questionable observation methodologies, and completely ignored nocturnal species and bats. WEST, Inc. has done no formal bat studies to date at either project site. To suggest this impact will occur, but no study was done to investigate the overall impact, is irresponsible. Formal bat studies must be carried out as well as night studies on migratory birds for 2 years. 30-21 Cont. PA-1

The wildlife study basically concluded that elk and deer occupy the area proposed for development, and they might have to avoid the area in the future if they don't like the turbines or human interference. What a tragedy for our community to become the next test case. Better proposed mitigation measures are needed to respond to the avian and wildlife impacts that will undoubtedly occur. 30-22 PA-9

Interestingly, a lawsuit was filed just days ago in California that relates to this issue. The Center for Biological Diversity in Oakland charged a Florida company, FPL Group Inc., and a Danish wind power company, NEG Micon A/S, and other operators with violating the federal Migratory Bird Treaty Act, which makes it illegal to kill migratory birds without permits. The group's suit, filed in the U.S. District Court in San Francisco, alleges that the companies are breaking the unfair competition law under the California Business and Professions Code. It's illegal to violate state or federal laws in the course of a business' activities. The suit also alleges that the wind turbine operators are engaging in an unfair business practice by receiving government subsidies and tax credits that are intended to promote environmentally sound production of energy when in fact the activities are causing harm. 30-23 NS-3

It will be tragic to discover that Desert Claim is the first wind power development in the country that has documented bald eagle fatalities. There must be a better avian study performed before allowing the project to be approved. 30-24 PA-1 There also must be adequate monitoring requirements and mitigation measures in place to document the bird fatalities that will likely occur and to hold the developer and operator responsible for violations of the law. 30-25 PA-20

Chapter 1, Section 1.7 - Cumulative Impacts, 1.7.7, Land and Shore Use: "it is possible that the proximate Desert Claim and Kittitas Valley proposals (together more than 12,000 acres) could cumulatively discourage residential uses to some degree in their general locations", and "some nearby residential users might seek to relocate if they felt that wind facilities, 30-26 LU-3

individually or collectively, conflict with elements of their lifestyle." The bias in this is overwhelming and shows the developer cares nothing about anything that stands in the way of their objective. The developer should be made to mitigate by compensating those residents whose lives they will impact and disrupt to further their goals and profit. There has been no mention in the DEIS of the unending stress that has been placed on hundreds of non-participant residents and the potential impacts of such, medical or otherwise, because of the applicant's proposal.

3-26 Cont. LU-3

30-27 NS-6

Chapter 1, Mitigation Measures, 1.8.4.3 Wildlife: "A Technical Advisory Committee could be formed to implement and evaluate a mitigation and monitoring program and determine the need for further studies or mitigation measures once the project is operational." This is an inadequate proposed mitigation measure and is simply a way to allow approval of the project with insufficient study to conclude whether impacts will really occur. The Applicant would have no obligation to form a TAC, and would they if conditions warrant, or will this issue just be swept under the rug? The details of the mitigation must be such that there are requirements that are binding and constructive, not just window dressing.

30-28 PA-4

Chapter 1, Section 1.8.8 Health and Safety, 1.8.8.3 Shadow Flicker: "Because shadow flicker can only occur...it could (in principal) be prevented by shutting down specific turbines.... Implementing this measure, in practice, would likely be quite difficult, however. One operational measure that might be feasible....would be to develop a telephone hot line system. Receptor locations ..... could be provided with a specific number by which to connect to project staff ...to request temporary turbine shutdown .... The viability of this option with respect to project operational costs and flexibility has not been evaluated." Evaluate it. Do not put the burden of dealing with the projects projects onto non-participant residents. Why should those people be expected to be calling EnXco every time they are being impacted by things that have been so well modeled and addressed?

30-29 HS-8

Chapter 1, Section 1.8 Mitigation Measurers, 1.8.8 Health and Safety, 1.8.9 Noise "Several noise mitigation measures were included in the project design." With these design features, no significant noise impacts were identified." Mitigation must be required if the modeling results provided by the applicant are wrong. The impacts that might occur to certain residences and properties by the Applicant's proposal could be so severe that they can not be adequately mitigated. Soundproofing or buy-out options for affected properties should be required.

30-30 NOI-3

Chapter 1, Section 1.8 Mitigation Measurers, 1.8.8 Health and Safety, 1.8.10, Aesthetics, Light and Glare: and Chapter 1, Section

30-31 ALG-4

1.9 Significant Unavoidable Adverse Impacts, 1.9.10 Aesthetics, Light and Glare : "Development of the project as proposed would result in significant unavoidable adverse impacts to the visual environment, especially for nearby rural residents in the northern half of the Northwest Valley." The impacts that will occur to certain residences and properties by the Applicant's proposal will be so severe that can not be adequately mitigated by anything other than buy-out. Applicant should be required to evaluate and include this as a mitigation option for those that will undoubtedly be so affected if the project is constructed. 30-31 Cont. ALG-4

CLOSING

It is apparent that additional work is needed to address the deficiencies in data and mitigation remedies presented in the DEIS. Regardless of the substance of the final EIS, there will be obvious and significant environmental impacts to surrounding properties if the Desert Claim project is approved and is built. Some of these impacts have the potential to directly impact residents and to change the character of the existing area to such a degree as to make residing there unbearable. Kittitas County has a responsibility to residents, property owners, and the environment to ensure that the magnitude of potential impacts are assessed in a complete and unbiased manner, to ensure that mitigation measures are required and enforced, and to require that there will be a system in place to report problems and obtain appropriate mitigation before the project is approved, constructed, or operated. 30-32 EIS-5

Thank you for reviewing my concerns and including them into the public comments for the Desert Claim - DEIS.

Sincerely,

Eric Larsen
20121 Reecer Creek Road
Ellensburg, WA 98926
(509) 962-6946
eb_smlars@msn.com

31
P.1

Clay White

From: Janet Lee [ponderosa53@hotmail.com]
Sent: Monday, January 19, 2004 3:24 PM
To: Clay White
Subject: No to Wind Turbines

JAN 19 2004

Dear Clay White:

I, have property in SunEast - Parcel # 19-18-13050-0403. I purchased this property because of the incredible view & my desire to live here. I currently own a piece of property in Graham, Washington & my intent is to sell that property & build a $300,000 home in Kittitas County. I have been made aware of these industrial machine wind turbines that are about to appear in my back yard. These people from Desert Claim WInd Power Project tell us what a great economic benefit it is to the valley. I am one party out of literally hundreds who are probably planning similar ideas of building & locating in the Ellensburg valley. Now, it is my understanding that $300,000 contributed to this county will traditionally turn over 10 times in this county before the money exits the county. So, that makes my $300,000 home a 3 million dollar revenue machine for Kittitas County. Now, take that times the hundreds of people who plan to move to this valley over the life of these turbines. Seems like a considerable loss in revenue. 31-1 FIS-3

People do not want to live close to or view these 410 foot eye sores. They are noise generating, they have extensive blinking lights & shadow flickering, & they will kill the birds of prey. We will have a huge rodent problem then. There is no doubt that our property values will go down dramatically. These turbines are a ploy to receive grant monies from the federal tax payers. As an end result this "green energy" will be costing us considerably more than we are paying now for energy. Rest assured that in the event that these towers are voted through, I will take my money to another county who is not doing this to their pristine landscape. 31-2 VB-3

Janet Morris

High-speed users—be more efficient online with the new MSN Premium Internet Software.

32
P.1

Clay White

From: Janet Lee [ponderosa53@hotmail.com]
Sent: Tuesday, January 27, 2004 8:05 PM
To: Clay White
Subject: Enxco Desert Claim DEIS

RECEIVED
JAN 27 2004
KITTITAS COUNTY
PLANNING DEPT.

Dear Clay - **We find that the DEIS is flawed & here are just a few reasons why.** After over a year of reading, interpreting & digesting the information concerning the wind machines & power, we take a definite stand against them. There is no reason for these wind machines to be in populated areas such as the Ellensburg greater vicinity. There are thousands of vacant non-populated acres where these wind farms belong, if at all. We find it absolutely unbelievable that we will be forced to pay an increase in our monthly electrical bill when we have the capability of building nuclear power plants. We would welcome a nuclear power plant on our 200 acres as opposed to 40 story buildings all over this valley with flashing lights. It will affect telephone, radio, television, cell phones & all other communication equipment. We already have a high powered transmission line crossing our property. When it rains or there is moisture in the air, it sounds like a roaring river from these power lines. With any decrease in the value of our property because of these wind monsters, whom do you suggest we sue? Will it be Kittitas County for allowing it, the Governor of Washington for oking the project or would you simply prefer to buy us out now? Then, we will invest my funds in an area that cares about it's scenery, it's lifestyle & an area that is not dedicated to negative growth.

32-1 SO-5
32-2 VB-11
32-3 HS-5
32-4 NS-1

Another subject that we feel is very important to this valley is to follow the Comprehensive Growth Plan that each county was required to participate in several years ago. So, with that in mind, we are assuming that every wind generating tower to be an industrial zoned. If this is Kittitas County's stand then we assume that it is ok for us to generate industrial parks on our property as well.

32-5 LU-6

David & Janet Lee

5821 Robbins Road

Rethink your business approach for the new year with the helpful tips here.

Clay White Planner II
411 N Ruby St
Ellensburg, WA 98926

RECEIVED
JAN 3 0 2004
KITTITAS COUNTY
CDS

January 30, 2004

R.E. the proposed enXco wind farm

Dear Mr. White,

About all that can be said concerning wind farms, including the one by enXco, has been said. Arguments pro and con have been well covered in the Daily Record and in testimony both written and oral before Kittitas County's government representatives. It is our observation from reading and having attended hearings, and having participated in preparing testimony for those hearings, that a substantial majority of people oppose allowing the wind farm projects. 33-1 VB-5

If Kittitas County decides to allow development of the proposed wind farms, a decision will have been made that includes these consequences:

I. It allows industrialization of broad sections of this Valley's scenic landscape – in the instance of the combination of the Zilkha and enXco projects something in excess of ten thousand acres of heretofore open country. It would be a precedent-setting action by the County, one with consequences difficult to comprehend or predict. A third project is in the wings and doubtless more are planned. The cumulative effects from such proliferation is something to bear in mind. 33-2 LU-6

What makes this issue especially dangerous is that in effect Kittitas County does not really look ahead, and PLAN much of anything. The County reacts (often grudgingly to judge from public comments made by County Commissioners), and jumps through the legal hoops required by State and Federal laws. But the position of the current Kittitas County government is to allow individual enterprise to dominate the broader interests of the community with the result that there has been no real effort to ascertain what those broader enduring interests and values are. Consequently very powerful and well-financed companies can and have overwhelmed a vulnerable Kittitas County with their demands – demands which fit rather well with a free-enterprise-at-the-expense-of-all-else philosophy. 33-3 VB-10

2. It should make clear to all citizens of Kittitas County that their home sites are not safe from any manner of scheme that makes money for a developer. The wind farm projects require the County to add a Development Overlay that encompasses thousands of acres in order to allow the industrialization of areas already occupied by homesites. 33-3 Cont. VB-10

   There are governmental actions required to be taken in the case of emergencies that threaten the health and safety of its citizens – actions that may abrogate established individual rights. Such is not the case here. There is no threat to our health and safety that would be satisfactorily or significantly addressed by allowing the enXco wind farm project to proceed. We don't argue that there isn't an energy crisis; indeed there is one, and it stems in major part from the unwillingness of Administrations past and present to plan for and to consistently fund basic research for energy conservation and for alternative energy sources. Ultimately the situation is almost certain to become one of crisis dimension where global warming, for example, threatens survival of the earth's life communities. But crises of such dimension require national and international attention and action. Since we have nothing resembling a competent national energy policy (the current Administration even refuses to divulge to Congress how it arrived at its proposed energy bill), it is absurd to argue that the enXco wind farm development will contribute in any significant way to addressing a looming energy crisis. 33-4 ENR-2

3. There will be an impact on wildlife. Because new wind turbine construction includes lessons learned from previous types of construction, the impact would be less severe than that from earlier models. Companies are cooperating with state agencies in attempts to reduce impacts. Both Zilkha and enXco have had WEST (a firm that does wildlife studies for wind farm project proposals) make wildlife studies for their project sites. That is certainly an improvement over the Altamont project(s) where apparently no such studies were made. However the WEST studies are of one year duration which detract from their value since the changes in, for example, bird populations can change significantly from one year to the next. Also, it isn't apparent that ornithologists are involved in the studies. Had they been there would likely have been an assessment of the rodent populations in the enXco site since such would be a predictor of the sites attraction for avian predators. There were no night time assessments made. 33-5 PA-1

A recently recognized problem is the incidence of bat kills. A 40-turbine installation in the Appalacians has caused a record number of bat kills – something over 400 in a year. Subsequent investigations reveal that the turbines were place in a migratory path for the bats. It isn't expected that anything like this would be found in the enXco project site area, but it points to the need for a more thorough study in order to avoid unexpected yet avoidable problems. 33-6 PA-15

4. The most obvious impact from these wind farm installations, and the one that most threatens our enjoyment with living in this part of the Kittitas Valley is scenic. We've lived four miles west of Ellensburg for more than fifty years. From our home we look out just beyond our property to a line of old cottonwood trees most of which we estimate to be 100 feet or more in height. It is very difficult perhaps impossible for people to judge the impact from a 150-turbine installation each unit reaching between 300 and 400 feet in height including the rotor sweep area. The installation of these turbines in an already populated area is unacceptable. The illogic siren song of "we need this green power" appears to dominate the senses of some to the extent that the beauty of their surroundings no longer (if it ever did) matters. To us it is a very significant part of our life as it surely is to the majority of people in the Valley. 33-7 ALG-1

   More and more we hear and read about the disenchantment of people in other places including foreign countries where wind turbine installations have ruined prized landscapes.

In conclusion: It is important for individuals to accept responsibility to contribute to the resolution of community problems. We do recognize that there is a crisis with respect to our production and use of energy. And, we are willing to play a part in solutions. But we must feel and know that our efforts are based on good research and will significantly contribute to the resolutions of whatever threat exists. Such is absolutely not the case here. The drive to install the wind farm(s) comes from the developers – not in order to solve a crisis (energy) but rather because it is financially good for them. Nothing wrong to want to make money, but such motivation must not be allowed to ride rough-shod over Kittitas County's obligations to protect its citizenry. Peoples' homes, which includes their viewscape, deserve protection. 33-8 VB-2

Hal Lindstrom

Gloria Lindstrom

RECEIVED
JAN 8 2004

34
P.1

Clay White

From: Mitch [meffman@kvalley.com]

Sent: Thursday, January 08, 2004 10:15 PM

To: efsec@ep.cted.wa.gov; tengstrom@kvnews.com

Cc: opinion@yakima-herald.com; susanblack@seanet.com; tribune@inlandnet.com; Residents Opposed to Kittitas Turbines; Clay White

Subject: wind farm comments

After taking time for several months to read the progress and developing news related to wind farms and the Zilkha/enXco projects, I must ask some questions.

First, if Zilkha were truly interested in working with their "neighbors" (as they've called all of us) in Kittitas County, including the commissioners, why would they publicly accuse the commissioners of changing criteria and rules for permit approval in the middle of their DEIS? I've seen this county do nothing short of bend over backward for them.....but it mustn't be enough. Not to mention Zilkha didn't even have the decency to apply with the County, they ran to the state.

Second, if wind farm technology and it's "product" are such promising developments, why does California have annual energy supply problems (they have the most wind farms of any state in the U.S.)? I **know** wind farm technology produces less than 1% of our national energy needs.

Third, since there are no buyers yet, and the energy produced wouldn't be distributed locally, what benefit does my family derive from supporting the projects? Given that there are no subsidies/tax credits to enable me to erect my own turbine, thus allowing me to reduce the energy the PUD has to send to my home, I see no reason to support any company that aims to destroy the value of this area, ruin the viewshed, decimate the wildlife habitat, and worst of all, offer nothing more than money, with which government, even local ones, rarely spend prudently. As a matter of fact, following our tax money sure makes this seem like another "filter" through which the state, county, and local governments get more of our salaries. This is in addition to the tax money (from our salaries) that the Wind Farm Developers get already. If there's that much extra money floating around, it should be made more affordable for you and I to engage in our own "green" energy projects, thus reducing our dependence on fossil fuels, making each of us more energy self-reliant, and most importantly, using our rural resources more intelligently. 34-1 NS-3

mitch meffert
ellensburg, wa
962-5046

35
P.1

Clay White

From: Mitch [meffman@kvalley.com]
Sent: Monday, January 19, 2004 9:22 PM
To: irinaM@ep.cted.wa.gov
Cc: allenf@ep.cted.wa.gov; Clay White
Subject: wind farms

JAN 19 2004

I'm writing to express my opposition to the siting of Zilkha's wind farm proposal in the Hwy. 97/10 areas, and the enXco proposal in Reecer Creek area. While being placated with words, the opposition's not being heard in relation to the 95% of us landowners who DID NOT sell leases to either of these 2 companies. 35-1 SO-5 If both companies do not set aside a fund to compensate those of us who would choose to sell our homes/properties if these proposals are approved, I would be among the many who would logjam the county and state's court systems with lawsuits. 35-2 NS-5 Since we're not being heard, and we'd loose our investments if the farms were approved, suing is no worse a loss of money and time. Please don't let it come to that. Tell these companies to site where there are not thousands of people living. thank you

mitch meffert
ellensburg, Wa

RECEIVED
FEB 0 2 2004
KITTITAS COUNTY
CDS

Janet Nelson
P.O. Box 203
Easton, Wa. 98925
January 29, 2004

Clay White
Kittitas County Planning Department
County Courthouse
Ellensburg, Wa. 98925 Re: Desert Claim Windfarm DEIS

Dear Clay,

I have some concerns about the Desert Claim Windfarm DEIS.

1) There is no discussion of the alternatives to windpower for providing ways to cut greenhouse emissions and reduce dependence on foreign oil. What about restructuring the power grid, conservation, solar power and the new Hydrogen power? 36-1 ALT-5
2) There is also no discussion of the fact that the reason these companies are building all these windfarms is the HUGE tax breaks and other incentives being provided by the state and federal governments. They are rushing to get as many done as fast as possible to get them in before these incentives RUN OUT. In addition there is no discussion of the true economics of windpower and how backup power will be required to be on line and operational during the time that the windfarms are not operating, producing more greenhouse gases all the while. 36-2 NS-3 36-3 AQ-4
3) Why are there so many farms being planned for this area? Why was not one alone proposed so that the impact would be much less on the visual environment as well as the birds, sagebrush steppe, and people? 36-4 EIS-11
4) Why are these windfarms so huge? In England and many places in this country the windfarms being built have only 40-60 towers. MUCH less impact. One could have been built and the REAL impact evaluated to see if more of the towers could or should be built. What about incentives for homeowner built alternative power? 36-5 ALT-2 36-6 ALT-5
5) There is no discussion, from what I could see, of the impact on homes located farther than 1000 feet from the towers but Not in Ellensburg. Obviously there have to be many. I saw no maps showing these homes.They will have views of the towers no doubt and be impacted. There are areas in Ellensburg (Radio Hill?) I would think that would have views of the towers. 36-7 ALG-2
6) The windfarm is only 6 miles away at one point. Ellensburg is a changing and expanding area in terms of home ownership, tourism and business. I am aware that retired people from Cle Elum are moving down out of the heavier snow to Ellensburg. New developments and assisted living complexes have sprung up and will attract more. These windfarms could have a negative impact on the cities growth. One of the main reasons people in general choose to live and recreate in Ellensburg is the rural , pastoral character of the area. I don't think "Rodeo City" should be turned into " Tower City". 36-8 LU-2

7) A recent letter to the editor of the local paper from a local realtor stated he felt a negative impact on property values would be a certainty. At a windfarm in Kewaunee Co. Wisconsin a survey done after construction showed 52% of the residents did not want to live within 2 miles of the turbines and the majority of those living closest felt that the turbines had adversely impacted their health and safety. The utility that owns the farm eventually purchased neighboring residential property to resolve noise and other complaints. (from Wind Energy Economics in West Virginia, Glen R Schleede Jan 20, 2003. Attached). There is a real potential for a negative impact on property values and the effect of turning potential homeowners away to another area of higher quality rural character to live in. I-90 is the way many people first see the area and the views are NOT going to be the unspoiled territorial views that have always existed if this or any windfarm is located near Ellensburg. The photos of the cumulative effect of both windfarms are dramatic. These projects will affect the entire valley. 36-9 NS-1

8) The potential for killing both endangered and migratory birds is understated.
A) **The number of birds counted is in question.** The bird survey, while done over a years time (when a 2-3 year study is recommended by various authorities) was done for 20-30 minutes at a time once a week. Many birds were in all likelihood missed. The total number of birds seen for ALL THREE proposed windfarms was only around 9000.
The Kittitas Audubon Society Christmas Bird Count done on ONE EXTREMELY FOGGY DAY in December of 2003 with 27 experienced birders participating found almost 17,000 birds! This count is done every year in the same area in a 15 mile diameter circle around Ellensburg and includes the Fairview and Reecer Creek areas which are in the two proposed windfarm areas. 6 of the 11 Bald Eagles found that day were in the Reecer Creek and Fairview areas! (copy attached)

B) **There was a failure to assess for migratory birds.** Referencing a letter from US Fish and Wildlife Service to Zilka Renewable Energy pertaining to Meyersdale Windpower Project dated Sept 5, 2003: (attached) "Because most neotropical migrants migrate at night, radar should be considered for use in determining the altitude of bird flights at proposed wind power project locations, as well as their spatial and temporal distribution… Acoustic and infrared radar devices can be used to determine dates of peak avian use, and the effect of different weather conditions on the bird activity". No night surveys were done. **The Ellensburg area is in the western neotropical migratory flyway** zone so there is real potential for migratory birds at night. 36-10 PA-1

C) **There was a failure to assess for weather conditions which would affect both bird and bat mortality.** Again referencing the USFW/Meyersdale letter: "Lights apparently draw birds into tower areas during times of fog, mist and low cloud ceiling, creating opportunities for collision. Therefore, we generally recommend avoiding siting of towers in areas with high incidence of these conditions, and weather records for proposed project sites should be

evaluated to determine if and when low cloud conditions and fog occur." Also:"Bat mortality at turbine sites has occurred during late summer and early fall migration and during inclement weather (i.e. fog and low clouds). For example, we were recently advised that 230 dead bats of five species were found between Aug 18 and 20, 2003 at the Backbone Mountain wind turbine site in West Virginia." **Ellensburg is well known to be a midwinter fog bowl with fog sometimes lasting for weeks at a time. The Christmas bird count was done during dense fog.** 36-11 PA-15

D) **There was a failure to monitor for bats at all.** The USFWS recommended a 2 year pre construction monitoring using radar, acoustical studies and other appropriate sampling at Meyersdale.

E) **There was a failure to assess for the presence of prey.** Rodents and other small animals attract raptors to the area. This has been a major reason for raptor mortality at the Altamont Calif. Windfarm. 36-12 PA-1

F) **Lights which are NOT REQUIRED will be used at night.** On the Kittitas Valley DEIS I saw a letter from the FAA indicating that lights WERE NOT REQUIRED. Why are lights being used if not required? To quote FAA "based on this evaluation, marking and lighting are not necessary for aviation safety." ALSO currently white strobe lights are planned for the day and red at night. The Meyersdale/USFWS letter states:"unless otherwise requested by the FAA, only white strobe lights should be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute allowable by FAA. Solid RED or PULSATING RED incandescent lights should NOT be used, as they appear to attract night migrating birds at a much higher rate than white strobe lights." 36-13 PA-21

G) **Wetland and riparian areas will attract birds.** Again the Meyersdale letter recommends avoiding wetlands and riparian areas unless mortality risk is low (birds present rarely enter the rotor swept area.) Bats also use these areas emphasizing the need for bat surveys. There was no discussion of wildlife impact near these areas. 36-14 PA-11

H) **Of the 13-14 endangered birds found in the area only the Bald Eagle seems to be of concern** in any of these DEIS's . Why is that? Golden Eagle were also found, which require a take permit as well as the bald eagle. 36-15 PA-12

9) **There was no mention of a plan for flexibility to be built in to address problems.** There was no mention of a plan to address a finding of high risk to wildlife post construction: Such as: adjusting tower height where feasible, shutting down of turbines during peak migration periods, orienting blades parallel 36-16 PA-7

to flight path etc. When upgrading or retrofitting turbines, if studies indicate high mortality at specific turbine, relocating or retrofitting should be considered. 36-16 Cont. PA-7

10) **There should have been a discussion of the relative importance of this (these)projects in the overall scheme of the contributions of wind energy and the whole energy picture.** The contribution for all of windpower is only 2% from what I have read so the meaning of these projects, other than taxes to the county, is really small. Conservation could accomplish this easily without the damage. 36-17 ENR-2

To quote Jeremy Worth of Englands Countryside Agency **" Future generations will want cleaner energy but they will also want tranquil places to escape to.....an ambitious pursuit of wind energy will mean we give up our wildest countryside for a very small energy contribution."**

I feel this DEIS demonstrates the lack of sensitivity by the applicant to the people of Kittitas County and especially Ellensburg. It is directly in conflict with our land use designations and the whole project (as well as the Kittitas Valley project) threatens to change forever the irreplaceable pastoral character of the valley as well as kill more of our already diminishing birds and bats than we can afford and further fragment the already fragmented sagebrush steppe habitat. 36-18 VB-3

I support the No Action Alternative. 36-19 SO-2

Yours truly,

M. Janet Nelson

M. Janet Nelson

Desert Claim Wind Power Project EIS
Kittitas County
Draft EIS Comment Form

Participant Information

Name: FELICIA M PERSSON
Address: 3561 ROBBINS RD
City, State, Zip Code: ELLENSBURG, WA 98926
Phone/Fax: (509) 925-9407
e-mail address: ~~fax~~ fmpersson@televar.com

JAN 20 2004

Would you like to receive notices about the project? Yes X No ___
Would you like to receive a copy of the EIS? Yes _ No X Have already Paid for it
If yes, do you prefer a printed copy (cost = $60) or a CD (no charge)? Printed ___ CD ___

Draft Environmental Impact Statement Review Comments

Please state any comments you have about the Draft EIS on the Desert Claim Wind Power Project published by Kittitas County in December 2003. Please be as specific as possible, and focus your comments on the adequacy of the information presented in the EIS and/or on the alternatives evaluated in the EIS. Use multiple sheets if necessary.

The Table 1-1 Summary in Chapter 1 does not adequately describe the adverse impacts addressed in detail in Chapter 3. The impacts discussed in detail are transferred to Table 1-1 with the designation insignificant w/mitigation while adequate mitigation measures are not available or discussed. Specifically the Table reports that "several simple practical options exist for controlling or preventing shadow flicker at the source." page 1-20 This is ~~false~~ indirect cons and I believe in error. According to the mitigation measures described in 37-1 HS-8

Completed forms may be returned at the meetings or sent by January 30 to:
Kittitas County Community Development Services
Attn: Clay White
411 N. Ruby Street
Ellensburg, WA 98926

Desert Claim Wind Power Project EIS
Kittitas County
Draft EIS Comment Form – Continuation Sheet

Participant Information
Name: _____
Address: _____

Page 2

Draft Environmental Impact Statement Review Comments - Continued

Please use this sheet, if needed, to continue any comments you have about the Draft EIS published by Kittitas County in December 2003.

Chapter 3 3.8.5.3 mentions 2 potential mitigation measures at the source concluding one is not feasible and the other's viability w/ respect to project costs has not been evaluated. The DEIS states that "several practical options exist for receptor locations. All of these involve controlling or preventing the flicker from entering residences through windows. It is not practical to assume that residents will or should be inside when light + wind conditions result in shadow flicker. These options are not feasible or practical. This places responsibility for mitigation of impacts on recipients. 37-1 Cont. HS-8

Table 1-1 is also contradictory in its comparisons in the summary of vegetation it is apparent that the WH alternative and Desert Claim are not similar. WH has no Wetlands and a different diversification of other vegetation. The Bird section of the table states that bird impacts at the WH alternative will be the same due to similar vegetation. 37-2 PA-22

Completed forms may be returned at the meetings or sent by January 30 to:
Kittitas County Community Development Services
Attn: Clay White
411 N. Ruby Street
Ellensburg, WA 98926

Felicia Persson
Comments Page 3

The alternatives described in the EIS do not realistically represent the proposed project. If you look at the footprint of those alternatives and the footprint of the Kittitas Valley project and compare to the footprint of the proposed desert claim the differences are apparent. The Desert claim project is unique in its patchwork appearance. The project site is identified as 5237 acres however the entire collection facility envelopes many more acres than that. The project is actually ~~several~~ 4 or 5 micro-sites that effectively surround many unwilling participant landowners. The EIS refers to non-participating landowners that term should be replaced throughout the document with unwilling participant landowners or as Linda Schentc said captives. 37-3 PD-9

37-4 EIS-14

Because there are effectively 4 or 5 micro projects cumulative impacts and mitigation measures should be addressed for those <u>captive</u> properties. The disassociative properties of Desert Claim add a completely different dimension and ~~are not~~ make it not comparable to either of the alternatives or the Kittitas Valley Wind Power Project. 37-5 EIS-12

JAN 2 0 2004

January 25, 2004

Clay White
Kittitas County Community Development Services
411 N Ruby St, Suite 2
Ellensburg, WA. 98926

RE: Comments on Desert Claim Wind Power Project DEIS

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JAN 30 2004
KITTITAS COUNTY
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Dear Mr. White:

First, I want to thank you for this opportunity to comment on the DEIS for the Desert Claim Wind Power Project. I hope you will take the following into consideration in development of the final EIS and the planning departments' recommendation to the board of commissioners.

There are a couple of wording changes I would like to recommend throughout the DEIS. For example, the term "nonparticipating landowners" should be replaced by either "unwilling-participant landowners" or "captive landowners." In addition, all instances of both "wind farm" or "wind plant" should be replaced with "wind factory." 38-1 EIS-14

I was a little distressed at the cost of a hardbound copy of the DEIS. Thorough analysis is difficult, at best without a complete copy at hand including maps and figures. How was the cost of the information derived? What was, and who paid the initial cost of the DEIS? 38-2 EIS-13

CHAPTER 1:

On page 1-4 Kittitas County Objectives are described as:

Determining the project is essential or desirable to the public convenience, the project is not detrimental or injurious to the public health, peace, or safety or to the character of the surrounding neighborhood, and the project will not be unreasonably detrimental to the economic welfare of the county . . . 38-3 EIS-4

On page 1-5, 1.5.1 the applicant states that the objective is to deliver energy to the Pacific Northwest. Can we then assume that the energy derived from this project will stay within the Pacific Northwest? 38-4 EIS-9

1.5.4 The no action alternative should be limited to existing zoning provisions without additional discretionary action by Kittitas County. The statements "Under differing scenarios, such as use of the formal subdivision process or clustering bonus provisions available under existing zoning, it might be possible to create significantly more lots in the area. Such actions would require environmental review and discretionary approval by the County, however. These are the conditions assumed to exist under the no action alternative." should be removed. Predicting all future events regarding the no action alternative is impossible. The no action alternative should only include those events with a high degree of probability based on current zoning. 38-5 ALT-1

Table 1-1 is purporting to be a highly summarized version of the impacts discussed in detail in Chapter 3. Several of the summarizations are flawed and introduce information not covered in detail in chapter 3. Error in the transfer of conclusions and mitigation was also noted. This table should be revised so that its presentation is not misleading and contradictory to the information it purports to summarize. For example:

Earth Impacts under the proposed project neglect to include the same ongoing impacts addressed in the no action alternative. Throughout the DEIS it is stated that the project will not change current land use and hence the earth impacts it will produce would be in addition to those currently occurring. 38-6 ER-4

Air Quality Impacts - No Action Alternative describes potential for some other energy facility to be proposed and generate air pollutants. This statement should be removed as its possibility is remote and should not be considered part of the no action alternative. The possibility of another energy facility is no more or less likely based on the development of this project. 38-7 ALT-1

Plants and Animals-Vegetation-Wetlands-Project facilities would overlap 9 acres of wetland area and the summary fails to relate the county's "zero net loss" policy for loss of wetlands. 38-8 PA-22

Wildlife- Birds- Alternative 1: states that the overall impacts to birds would be similar to those reported for Desert Claim due to similar vegetation types. This conclusion is flawed as the prior section discussed the representative percentages of vegetation in each of these areas and they differ significantly. Primarily there are no wetlands identified in the Wild Horse Site. 38-9 PA-22

Energy and Natural Resources-No Action Alternative- includes a statement that "The broader energy impacts of the no-action alternative would depend on how and where alternative electricity supplies were developed." This statement should be removed as it is beyond the scope of the DEIS. By the same token the impacts of this project on the broader energy impacts have not been evaluated. 38-10 ALT-1 38-11 ENR-1

Land and Shoreline Use-Land use patterns-No Action Alternative - The statement "... and the potential for conflicts with existing agricultural activities ... " should be removed. It has not been shown that there are current conflicts between agricultural and rural residential uses in the defined area or that the potential exists. 38-12 LU-8

Health and Safety - Shadow Flicker- Proposed Action: The statement that several simple, practical options exist for controlling or preventing shadow flicker at the source is in direct conflict with the information presented in Chapter 3. There were two options presented for controlling or preventing shadow flicker at the source. The only place shadow flicker can be <u>prevented</u> is at the source. See additional discussion 3.8.5.3. 38-13 HS-8

<u>CHAPTER 2:</u>

2.1.1 The project area is described as 5237 acres. Because the project consists of 8 noncontiguous properties, the area impacted is much larger. Looking at the project footprint, there are several properties that are "outside" the project but effectively surrounded by the projects' production and collection systems. The total area impacted and effectively enveloped by the patchwork quality of this particular project should be referenced. 38-14 PD-9

2.2.1.3 This section identifies 56 landowners owning 101 parcels within 300' of the project, these again do not include some landowners and residents that are effectively surrounded by the project. To gain a 38-15 EIS-2

clearer picture of the number of residents and landowners impacted by the proposed project a ½ mile radius would be more appropriate. 38-15 Cont. EIS-2

2.2.2.1 This DEIS modeling assumes a 1.5MW turbine which is the smallest listed in Table 2-1. Why does the table of potential turbines include larger and more powerful alternatives? Only smaller and/or more technologically advanced would be assumed to produce less impact. If the DEIS addresses 1.5 MW nothing greater should be considered without additional environmental impact analysis. 38-16 PD-4

2.2.2.2 The existing turbine location plan is to maintain 1000' buffers from residences and 250' from rights of way or property lines. These setbacks do not meet the estimates for safety regarding tower collapse, ice and blade throw or shadow flicker. If the minimum setback from residences is 1000' that relationship should be preserved from rights of way and property lines as well. Establishing smaller setbacks from property lines effectively limits property use by unwilling participant land owners. To effectively negate the effects of shadow flicker a minimum setback of 2000' is required. 38-17 HS-4

2.2.2.3 States that overhead collection lines will be used to connect noncontiguous portions of the project. What are the visual and environmental impacts of additional overhead lines? Will the current poles be used or are additional poles necessary? Does the diameter of the proposed collection lines make them highly visible? The placement and number of substations have not been finalized. Without that determination the impacts are not certain. The placement of the O & M facility has not been determined; the impacts cannot be certain. 38-18 PD-8

Page 2-24 The transmission interconnection discusses the potential for an interconnection point at the Woldale substation. Would this involve any additional development or potential impacts not addressed in this DEIS? Because the characteristics of the interconnection facility would depend upon which transmission option is selected, potential impacts and appropriate mitigation cannot be adequately addressed until such variables are set. 38-19 PD-11

2.2.2.4 The number and location of permanent meteorological towers have not been determined. The specific number and placement need to be determined in order to assess the potential environmental impacts and, if warranted appropriate mitigation. 38-20 PD-4

2.2.2.5 Are the projected 23 miles of access roads included in the permanently impacted acreage per this DEIS? 38-21 PD-4

2.2.2.8 Specific plans for visitor facilities have not been proposed but will potentially be included in the development agreement. This seems that the DEIS is being circumvented. Aren't there additional impacts from such a facility that should be addressed in this DEIS? 38-22 PD-12

2.2.3.1 In the construction schedule and general sequence it states that the project could be completed in 9 months but Desert Claim may opt to construct the project in phases. Now hold on a minute! The extensive construction impacts, especially concerning air quality, noise, traffic, impaired access, etc. have been downplayed throughout this document because of the temporary nature of construction. Construction of the project could conceivably span several years if implemented in phases. This is not temporary or acceptable. The option to construct in phases should be removed. 38-23 PD-13

2.2.3.3 Use of local contractors and suppliers can and should be quantified. "...to the extent possible" is too vague. Since Desert Claim has extensive experience in development of wind factories, they probably have a good idea of what can be supplied locally. 38-24 PD-14

2.2.3.4 & 2.2.3.5 Plans for restoration and revegetation and related time lines should be documented prior to commencement of the project. In order to mitigate environmental impacts reasonable deadlines and maximum impact exposure limits should be set. 38-25 PD-15

2.2.3.5 & 2.2.3.13 Hauling immense quantities of construction materials, gravel, water etc. will have a huge impact on public roads. Waiting for completion of the project to repair and return the roads to preconstruction condition is not acceptable or realistic. Developers of the project should be responsible for maintaining the roads in preconstruction condition throughout the project construction phase. Preconstruction condition needs to be specifically defined according to specific criteria developed by Kittitas County Public Works. 38-26 PD-16

2.2.3.15 The traffic management plan should stress that community access cannot be compromised. 38-27 PD-16

2.2.4.1 What does "controlling turbine operations as necessary to meet scheduled power deliveries" mean? How often will the project area be patrolled? Are current county laws and regulations sufficient to deal with large volumes of hazardous substances? 38-28 PD-2

2.2.4.2 The applicant states that most of the full-time staff will be local. Of the 10 proposed does that mean at least 6 or more? 38-29 PD-14

2.2.4.4 Safety measures include automatic braking systems to shut down the rotor if a malfunction or excessive wind speeds occur. Is there a sound effect to this braking system and if so what is the estimated dBA when the brake engages? 38-30 NOI-1

2.2.5 Repowering should not be permitted under the county approved development agreement without formal process. Furthermore the county should retain the right to periodic review of the project and authority to implement additional mitigation measures for impacts not addressed or flawed projections presented in this DEIS. If actual impacts are substantially greater than estimated and cannot be effectively mitigated the county should have the right to stop project operation and implement accelerated decommissioning. A bond to cover estimated decommissioning expenses should be required. 38-31 PD-3

2.3.1.1, Page 2-41 References Kittitas County objectives contained in KCC17.61A.010. Only the county objectives specifically contained in this document or its appendices should be referenced here. 38-32 PD-10

CHAPTER 3:

The potential impact on property values has not been addressed in this DEIS because it is not required by SEPA. The impact to property values should be addressed in this document as it directly relates to the character of the neighborhood and the financial health of landowners in the immediate vicinity of the project. 38-33 NS-1

Page 3-24 and 3-25, 3.1.5.1 Discussion of erosion best management practices that would be implemented during construction identifies several measures for reducing erosion. Throughout the listing each measure described states that it "should" be used. In all instances "should" should be replaced with "shall." 38-34 EIS-10

Page 3-25, 3.1.5.2 In this discussion of landslide hazards the document states, "Construction of proposed 38-35 ER-3

wind energy facility would not increase existing landslide hazard risks provided appropriate mitigation measures were implemented." Proposed mitigation is a setback distance based on experience and standard practice. Discussion goes on to say that the triggering mechanism for landslides in hazard zone 1 is not known and risk will remain high regardless of construction activity. This is confusing and contradictory. Mitigation should include site-specific geotechnical study and removal of those turbines in the high risk zone, if the risk cannot be mitigated to an acceptable level. 38-35 Cont. ER-3

Page 3-27, 3.1.6 Concludes no significant unavoidable adverse impacts are expected. If removal of the turbines or mitigation as described above cannot be accomplished, then significant unavoidable adverse impacts can be expected. 38-36 ER-3

Page 3-30 3.2.2.1 Practices to control airborne dust include watering exposed soil surfaces daily during dry weather. Where will that water come from? Much of the proposed project site is comprised of dry land. The dry season often commences the 1st of June and can continue through October. If the land will potentially be disturbed for 9 months, and 23 miles of road will be constructed and approximately 1.25 acres will be disturbed per turbine, without considering the additional acreage impacted by the substation, batch plant and staging areas, there is a large quantity of water necessary on a daily basis for dust control. Reducing the speed limit to 20 and watering roads, or applying a binder of some sort would further mitigate the dust impact. 38-37 AQ-3 38-38 AQ-3

3.2.3.3 "Under the no-action alternative, most of the land in the project area would likely remain in its current agricultural use." Land use currently involves both agricultural and rural residential. That use should be listed as well. This section goes on to identify possible development of some other energy facility. The possibility is remote and irrelevant to this discussion. The entire second paragraph should be removed. 38-39 AQ-5

3.2.6 The DEIS states that dust and vehicle emissions are temporary (limited to 9 months), "and would be minor in the context of other rural-residential, industrial and agricultural activities." This statement is not true and should be removed. The construction activity if undertaken would be in addition to those other activities. Due to the impact's concentration and activity in a small area the addition would prove to be a major impact. 38-40 AQ-2

Page 3-43 Actual well locations may differ. If an address has not been obtained prior to drilling the well the location may differ significantly from the representation on the map. Our well is shown on the map as located on the SW corner of our property; it is actually located in the NW corner. Before any decisions regarding placement of turbines in relation to required setbacks from wells it would be wise to verify well locations. Again, if setbacks of 1000' are required from wells the same setback should be required from property lines so as to not limit landowner use of property. 38-41 WR-3

3.3.2.1 The paragraph immediately prior to <u>Turbines section</u> indicates that portions of ephemeral or intermittent streams may be relocated. This sounds like an impact to the existing drainage pattern of the site. Would this require Department of Ecology approval? 38-42 WR-1

Page 3-47 The disruption to priority habitat designated by WDFW would be temporary according to this discussion. The displacement of the wildlife that resides there may be much longer or permanent. If wildlife is displaced for the 9 months or more of construction will it return? 38-43 WR-5

Page 3-49 The DEIS states, "Following installation of the wind power facility original preconstruction contours and drainage patterns would be restored around turbines, roads and substations. Restoration would minimize loss of stream functions or associated wildlife." What impact would the 9-month or

more displacement have on wildlife?

Page 3-50 and 3-51 Blasting and wind turbine vibrations are not expected to affect wells because they are located 1000' from wells and residences. Again, verification of actual well locations should be conducted prior to placement of the turbines. 38-44 WR-3

Page 3-57, 3.4.1.1 Paragraph 3 describes classification of vegetation within the project area. The final sentence states that shrub-steppe and grassland types are also used for agriculture. Either all uses of the various vegetative areas should be disclosed (i.e., rural residential use) or all should be left for the section on land use. 38-45 PA-23

3.4.2 It is unclear what the total wetland acreage is within the project site. There are several numbers of wetlands identified, however, no total area or acreage is presented. What percentage of the total wetland area will be temporarily or permanently destroy? 38-46 PA-11

3.4.3.2 It appears that all conclusions are being based on other wind project site studies of avian mortality. The single one-year study conducted in this area has documented a higher raptor use than at any of the other wind factory sites. The Stateline factory has the highest raptor mortality. Without further study, prior to project approval, Desert Claim could easily take that title. 38-47 PA-1

The table at C1-13 follows some of the same flawed analysis concluding that bald eagle mortality risk is low due to winter foraging and low actual use of the wind factory area. The eagles come down to the valley floor during calving from the forests north of the project site. Although their use of the 8 specified, project properties may be limited, they are passing through the project minefield twice daily. 38-48 PA-13

No avian observations were taken at night and no information documented regarding nocturnal birds or migration. There seems to be a substantial owl population in the project area. Nighttime avian study should be conducted to determine potential impacts to the owl, bat and nocturnal migratory species. 38-49 PA-1

Throughout this section the statement that mortality rates on avian species, mallard, passerine and bald eagles would not have a measurable effect on their populations. Is that statement addressing their total populations or their local populations? 38-50 PA-14

Page 3-100 and 3-101 This DEIS proposes one year of standardized fatality monitoring. That monitoring should be ongoing. The DEIS suggests continuing investigation of better lighting schemes and mechanisms for deterring migrating bats from turbines but follows that with the suggestion that Desert Claim should not be required to implement better mitigation procedures if they are identified. This directly contradicts other proposed benefits and implied mitigation potential of TAC. If TAC can determine and coordinate mitigation measures then all "new" information should be available for possible implementation. 38-51 PA-4

3.4.3.6 The described lack of knowledge is incorrect in concluding that there will be no large-scale adverse impact to bat species. This lack of knowledge is incorrectly summarized in Table 1-1, chapter 1, as follows: "...nonmigratory and migratory resident bat populations do not appear to be negatively impacted by wind turbines." 38-52 PA-15

3.5 The DEIS states that "The project would generate a substantial amount of electrical energy on a long-term basis." This statement is at the least misleading and should be removed. The electricity estimated to be produced by this facility is negligible. Total wind supply estimated on a nationwide basis by the US Energy Information Administration indicates that wind will provide just over ½ of 1% of total 38-53 ENR-2

electricity by 2020. Based on that estimate alone the 60MW estimated to be produced by this project would be insignificant. 38-53 Cont. ENR-2

Page 3-111 3.5.3.3 That PSE is seeking 150MW of wind generated electric capacity has been referenced several times in this DEIS. This statement is referenced under the no-action alternative. It would be more appropriate to list its reference under Alternative 1, as that project would potentially connect with PSE lines. Discussion of other potential energy facility developments is outside the scope of this document and should be removed. If this project were approved, it would not cancel out other energy facility proposals here or elsewhere. 38-54 ENR-3

3.6.2.1 Again reference is made to transmission connection impacts. These impacts cannot be determined, as the route and distance of the transmission connection are not known. This should be determined or all alternatives should be analyzed in order to complete the EIS. 38-55 CR-2

3.6.5 The only acceptable mitigation for the adverse impacts on cultural resources is avoidance of the area. The discussion proceeds to the project engineer's evaluation of the site-specific data to determine if relocation of the turbines is feasible. If relocation is not feasible then removal of those offending turbines from the plan should be the implemented mitigation. The proposed mitigation of retrieving the scientific or cultural information from its location is not an acceptable mitigation measure. Removal of the information, artifacts, etc. from the cultural and historical environment significantly alters the character of both the site and the artifact. The retrieval of the information or artifact is itself a significant adverse impact. 38-56 CR-1

3.6.6 As referenced above the conclusion in this section is flawed as the removal of scientific and historical information from the environment, which contributes to the designation of cultural significance, is an adverse impact. Therefore there are potential significant unavoidable adverse impacts which may result from the proposed mitigation measure. 38-57 CR-1

Page 3-130 The comparison of turbines to agricultural machinery and structures is not a reasonable comparison. To presume that they are characteristic of or similar to any element of rural character is ludicrous. The statement "... wind farm operations are not inherently more intensive than other resource activities in terms of noise and associated land use impacts" is completely false and should be removed. In the current setting with agricultural and residential uses at their current state the operations of Desert Claim would be significantly more intensive. The primary agricultural use of the properties identified in the project is cattle grazing. The wind turbines are much more intensive in terms of noise than is cattle grazing. Agricultural activities and intensities are intermittent and seasonal. The constant intensity of the wind factories is much different. 38-58 LU-1

Under indirect impacts the conclusion that Desert Claim would not attract supporting land use and stating that transmission lines are already located proximate to the site indicate that a means of transmission connection has been determined. This is not the case. The proximity of transmission lines is therefore irrelevant in this context and the statement should be removed. 38-59 LU-9

Pages 3-130 and 3-131 Under direct impacts it is acknowledged that the project is incompatible with residential use. Under indirect impacts it is suggested that relocation of rural residential users is an option. For that to be a viable option then property value analysis and mitigation would be necessary to allow residents the financial ability to relocate. Furthermore, the suggestion that residential users currently compete with ongoing agriculture is not accurate. It has been determined that the primary agricultural use of property within the area is grazing. Most rural residents are aware of the best production areas and seek to maintain those for grazing and other agricultural pursuits. The statement 38-60 LU-3 38-61 LU-8

that current agricultural activities would continue on the land leased to the wind factory cannot be substantiated. 38-61 Cont. LU-8

Page 3-131 Although not required Kittitas County objectives may be impaired if the impact on property values and appropriate mitigation measures is not addressed here. Without consideration of the impact to property values the county is derelict in its protection of the surrounding properties. 38-62 NS-1

3.7.1.7 Increasing turbine setbacks from residences adjacent to the central portion of the site would further mitigate some of the adverse impacts of the surrounding project. 38-63 LU-5

3.7.1.8 The statement that the impact on overall land use patterns would be insignificant is untrue and should be removed. Although the zoning is largely Ag-20, there are a large number of rural residents in this area. Based on the numbers alone, use is largely rural residential. The project includes only 8 of 83 residents within ½ mile of the project boundary. Of the 75 unwilling participant residents, many engage in agricultural activities although they are rural residential users as well. The overall use patterns for 90% of the residents will be significantly impacted. 38-64 LU-1

Page 3-134 cites GPO 8.9 as support for the development of wind factories. Wind factories do not conserve rural character. See preceding discussion regarding page 3-130.

GPO 8.11, again, the existing and traditional uses are both rural residential and agricultural in nature. Both land uses along with the existing character of the rural neighborhood should be protected. 38-65 LU-6

The discussion is flawed. Incompatibility with rural residential uses has been identified within this document. The construction of a wind factory would destroy the current character of this rural neighborhood. Introducing 120, nearly 400-ft tall structures would significantly overpower the existing landscape and define and dominate the character of the neighborhood.

Page 3-135 Expanding on the discussion which states that most collection lines would be located within the project area, it should be noted that additional overhead lines are proposed off site increasing the adverse impacts to unwilling participant landowners. 38-66 LU-10

Page 3-136 Kittitas County Critical Areas Ordinance (Title 17A) The project would violate the "zero net loss" policy regarding wetlands. 38-67 LU-6

Page 3-139 The discussion regarding the project's relation to the Growth Management Act is flawed in its conclusion that "the proposal would not involve significant amounts of buildings, structures or impermeable surfaces." If there are currently only 83 residences within ½ mile of the project then the introduction of 120 structures would be significant in both amount and (considering their immense size) impact. 38-68 LU-7

3.8.1.1 Are residential hazards applicable to this DEIS? That paragraph appears irrelevant to an analysis of the affected environment and should be removed. 38-69 HS-13

3.8.1.2 First paragraph, last sentence- Again, are household electrical hazards applicable to this DEIS? That sentence appears irrelevant to an analysis of the affected environment and should be removed.

3.8.1.3 Listed land uses should include rural residential. 38-70 HS-13

Pages 3-145 through 3-147 Icing conditions are estimated to occur 4 to 5 times per year on average. Is that 38-71 HS-3

a 2-year average or has historical weather data been evaluated to determine that average over a larger time frame? 38-71 Cont. HS-3

Page 3-150 In the discussion on wind turbines' influence on fire it was noted that they can be stopped to facilitate aerial fire fighting. What is the estimated elapsed time from the time the fire is reported until the turbines can be stopped? Is it longer than the estimated response time for aerial fire fighting equipment? Do the mitigation measures regarding fire hazards address the potential compromise of aerial fire fighting techniques and the resulting increased demand for firefighters and equipment to effectively battle a brush fire on the ground? 38-72 HS-1

Page 3-155 Shadow Flicker - Modeling - Consideration of fog or cloud cover occurring in the mornings and evenings is not reasonable as the presence of fog or low clouds often indicates a lack of wind. The model only addresses receptors, in this case identified as residences. Potentially anywhere the shadow contacts the terrain or a building shadow flicker can occur. 38-73 HS-7

The statement that covering a window where shadow-flicker occurs will prevent it from occurring is incorrect. The shadow-flicker will still occur. It will not be observed from inside the building with the curtains drawn. Covering a window may be one means of mitigating impact but it is not prevention. Please restate or remove the statement. 38-74 HS-8

Page 3-156 Impact Results - DEIS state "All potential receptors for the Desert Claim project have been included in the model." Due to the narrow definition of receptor this statement is misleading and should be removed or restated. The statement indicates that all potential affected places have been included when that is not the case. Again, the model addresses only residences. 38-75 HS-7

Page 3-159 Shadow-Flicker Consequences- Although a single turbine's blade pass frequency is .87 Hz, and well below the Hz likely to trigger epileptic seizures, would the combined flicker from several turbines have a different effect? Also, although not enough to cause seizures, the flicker can cause a sense of vertigo, which can result in injury. 38-76 HS-7

3.8.2.4 The level of mortality on <u>local</u> raptor populations may be more than anticipated based on the single one year study conducted. Additional studies are required. 38-77 HS-12

3.8.5.1 Mitigation measures discuss various setbacks required for various hazards. The greatest distance should be determined to mitigate all potential impacts. That same distance should be set for residences, rights of way and property lines. 38-78 HS-4

Page 3-164 2nd bullet -indicates that transformers can be located below ground. Will transformers be located below ground? 38-79 HS-6

Page 3-165 The statement that "several practical options exist for controlling or preventing shadow flicker at the receptor location rather than at the source" is false and should be removed. The only means of controlling or preventing the phenomena is at the <u>source</u>. All options listed here make unwilling participant residents responsible for mitigation of the damage imposed by the introduction of the wind factory to this area. Part of the allure of a rural neighborhood is being able to enjoy the outdoors. Suggesting that residents be confined to their homes when shadow flicker occurs is not practical. Setbacks of 2000' from residences and property lines would effectively control shadow flicker. 38-80 HS-8

3.9.1.2 It appears that the county may need to adopt noise standards based upon actual area uses. Since dBAs of 40 to 50 can result in sleep interference protection of rural residential use would require night 38-81 NOI-4

time limits of less than 40. The state standards for noise on agricultural properties should be reduced for application here. Most of the agriculture in this area consists of grazing, a smaller amount of feed crop production contributes to lower, existing, ambient noise levels. 38-81 Cont. NOI-4

3.9.1.3 Project area uses should include residential. 38-82 NOI-6

Table 3.9-4 Existing sound levels on the eastern side of the project area are quite quiet according to the measured sound levels. Introduction of this project and the increase in the average, ambient noise would result in a medium to high impact on this side as it appears the additional increase in sound from the turbines would be 5-10 dBAs. The greatest impact would obviously occur at night. 38-83 NOI-1

Page 3-177 The noise modeling provides estimates for wind speeds of 4m/s and 8m/s. Since Desert Claim has wind data from their 2 years of prospecting they should be able to provide additional information to analyze the applicability of these wind speed estimates. (i.e. how many hours per year does the wind blow less than 4m/s , 4 to 8m/s, over 8m/s?) 38-84 NOI-1

3.9.5 Minimum setbacks should be increased to 2000' or the amount necessary to obtain the 40dBA sound level at residences. 38-85 NOI-2

3.9.6 Projected sound level increases could feasibly produce high impacts based on the quiet nature of the existing conditions. How would the clusters of turbines upwind affect sound levels on the quieter east side? 38-86 NOI-1

Page 3-193, Figure 3.10-4 showing visual assessment units and key views is difficult to interpret as the specific project properties are not identified in relation to the visual assessment units. The visual impact area for key views 1A and 1E appears to be approximately a 90-degree view. To adequately portray the adverse impacts of these two key views the full 270-degree view of the project should be shown. The condensed views and photos are misleading. Also, the area of impact in and around these two specific views should be identified as to the number of residents impacted by these views. The discussion of visual impacts states that few people will be impacted by these views although those that are will be highly sensitive. Jumping ahead to information presented in section 3-12 it is easy to calculate that there will be in excess of 700 vehicles, which will pass through views 1A and/or 1E daily. That is a significant number of viewers that will be highly impacted by the visual intrusion of these wind turbines. How many residents are there currently residing in the foreground and middleground of this visual atrocity? 38-87 ALG-2

To say that only two of sixteen key views were rated as "high" impact views is misleading. The visual assessment assumes a 90-degree view of the project area at a given key view. The cumulative impact of the true 270-degree view from locations 1A and 1E should be weighted accordingly.

3.10.2.3 The lighting scheme proposed by Desert Claim will be a significant impact to the current environment. Although the daytime strobes are not so obtrusive the red flashing lights at night will be a significant adverse impact especially for those residents at the higher elevations north of the proposed project site. 38-88 ALG-1

3.10.2.4 The statement that shadow flicker can arise within or near houses is incorrect and should be removed.. As noted in my comments regarding section 3.8, shadow flicker occurs when the blades pass across the sun causing a flickering shadow on land, structures and all objects. A residential structure does not cause or contribute to the phenomena. 38-89 ALG-5

Page 3-226, 3.11.2.1 In the discussion regarding recreation traffic impacts, primarily due to construction, 38-90 RC-3

it is acknowledged that travel along highway 97 and county roads within the project area may be congested with potential delays due to construction. These impacts will also affect residents and their visitors. The traffic plan needs to address resident access priority. 38-90 Cont. RC-3

3.12.2.1 The proposed project road connections to the existing public road system should be indicated on figure 2.12 to identify areas of potential traffic disturbances. Based on descriptions in this section, most connections can be estimated however, the proposed connections to the KRD access road are not clear. 38-91 PD-4

3.12.5.2 Regarding tourism, the DEIS states that a tourism plan is recommended prior to power generation. A tourism plan should be required to be completed and approved prior to construction. The plan should be designed so as to minimize environmental and community impacts. 38-92 GT-3

3.12.6 Without continuing maintenance and repair activities on county roads during construction, there would be severely adverse physical impacts to the road conditions. The development agreement should require the roads be maintained in their current condition throughout the construction process. 38-93 GT-6

Beginning on Page 3-245, section 3-13 discusses air traffic impacts to Bowers field. The mitigation measures addressed include project modifications to comply with air traffic obstruction or changes to the existing air traffic patterns. Desert Claim has not taken the initiative in exploring any modifications to the proposed project. Again, the applicant would rather place responsibility for mitigation on those impacted by their project. Mitigation is unresolved. The applicant should further investigate means available for them to mitigate the impacts to the community. 38-94 AT-2

It seems that the lighting scheme developed for this particular project in order to meet FAA requirements involves a large number of turbines with dual lighting requirements. If the project did not have its unique patchwork footprint, how many fewer towers would require lighting? 38-95 AT-6

3.14.1.1 In the second paragraph concerning stations listed within closest proximity to the project area, the Fairview location is incorrectly described as west of the project on Highway 97. 38-96 PSU-3

Page 3-282 Since there is economic information presented for informational purposes only, which are not part of SEPA regulations, why then was the effect on property values left out of the DEIS? It appears that only favorable economic impacts are presented for informational purposes. Economic impacts on property values should be studied for this area and presented for informational purposes as well. In order to present a more complete economic impact analysis for the decision making process, all impacts should be addressed. 38-97 NS-1

Page 3-291, 3.16.2.1 The statement "However, the amount of these additional tax revenues - based on increased property values and increased consumer expenditures - has not been determined." should be modified and the reference to property values removed. Property values have not been addressed in this document. Furthermore, studies supporting an increase in property values have not been presented. No studies of areas comparable to the Kittitas Valley have been completed. Property values on turbine lease properties would increase due to the 30 year income producing potential of the property. Properties within the project area, subject to all of the impacts and none of the benefits, would likely decrease in value. 38-98 FIS-3

CHAPTER 4: CUMULATIVE IMPACTS

4.1 Earth Resources - As discussed in 3.1.5.2 landslide hazard zone 1 has a high risk regardless of 38-99 ER-3

construction activity. If geotechnical studies are not capable of relocating the turbines to avoid this hazard area those turbines should be removed. 38-99 Cont. ER-3

4.2 Air Quality - Fugitive dust emissions are dismissed as insignificant because of the temporary nature of construction activity (9 months to several years) and would not be noticeable in extensive off-site areas. How extensive an area are we considering? The potential for cumulative effects of dust and vehicle emissions (if both the Kittitas Valley and Desert Claim projects are constructed simultaneously) combined with other agricultural activities inherent to the area could be significant. 38-100 AQ-2

4.4.2 Desert Claim will impact wetlands in direct conflict with county policy. Turbines that cannot be relocated to avoid impact should be removed from the project. 38-101 PA-11

4.4.3.1 The conclusion that there will be no impact to population levels of individual species based on one abbreviated study is misleading. What will be the effect on local population levels? Bald eagle foraging areas include all calving operations. As was stated earlier in this document, agricultural use of the area is expected to continue. Therefore, calving will continue as well, within, or directly adjacent to the project area. Even low level mortality risk to threatened or endangered species is unacceptable. 38-102 PA-1 38-103 PA-13

4.4.3.2 A lack of knowledge regarding bat fatalities and limited study should not be used as the basis for determining that significant adverse impacts are not expected. 38-104 PA-15

4.5 Electrical energy production is compared to local production to determine significance. Throughout the document references have been made to the region's electric production, now project production is compared to "local" production to boost its significance. The collective energy production of the proposed projects is significant only at the county level. 38-105 ENR-2

4.6 Desert Claim will disrupt twice as many culturally significant sites than the other two proposed projects combined. Mitigation should be the relocation or removal of turbines which would cause the disruption. 38-106 CR-1

4.7 The statement that "Some disbursed rural residential uses are located adjacent to the Desert Claim and Kittitas Valley sites, . . . " should be reworded. Many people reside in adjacent and captive properties of Desert Claim. Looking at population uses of the area, agriculture is secondary to rural residential use. 38-107 LU-1

The external impacts of these wind factories is not comparable to agricultural uses. Noise from the wind factories is constant - not seasonal. No agricultural equipment is comparable in size or visual impact. This conclusion is flawed. 38-108 LU-1

The proximate Desert Claim and Kittitas Valley proposals individually or combined would discourage residential use. Although zoning is largely agricultural, actual use is largely residential. If the developers would like to return the area to largely agricultural use and proceed with the project, they should compensate residential users for the decrease in property values and thereby encourage relocation. 38-109 LU-4

Cumulatively, the introduction of 361 to 391 turbines and specifically, the 240 in the Desert Claim and Kittitas Valley projects represent an intensive use of structures based upon the current land use and current structures. 38-110 LU-1

4.9 The statement, "While the project would result in incremental increases in typical noise levels at a small number of selected locations . . . " is misleading. It appears only four locations were selected for noise modeling. There are many areas surrounded by Desert Claim's patchwork footprint where incremental increases may be significant. 38-111 NOI-1

Page 4-17 The cumulative visual impacts section concludes that, ". . . some local residents and frequent visitors might perceive a substantial change to the overall character of the Kittitas Valley landscape . . . " It is obvious that the more exposure, the greater the impact will be but everybody will perceive the overall change in the character of the valley. This is in direct opposition to the county's objectives. 38-112 ALG-1

Page 4-24 Economic impacts are not considered part of the DEIS based on the direction in WAC-197-11-448 and not required under SEPA. Is this DEIS supposed to present a slanted view of the project? If all economic impacts are not presented then the informational aspect becomes skewed. 38-113 PHE-4

Technical corrections: Table 1-1 as referenced earlier concerning shadow-flicker 38-114 HS-8
Page 5.2 paragraph 2, location designated as King County 38-115 EIS-15

Other Issues: It seems that the comparisons throughout this document change based on the intended result. Impacts are compared against larger areas if the intended result is to be diminished and against smaller areas if the intended result is to appear greater. 38-116 VB-4

This document has addressed most of the potential adverse impacts. Many impacts have been downplayed due to their temporary nature. However, many will adversely affect this valley for the next 30 years or more if this project is approved. Additional mitigation measures should include a local, 24-hour hotline to address residents' concerns and impacts if this project goes forward. All mitigation measures must be specifically identified and detailed in every aspect, prior to project approval and permitting. A comprehensive decommissioning plan must be completed prior to construction. That plan should contain provisions for accelerating decommissioning of any portion of the project or the entire project if impacts are significantly more adverse than contemplated. It looks like the approval or rejection of this project alone will significantly alter the course of future development in Kittitas County. The decision to approve this project will forever adversely affect the character of the neighborhood and the county. 38-117 EIS-1 38-118 EIS-10 38-119 PD-3 38-120 VB-3

Thank you again, for this opportunity. I hope you will take these comments, concerns, and questions into account in preparing the final EIS.

Sincerely,

Felicia M Persson
3561 Robbins Rd
Ellensburg, WA 98926
fpersson@televar.com
(509)925-9407

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

JAN 28, 04

CLAY WHITE
PLANNER II

OIL AND WATER DO NOT MIX!

THE DESERT WIND POWER CO. HAS PROPOSED TO ESTABLISH AN INDUSTRIAL POWER PLANT IN AN AREA THAT IS MOSTLY ZONED AG. 20

AGRICULTURE IS DEFINED AS THE CULTIVATION OF THE LAND TO RAISE FOOD AND ANIMALS.

AN INDUSTRIAL PARK, OR COMPLEX IS DEFINED AS AN AREA ZONED FOR INDUSTRIAL, AND, OR BUSINESS USE TO PRODUCE A PRODUCT, OR SERVICE.

OIL AND WATER DO NOT MIX!

IF THE COUNTY WANTS TO HAVE WIND GENERATOR POWER PLANTS IN KITTITAS COUNTY, THEN THEY MUST FIND AN AREA VOID OF POPULATION, AND THAT CAN BE ZONED INDUSTRIAL AN AREA SUITED FOR THAT PURPOSE IS EAST OF THE TOWN OF KITTITAS, CLEAR TO THE COLUMBIA RIVER. 39-1 ALT-6

OIL AND WATER DO NOT MIX!

PROPERTY RIGHTS ARE IMPORTANT TO EVERYONE OF US. IF ONE PROPERTY OWNER ALLOWS HIS LAND TO BE USED TO CONSTRUCT WIND GENERATING TOWERS, HE IS INFRINGING ON THE PROPERTY RIGHTS OF HIS NEIGHBORS. 39-2 VB-6

PROPERTY VALUES OF THE LAND IN THE AREA OF WIND GENERATOR TOWERS WILL BE 39-3 NS-1

GREATLY REDUCED. IF THERE IS ANYONE THAT BELIEVES THAT LAND VALUES WON'T BE GREATLY REDUCED. I WILL GLADLY SELL MY HOME, AND LAND TO THEM, AT THE PRESENT MARKET VALUE. 39-3 Cont. NS-1

OIL AND WATER DO NOT MIX!

THE VIEWS IN KITTITAS VALLEY ARE ONE OF THE GREATEST RESOURCES KITTITAS COUNTY HAS. IT IS PROBABLY THE GREATEST NON-RENEWABLE RESOURSE THAT DRAWS PEOPLE HERE. THE BEAUTY OF THIS VALLEY IS NOT A RENEWABLE RESOURCE. IT IS THE RESPONSIBILITY OF THE COUNTY COMMISSIONERS TO PROTECT THIS VALUABLE RESOURCE, WHAT EVER THE COST. 39-4 VB-8

THE DECISION ON THIS MATTER IS YOURS, COUNTY COMMISSIONERS. DO THE RIGHT THING! SAY NO TO THE DESERT WIND POWER COMPANY! 39-5 SO-5

THANK YOU FOR YOUR TIME

Ray Ridenour

Betty Ridenour

Clay White

From: Kestrel's Edge [kestrels.edge@elltel.net]
Sent: Sunday, January 25, 2004 9:41 AM
To: Clay White
Cc: Ellensburg Daily Record; NKC Tribune; Snoqualmie Pass Times
Subject: Wind Farm Low Frequency Sound Impacts

JAN 2 5 2004

Clay White, Planner II
Kittitas County Community Development Services
411 N. Ruby St. Suite 2
Ellensburg WA 98926

Clay,

I thought I should send you this article concerning the effects of low frequency sound on residents living near existing wind farms within the UK. Low frequency noise associated with the operation of very large modern day wind turbines is a very real impact and can only be mitigated by placing these machines well away from people's homes. 40-1 NOI-5

Neither the KVWP or Desert Claim projects acknowledge this impact, offer any studies, or suggest ways to mitigate its effect.

Mike Robertson

==========

http://www.telegraph.co.uk/news/main.jhtml?xml=%2Fnews%2F2004%2F01%2F25%2Fwind25.xml&secureRefresh=true&_requestid=24587

Wind farms 'make people sick who live up to a mile away'

By Catherine Milner
(Filed: 25/01/2004)

Onshore wind farms are a health hazard to people living near them because of the low- frequency noise that they emit, according to new medical studies. Doctors say that the turbines - some of which are taller than Big Ben - can cause headaches and depression among residents living up to a mile away.

One survey found that all but one of 14 people living near the Bears Down wind farm at Padstow, Cornwall, where 16 turbines were put up two years ago, had experienced increased numbers of headaches, and 10 said that they had problems sleeping and suffered from anxiety.

Wind farms: doctor claims they cause an increase in depression

Dr Amanda Harry, a local GP who did the research, said: "People demonstrated a range of symptoms from headaches, migraines, nausea, dizziness, palpitations and tinnitus to sleep disturbance, stress, anxiety and depression. These symptoms had a knock-on effect in their daily lives, causing poor concentration, irritability and an inability to cope."

Dr Harry said that low-frequency noise - which was used as an instrument of torture by the Germans during the Second World War because it induced headaches and anxiety attacks - could disturb rest and sleep at even very low levels.

"It travels further than audible noise, is ground-borne and is felt through vibrations," she said. "Some people are having to leave their homes to get away from the nuisance. Yet, despite their obvious suffering, little is being done to relieve the situation and they feel that their plight is ignored."

Similar problems have been found by Dr Bridget Osborne, a doctor in Moel Maelogan, a village in North Wales, where three turbines were erected in 2002. She has presented a paper to the Royal College of General Practitioners detailing a "marked" increase in depression among local people.

"There is a public perception that wind power is 'green' and has no detrimental effect on the environment," said Dr Osborne. "However, these turbines make low-frequency noises that can be as damaging as high-frequency noises.

"When wind farm developers do surveys to assess the suitability of a site they measure the audible range of noise but never the infrasound measurement - the low-frequency noise that causes vibrations that you can feel through your feet and chest.

"This frequency resonates with the human body - their effect being dependent on body shape. There are those on whom there is virtually no effect, but others for whom it is incredibly disturbing."

A report by Dr Geoff Leventhall, a fellow of the Institute of Physics and Institute of Acoustics, has endorsed the findings. "Low-frequency noise causes extreme distress to a number of people who are sensitive to its effects," it says.

The claims have sparked an inquiries by the British Wind Energy Association and the Department of the Environment, Food and Rural Affairs, which has commissioned scientists at Salford University to research the effects of wind turbines on human health.

There are more than 1,000 turbines on 80 wind farms around Britain. They have rapidly increased in number during the past decade as a result of the Government's aim of getting 10 per cent of Britain's energy needs from renewable sources by 2010. To meet that target, there would have to be at least 5,000 turbines.

In Denmark, where wind turbines were introduced as long as 30 years ago, the government has responded to public demand and stopped erecting onshore turbines because of the noise hazard.

Dr Stephen Briggs, an archaeologist who lives in the village of Llangwryfron in West Wales, initially welcomed the news that 20 turbines were to be built in the hills behind his home.

He said: "I'm as green as the next man and the developers assured us that the windmills would cause hardly any disturbance, but once they began operating I couldn't work in my garden any more - the noise was unbearable. It was as if someone was mixing cement in the sky."

Two neighbours became ill from a lack of sleep and after four years of frustrated appeals, the Briggs family left their home of 17 years. House prices near to wind farms have also plummeted.

Mark Taplin, who has lived close to a wind farm near Truro in Cornwall for almost a decade, said: "It has been a miserable, horrible experience. They are 440 metres away but if I step outside and they are not generating I know immediately because I can hear the silence. They grind you down - you can't get away from them. They make you very depressed - the chomp and swoosh of the blades creates a noise that beggars belief."

National Wind Power, a company that builds turbines, recommends that they are erected at least 600 yards from human habitation, but government planning guidelines allow them to be put up just 400 yards from houses.

Alison Hill, the communications manager for the British Wind Association, said: "Wind farms make people feel better - they are a visible evidence of a

cleaner, better future. However, we are currently doing research into the health impact of the turbines and shall be publishing the results within the next six months."

40
P.3

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Comments pertaining to the accuracy and completeness of the:

Desert Claim Wind Power Project
DEIS
December 2003

(Summary of Comments starts on Page 8 of this document)

RECEIVED
JAN 19 2004
KITTITAS COUNTY
CDS

Michael H. and Elizabeth F. Robertson
4101 Bettas Rd.
Cle Elum WA
98922

Fact Sheet

The statement that the proposed project will produce 180-megawatt (MW) wind energy is incorrect (or at a minimum – misleading). A conservative estimate of wind-energy facility efficiency is 30% of stated nameplate capacity. This project will, at best, only contribute 60 MW of intermittent power.

Chapter 1
Summary

1.3 APPLICANT'S OBJECTIVES FOR PROPOSAL

41-1
PD-5

The statement that the proposed project will produce 180-megawatt (MW) wind energy is incorrect (or at a minimum – misleading). This project will, at best, only contribute 60 MW of intermittent power. Instead of stating this throughout the whole document, please replace this reference with the words, "60 MW of effective power".

41-2
EIS-9

The application stated that one the site-specific criteria needed to support such a facility required ready access to sufficient available capacity on an existing electric transmission system. This may be criteria by the applicant from a business profitability standpoint, but should not be stated as a requirement for evaluation within this DEIS (unless the applicant is proposing to build increased transmission capacity).

1.4 KITTITAS COUNTY OBJECTIVES

To meet the Kittitas County's requirements to obtain a Wind Farm Resource Development permit, execute a development agreement, adopt a site-specific amendment to the Comprehensive Plan use designation map, and adoption of a site-specific rezone of the project area to Wind Farm Resource Overlay Zoning District; evaluation is required of the following:

41-3
EIS-4

- The project is essential or desirable to the public convenience.
- The project is not detrimental or injurious to the public health, peace, or safety, or to the character of the surrounding neighborhood.
- The project will not be unreasonably detrimental to the economic welfare of the county and will not create excessive public cost for public facilities and services.

There is no data offered to substantiate why this project is desirable to the public convenience. Utilizing data provided, this project will disturb the peace in the project area, introduce significant potential public safety hazards, and may affect the public health.

1.5 SUMMARY OF THE PROPOSAL AND ALTERNATIVES

41-4
ALT-7

No alternative site was provided that was not already near existing transmission lines.

1.6 SUMMARY COMPARISON OF ENVIRONMENTAL IMPACTS

Table 1-1

PLANTS AND ANIMALS

Wildlife

Birds

Compared to other wind plants that have been studied, raptor use for the Desert Claim site is above average. **The studies provided are insufficient to support the statement that 3 to 4 raptor fatalities a year could be possible.**

The study deficiencies are mostly due to the small data samples used and the frame of reference scope.

41-5
PA-13

Their main data collection technique was a 'Fixed point' observation scheme augmented with informal automobile travel and helicopter flights to discover raptor nesting sites. They had six observation stations within the project area that were visited once a week by a single individual for 30 minutes at each station. There were a total of 162 ea; 30 minute station observations documented. The math doesn't add up (52 weeks x 6 stations = 312 possible station observations) with the total of 162 observations being only 51% of the total possible in the time period given.

The local Kittitas Audubon group has stated that a two year baseline study of the whole valley (day and night and including bats) is required to sufficiently analyze potential impacts to bird populations. This makes sense to determine migratory patterns (local and transitory). It would also help in determining how one wind farm project might affect another (cumulative affects). WEST's studies 'live in a vacuum'. They only address the proposed project area for which they are contracted. Their risk assessment data is based on all the projects they have done previously, but if their methodology is deficient, they will always get the same answer (which is why wind developers use them). Arial helicopter surveys of raptor nests are without merit. They will most likely observe Buteo and Great Horned owl nests, but Kestrels are cavity nesters and are hard to find even if your are an experienced bird watcher. They will never discover Accipiter nests (if there are any in the area - they prefer mixed wood/meadow) because they are low flying 'sprinters' that rely on surprise (from tree to meadow) to take prey. The lack of rodent surveys suggests they have not determined with any accuracy, the raptor 'feeding' environment potential. All the same concerns of mortality count methodology in existing wind farm installations still exist and if this is not improved, the projected mortality data is just noise. Reduction of raptor populations would imply that there would be a corresponding increase in rodent populations. This could present a significant health risk with the increased risk of Hantavirus exposure to neighboring residents. No follow up baseline studies of other operational wind farms are offered to determine if wind farms change the 'overall' ecology of a wind farm project site.

41-6
PA-1

41-7
PA-13

41-8
PA-16

41-9
PA-20

- No night time observations were performed (i.e radar studies or night vision eyewear).
- No bird sound observations were performed.
- No Bald Eagle roosting sites were looked for outside the project area to determine if their travel patterns might intersect with the wind farm.

41-10
PA-1

- No bats studies were provided.
- Residents were not asked if they were aware of any raptor nests in the project area. 41-10 Cont. PA-1

This project violates at least 3 of the following US FWS guidelines to site wind turbines (2, 4, and 10). Without the required study, item 3 cannot be determined and bats should be considered at risk.

Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines US Fish and Wildlife Service May 3, 2003

Site Development Recommendations

The following recommendations apply to locating turbines and associated structures within WRAs (Wind Resource Area) selected for development of wind energy facilities:

1. Avoid placing turbines in documented locations of any species of wildlife, fish, or plant protected under the Federal Endangered Species Act.
2. Avoid locating turbines in known local bird migration pathways or in areas where birds are highly concentrated, unless mortality risk is low (e.g., birds present rarely enter the rotor-swept area). Examples of high concentration areas for birds are wetlands, State or Federal refuges, private duck clubs, staging areas, rookeries, leks, roosts, riparian areas along streams, and landfills. Avoid known daily movement flyways (e.g., between roosting and feeding areas) and areas with a high incidence of fog, mist, low cloud ceilings, and low visibility.
3. Avoid placing turbines near known bat hibernation, breeding, and maternity/nursery colonies, in migration corridors, or in flight paths between colonies and feeding areas. 41-11 PA-3
4. Configure turbine locations to avoid areas or features of the landscape known to attract raptors (hawks, falcons, eagles, owls). For example, Golden Eagles, hawks, and falcons use cliff/rim edges extensively; setbacks from these edges may reduce mortality. Other examples include not locating turbines in a dip or pass in a ridge, or in or near prairie dog colonies.
5. Configure turbine arrays to avoid potential avian mortality where feasible. For example, group turbines rather than spreading them widely, and orient rows of turbines parallel to known bird movements, thereby decreasing the potential for bird strikes. Implement appropriate storm water management practices that do not create attractions for birds, and maintain contiguous habitat for area-sensitive species (e.g., Sage Grouse).
6. Avoid fragmenting large, contiguous tracts of wildlife habitat. Where practical, place turbines on lands already altered or cultivated, and away from areas of intact and healthy native habitats. If not practical, select fragmented or degraded habitats over relatively intact areas.
7. Avoid placing turbines in habitat known to be occupied by prairie grouse or other species that exhibit extreme avoidance of vertical features and/or structural habitat fragmentation. In known prairie grouse habitat, avoid placing turbines within 5 miles of known leks (communal pair formation grounds).
8. Minimize roads, fences, and other infrastructure. All infrastructure should be capable of withstanding periodic burning of vegetation, as natural fires or controlled burns are necessary for maintaining most prairie habitats.
9. Develop a habitat restoration plan for the proposed site that avoids or minimizes negative impacts on vulnerable wildlife while maintaining or

enhancing habitat values for other species. For example, avoid attracting high densities of prey animals (rodents, rabbits, etc.) used by raptors. 41-11 Cont. PA-3

10. Reduce availability of carrion by practicing responsible animal husbandry (removing carcasses, fencing out cattle, etc.) to avoid attracting Golden Eagles and other raptors.

HEALTH AND SAFETY

No analysis was provided on the potential increased exposure of residents in proximity to the project area to the Hantavirus as it relates to increased rodent populations due to declining raptor populations. No analysis was provided on the potential increased exposure of residents to the project area to the West Nile virus as it relates to increased mosquito populations due to declining bat populations. 41-12 HS-12

Shadow Flicker

Not a single minute per year of this effect should cross any non-participating adjacent land owner property line without his or her permission. This is a property rights issue due to the fact it would limit the use of non-participating land owner property as it relates to: 41-13 VB-7

- Where a land owner is able to build his or her residence
- Whether transitory horses can be boarded*
- Enjoyment of 'undisturbed' property value

***Reference: THE BRITISH HORSE SOCIETY**
Revised Policy Statement on Windfarms and Horses/Ponies

1. The Society is conscious of the need for developers and planners to be made aware of the safety implications to horses and their riders or drivers arising from the construction and operation of wind turbines in the vicinity of routes for riding and/or driving horse drawn vehicles (HDV).
2. The natural instinct of a horse when faced with perceived danger is flight so its reaction depends very much on, in that first split second, the horse's perception of the hazard, and equally as important the riders/drivers ability to handle the horse or pony when faced with unexpected circumstances.
3. The horse and rider unfamiliar with the area may react in a potentially dangerous manner to any of the following characteristics which can arise from the operation of a wind turbine: sudden appearance in the horses' sight line of turning blades, the low frequency noise emitted by the turbines punctuated by the "whoomph" as the blades pass the nadir point and sometimes said to be felt rather than heard, shadows sweeping the ground or bushes/trees in sunny weather, the unexpected starting up of the turbine if the wind builds up as the horse approaches.

The noted effects on horses can be applied to deer and elk with the net effect of driving these animals away from the area. 41-14 PA-9

NOISE

It is not relevant to this DEIS that "*Low-frequency noise impacts are not anticipated due to "upwind" design and streamlined turbine design. Tonal noise from turbine operation is possible, but cannot be predicted*". The purpose of an EIS is to 'anticipate' and assess just such factors and offer mitigations. There is abundant documented testimony from around the world of residents living in close proximity to modern wind farms. The noises they find most irritating are 'thumping' noises heard as the blades pass in front of the tower structures and 41-15 NOI-5

'whoomphing' noises (as indicated in the previously quoted British Horse Society policy statement) when the blades pass the nadir point. This is a cumulative effect as more turbines in an area are added. **If the applicant cannot offer any data regarding these impacts, then a minimum 2 mile setback from any non-participating property owner should be required.** 41-15 Cont. NOI-5

AESTHETICS/LIGHT AND GLARE

A majority of the simulations were pictures taken when either the sky was hazy, there were low clouds, or taken in the winter with snow covering in the background. There was no indication of an intense strobe light "light source" on the tower tops (FAA requirement), no blade motion simulations, and of course, no night time simulations with blinking red lights. 41-16 ALG-2

Every advertiser knows that movement, color, blinking lights, or sound will draw a person's attention. The Proposed wind turbines are two and a half times as tall as the tallest BPA power transmission line support structure. Their rotor blade diameter alone is much greater than the height of the tallest power transmission line and the rotors move. In the morning hours and afternoon hours these turbines sweep large shadows across the landscape referred to as shadow flicker. Add to this a blinking strobe light designed to draw attention to unwary pilots and you have a landscape feature that no one will be able to ignore. Now spread 240 of these monsters across the highest ridge tops in the upper Kittitas Valley. You would not be able to even drive on Hwy 97 without being distracted. Put one of these machines within 1,000 feet of a resident's home and you tell me if it will bother them. 41-17 ALG-1

No visual simulations were provided from the homes of neighboring, non-participating home owner properties. 41-18 ALG-2

This particular impact alone is enough to deny siting this project anywhere near non-participating land owner property. 41-19 VB-7

PUBLIC SERVICES AND UTILITIES

<u>Police Service</u>

It should be anticipated that there will be an increased call rate to the police department due to private land violations from curious non-residents wishing to get "up close" to a gigantic wind turbine. 41-20 PSU-5

FISCAL CONDITIONS

"Potential property tax revenues from the project are estimated at a maximum of nearly $1.1 million for the first year of operation. Tax revenues in subsequent years would be based on depreciated value of the project and have not been estimated." 41-21 FIS-2

Why have the tax revenues for subsequent years not been provided?

1.7.4.3 Wildlife

Birds

The conclusions presented are without merit due to the lack of a minimum two year base line study of the whole valley. Other deficiencies were noted in previous section **"PLANTS AND ANIMALS, <u>Wildlife</u>, Birds"**. 41-22 PA-1

1.7.5 Energy and Natural Resources

"The three proposed wind power projects would provide a combined nameplate capacity of approximately 540 to 545 MW of electricity (under the "middle scenario" for development of the Kittitas Valley project). Assuming long-term operation of the three projects at a typical plant factor of 33 percent, the Kittitas Valley, Desert Claim and Wild Horse projects would produce approximately 180 average MW of electricity on a long-term basis. Operation of the three projects would add substantially to the capacity, production and availability of renewable energy sources in Washington and the Pacific Northwest."

41-23
ENR-2

On the other hand, these combined projects will only be capable of supplying 1.1% of the anticipated Pacific Northwest Electricity demand through 2025*. This is an insignificant contribution when you consider that the recently approved Sumas Energy 2 Generation Facility will nominally produce 660 MW of also available (dispatchable) electricity and only occupy a portion of a 37-acre site within the industrial area of Sumas, Washington. The Pacific Northwest receives approximately 80% of its electrical power from hydro-electric resources. No common sense case can be made that we need any more renewable energy sources of power provided at significantly increased rates to the utility consumer.

*Table 1-1 (Projected Pacific Northwest Electricity Demand, 2000-2025) Kittitas Valley Wind Power Project DEIS.

1.7.16 Fiscal Conditions

"Current statewide legal limitations on property taxes would likely result in actual tax revenues lower than those indicated above. Initiative 747 limits the growth of local government property tax revenues to 1 percent per year, although the I-747 cap does not apply to the assessed value of new construction. Because the total assessed valuation for Kittitas County would increase substantially (over 10 percent) with inclusion of the value of the wind power projects, the tax rates levied against the total assessed valuation base might need to be reduced to stay within the I-747 limit. In that event, actual revenues derived from the projects would be less than indicated <above>, although all taxpayers would benefit from the reduced levy rate. On balance, the actual effect of the projects on property taxes would likely be some combination of increased revenues and decreased levy rates."

No data was provided as to the estimate of increased utility rates to Kittitas County residents with the introduction of 180 MW of intermittent power to the regional grid. Any savings in property tax rate assessments will more than be lost by these increases.

41-24
FIS-4

1.8 MITIGATION MEASURES

1.8.4.3 Wildlife

In addition, consideration could be given to developing, in cooperation with other industry participants, a focused monitoring study that addresses a specific question regarding impacts from wind plants, such as:

41-25
PA-20

- *effects of different turbine lighting schemes or guy wire BFD's on avian mortality.*
- *the impact of the facility on wintering mule deer.*
- *whether wind turbines attract migrating bats.*
- *mechanisms for deterring migrating bats from turbines.*

You don't "monitor" the operational situation after building an environmentally impactive industrial power generation facility and "hope" you can mitigate anything that may come up. If this is an accepted methodology, then a "test" installation (one turbine, let's say) should be erected and closely monitored for a minimum of two years. If this is not acceptable, then bat studies and a two year avian baseline study should be required. 41-25 Cont. PA-20

1.8.8.3 Shadow Flicker

No resident should have to endure one minute of this effect anywhere on his or her property. The only mitigation possible is to position these turbines in a way that the effect never crosses a non-participating land owner property line without their permission. 41-26 VB-7

1.8.9 Noise

The definition of "noise" is a sound that is loud, unpleasant, unexpected, or **undesired**.

As stated previously, no analysis was provided on the impacts of low frequency noise. There is abundant documented testimony from around the world of residents living in close proximity to modern wind farms. The noises they find most irritating (**undesired**) are 'thumping' noises heard as the blades pass in front of the tower structures and 'whoomphing' noises when the blades pass the nadir point. This is a cumulative effect as more turbines in an area are added. To insure that non-participating residents are not impacted, a minimum 2 mile (10,560 feet) setback should be required to mitigate these effects. 41-27 NOI-5

1.8.10 Aesthetics, Light and Glare

You cannot disguise a 400 foot structure that moves and blinks. These machines are visually distracting and demand your attention. The only mitigation possible is to build them in a location that does not impact the aesthetic beauty that non-participating land owners consider as the prime reason for living where they live. 41-28 ALG-4

Chapter 2
ALTERNATIVES INCLUDING THE PROPOSED ACTION

2.1.1 Proposal History

"Areas indicated as having sufficient wind resources were then screened against other site selection criteria standard to the industry, including access to existing electrical transmission facilities.."

Proximity of transmission facilities is not a criterion that is required for an EIS evaluation unless the applicant is proposing to build new capacity. No alternatives were presented of remote locations in the county that have sufficient wind resource, but no access to existing electrical transmission facilities. 41-29 ALT-7

Chapter 3
AFFECTED ENVIRONMENT, ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Comments previously stated in Chapter 1 – Summary

Chapter 4
Cumulative Impacts

Comments previously stated in Chapter 1 – Summary

Summary of Comments

This document has not provided any demonstrable public need for the insignificant amount of power this facility is capable of producing. No valid, compelling local (or even statewide) economic reasons were offered to potentially offset the overwhelming negative impacts that will result if built. 41-30 EIS-7

Various mitigations offered are unacceptable or unworkable.

The following are areas of analysis that were either deficient or not performed at all:

- List of offsite alternative locations regardless of cost incurred to transport the power produced. 41-31 ALT-7
- A two year avian baseline study for the whole Kittitas Valley to accurately assess potential cumulative avian mortality rates associated with the construction of multiple wind power facilities.
- Study to locate Bald Eagle roosting sites outside of the project area to asses risk traveling to and from as it relates to the wind facility.
- Rodent population survey to determine raptor habitat desirability. 41-32 PA-1
    - No analysis was offered on the potential effect of declining local raptor populations, increased local rodent populations, and the potential increased risk to local residents of exposure to Hantavirus.
- Studies to assess potential bat mortality.
    - No analysis was offered on the potential effect of declining local bat populations and the potential increased risk to local residents of exposure to West Nile virus.
- Night time point count and in-transit surveys to estimate potential owl mortality rates.
- Visual simulations utilizing 3 MW wind turbines, on a non-hazy day, and against a cloudless sky. 41-33 ALG-2
- Visual simulations from the homes of residents living within the proposed project site.
- Low frequency noise analysis relating to the sound made when a rotor blade passes in front of the tower structure or passing the nadir point of its rotation. 41-34 NOI-5

Mitigation measures offered in some cases are unworkable, insufficient, or unacceptable to local residents.

In the general area of mitigating setbacks associated with individual turbine placement:

- Shadow-flicker analysis provided indicates that a much greater distance is required to eliminate this effect. 41-35 HS-4
- Low frequency noise mitigation would suggest a much larger distance is required. 41-36 NOI-2

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January 30, 2004

Clay White
Kittitas County Planner II
411 N. Ruby St., Suite 2
Ellensburg, WA 98926
VIA EMAIL

RE: Desert Claim Wind Power Project DEIS

Dear Clay,

Below are my comments Desert Claim Wind Power Project DEIS.

THE APPLICANT	The DEIS is so what misleading in that it implies that EnXco is a US corporation: "EnXco develops, builds, operates and manages wind energy projects throughout the United States". In fact EnXco is a French corporation with a few projects in the US.	42-1 EIS-9
OUTPUT FROM THIS PROJECT	The DEIS claims that the project is "a 180-megawatt wind energy facility". In fact this is a theoretical capacity that is never achieved. Actual produced electricity is only 25 to 30% of this amount.	42-2 PD-5
	The DEIS claims that the applicant's objective is to "deliver renewable energy to the Pacific Northwest." Since there is as yet no contract with a utility company there is no evidence that the Pacific NW will benefit. Thus this statement should not be in the DEIS.	42-3 EIS-9
	Elsewhere the DEIS states, "Electricity generated by the project would be sold to power marketing entities, such as Bonneville Power Association, local and regional utilities, such as Kittitas County PUD and Grant County PUD; and/or regional investor-owned utilities, such as Puget Sound Energy and Avista." Again, this is not a fact since no contract with these entities exists. Similar claims appear elsewhere in the DEIS. All should be removed.	42-4 PD-6
	The DEIS states "The project would have little or no impact on the supply and price of electricity available to local consumers. Since EnXco has no buyers for the power, they cannot comment on the impact. In fact, since wind power is more expensive than other forms of electricity, it is likely that prices to consumers would increase. The DEIS should provide evidence why this will not happen.	42-5 ENR-1
	In the section "Summary Comparison of Environmental Impacts" it is stated that if the wind farm was not built that a fossil burning energy would have to be built to replace lost wind energy. No evidence at all is provided for this dubious claim.	42-6 ALT-1
IMPACTS ON WILDLIFE	The section "Summary Comparison of Environmental Impacts" states conclusions from a limited 1-year study performed by WEST Inc., consisting of several 30 minute visual observations at random locations in daylight. The Kittitas County Audubon has publicly stated that the WEST study is inadequate. Many of the WEST results were produced	42-7 PA-1

	"statistically" and not from actual observations. No night studies were made and no confirmation of migratory pathways were studied. Documentation from other wind facilities has stated significant raptor and bat fatalities and these documents were not acknowledged. No bat studies were performed in the project area. The proposed project area is in confirmed bald eagle hunting and roosting areas. Bald eagles are protected at the Federal level by the Bald Eagle Protection Act. Raptors are protected by State law. Aerial observations by helicopter for active raptor nests is insufficient. Some species of raptors are cavity dwellers, which cannot be seen from the air.	42-7 Cont. PA-1
	Guidelines for minimizing impact of wind turbines on wildlife were issued by the US Fish and Wildlife Service, dated May 3, 2003, were not mentioned. The DEIS should state EnXco's level of compliance with these guidelines.	42-8 PA-3
	The DEIS statement "To date, no bald eagle fatalities have been reported from wind plants in the US" is patently false. US government agencies state that hundreds of raptors, including golden and bald eagles, have been killed by the wind farm at Altamont, CA. The Desert Claim as well as the Kittitas Valley Wind Power Project areas are in bald eagle hunting grounds. The Kittitas Valley Audubon has confirmed that fact. There is a high potential that these two projects, if operational, will take a toll on our local eagle population. This is in violation of the federal Bald Eagle Protection Act.	42-9 PA-12
	The DEIS acknowledges that "based on experience at other wind plants, bat fatalities are likely to occur at all three Kittitas County projects". Yet, the WEST study did not review bat fatalities. This should be required of the applicant.	42-10 PA-15
CONSISTENCY WITH LOCAL LAND USE	The DEIS states that project facilities are "not expected" to significantly impact existing activities, and changes to "land use patterns are not seen as significant". No evidence is provided for these claims, and on the surface it appears obvious that these claims are false. The project is in the middle of recreational and residential land and owners will be impacted. The DEIS should providence evidence for its claim that this is not so.	42-11 LU-1
	The DEIS states Chapter "current research has generally found that wind farms have either no effect on tourism or a positive effect". Yet it provides no evidence, and there is a prima facie argument that the opposite will be true – recreational users of Kittitas County value the unspoiled scenery and will likely avoid the area if it is littered with hundreds of huge turbines.	42-12 PHE-1
	The DEIS acknowledges that "it is possible that the proximate Desert Claim and Kittitas Valley proposals (together more than 12,000 acres) could cumulatively discourage residential uses to some degree in their general locations". It also states "some nearby residential users might seek to relocate if they felt that wind facilities, individually or collectively, conflict with elements of their lifestyle." This is reason enough to not approve the project.	42-13 VB-7
	The DEIS states, "The proposed project would be consistent with the land use and utilities policies of the Kittitas County Comprehensive Plan." To be consistent with the KVCCP the following conditions must be met:	42-14 LU-6

	1. The project is essential or desirable to the public convenience. The project has not been proven essential or desirable. **2. The project is not detrimental or injurious to the public health, peace, or safety, or to the character of the surrounding neighborhood.** In fact, there is a great deal of evidence that the project will introduce fire risk, ice throw risk, blade and tower failures, driving distractions, increased light and noise pollution, shadow flicker and blade glint effects which are detrimental and injurious. In addition, there is much evidence that neighboring property values will plummet. The DEIS acknowledges, "Development of the project as proposed would result in significant unavoidable adverse impacts to the visual environment, especially for nearby rural residents in the northern half of the Northwest Valley." It also admits, "The scale of the wind turbines would be significantly larger than other land uses; this contrast is unavoidable because of the nature of wind facilities." By its own admission it is not consistent with the character of the surrounding neighborhood, and cannot be made consistent. **3. The project will not be unreasonably detrimental to the economic welfare of the county and not create excessive public cost for public facilities and services.** Recreation and rural development are the growing major economic force for land ownership in Kittitas County. There is a prima facie argument that property values will decline, recreation will suffer, and that area will become far less attractive as a place to live, causing the local economy to suffer. The DEIS provides no evidence that this is not so.	42-14 Cont. LU-16
SAFETY ISSUES AND HUMAN IMPACTS	The DEIS states that turbine tower collapse and blade failure (throws) are extremely remote, but then states it has occurred in the past. However, the large1.5 MW turbines proposed by the applicant are new technology with little or no track record. Thus large safety setbacks should be mandated by the county – 2500 feet from feet from property lines and roads.	42-15 HS-4
	The DEIS states "the presence of the project would likely have little long term effects on the level of fire hazard". In fact there is much evidence that such projects increase the fire hazard. Only a few months ago an employees at an EnXco wind farm was killed when a transformer at that facility exploded, causing a fire.	42-16 HS-1
	The DEIS states "The distance threshold for shadow flicker impacts is approximately 2,000 feet." And, "38 receptors (residences) in the project area could be exposed". This fact is argument for a setback of at least 2000 feet from property lines (NOT existing residences).	42-17 HS-4
	The DEIS states "project noise impacts would be rated at either low or medium, and would not be significant." There is ample evidence that noise from such facilities is a major disturbance to neighbors. This again argues for setbacks from non-participating property lines of at least 2500 feet. The DEIS also states "tonal noise from turbine operation is possible, but cannot be predicted." If it can't be predicted then the project should not be approved.	42-18 NOI-2 42-19 NOI-1

	The DEIS states "Blade glint or glare can be noticed over distances of 6 to 9 miles and could be an occasional occurrence." This impact can affect the public driving on public roads out to 9 miles if the information is correct. This is a significant impact on public safety.	42-20 ALG-3
	The DEIS states that 27 turbines would "likely be considered hazards to air navigation and a potential adverse impact on air traffic operations in the traffic pattern". Those 27 turbines identified as hazards should therefore be eliminated from the application.	42-21 AT-2
	The DEIS does not address mitigation measures for wells that could be damaged by the blasting to create each turbine base. There could be silting or other water quantity or quality issues. The long-term effect of the huge amount of concrete proposed for these turbines ground has not been evaluated. Concrete is known to leach minerals over time.	42-22 WR-2 42-23 WR-3

This project, as judged from the DEIS, has many impacts on Kittitas County that cannot be satisfactorily mitigated. I believe that the County should not approve this project in the proposed location. 42-24 SO-5

Sincerely,
Geoff Saunders
8241 Elk Springs Rd
Ellensburg 98926

EnXco Desert Claim Wind Power Project Comments

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Chapter One

1.8.3.1 Surface Water
This section should include assurances that current surface water flow will not be changed from current sites or current flow and direction. 43-1 WR-2

1.8.3.2 Ground Water
This section should assure that any placement of turbine not be in contention with current ground water amounts and are not running below the base of the turbine. 43-2 WR-2 Also, there should be assurances that any blasting will not change the actual direction or cause the ground water to "leave" the current location. 43-3 WR-2 Mitigation measures should be in place for homeowner's wells.

1.8.4.1 Vegetation
The amounts of land replacing the grass and shrub steppe should not be used for farming as well? Otherwise, we lose the area that the turbines and roads are placed. 43-4 PA-5

1.8.4.3 Wildlife
A monitoring program would be in place after the Wind Factory is operational to monitor bird kills. 43-5 PA-1 While I cannot disagree with this, we need to know more completely how the birds will be affected before we can approve a Wind Factory. Any post construction monitoring has to be done with non-wind factories employees; otherwise, we will never get the truth. 43-6 PA-20

1.8.7 Land Use
I disagree that increasing the turbine setbacks for residents adjacent to the center portion of the site could reduce visual and proximity impacts. The DEIS goes on to state that other impacts do not warrant mitigations. Unless the setbacks are made for all noise, shadow flicker, ice throws, tower collapses for ALL the residents on the site, land use will be significantly changed for all involved. This will include building sites, outbuildings, 43-7 LU-5

riding arenas, grazing and pasturing of animals as well as use of those landowners by not being "comfortable" or feeling safe on their own land. 43-7 Cont. LU-5

1.8.8 Health and Safety

Blade Throw

I think additional proof that a blade will not travel more than 540 feet in a 30 or 70 mph wind is warranted. I do not trust these figures. At the open house, the engineer stated "normal wind speed" was used for his purposes. 43-8 HS-2

Fire Hazards

Additional Information is warranted on how a fire could be fought in the Wind Factory site. How fire fighters would attain access. 43-9 PSU-2

1.8.8.2 Electrical Hazards

The DEIS should include stray electricity, how it occurs in wind factory sites and how it can be mitigated "at the source". There should also be a plan to assure electricity cannot back up into residents systems, via lightning or other natural occurrences. EnXco should be responsible for all damage caused by these occurrences. 43-10 HS-6 43-11 HS-10

1.8.8.3 Shadow Flicker

The several options discussed should NOT include receptor sites. It is EnXco's responsibility to mitigate this at the source. Most of the suggested mitigation measures sum up to "close your eyes and you will not see it". Examples: 43-12 HS-8

- Residents to call hotline and report it so WF can shut those turbines off.
- Residents to plant trees.
- Residents to put up curtains.

We own 60 acres, so that would mean do not go outside during these times? Our suggestion is to place turbines at least 2000 feet from property lines, right of ways and roads to assure health and safety. Why wasn't this mitigation measure suggested? 43-13 HS-4

1.8.9 Noise

- Setbacks suggested were 1000 feet. Turbines can be heard 2 miles away. The DEIS needs to look at other WF sites to assure 1000 feet is adequate. 43-14 NOI-2

- Low frequency sound needs to be explained and the public made aware of what that is, the impacts before mitigations can be understood. 43-15 NOI-5

1.8.10 Aesthetics, Lights, Glare

When reading all that EnXco is willing to do to minimize a wind factories look in the valley should tell us that these turbines do not belong in populated areas. Clusters of 10-15 turbines spread out across 5200 acres, essentially the whole base of the NW and Central valley will not minimize the impacts to the residents living there. In fact, it will encircle many of us, as we will not be able to not see turbines when we look south, north, east of west. Glare cannot be minimized when you are held captive on 3-4 sides of your property. 43-16 ALG-1

They state that there will be large changes in the rural landscape. We should listen to what they say and re-site this project, based upon this alone. 43-17 ALG-1

1.8.12.1 Construction

There is no mention of dust mitigation. 43-18 GT-7

1.8.13 Air Transportation

As stated in the DEIS, 27 turbines will be over FAA height restriction on the VFR flight pattern. We also have 185 students that add 44000 operations to the airport annually in addition to the 39000 operations or 85 flights daily. 43-19 AT-1

The mitigation suggested was to change the take off flight patterns for the VFR to a South turn, rather than a North turn. This will increase noise and traffic over the City of Ellensburg and the campus of CWU. I also think we should look at the impact of sending ALL flights southbound. I would think that there would be an increased chance of accidents to move traffic all in one direction. 43-20 AT-2

As a better mitigation proposal, we should consider eliminating 27 turbines or lowering the tower height to meet FAA approval. 43-21 AT-2

The lighting pattern required by the FAA will be obtrusive to the residents that live within the project and to those who live to the east, south and west of this area. As a resident in the middle of the project, I find it unacceptable to place turbines anywhere near the airport. 43-22 AT-6

1.8.14.1 Fire Hazards

How will a fire be fought in a 5200-acre site that can't be fought from the air? How will that jeopardize the safety of the public, their homes and animals? This is the main issue and it is not addressed, other than to say, a plan will be put in place later. NO, we want to hear from the WF and the Fire chief to know the issues. 43-23 PSU-2

Secondly, while EnXco states they will employ all possible mitigations to minimize the risk of starting a fire, most of those factors depend upon humans to perform them. Accidents do happen. Slip-shod maintenance does happen, whether due to lack of knowledge, time or laziness. The wind factory is adding another large risk to a known list of fire risks in this area currently. Placing them where people live is just not a good idea. I also believe that this section, or in the adjoining sections, insurance rates should be researched and discussed. 43-24 HS-1

My third point is that EnXco states, no burning, other than natural vegetation will occur. EnXco should also operate within the restrictions of "county fire rules and restrictions" and common sense, like don't burn on a windy day, August, September, etc. 43-25 HS-1

1.9.1 Significant Unavoidable Impacts

1.9.2 Air Quality

Construction will add dust to the valley floor, especially if several turbine sites are being prepared at one time. Dust mitigation should be addressed. 43-26 AQ-3

1.9.3 Water

The DEIS states that there are no significant impacts on the water.

- Depends upon damage to wells from blasting
- Depends upon no re-routing of surface of ground waters
- Depends upon no hazardous material spills

43-27 WR-3

These are all huge risks for the residents living in the WF site as they depend upon wells for their drinking water; they depend upon wells and surface water for livestock. In fact, all life in this site depends upon water. To state that there will be no significant impacts is irresponsible.

1.9.4 Wildlife

The DEIS states bird mortality would be adversely affected. And this conclusion is based upon a study that is incomplete and the data flawed. My conclusion is that the Wind Study did not include bats, nighttime birds, migration paths, in fact West, Inc. Did not even know where the Eagles nested! We cannot accept these facts until a more comprehensive bird study is completed. We also need to include who gets fined or arrested when the protected species are killed.

In the December 2003 Issue of the Audubon Society Magazine in an article called "Answering a Call". This article states: {Biologists believe the nation's 138000 communication towers, which range from tiny antennae mounted in church steeples to steel spires souring 2000 feet into the sky, kill between 5 million to 50 million birds a year (see "Faulty Towers," Audubon, September-October 2001). Historically, the biggest kills–thousands of birds at a time-have occurred on cloudy nights during fall migration at tall, lighted towers. "The birds appear to be attracted by the lights, then die in gruesome collisions with girders and guy wires, says Art Clark, an ornithologist in Buffalo, New York, who has studied the problem for decades."} 43-28 PA-1

My point is this, if cell towers cause millions of deaths a year, these turbines will cause the death of many more birds than stated in the West, Inc. Study. Particularly at night, migrations were not looked into and should be before any decisions are made.

1.9.6 Cultural Resources

Based upon the little information that is in this section, I would doubt any meaningful conversations took place with the Yakima Nation. We need to include which sites will be affected, understand the value to the tribe, how wind turbines will affect access to tribe members, their safety, how will turbines interfere with customs and ceremonies? This section is incomplete at best. 43-29 CR-3

1.9.7 Land Use

Again, the DEIS states that effects on land use are insignificant. We beg to differ.

Unless setbacks can be at least 2000 feet from property lines, shadow flicker will affect how you use your land. If a 2000-foot setback is not regulated, safety concerns over throwing ice and blades, tower collapse may cause residents on adjoining properties to not use those areas for home sites, out 43-30 LU-5

buildings, animal grazing and pasturing. We do not trust that a collapsing tower and pieces of a collapsing tower will only fall 540 feet. Add a 30 or 50 mph wind to that formula and we could have some terrible consequences. Again, the 540 ft estimate did not include any high wind speeds. 43-30 Cont. LU-5

1.9.8 Health and Safety

The DEIS states that 38 residents will have shadow flicker. This is unacceptable to those 38 residences. What about the roads? This section does not address the safety of shadow flicker over roads. They also state there will be no significant adverse effects. However, it is recommended that the 38 residences or receptors be responsible for all the mitigation. This is just plain wrong and irresponsible on the WF owners to even suggest. 43-31 HS-7 43-32 HS-8

I suggest we add one mitigation to the list.

- Remove all turbines that cause shadow flicker to residences in the project site and 2000 feet beyond.

1.9.9 Noise

Again, no significant adverse impacts. See a pattern here? It almost appears that EnXco is hoping the public will only read Chapter one. 43-33 NOI-1

While my residence is at an avg. of 45 decibals, the graph shows ratings going into the mid to high 50's. This will have an impact on my life, especially during windy months. The significance HAS to be measured at the receptors level, not estimated based upon a 5200-acre site. 43-34 NOI-1

What if the projected calculations are wrong, as they were in the Lincoln Township Wind Factory? What will be the mitigation factors for landowners whose life is made miserable? This needs to be added to the DEIS. 43-35 NOI-3

Low-Frequency Noise and it's impacts are not addressed and need to be added to the DEIS. 43-36 NOI-5

1.9.10 Aesthetics, Lights, Glare

Anyone that says they can make 121-393 foot towers look better in a rural setting is lying. Unless of course, they are moved 20 miles away. 43-37 ALG-4

1.9.13 Air Transportation

A change in flight pattern that causes ALL flights to turn south is a significant impact to those living in the north portion of the city. It is also a safety concern as there are 184 student pilots that may get confused or have an emergency situation over the city. 43-38 AT-2

IF there is an in-flight emergency and the pilot has to risk a low altitude landing or fly through the 27 turbines, it will put undue danger on the pilot and his passengers and craft. Insignificant? I don't think the FAA will approve this and they should not. 43-39 AT-7

Chapter Two-Land Use

Introduction

The DEIS states there are 31 non-participating residences within the project area. While it appears there are 31 landowners whose property adjoins wind factory leased land, there are many more residences affected. This is due in part to the broad acreage that is used across the valley floor to site the turbines. Many more residents are "encircled" by towers on all of parts of their land, it may not adjoin, but the structures will be quite visible and noisy from their vantage. 43-40 EIS-2

The DEIS needs to include residents affected from ¼ mile in 1/4 mile increments up to 2 miles away. This will enable to the county to really see the potential impacts to valley residents and to look at the total impact from the project footprint and suggested distances. There are hundreds of landowners that will be affected.

2.2.2.3 the project also will add collection lines down Smithson Rd. These will be in towers of 37 feet. It should include whether these are additional poles, at the same height or not of existing power lines and if they will encroach on property owned along Smithson. 43-41 PD-8

Additional underground cables will be installed on non-leased property. This statement needs to be better explained. Will they need "unwilling property owners" permission? Or will they use existing county right-of-ways? If county right-of-ways, will EnXco foot the bill? Or taxpayers?

No site selected for meteorological towers, DEIS is incomplete. 43-42 PD-4

This section does not state how many cubic years of material will be disturbed, removed, moved, etc. We need to know this information to adequately address environmental concerns. 43-43 PD-1

In addition, a visitor center location is not addressed, as well as the impacts associated with a visitor center. 43-44 PD-12

Hazardous materials, i.e. oils, lubricants, etc. are not listed in their entirety and impacts addressed. 43-45 PD-7

2.2.2.7 Safety and Controls

This section states additional telephone lines will be needed for each of the turbines for communication and will be a part of telephone poles for electricity. We really need to require these to be underground as additional above ground poles and lines will add to the bird kills and worsen the aesthetics. 43-46 PD-8

CHAPTER THREE-AIR QUALITY

3.2 AIR QUALITY

3.2.2.1 Impacts during construction
In regards to the mitigation steps, Please be more specific to watering the soil surfaces when blowing dust is noticeable. Please add road and site surfaces will be watered during construction hours and after construction hours if needed. 43-47 AQ-3

Last paragraph states that the wind turbines rotors actually slow the wind and therefore will not add to the current level of dust and pollution. If this statement does not prove to be true and there is added dust and pollution, there should be a statement about appropriate mitigation measures. 43-48 AQ-3

3.2.3.3 No Action Alternative
The statement about another energy facility being build should be removed from this DEIS as it is an untrue statement. The power from this project isn't even sold and is likely to be sold out of state. 43-49 ALT-1

In addition, this paragraph should include residential use where it states the land would continue to be used for agricultural use.

3.2.6 The dust and air quality impacts would be *in addition* to current use impacts. If mitigation measures work, the impact may be negligible, however, it may not be insignificant. 43-50 AQ-2

Water Quality

3.3.2.1 Surface water

In this section, the DEIS projects crossing streams 24 times for road beds and 17 times multiplied by "several" crossings for underground cable. Because they are not specific, I estimate 100 crossings, disturbances of the vegetation, surface water, and soils. This potentially is a huge impact on the residents who depend upon this water for irrigation of hay fields and stock watering. It is not insignificant. There should be mitigation for loss of water and water quality. 43-51 WR-1 43-52 WR-2

In the last paragraph they state some stream water will be used for dust control. This should NOT be allowed in this project. 43-53 WR-4

3.3.2.2 Ground-Water pg 3-47

Up to 200 acres of impervious surfaces will be disturbed, destroyed permanently or temporarily. This is a lot of acreage and represents almost 4% of the project area. This will have an impact if underground water flow if affected. We need to put wording in the EIS to state that placement of turbines cannot be over known underground rivers to help protect landowners. This is very important as blasting will occur at turbine sites and admittedly, the turbines vibrate in operation. I believe we need more information (engineered or real-life situations) to compare and evaluate the impact of this vibration in combination with blasting. 43-54 WR-2 43-55 WR-3

The 1000-foot set back from residences is not far enough based upon this information, blasting and vibrations and should be changed to 2000 feet from property lines. 43-56 WR-2

3.3.3.1 Alternative Sit Impacts

Again, Alternative 1 is the better site as it affects one resident. 43-57 SO-4

Ground Water Conclusions state that overall impacts are insignificant. How can this statement be made when there are no facts to back up that blasting will not alter well depth, ground water flow? Blasting will take place 1000 ft from residences, down to 40 feet and wells are an average of 165, but could be shallower. Where is the study? 43-58 WR-3

Mitigation measures to protect residents HAVE to be put in place and EnXco has to be held responsible for well issues during and after construction. 43-59 WR-2

3.4 Plants and Animals

Birds

West Study was incomplete and on-site surveys were cursory. Only one person conducted surveys, one time a week for 30 minutes. No nighttime surveys were conducted. Migration of birds was not studied. An example of their finding were only 3 Horned Owl nests were located within ½ mile of project. I have 2 great horned owls on my property and another nesting pair at our cabin in Suneast within 1 1/2 miles of the project. I know my property has to represent many more properties in the Wind Farm vicinity. 43-60 PA-1 43-61 PA-14

Eagle nesting was looked at in May and June. While we know, some eagles stay year round, the winter nesting takes place from December through March or April. At the Audubon meeting, Wilson Creek residents stated 2 dozen or more come down from the Wilson Canyon every morning and fly across the Wind Factory site. West was not aware of this. They did not talk to residents! 43-62 PA-13

There was no discussion of Raptors along ridgelines, other than in the mitigation measures. No Bat mortality numbers, as they are unknown. This study needs to be extended another year and include more people, more time, bird migrations and night birds. What will the effect be on west Nile virus if bat populations are killed? Horse populations are large in our Valley and a big part of our economic profile. Please refer to the Audubon study on birds that are killed each year on cell towers. 43-63 PA-13 43-64 PA-15 43-65 PA-16

Risk of Turbine Collision, pg 3-91

How can we assume that bird mortality rates will be like other projects, when the study is flawed and the information from other sites is very sketchy (for the obvious reasons). 43-66 PA-1

Mitigation Measures

Where the word "could" is used, change to shall or will. 43-67 EIS-10

3.4.4.3 Alternative Site Impacts

Again, Alternative 1 is the better site as no Eagles are sited; there are low population of horses. 43-68 SO-4

3.5 Energy and Natural Resources

Again, no projected displacement of natural resources are listed in the cubic yard or ton measurements. This needs to be added to the DEIS. 43-69 ENR-4

3.6 Cultural Resources

No conversations and research conducted with the Yakima Nation. Private property use was not identified. We cannot make this assumption until the Yakima Nation is included. It is a big risk, if they decide to "sue" during the construction phase. 43-70 CR-3

Several direct ad indirect impacts were identified, the main ones being placement of turbines or roads in current historical sites and the hardship or trying to control loss of artifacts due to the workers in these areas. Six sites were identified as having a large impact of this type. 43-71 CR-2

3.6.5 Mitigation

I found this section to be stated as what might be done. It needs to be specific. Also any turbine or road that will be sited in these areas needs to be re-located, period. 43-72 CR-1

3.6.3.1 Alternative Site Impacts

Again, alternative 1 is the better site, as NO historical sites will be near a road or turbine placement. 43-73 SO-4

3.7 Land and Shoreline Use

Desert Claim Project Vicinity states in the 3rd paragraph that 83 residences within ½ mile of the project will be affected. I believe this information is incomplete and needs to include residences in the project area, surrounded by the project area and within ¼ mile increments up to 2 miles. The county really needs to have an accurate picture of residential impact, as it will affect residents up to 2 miles away. Admittedly, 2 miles away the impacts would be lesser than ½ mile. 43-74 LU-1

In the introduction to Land Use Section, DEIS states that there is an average of 1 household per 20 acres and that there are an additional 83 residences within one half mile of the boundaries. Based on a 5200-acre site, I estimate that to be 360 residences, 8 of which are participating landowners. So 8 landowners are going to impact 350 other landowners? That is the tail wagging the dog. That is allowing 10 landowners to affect 350 families land 43-75 VB-6

rights, their quality of life, potentially their health and their animal's health and the value of their homes.

Desert Claim Project Area pf 3-126
Please note that 8 landowners who are "willing participants" are affecting this number of residents that the additional numbers (above paragraph) will show. The tail is wagging the dog here, there will be hundreds affected. 43-75 Cont. VB-6

Table 3.7.2 is a manipulation of the #'s that may be impacted. As you can see, there are missing residences to the west of Howard Rd, to the south of Smithson, other than the residents within 1000 feet, Sun East is primarily not accounted for and views are not accounted for. This graph is a ploy to show what little impact the project will have on surrounding neighbors and neighborhoods, as if only residents within 1000 feet will be affected! Do not let these numbers be manipulated! 43-76 LU-1

Alternative Site Impacts
Again, at Alternative 1 site, only 1 landowner is affected, it is the best site, hands down. 43-77 SO-4

3.7.1.2 Environmental Impacts of the Proposed Action
Direct Impacts
The proposed wind turbines would be significantly larger than surrounding structures. While this difference in scale would generate visual impacts (see Section 3.10), it would not inherently conflict with rural land use patterns. Many agricultural activities include associated large structures and mechanical/industrial equipment; such appurtenances may be considered to be a characteristic or element of rural character. 43-78 LU-1

Are they suggesting that 393 ft tower structures that spin between 10- and 23 times each minute, have flashing red lights at night and white during the day will be considered part of a rural element or character? The towers are industrial in nature, let there be no mistake about this. These are Wind Factories. The DEIS should treat the towers as such.

They also suggest that we should really look at the impact of Wind turbines in a larger context that they are compatible with farming uses. If there were only participating farmers in this area, then that might be true. It is not true, there are only 8 willing participating farmers, and the rest of us are captives or unwilling participants. Wind turbines would be located at least 1,000 feet 43-79 LU-5

from existing residences and 250 feet from any public right-of-way and adjoining non-project property lines. This will affect all adjoining properties from using their property to its full extent. The 1000 foot set back is for safety, so essentially, if you border a public right-of-way, you are losing 750 ft x your property length. Property owners will need to be compensated for this. If for some crazy reason, this project would be approved, mitigation and compensation needs to occur.

43-79 Cont. LU-5

43-80 LU-4

Land Use Indirect Impacts

In this section, the DEIS discusses the impact of compatibility and incompatibility of residences and suggests that by placing turbines here, it will encourage agricultural uses and stop the growth of residential use. I must agree completely, who in their right mind would buy land and build their home of their dreams surrounded by turbines! What would the impacts be on the tax base and economic health of Ellensburg is residential growth slowed or stopped in these areas?

43-81 LU-2

43-82 FIS-3

They go on to suggest and I quote, "Some nearby rural residential uses that viewed the wind facility as incompatible could seek to relocate. This would be an adverse impact to these property owners." Approximately 80% of the residents in this area are small ranchers with horses, small wheat fields and some other cattle. Any DEIS that suggests the possibility that 80% of the residents that live here should relocate is irresponsible and insulting! In essence they are telling us wind Turbines are not compatible with residential/ranch use. Based upon this, the application should be pulled and the Wind Farm re-sited.

43-83 LU-3

The range of the project is from the foothills of the Wenatchee Matins. Along Hwy97 and State Route 10, across to north of Bowes field, which includes Green Canyon, Reecer Creek Canyon and Wilson. The pattern that EnXco has selected is random and encompasses all of this area. Basically, there is no relief to residences from looking at turbines and additional power connector lines as they are scattered across 5200 acres. This will have a cumulative impact on all residences from the view, the noise and the values of their properties. This is not addressed at all in the DEIS, other than to dismiss it as compatibility with a rural lifestyle. In addition, non-participating landowners are participating after all; we are captive landowners, as we will get ALL the impacts of the Wind Factory and none of the benefits.

43-84 LU-1

43-85 VB-2

Property Values

In the Lincoln Township, after 2 years, Homes ½ mile away from the turbines loss value of 26%. Homes within 1 mile of the wind factory lost 18%. I did not find this addressed in the DEIS, other than to refer to the biased study put on by the Dept of Energy and wind power. There needs to be mitigation for homeowners. I suggest that each parcel be valued based on a Real Estate Assessment and a Market Value analysis to find an appropriate selling price. For those residents where the impact is incompatible with their residential lifestyle, EnXco will buy out their property. For those who choose to stay and lose value over time, they would also be compensated, based upon initial loss and yearly real estate average valuation. EnXco would have to post a bond to assure money was available to the Wind Factory victims. It seems fair, since EnXco is convinced that the Wind Factories will have no affect on property values, they should be able to make a profit on this approach. This needs to be addressed in the DEIS. This is the only way the County can protect themselves from the myriad of lawsuits that will happen if this project is approved. 43-86 NS-1

Indirect Impacts Alternative 1, pg 3-132, again, no negative impacts on land use because only one family lives there!! See a pattern here?? 43-87 SO-4

3.8 Health and Safety

3.8.1 Mechanical Hazards

6th paragraph once again states that the alternative site 1 is a better location, as it would not have the same level of potential hazards to residents. 43-88 SO-4

3.8.1.2 Electrical Hazards pg 3-143

Paragraph 1 states electrical overhead lines increase potential for safety hazards due to fire. By adding more to this fire prone area is only "adding fuel to the fire". In addition, the added increase for personal injury due to transmission line failure and tower collapse is unacceptable in this area due to the increase of existing conditions. 43-89 HS-6

Stray voltage is not addressed. Please read the following excerpt from the Lincoln Township study Findings: 43-90 HS-6

Stray voltage

Another issue addressed by the Moratorium Committee is that of stray voltage and earth-current problems that may be exacerbated by the wind factories. This issue was brought to the attention of the Lincoln Town Board by the committee and concerned residents. An ordinance was passed by the Town Board to study the potential effects and to declare a moratorium on any further turbine development. The Committee agreed that any study of earth currents and stray voltage issues must include an analysis of the distribution system, analysis of the wiring from the utility's grid to the wind turbines, and an analysis of the grounding system used for the wind turbines. They also drafted a request for proposals to identify an expert that could help pinpoint the issues surrounding stray voltage and earth currents. The issue has yet to be resolved.

In the meantime, farmers and their livestock in Lincoln Township have been suffering. There are over four farms that are battling -- among other problems -- herd decline due to diseases that were not present in the herds prior to turbine construction, but are present now, according to farmer Scott Srnka. These problems are not limited to non-participating leaseholders. Farms with turbines have been affected as well, as evidenced by the trucks, which have grown more and more frequent, hauling away animal carcasses, Mr. Srnka said.

Mr. Srnka is a former supporter of the WPSC wind power project that is across the road from his family farm. His dairy herd is about 175 cows on 800 acres of land. Mr. Srnka said, "Thirteen turbines were proposed for my land, but we decided to wait. Thank goodness we did or we'd be out of farming."

Mr. Srnka has traced the decline of milk production and increase of cancer and deformities in his formerly award-winning herd to an increase of electrical pollution on his farm after turbine construction. He also has seen the same chronic symptoms that are in his herd in his family.

Animal health problems in the Srnkas' formerly award-winning herd include cancer deaths, ringworm, mange, lice, parasites, cows not calving properly, dehydration, mutations such as no eyeballs or tails, cows

holding pregnancy only 1 to 2 weeks and then aborting, blood from nostrils, black and white hair coats turning brown, mastitis, kidney and liver failure.

Within a few months in the first year after the turbines were erected, 8 cows died of cancer. No previous cases of cancer were detected ever before in the Srnka herd, which is a closed herd, according to Mr. Srnka.

Mr. Srnka also detected a change in well water on his property, and there has been a definite change in taste, he said, which has contributed to the decrease in water consumption by his herd. In the past his cows consumed 30 gallons of water a day, but that figure declined to 18 to 22 gallons of water a day after turbine construction. As a result, cows became dehydrated and terminally ill.

<SPANVideo: What the Zoning Board of Appeals members saw was a brief, unedited video interview with Mr. Srnka in his dairy barn, taken this spring. In it there were some of the cows in his herd and Mr. Srnka talking about some of the rewiring that he has had to install to try to combat problems of electrical pollution. Mr. Srnka said that he has had to resort to insulating the farm through electrical wiring to put his farm, in effect, on what he calls its own island.

Dr. Pettegrew, testifying before the Bureau County Zoning Board of Appeals, said he would be remiss as a doctor if he didn't tell the board that he thought the weaknesses and illness he saw in the cows in the video were most likely caused by EMFs or electrical pollution. Dr. Pettegrew also said the risk would be greater in Indiantown and Milo for animals and humans to become ill than in Wisconsin because the proposed turbines would be taller and would produce more electricity.

Back to what Mr. Srnka has personally experienced. Mr. Srnka and neighbors report serious health effects on not just dairy cows. Health problems in residents include

- sleep loss
- diarrhea
- headaches
- frequent urination
- 4 to 5 menstrual periods per month
- bloody noses: Mr. Srnka had cows bleed to death from uncontrollable bleeding from the nostrils
- inability to conceive

Sometimes even short-term visitors to the farms or homes contract the symptoms, including construction workers on the Srnka property who broke out in nosebleeds after only a few hours. One of the workers left and refused to return.

The Srnkas are so concerned with health effects that they "aren't going to have kids anymore because we're so afraid."

At the time of his testimony before the Bureau County ZBA in October, Mr. Srnka said he had spent upwards of $50,000 of his own money to try to remedy the electrical pollution in his home and on his farm. Mr. Srnka stated that in his opinion, there were three other farms in the area facing enough problems with their herds in the aftermath of the turbines going online that those three farms are "almost ready to sell out."

Representatives of WPSC have denied that there are stray voltage or earth currents affecting Mr. Srnka's family or livestock and will not compensate him for his family health bills, electrical system upgrades, loss of herd or decrease in milk production.

How did the situation become so grave when wind factory developers swore there would be no problems?

Even if a wind developer may claim that the wind factories, substations and power grids will not contribute to stray voltage or electrical pollution because 1) insulated cable will be used, 2) all cable will be buried feet beneath the surface, and 3) cables are laid in thick beds of sand -- these statements should be viewed with suspicion because of poor project track records, according to Larry Neubauer, a master electrician with Concept Electric Inc., in Appleton, Wisconsin. Mr. Neubauer, who has customers who are dairy producers, who are homeowners with stray voltage problems, and who are farmers with turbines on their property, said that currents from each ground on the cables and project substations, as well as the regional transmission lines that receive electrical energy and that are electrically tied together, do not harmlessly dissipate into the soil. Energy disperses in all directions through the soil and these currents seek out other grounded facilities, such as barns, mobile homes and nearby residences. Only in California is it illegal to use the ground as an electricity conductor. In the rest of the country, including Wisconsin and Illinois, power companies are allowed to dump currents into the ground, according to Mr. Neubauer.

Residential properties that are in a direct line between substations and the ground conduits are particularly at high risk since electricity takes the path of least resistance. Mr. Neubauer said that burying the cables, as the Illinois Wind Energy, LLC, project intends to do, "makes it worse," citing the short life spans of buried cables, frosts that wreak havoc on the cables, and the problems of locating trouble spots that cannot be seen without digging up the cables.

3.8.1.3 Shadow Flicker pg 3-143

The 1st paragraph contradicts residential counts in the Land Use section. 80 within ½ mile of project, while land use states 83 residents within ½ mile. All residents should be accounted for within 2 miles of project. 43-91 LU-1

3.8.2 Environmental Impacts

Mechanical hazards

A recent death occurred in the Altamont Wind Factory site, due to mechanical failure. This same failure caused a fire. 43-92 HS-1

Tower Collapse

Figure 3.8.1 shows number of feet a tower would fall. I challenge this figure, as common sense tells me fragments would break off and "fly" further than the 393-foot hazard zone. This section needs to be updated and better address potential distance in a worst-case scenario. 43-93 HS-2

Blade Throw

This states there are 2 documented blade throws, however, no advanced modeling has occurred. Also, no wind speeds are used in the calculations of throw distances on table 3.8.1. It is common sense that will tell you wind will add to this distance. An accurate study needs to be conducted. 43-94 HS-2

Ice Throws

DEIS states recorded throws of about 320 feet have occurred. However, they are suggesting 250 foot set backs for right-of-ways. This needs to be expanded based upon further study as suggested for blade throws.

The DEIS also estimates 3 ice throws of 1000 feet in 20 years could happen. However, the DEIS is suggesting 1000 foot set backs form homes. This assumes that animals, out buildings and humans do not use their land less than 1000 feet from turbines. A minimum setback of 2000 feet from property lines will address all these potential hazards. 43-95 HS-4

Fire Hazards

The DEIS states that the wind turbines mechanical failures can cause fires and that their wind turbines will withstand a brush fire. However, there is a much bigger issue here. The residents that live in the area!! 43-96 HS-1

1. We are in a fire prone area.
2. We have an arsonist in our community.
3. There are difficulties fighting fire with airplanes in the turbine area.

4. There are several home sites downwind of the areas where a fire would be started. 43-96 Cont. HS-1

I also find the shallow approach in this DEIS to the fire issue a large concern. This affects our homes, our families and our insurance rates.

3.8.2.2
Stray voltage issues not addressed. Overhead lines add to the potential for fire and bird kills. Magnetic and electromagnetic fields that can cause health issues to animals and humans in addition to nuisance shocks as well as computer screen problems. 43-97 HS-6

Due to the close proximity of the residences, I find this section glossing over potential impacts and mitigations. IT does not refer to any engineered or real life studies conducted. 43-98 HS-6

Electromagnetic Interference
The actual towers are known to cause interference with TV and Radio reception. Are we to take the DEIS at their word, these impacts will be insignificant, when we know several Wind Factories where the residents waited 2 years or more for this to be fixed? A study needs to be conducted and full mitigation measures inserted into this DEIS. 43-99 HS-5

3.8.2.3 Shadow Flicker
Modeling

- No site-specific assessments? So basically we are guessing who and how they will be impacted. 43-100 HS-7
- The map does not adequately show the impacts, is it hiding something?
- The suggestion of potential mitigation at the receptor is unacceptable. The source needs to mitigate and be held responsible for the impacts. 43-101 HS-8

3.8.3.1 Alternative site Impacts
Alternate site #.1 has no impacts. This is the best site for shadow flicker mitigation. 43-102 SO-4

3.8.5.1 Mitigation
Tower Collapse-Set backs of 435 feet should be stated from property lines and another study with flying fragments calculated. 43-103 HS-4

Blade Throws and Ice Throws pg 3-163
Human access and high value facilities should not be built within 540 feet from turbines. So minimally, a 540 ft set back from property lines is being suggested? This does not include a more comprehensive study that accounts for throws during high winds. 43-103 Cont. HS-4

Ice sensors should be required as part of this project. 43-104 HS-3

Fire Hazards
Fire fighting plan is not addressed and HAS to be part of this DEIS before we can accept it. 43-105 HS-1

3.8.5.2 Electrical Hazards
Stray electricity is not addressed. 43-106 HS-6

3.8.5.3 Shadow Flicker
There are no mitigation steps that the source is responsible mentioned here. We should add "Removal of turbines that are projected to cause shadow flicker and after construction, removal of turbines that do cause shadow flicker".

I find it irresponsible of the Applicant to suggest that the receptors be responsible for 100% of the mitigation for shadow flicker and find their suggestions unacceptable. 43-107 HS-8

- Telephone hotline to call to stop rotors
- Add curtains
- Plant trees in front of your windows
- Turn on lights in room where flicker is occurring.

Indirectly they are also suggesting that we stay inside; do not look outside during these times. What about animals? Flight response of horses, turtles, etc?? These areas are not addressed, but in the discussion, a 2000-foot set back should be ample to prevent shadow flicker. Again, a 2000-foot set back from property lines should be one of the mitigations!! 43-108 HS-4

3.8.6 Significant Unavoidable Impacts
Other than lightning. All electronic issues are insignificant. What about lightning? What are the potential hazards if lightning hits in the turbine field or hits a transmission line in the WF site? What is the mitigation?? 43-109 HS-6

Also, regarding stray electricity, tell the farmers in Wisconsin who spent 50k and 200 k to make their farms a separate grounded island due to the WF!

This section dismisses the potential for fire as insignificant. 43-110 HS-1

3.9 Noise

The graphs in Decibel Bitmap 003410, show the result of the decibel ranges and actually average our range proximate to the wind tower and residence locations. My home is in the 45-decibel range. Based on the Lincoln Township Moratorium Findings and Survey, they allowed turbines to be placed that put the residences in a 50 zone. They asked for 40, they settled for 50 and now that they have bought and bull dozed several residences, they would have not placed any turbine closer that a 35 decibel rating. There are significant sleep problems and health issues that have occurred in over 60% of the residents. There were also errors in the sound measurement predictions or models. A second opinion should approve the current model before moving forward. 43-111 NOI-1

Other mitigation measures need to move turbines far enough from homes that a 35-decibel rating can occur. In essence, by moving to a 35-decibel rating that will allow residents to reasonably live with these turbines, there won't be many turbines to construct. This should tell us this is not the site to place turbines in an area where people have ranches and home. 43-112 NOI-2

On page 3-177, 3.9.4, noise modeling uses 4-8 mph wind speeds. When the wind blows our wind speed is much higher than 4-8 mph. Noise decibels needs to measures using 20-35 mph wind speeds. I believe this will bring our levels up in the high 50 and 60 decibels. Mitigation of 2000 feet of more set backs may reduce the impact. 43-113 NOI-1

Normal rural uses are not the same and will have an impact. The main reason for this other than the obvious is that cows stop bawling and tractors turn off and on, but wind turbines cannot be turned off!! 43-114 NOI-1

I recommend that the county take steps to do on site observations of current Wind Factory sites to verify this model before it can be accepted. 43-115 NOI-1

3.9.3.1 Alternative Site one is once again the best site with least issues. 43-116 SO-4

3.9.6 Unavoidable Adverse Impacts
I don't know what to say, all this sums up to no adverse impacts of any significance! Too bad our consultants and applicants don't live in a Wind Factory site. 43-117 NOI-1

3.10 Aesthetics/Lights and Glare
Project area view shed 3.10.3
View 1A states the primary view is to the northeast. My view to 360 degrees, with turbines to the NE, NW, W, N and SE.

Figure 3.10.6. The view looks south and places the turbines behind the power transmission lines. This is misleading as most of the resident views will be looking NW, NE or N and the transmission lines will be behind the Wind turbines.

Figure 3.10.7 These pictures should be taken from a closer location so the residents along the NW portion of E-Burg and along Dry Creek Road/Reecer can really see what they will be looking at. These pictures do not show a real case scenario nor a worst-case scenario, which is what we will be looking at! 43-118 ALG-2

I find that these obvious manipulations of the view shed and the lack of pictures that depict what each affected resident will look at insult our integrity and put EnXco's integrity in question. Doe we really know what we will be dealing with from a view shed standpoint? NO. Can the County make a correct decision with this information? NO.

3.13 Air Transportation
I believe that moving all take off patterns to the south will impact the City of Ellensburg from a noise level and a greater potential of hazard in case of an accident. In addition, I find it unsafe from the standpoint that we have 15 students that fly 40000 operations yearly. Plese refer to my specific comments in Section One. 43-119 AT-2

In summary;

- I believe the DEIS measures significant adverse impacts at the overall project level and they HAVE to be measured at the individual resident level to be real. 43-120 EIS-1
- I believe this DEIS proves the project does not meet with Kittitas County Objectives; 43-121 EIS-4
  - The project is desirable for the public convenience
  - The project is not detrimental or injurious to the public health, peace, or safety or to the character of the surrounding neighborhoods.
  - The project will not be unreasonably detrimental to the economic welfare of the county and create excessive public cost for facilities and service.
- I also request that "Wind Farms" be replaced with "Wind factories" and that "non participating land owners" be replaced by "unwilling landowners" or "captive land owners'. 43-122 EIS-14
- I have attached the US Dept. of Fish and Wildlife Wind Farm Site Recommendations for your perusal and would like to point out that this project does not meet 6 of the 10 criteria, specifically the 6 criteria listed. 43-123 PA-3
- Alternative Site #1 repeatedly was the better location for most issues and should be considered strongly to re-site this application to Wild Horse proximity. 43-124 SO-4
- There are several areas that are not complete, specifically the fire protection plan, the noise modeling data used, the nonexistent ground water blasting studies and wind speed use in the calculations used for Ice and Blade throw. No calculations were given for displaced ground cover, dirt and bedrock and no estimates of hazardous materials use in the turbines other than oil. 43-125 EIS-1
- It is unacceptable that the applicant would recommend the receptor be responsible for shadow flicker mitigation. 43-126 HS-8
- Stray voltage is not addressed in Electricity section. 43-127 HS-6
- I have also attached the excerpts form the Lincoln Township Survey and Study. A printed copy of the final report is available from the Township. 43-128 EIS-1

Thanks for allowing us to comment on the Wind Factory Application. I hope you will find our comments, concerns and incorrect data pointed out helpful to finalizing the DEIS.

US Dept of Fish and Wildlife Services Wind Farm Recommendations

The US Fish and Wildlife Service have produced the most recent comprehensive document "Interim Guidelines to Avoid and Minimize Wildlife Impacts From Wind Turbines, 3 May 2003", follows the examination by scientists of bird kills and disruption to bird habitat and formulated using information from the worldwide scientific community. It contains a series of recommendations for the siting of wind energy facilities that include the following:

* Avoid placing turbines in documented locations of protected species,
* Avoid locating turbines in known local bird migration paths or in areas where birds are highly concentrated. Examples of high concentration areas for birds are wetlands, State refuges, private duck clubs, staging areas, rookeries, roosts and riparian areas alongside streams. Avoid daily movement flyways (egg. between roosting and feeding areas),
* Avoid placing turbines near known bat hibernation, breeding, and maternity/nursery colonies,
* Configure turbine locations to avoid areas or features of the landscape known to attract raptors (hawks, falcons, eagles, owls),
* Configure turbine arrays to avoid potential avian mortality where feasible. For example, group turbines rather than spreading them widely, and orient rows of turbines parallel to known bird movements, thereby decreasing the potential for bird strikes. Implement storm water management practices that do not create an attraction for birds, and maintain contiguous habitat for area-sensitive species,
* Avoid fragmenting large, contiguous tracts of wildlife habitat.

Where practical, place turbines on lands already altered or cultivated and away from areas of intact and healthy native habitats

Al & Diane Schwab
P O Box 290
Maple Valley, Wa. 98038

425-432-366

Mr. Clay White
Planner II
KCCDS

JAN 2 0 2004

Re: Desert Claim Wind Power DEIS

Dear Mr. White,

Once again we are very disappointed in the results of this DEIS. This DEIS of full of scare tactics, lies and half truths. They give the idea that if this area were not developed for wind farms, as many as 400 homes could or would be built. This is far fetched. On page 3-124, they state that this area generally consists of 1 house per 20 acres . This DEIS has also missed the points that we have been bringing forward for the last almost two years. Homes in close proximity to wind mills and the effects these wind mills will have on those homes including but not limited to shadow flicker, ice/blade throws, values, and the salability of those homes, just to name a few. 44-1 ALT-1 44-2 LU-1

They state that the towers could be 393 feet tall, approximate numbers are given for their newly run overhead cable, several hundred feet or up to several miles is not definite enough, approximately 4 guyed meteorological towers, again not a definite answer, a network of graveled project roads, again not a definite. They do not even state how many turbines they will put up. 44-3 PD-4

On page 1-4, they state "The project is not detrimental or injurious to the public health, peace, or safety, or to the character of the surrounding neighborhood." This statement is not true. If it were true, the people who will be living on adjoining properties would not be fighting this wind farm. As many as 83 residences lie within ½ mile of the project boundary. In figure 3-7-2, you can clearly see where the residences are. Some of these residences will be totally engulfed in wind mills, and at a close range. This will definitely affect the life styles of those residences and will be detrimental. 44-4 EIS-4 44-5 LU-1

All of the maps included in this DEIS are not legible enough to pin point certain areas, also they do not include enough of the area. I want to know where is our property in relation to these wind turbines. As far as we can determine, we will be affected by these turbines by our loss of the view to the Northeast. Shadow flicker?, we can't tell by their maps. 44-6 EIS-3

On page 3-131, they state that if these wind mills are not compatible with the people living next to them, the people could move, no mention of restitution? They claim wind production is compatible with rural resources. No where do they claim wind production is compatible with residential land uses, and, that is what we are talking about. 44-7 LU-3

In figure 1-1, they show the location again of their power project, but again the roads are not legible. They should have shown the location of their project on figure 3.10-2. This would have made them not look so good, but it would have given us a better description of exactly where their turbines would be going. 44-8 ESI-3

Figure 3.10-3 is showing the view shed, but once again it is still not clear. On page 3-225, they claim they could make their project look better (blend in better). How is it possible to hide several hundred 393 foot wind turbines with rotating blades and flashing lights? 44-9 ALG-2 44-10 ALG-4

In section 3-9-5 they claim that although medium noise impacts were identified at several of the agricultural residences in the project vicinity, either due to overall sound levels exceeding 50 dba or due to projected sound level increases, no high (i.e. significant) unavoidable adverse impacts were identified. Do I read this right? This paragraph contradicts itself. 44-11 NOI-1

They claim sound levels for equipment. What will the sound levels be when more than one piece of equipment is running at the same time, then the blasting that will be needed. No where in this DEIS are these true sound levels stated. 44-12 NOI-2

In Section E, there are approximately 189 pages of graphs, I believe this was put in to throw us off. These graphs meant nothing to me and I found them very difficult to read and understand. 44-13 HS-7
They also claim on page 3-155 that in most areas, cloud cover (or fog) is likely to be present in the morning and evening hours. In the summertime, we never have fog, we like to get up and look at the beautiful sunrise. 44-14 HS-7

There is also navigational hazards which need to be taken into consideration. There is a small landing strip very close to their turbines, planes land on it daily. Also small planes fly over this area on a daily basis. 44-15 AT-7

Who is going to police this company. What about mitigation measures to appease the adjoining property owners. Who is a person going to complain to if they have a problem with their television, shadow flicker, ice/blade throws etc. I have spoken to a person who has a farm just outside the boundary of a wind farm in California, he advised me to mitigate before construction, because after construction is too late. The wind mill company could care less about his problems connected to their wind farm. He also says the noise, shadow flicker etc. is unbearable at times. He can't pull down the shades and go in to watch television because since the wind mills, he has little to no television reception. I asked him if he has complained. His response was "I've complained to everyone, wind mill company, county officials, everyone, but no one cares. After talking to this gentleman, I get the distinct impression that if us property owners have a problem, we're on our own. Perhaps this company should step up to the plate and so some mitigation before their plan is approved. 44-16 EIS-10

In summary, this DEIS tells us very little about the true facts, is distorted to make Desert Claim look good, and dismisses us adjoining property owners as if we don't exist. This proves to me that the gentleman I spoke to in California is right. These companies are here to make a profit, they don't give a dang about the people who will have to live with their wind turbines. 44-17 VB-2

Enclosed are some pictures of our view, and the icing conditions which currently exist. These views will all be destroyed if these wind mills go in as proposed. 44-18 ALG-1

Sincerely,

Al & Diane Schwab
P O Box 290
Maple Valley, Wa. 98038
Ellensburg Land Owner

45
P.1

Clay White

From: DIANE SCHWAB [buds_pumps@msn.com]
Sent: Thursday, January 22, 2004 12:07 PM
To: Clay White
Cc: Ed
Subject: Desert Claim WPP

JAN 2 2 2004

Dear Clay,

If you were to look in the dictionary for environmental impact statement, it is defined as follows: a written statement of the likely environmental effects of a proposed development based on a scientific assessment or study.

I don't feel that a scientific study was done. Basically everything included in this DEIS were the results of wind farm proponents studies. It is in no way scientific because if it were, there would be included the information that I have found quite easily on the internet. This would be the information that shadow flicker , blade throws, icing of blades ,constant flashing lights, devaluation of property etc. etc. does occur and can be a real problem for people living next to a wind farm. 45-1 EIS-1

There is no where, at least that I've seen where there a lot of people (such as this site) who live next to wind turbines of this size. However there are places where wind turbines have been erected next to a lone farmer or a single house. These people are living a nightmare. Even the guard at Stateline has to keep his shades closed.

Until I see a real and true analysis done, I can not accept any EIS, and I don't feel the County should either. Anyone can take facts and figures some one gives to them and write a report. I do believe that this is what was done in this instance. 45-2 VB-4

Good meeting tuesday night, I'm glad our Real Estate people finally got on board. Another indication that true facts were not given..

Sincerely,

Diane Schwab

RECEIVED 46 P.1

JAN 3 0 2004

KITTITAS COUNTY
CDS

Clay White, Planner II
411 North Ruby Street Suite 2
Ellensburg WA 98926

RE: Desert Claim Wind Power LLC DEIS

According to the DEIS, the county needs to decide whether this project is detrimental to the character of the surrounding neighborhood.

Page 1-63 states: "Development of the project as proposed would result in significant, unavoidable adverse impacts to the visual environment."

The project includes 47 towers that will have flashing lights 24 hours a day, every day.

The project includes a total of 120 towers that will be about 400 feet tall including rotating blades on top. Some of these towers will be only 1000 feet from homes. All of the towers will create flickering shadows when the sun is shining. 46-1 LU-1

The surrounding neighborhood is residential not industrial. Very large towers that create flickering shadows and flash lights continuously may be all right in an industrial neighborhood. They are not all right in a residential neighborhood.

This project is obviously detrimental to the character of the surrounding neighborhood. 46-2 SO-5

It should not be approved.

Sincerely,

Boyd Rear

Gloria J Sharp

Gloria J. Sharp
Boyd Rear
7731 Reecer Creek Road
Ellensburg WA 98926

Lathrop, Winbauer, Harrel, Slothower & Denison L.L.P.
Attorneys at Law
Post Office Box 1088, 201 West Seventh Avenue, Ellensburg, WA 98926

F. Steven Lathrop, P.S.
John P. Winbauer
Susan K. Harrel
Jeff Slothower
James T. Denison, Jr.

Tel (509) 925-6916
Fax (509) 962-8093

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

January 30, 2004

Mr. Clay White
Kittitas County Planning Department
411 North Ruby, Suite 2
Ellensburg WA 98926

Re: Desert Claim Wind Power Project
DEIS COMMENT LETTER

Dear Clay:

As you know I represent F. Steven Lathrop. Mr. Lathrop is an intervener in the EFSEC process being conducted in association with the Zilkha wind power project. We take this opportunity to comment on the Desert Claim Wind Power Project.

The environmental impact statement for the Desert Claim Wind Power Project must provide sufficient information to Kittitas County to allow the county to comply with all statutory and regulatory review criteria.

Comments critical of the DEIS have been submitted by others, and to avoid repetition, all of these comments are incorporated in this letter by reference.

The DEIS does not fully address the projected demand for electrical power and the role of wind power in meeting the projected demand. There is an inadequate discussion of how much capacity utilities are seeking or how much is currently produced in the state. The DEIS does not provide enough detailed information to assess the market for wind energy in Washington. 47-1 EIS-7

The DEIS fails to discuss the impacts of each site spread over the entire area. The location of each tower should be required to be studied. At the location of each turbine, at a minimum the following questions should be, addressed by the DEIS: 47-2 EIS-1

- What are the number and location of residences, roads and other features and activities within a radius of 1000 feet from every turbine location and every half mile thereafter out

to at least five miles? How can any reasonable setback evaluation be conducted without this information

- What view sheds and sight lines are impacted by each turbine and to what extent?
- Are there no turbine locations that are being recommended to be moved or eliminated due to their impacts?
- The applicant's economic or business interests, such as proximity to the BPA power lines and ease of construction of access roads are not relevant to an environmental analysis and no justification whatever for a particular turbine location.

47-2 Cont. EIS-1

The DEIS fails to take into consideration the definition of rural lands and the type of activities which are to be encouraged and discouraged on rural lands within Kittitas County. 47-3 LU-6

The no action alternative proposed in Chapter 2 of the EIS is inadequate because it doesn't contain a discussion of alternative electrical generation technologies. That is particularly relevant in this situation because of an abundance of power generating facilities in the State of Washington. There is no analysis as to whether this particular project is necessary, let alone whether this particular type of technology is necessary, to meet Kittitas County energy needs. The no action alternative makes assumptions that there are economic benefits and positive attributes of the project. The no action alternative fails to discuss, at the level of detail that is sufficient, the positive aspects to the environment and Kittitas County of not constructing any wind generation facilities in the County let alone this specific project. The no action alternative does not adequately address the benefits that would be derived by not placing this type of power generation facility on or in a populated area as is proposed by this project. 47-4 ALT-1

In Section 3.10, dealing with visual aspects of the project, there is an attempt made by the writer of the DEIS to develop a "viewer exposure scale" and a "viewer sensitivity scale" (See Table 3.10-2 and 3.10-3). In addition, there is an attempt to develop a "visual quality scale" (Table 3.10-4). These tables and the application of these types of criteria to a specific view shed are clearly subjective. Use of this type of subjective scale is inappropriate in a draft EIS. 47-5 ALG-2

With respect to the visual impact, the USFS, for example, did a study of view impacts its timber sales in Kittitas County and the resulting clear-cut logging would have and determined not to sell timber in certain areas as a result. There does not appear to be any consideration given to how views would be impacted. An 8x10 photograph taken from an unknown distance from any particular turbine site does not assist in the determination of visual impact. How is one to accurately gauge the scale of a turbine from a given distance in relation to common experiences? 47-6 ALG-2

Section 3.16 which deals with the "fiscal conditions" is inadequate. The DEIS does not have a detailed enough discussion of the economic costs of this project arising from the negative impact on land values in and around the project. The negative impact on land values as a result of the project has a corresponding long-term affect on Kittitas County revenues and the general economy of the area. The EIS does not do a sufficient job of discussing these effects and taking into account these effects. 47-7 NS-1

Where is the analysis by a qualified real estate appraiser, familiar with land values and development patterns in this county as to the impact on ***local*** property values?

The multiple requirements for protection of esthetic and scenic resources and the quality of the environment under the statutes and regulations pose heavy burdens on the approval of even a few of the project sites, yet the DEIS gives inadequate guidance as to the areas, maximum number of turbines (whether for this project alone or in combination with the other projects), maximum dimensions, or other possible limitations that might be necessary to adequately mitigate impacts. 47-8 ALG-4

The DEIS makes an inadequate attempt at a cost-benefit analysis of the project. 47-9 NS-4

The discussion of the cumulative impact costs of the project inadequate.

Kittitas County has experienced considerable recent growth in population and commensurate residential growth in the scenic, less populated areas, and these trends are expected to continue. Each turbine site is, in effect, an industrial land use in the Ag 20 and Forest and Range zones yet there is no mention or discussion of GPO 2.109 and GPO 2.109A. What are the land development patterns presently being experienced in the areas within ten miles (or some other reasonable distance) of each turbine site of the project? How will these patterns be impacted by the project? Recognizing that county land use is dynamic, the actual timing of construction could be delayed, how long should the approval of any site last? What are the risks of unforeseen changes in the county and where would it be reasonable to deny any vesting beyond some point in time? 47-10 LU-6

The DEIS fails to address far more than it covers. The construction of one wind turbine in the Kittitas valley will result in numerous other wind turbine projects. The DEIS simply fails to adequately address the impacts of changing this valley from a rural residential-agricultural area to a giant wind power generation facility. 47-11 VB-9 47-12 LU-1

I reserve the right to comment further as I deem appropriate.

Very truly yours,

Jeff Slothower

deis comment letter

Glenn H Stinnett
315 Lincoln St
Ellensburg, Wash

RECEIVED
JAN 29 2004
KITTITAS COUNTY
CDS

Attn: Clay White!

Regarding EWXCO Wind farm ~~proposal~~ PROPOSAL I have the same opposition as a tax payer to both State, County & Fed Gov't, as I have with Zilkha Proposal! I am not opposed to a system of Wind Electric energy generation in some areas of the Country where power is costly & in short supply. I lived in Minnesota the 1st 21 yrs of my life. At that time R.E.A. diesel generated power was approx. 10¢ per K.W. hour, and it was only available for 4 to 5 miles out of town. In later years it dropped to about 8¢ per K.W. hour. In those areas today the wind generators are practical as the prevailing wind in winter is from the West & North West most of the time, about 5 to 15 M.P.H. Late spring early summer from the South, southeast & occasionally westerly, these winds are fairly constant for perhaps 6 to 7 months of the year creating more ideal conditions for wind generators. My observations while working the tower at the E burg airport in 43, 44, 45 approx 1½ yrs we don't have but 4 to maybe 5 months of favorable winds. Also they are not natural, they are variable & turbulant, changing as much as 25 to 30 M.P.H. in a very short time, less than a minute. Our winds are not ideal or favorable to supply a constant input of power to the Bonneville Grid. These winds are mainly during the sun shining daylight hours. My best estimate of the 4 or 5 months of favorable winds, we would have only about 3 months of useful production. This falls pretty much in line with a 25 to 30% yearly generation production. I don't see these wind farm proposals as producing enough revenue to pay the costs related to the project. I also can't see where the County will be deriving income from a tax base, Zilkha has applied for a accerated tax write off, this needs a thorough investigation. So far I understand not much has happened in this area. I would advise extreme

48-1
ALT-6

48-2
FIS-4

(2

Caution in dealing with both proposals. I have very little faith in the stability of these people to honor their words. I have read about contracts by companies doing business here, and then were under foreign control. When they were sold or transferred to a foreign company, the existing contracts were not enforcable, mostly worthless. The foreign parent company could abandon the operations, and in this case the County which granted the permit is left holding the abandonment, forfeiture & removal. Remember the projected life of these wind turbines is 25 to 30 yrs. Put that against Hydro's 100 to 200 yrs or more. Do you realize it would take 14 to 15 thousand wind generators just to equal Grand Coulee dam output. That dam output is 16,500 megawatts of energy at present we only have about 5,000 megawatts of wind power in the entire country. They talk about this output of wind power supplying X thousands of homes, but on what basis. More realistically the figure should be 1/2 of their claims as that is closer to what is useable produced. Their only argument is it saved using natural resources, but it also takes lots of natural resources to produce those ~~fiberglass~~ fiberglass blades and after 5 yrs much more service than Hydro power is necessary. A number of Hydro's on the Columbia are being retrofitted with more effecient units. This will create more output with somewhat less water volume. Both Wells & Rocky Reach had been modified in recent years. As I told you in my past letter, Bonneville did not have a shortage of energy during the Enron manipulation. Bonneville publicly stated they had a shortage of line capacity to deliver the available power. So why do we need wind power in the Northwest. In case you not familiar, there are limits to how far power can be delivered without

48-2 Cont. FIS-4

48-3 ENR-2

48-4 ENR-5

(3)

Line resistant Power (Voltage) loss. Bonneville's must Convert after some distance to D.C. Called inversion then back to A.C. Converters which also Creates Power Loss. In my sources of information Wind Generation is the best used in Area of Close Approximate Consumption. If it were Constant, "or on Call" wind Power would be fine as a line Booster Voltage. People don't realize how much energy is radiated and loss in line transmission. This is why we have sub-stations, to boost Voltage or transfer to a useable Voltage. Perhaps decision Makers should be required to be electrical engineers or thoroughly knowledgeable in the Power generating & distribution field before important decisions are made. Consult the experts not the Novices or the emotional.

48-4 Cont. ENR-5

48-5 VB-12

Getting back to wind farms: these roughly 400 ft Blades should be out of sight & located where access is available for service. I would recommend the Area if a decision is made for them. They would best be located East of Kittitas between the old Vantage highway & I-90 freeway. Also some could be North on the Ellensburg Park side. The winds there are less turbulent, but sometimes reaching 40 M.P.H. The Columbia gorge both North & South experience strong winds However I don't believe you could expect much over a 30% Productive winds.

48-6 ALT-6

I also think the Commission should make a Policy decision & stop tormenting the home owners in the Hayward Hill, 97, highway and old #10 area. This triangle area old #10, 97 & 97A is ideal for those boat folks who want more leisure living to Place home or Pony farm as I call them. Also remember the R.O.T.C. training Aircraft are small and don't have the lift as more Powerful aircraft Possess. These are students just learning to fly. Let's not Place another obstical befor them. (over)

48-7 AT-7

I spent about 1 hr talking to a Pilot with about 3000 log hours of flying time. He's a local man, he felt experienced Pilots could adjust to wind towers in the area. However rather than straight out from runway 29 a right or left turn would need to be made; that is in case this concentration of wind turbulence could alter the flight behavior of a small, low powered Aircraft. The other Problem in wind towers a few miles of runway 29 is with unfamiliar Pilots coming in or leaving the Airport in less than ideal weather. Incidentally, pilots landing usually follow down-wind facing & swerving the runway. Hopefully should never cross this Path and should turn to the right as the leave. In this case an aircraft would be directly over those wind blades. No one knows what turbulence ("or sometimes called-Prop-Wash") that this Concentration of 150 to 200 ft blades would create. Their is no doubt they will alter the Air Currents Aircraft fly into. Only one mishap or accident resulting in placing those wind farms so close to the Airport would involve the County in legal action. For the County to approve this wind Project in this location is a very high risk decision. Their will also be law suits with County involvement on land depreciated Values. Anyway the location are wrong the risks are high and consider the emotional factors of residence in the area. I would not want to live and look out and see my whole horizon revolving. The sycadelic reaction could make a person ill, similar to sea or motion sickness. In the long run, the County would be better served by homes & ranchettes in those locations.

As Ever Elmer Stabel

48-7 Cont. AT-7

48-8 NS-5

48-9 VB-3

Clay White

From: LINDA WAITS [linlee@inorbit.com]
Sent: Wednesday, January 21, 2004 7:44 PM
To: Clay White
Cc: garrett_ew@netos.com; geoff@geoffsaunders.com
Subject: Concern over wind turbines & their health effects.

JAN 2 1 2004

Dear Clay,

We have received so much information about the deleterious effects of wind turbines on the people who live nearby. In other applications, the harmful effects on neighbors is enough to get the project refused. It seems abundantly clear that wind turbines cause many, severe negative health effects in those who must live nearby, within sight and hearing of them.

It seems abundantly clear that these things HURT people who are forced to live near them. How can you even consider approving something so harmful to humans, let alone animals and birds. 49-1 VB-3

It seems clear that these will hurt people. Are people not important anymore? Is MONEY the only thing that matters anymore? Please, say it isn't so. Please deny these things. Electricity from windmills is NOT enough to justify the harm they will do to all of us.

Linda Waits
40 Cove Lane
Ellensburg, WA 98926
925-6252
linlee@inorbit.com

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Lathrop, Winbauer, Harrel, Slothower & Denison L.L.P.
Attorneys at Law
Post Office Box 1088, 201 West Seventh Avenue, Ellensburg, WA 98926

F. Steven Lathrop, P.S.
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James T. Denison, Jr.

Tel (509) 925-6916
Fax (509) 962-8093

January 30, 2004

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

HAND DELIVERED
Mr. Clay White
Planner II
K.C. Community Development Services
411 North Ruby Street, Suite 2
Ellensburg, Washington 98926

RE: Desert Claim Wind Power LLC
Application for Wind Resource Development Permit Z-2003-01
Comments on Draft EIS

Dear Mr. White:

This letter is in comment to the draft EIS in the above matter. Attached hereto and incorporated herein by reference are my prior letters of comment of March 4, 2003 and May 20, 2003. All of the concerns I have addressed in those prior letters are also relevant to my discussion of the draft EIS.

Our property is located at 6181 Smithson Road, on the northeast corner of the intersection of Reecer Creek and Smithson roads. This is located in the Visual Assessment area 1E of the Northwest Valley Visual Assessment Unit. The Draft EIS reads as follows on page 218:

> The views showing the greatest degree of visual impact were 1A and 1E in the Northwest Valley Visual Assessment Unit. Both of these views have foothills of the Wenatchee Mountains as their background, have the turbines near the foreground of the view (approximately ¼ mile from the nearest turbine), and look out over relatively flat terrain. Under these circumstances, the turbines' color contracts sharply with the browns, greens, and blues of the foothills and sky, and the turbines' size is such that the turbines break the skyline and dominate the view. The arrangement of the turbines appears scattered, unbounded, and overwhelming because it is unrelated to a topographic or geometric order, lacks a clear edge, and includes turbines in a continuous cluster (Gipe, 2002). Rural residents of this unit would be the viewers most affected by this change in visual

50-1
ALG-4

quality, because their proximity suggests a moderate exposure rating and their activity and landscape appreciation suggest a high sensitivity rating. 50-1 Cont. ALG-4

The mitigation measures suggested in 3.10.5 do not include the planting of screening vegetation for impacted properties (although this was mentioned briefly elsewhere in the EIS). In addition, the mitigation measures do not include the obvious issue of compensation to the property owners who are most effected by the impact of the wind farm. This should include a consideration of diminution in property values and a plan for compensation to the impacted property owners. A determination of impacted property values needs to be an impartial study of the specific properties involved and not an extrapolation from other wind farms in other areas or even from properties in the surrounding areas. The final EIS needs to examine the impact to the value of each property in, at a minimum, Visual Impact Areas 1A and 1E in the Northwest Valley Visual Assessment Unit. Any diminution in value of a property caused by the project should be required to be promptly compensated or the project be denied as injurious to the surrounding area. 50-2 NS-1

I must also reiterate my strong concerns regarding the power collection system as depicted in the draft EIS. Once again, the depiction is of an overhead cable system on the east side of Reecer Creek Road and the north side of Smithson Road. An overhead cable system as depicted in the draft EIS would traverse the entire westerly property line of our property, turn at the southwest corner of our property and then traverse the entire southerly boundary of our property. Again, the draft EIS continues to be vague as to whether this would be an underground line or an overhead line on the poles depicted. The final EIS needs to be <u>specific</u> as to whether it is an overhead line or an underground line and must be specific as to the route of this proposed power collection system. As has been stated in prior correspondence, an overhead system as depicted in the documents submitted to date would have a severe adverse impact on our property and we are vehemently opposed to any such collection system. 50-3 PD-8 50-4 LU-10

I also disagree with the draft EIS in its claim that "medium" levels of "tonal noise" from the turbines is determined to be not a significant impact. As I stated in prior correspondence, I have visited the State Line project and I have heard for myself the "tonal noise" that can be expected from this turbines. It will, in fact, be an adverse impact on any property within a one mile radius of these turbines. The final EIS must recognize this negative impact and propose specific mitigations, including payment to land owners whose land value will be impacted by such "tonal noise". 50-5 NOI-1

Sincerely,

John P. Winbauer
Homeowner
6181 Smithson Road

Woody Woodcock
6202 Smithson Road
Ellensburg, WA 98926
January 29, 2004

RECEIVED
JAN 30 2004
KITTITAS COUNTY
CDS

Clay White
Kittitas County Community Development Services
411 North Ruby
Suite 2
Ellensburg, WA 98926

Clay:

Please consider these comments regarding Enxco's Desert Claim Draft Environmental Impact Statement. First and foremost, the entire project does not meet the county's criteria stated in 1.4 Kittitas County Objectives. This reads that " The project is not detrimental or injurious to the public health, peace, or safety, or do the character of the surrounding neighborhood." For the bulk of a year we have heard both through the public testimony and through the Daily Record that the project will be detrimental or injurious to the peace and character of the surrounding neighborhood. Passionate testimony affirming this degradation has been given by numerous residents and neighbors in contrast to the tepid "objective" opinions offered by paid consultants who live and work in overly populated locales. As the lead agency is your job to promote this project or to protect neighborhood residents, county citizens? Is there a county agency where people are paid to protect citizen's rights and if so, where are they mentioned in this document? 51-1 EIS-4

The DEIS does a pitiful job of expressing the neighborhood discontent expressed over the last year. It is summed up in a few paragraphs and minimized by such sayings that "with considerable effects... the visual impact could be dramatically reduced" (Chapter 1, Summary). I never saw terms like 'industrial viewshed' or 'visual 51-2 VB-4

pollution.' In fact I think the DEIS appears to have been carefully constructed so as to support this project. Hundreds and hundreds of pages of entwined words and numbers citing industry standards and referring to vague mitigation procedures which one can attempt to analyze and cross reference for discrepancies from a CD, one page at a time, unless you want to pay $60.00 for the right to fight for your home. If Enxco wanted a level playing field, why didn't they insist on footing the bill and ensuring all interested parties receive a copy of the DEIS free of cost. This is a LIMITED LIABLILITY OPPORATION. At the very least, Kittitas County must retain a clause or contact to invoke decommissioning should unforeseen situations arise if this project gets rammed through.

51-2 Cont. VB-4

51-3 EIS-13

51-4 PD-3

It is frustrating to have to wade through this draft labyrinth but please consider the following. (Excuse the cited page numbers because the CD printouts are different then the printed document in some cases...)

- Table 1- 1, Chapter 1, Summary, pg. 1-10?
  "Turbine operation would not increase the normal dispersion of dust and pollen and would not result in dust-related impacts for residents near the project area"
  This is a false statement when considering Mr. Lind's testimony (at your public hearing) describing the brownouts he witnessed at the Stateline Project in the summer of 2003.

51-5 AQ-1

- Table 1-1, chapter 1 Summary, pg. 1-20?
  " The distance threshold for shadow flicker impacts is approximately 2000 feet..."
  This should determine the absolute minimum set back from adjoining property lines not from existing residences.

51-6 HS-4

- Table 1-1, Chapter 1 Summary, pg. 1-21
  "Predicted operational noise levels...would meet applicable noise limits...project noise impacts...would not be significant." Didn't Zilka recommend or at least discuss a 1-mile buffer for operational funds in their Sagebrush EIS? I realize there were different consultants used for noise by each company but what do we believe? We meaning residents who are fighting to retain the peace and character of the surrounding neighborhood. Maybe

51-7 NOI-2

Zilka's referred to1-mile distance should become the minimal setback from non-leased property lines rather than the 2000 ft. shadow flicker distance I recommended earlier. 51-7 Cont. NOI-2

- 1-7 Cumulative Impacts.
  I don't see any mention of expanding the size of this project and the impacts, which would result as this project encroaches upon Ellensburg or across the north side of the valley. Enxco's application leaves the door for expansion if they can find receptive landowners, but nothing is mentioned in the DEIS. 51-8 EIS-8

- Aesthetics, Light and Glare has been glossed over. The number of lights has at last been stated, but their impact is minimized. View degradation isn't mentioned in the Recreation section. Didn't Enxco mention that their turbines would be Earth Tones, while Zilka offers gray as the most aesthetically blending and pleasing color? How can 'industry giants' come up with different noninvasive colors ? If Enxco is recommending Earth Tones, why are the visual simulations all white? 51-9 ALG-2

- The assumption that property values won't suffer is pathetically backed up with incomparable studies. There are no mitigation procedures offered to non-receptive, neighboring landowners. Enxco or the County should purchase parcels at a fair market value form landowners that want away from this whole mess. If property values won't be affected, as both the County and Enxco attest, these 2 entities could look at their newly purchased holdings as sound investments. 51-10 NS-1

- There should be a full 30-year depreciated tax base analysis offered rather then a first year dollar amount. It seems that a company which oversees thousands of turbines around the world, could estimate some kind of depreciation schedule. 51-11 FIS-2

- Word searches should be done on this entire document to find uses of words like "promptly" (like 'promptly repair'), "continually" (like 'continually monitored'), "regularly" (like 'regularly patrolled'), and "might" (like 'some or all of the following mitigation measures might also be warranted'). Once the word search turns up these word use situations, the document (DEIS) should be changed by 51-12 EIS-10

replacing vague uses with specific, time-line linked words with consequences if there is not compliance by Enxco. 51-12 Cont. EIS-10

These are a few suggestions to tighten up this Draft. It seems ludicrous to me that a Final Environmental Impact Statement could be generated by using this vague DEIS document as a foundation with such little opportunity for public input. What certainty does the public have that their comments are even taken seriously? I hope that the public comments are not considered as a mere venting formality. What is the rush? The wind will be here. The time is now for Kittitas County to proceed with caution. 51-13 EIS-1

Sincerely,

Woody Woodcock.

To: Kittitas County Board of Commissioners
205 W. 5th Room 108
Ellensburg, WA 98926

RECEIVED 52 P.1

JAN 2 2 2004

KITTITAS COUNTY CDS

We, the undersigned, being property owners, residents and taxpayers of Kittitas County, hereby petition the Board of Commissioners to oppose the placing of wind turbines in Kittitas County. 52-1 SO-5

Wind generated electricity has been shown to be of no benefit to our county. Rather, these bird killing abominations with their flashing lights and whirling blades will be a blight on the countryside, destroying property values and the quality of life we have come to appreciate in our beautiful county. The only benefit will be the enormous tax subsidies to the corporations that wish to force these ugly, towering monstrosities upon us. 52-2 VB-3

Upon signing this petition, We give Mr. Jack Boyovich authority to act in our behalf and to represent us to the Board of Commissioners in the matter of wind turbines.

Signed, this 31 day of Dec, 2003

Name: Kathleen L Armstrong

Address: 18571 Pacer Crk
Ellensburg WA
98926

Telephone: 509-962-3529

Letters 52 through 78 are form letters with the identical substance in the body of the letter, but different signatures.

The marked versions of Letter 53 through 78 are not reproduced for inclusion in this appendix, but those comments are noted in the table of DEIS issues.

DESERT CLAIM WIND POWER PROJECT EIS
DRAFT EIS PUBLIC MEETING
JANUARY 20, 2004
Kittitas County Fairgrounds, Home Arts Building

[Kittitas County Community Development Services recorded the proceedings of the Draft EIS public meeting on audio tape. In preparing a transcript of the meeting, it became apparent that the tape did not clearly and successfully record 100 percent of the discussion at the meeting. Even though the tape was sent to a specialist for enhancement, brief portions of a substantial number of statements remain inaudible, as is noted in the transcript. Kittitas County Community Development Services regrets the incomplete nature of the recording, but notes that the transcript is complete enough to allow identification of the nature of individual comments on the Draft EIS.]

Clay White: It's about 6:40 and we're going to get started tonight. Good to see everyone here. Just for the record, my name is Clay White and I'm a land use planner for Kittitas County Community Development Services. Just so you know who's up here, to my right is Lorna Kenny from our office. To my left is Richard Weinman from Huckell/Weinman Associates. His group was hired by the County to put together the Draft Environmental Impact Statement. I'd like to thank everyone for attending tonight. There's a lot of familiar faces, we've all seen each other a lot in the last several months. We thought we would take a bit of time at the meeting tonight for you to provide us with comments.

The proposed action consists of development of a 180-megawatt wind energy facility by Desert Claim Wind Power, LLC on 5,237 acres of privately owned land in unincorporated Kittitas County. Approval to implement the proposed development would require four related actions by Kittitas County, as detailed in Kittitas County Code 17.61A. These include: number one, adopting a site-specific amendment to the Comprehensive Plan land use map designation; rezoning the site; issuing a wind farm resource development permit for the proposed project; and executing a development agreement stating our standards and conditions for development, including mitigation measures. Desert Claim Wind Power LLC, a Washington limited-liability company wholly owned and managed by enXco, Inc. submitted an application that's dated January 28, 2003 to Kittitas County Community Development Services. The proposed project would consist of up to 120 individual wind turbines. Construction of the project would also require construction and placement of access roads, the control and power collection cables, one or more substations, transmission interconnection, and an

operation and maintenance facility. The operating life of the proposed facility would be approximately 30 years.

Kittitas County Community Development Services Department did hold a scoping meeting in May 2003 where public comments were taken on the scope of the Draft Environmental Impact Statement to be prepared by Kittitas County. Based upon the comments received during the comment period ending on May 8th, the EIS was prepared in accordance with the SEPA rules and regulations. On December 15, 2003 Kittitas County issued the draft EIS that was prepared for the Desert Claim Wind Power Project with a 45-day comment period ending on January 30th, 2004. Comments may be submitted to myself at the planning office by 5:00 p.m. on January 30th. Our address is 411 North Ruby, Ellensburg, Washington. The purpose of tonight's hearing is to accept all the comments related to the draft environmental impact statement. We are hopeful that we will receive comments on items or issues which you, the public, believe were overlooked on the last (inaudible) or comments relating to specific issues that you think were addressed. We will prepare a response to comments for the Final EIS. Comments citing specific sections and page numbers will help Kittitas County prepare those responses.

Due to the anticipated number of people wishing to provide comments, I'll limit each person's time to 3 minutes. I have handmade signs to keep everybody on notice about the time limit. Please be specific and if someone else covers your concerns first, indicate… (inaudible). Tonight's hearing is being mechanically recorded, so we ask that when you testify you state your name and address for the record and sign the attendance sheet. I'm just going to read the people that are signed up that wish to testify tonight, barring enough time, which I'm sure that we'll have. If you really did want to testify and didn't sign up, at the end of the evening, I'll certainly ask if anyone else wishes to speak. We have a box over by the front door, you can drop comments in there, as stated previously. We have until January 30th to provide comments so we still have another ten days. If you have any other questions please call me; I'm always available for you. With that we'll get started. Phyllis Whitbeck.

Phyllis Whitbeck: Well, my name is Phyllis Whitbeck. I live at 7440 Robins Road, PO Box 1175, Ellensburg, WA 98926. And my husband and I both are Sun East property owners. We have spent all of our big millions to buy a few little lots there. And it's an absolutely gorgeous (inaudible). What I wanted to talk about was the blinking lights. Because we live approximately the same height as the windmill lights will be shining. So we'll be looking straight at them south and we'll be looking straight at them west and we'll have blinking night lights all night long, which don't seem to be as bad

T1

T1-1
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because the white lights are on in the day time. One little cell tower, you don't really see it. But when it's at night time you see that little red blinking light quite readily, even across the whole entire valley. While these, I understand, will have one light approximately every 4 wind towers. And that, I understand, will have red lights blinking all night long out there east and west of our property. Anyway we won't be able to watch night fall anymore, because we'll look out at the valley and see all these blinking red strobe lights. (Inaudible) We'll have a living room full of blinking, strobing red lights all night long. That's about all I have to say. Thank you. T1-1 ALG-1 Cont.

Clay White: Thank you very much. Ginger Morrison.

Ginger Morrison: Good evening. I'm Ginger Morrison, I reside at 1607 West Dolarway Road in Ellensburg. I have a few comments regarding the property tax …(inaudible)… in Kittitas County. The Draft Environmental Impact statement indicates that the Desert Claim Wind Project will increase the total county assessed tax base by 5 percent. This project will pay millions of dollars in property taxes to the county in the years to come. Because of the property tax collection limits imposed by us with the approval of the Initiative 747, every property tax payer in our county will likely receive a 5-percent reduction in the amount of taxes that they pay. My husband, his brother, their parents and grandparents, as well as our two children have attended school in Kittitas County. My children and funding for schools have always been an issue here. However, I would like each of us to consider another possibility. My children are now grown and no longer attend school here, but many of you have children in the school systems. Consider the possibility that every business and individual in the county received a tax reduction. We approved a county-wide special levy so all the property tax funds generated by the wind project are dedicated to our children's education for now and in future years. With the approval of this project, we have the opportunity to do this at no additional cost to the taxpayers. Five percent might not seem like a lot of revenue, but as an example, Fred Meyer, a local business, has an assessed value of $15 million, according to public record, which pays approximately $177,000 a year in Kittitas County taxes. That would equate to $8,850 at 5 percent. Now a local homeowner who has an assessed value of $200,000 would be paying $2,360 a year in taxes. But at 5 percent, that would be $118. Now consider multiplying 5 percent by the total tax base in Kittitas County. That would be substantial revenue for our schools, without having the special bond issues and levies each year to meet the growing needs of our growing schools. I ask our county officials to look at this opportunity and tell us how we can provide tax revenues to the county for this project. Thank you. **T2** T2-1 FIS-1

Clay White: Thank you Ms. Morrison. Arthur DePalma.

T3

Arthur DePalma: I live at 6991 Manastash Road in Ellensburg. And although I don't live near the project and we've lived across the valley …(inaudible), I'm against building these turbines for two reasons. I think that it's outrageously unfair for the people who live nearby. And I'm also opposed because this particular project proposes to build these huge towers just 8 miles outside Ellensburg and near the pristine area of Table Mountain and Lion Rock. And even the Zilkha project's just a simple warm up …(inaudible). As I see it there's 3 groups of people who support these wind farms. One is the energy companies. And they talk about green energy and clean energy, but if they weren't getting hundreds of millions of dollars in federal subsidies, the tax dollars, there wouldn't be any project because wind farms by themselves are not economically viable. They need fossil fuels to keep the turbines going. And once subsidies are done, the turbines just are there and they just sort of rust. The second group, land owners in the project area contracted with these companies are getting paid a lot of money and that's the mitigating factor I think. That's the one and only mitigating factor that can change minds if you have property here in the area of wind farms. Actually if it weren't for money, somebody last week said that it's not energy it's money. If it weren't for the money, neither of these two groups would be interested in wind farms at all. And another group is conservationists that think that it's great to have wind energy and free natural resource, but they seem to be unswayed by the facts that wind farms produce very little energy and also need fossil fuel, when the winds aren't blowing. They also seem to be unconcerned by those …(inaudible)… towers and …(inaudible). And I think it's, you know, it's easy for those that don't think that they're going to be affected by it, these towers, to go up and support wind farms. I think the group would have more credibility if they themselves lived in the area and were affected by the turbines. I think the people that make these decisions whether this wind farm's going to be built, need to think what it would be like if wind farms were going to be built around your property. Imagine what you'd feel and imagine what you'd feel about your property values in spite of what the studies say. I'd just like to close with four points: number one, the visual effect is going to ruin the views and it's gonna lower property values. And it's gonna actually be seen from a large part of town and the problem is that it's going to be built on elevated land that's higher than the town of Ellensburg. I think that if people realize how it's going to affect the value of their land …(muffled). And the other thing, which …(inaudible) already mentioned, which is light flicker, which is going to be going on all day long and the red beacons at night. You can't live near these, you just can't. It's going to be visible for miles …(inaudible). And it's easy to ruin other people's quality of life …(inaudible) people return. These industrial towers should not be built near homes.

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T3-4
NS-1

T3-5
NS-2

The feelings and judgment of the residents who are impacted should have priority in the decision. So in closing I'd just like to encourage you to make your recommendations as you would if these huge towers were proposed to be built around your homes and properties. T3-6 VB-6

Clay White: Thank you very much. Dwight Lee Bates

T4

Dwight Lee Bates: I'm Dwight Lee Bates and the last name is spelled B-a-t-e-s, 1509 Brick Road, Ellensburg, Washington 98926 and I represent myself. I'm against these wind farms. A decommissioning plan was not shown in Chapter 4. This DEIS is incomplete. The decommissioning plan should be in the DEIS. Where is the information on the bond Desert Claim should post so we can tear down the turbines when they result in being eyesores and inefficient and a waste of taxpayers money. I think Desert Claim will be long gone having sold the wind farm and we'll have to pay to tear it down. T4-1 SO-5 T4-2 PD-3

What I'm trying to say to you, I disagree with the DEIS statement on page 4-21 that the turbines would not present conflicts or adverse impacts on the air transportation resulting from these projects. I am a private pilot who flies the Kittitas Valley and these monstrosity turbines are in the way. They are too close to the Flying Rock Ranch grass airstrip near Reecer Creek, which I land on. This aviation program at Bowers Field trains CWU students to fly in the valley. These turbines are dangerous and (inaudible) for these students. The very fact that the FAA, the Federal Aviation Agency, requires lights as shown on page 3.10-16 of the Sage Brush Power Partners DEIS shows that these monstrosity turbines are hazards to flight. T4-3 AT-7

The DEIS on page 1-59 states "Consequently a change to a right-hand VFR flight traffic pattern for runway 7 and 11 would likely cause a negligible shift in aircraft operating patterns and an imperceptible change in noise experienced in the community. This is not a normal departure and causes a great deal of inconvenience and it puts more noise in the community. There are approximately 120 flight students from the CWU flight technology program who utilize the Bowers Field Airport. With 19 airplanes and each student scheduled for 3 flights per week, I estimate the average number of operations to be in excess of 300 per week, with many of these operations entailing practice take-offs and landings. I estimate the number of take-offs and landings to be about 1,000 per week by the college students alone. Any aircraft that has left the traffic pattern needs to reenter it in an orderly fashion. This state has instituted a procedure to allow for an orderly flow of traffic into the pattern. These procedures have been approved by the Spokane Federal Aviation League. They include that in addition to the normally accepted 45 degree reentry to the downwind leg, the procedures for entering the pattern from the upwind side is, the practice is to enter on the 45 to the upwind and T4-4 AT-2

cross the airport on the crosswind leg to enter the downwind. In this manner, aircraft can enter the pattern on the opposite side. If the proposed changes are made to accommodate the wind farm, it will impact the flight safety. I strongly object to the proposal to change the traffic patterns. T4-4 AT-2 Cont.

The DEIS Chapter 4 did not address setbacks. The setback should be 2,000 feet from roads and residences due to shadow flicker, flashing lights, noise, ice throw and blade throw to ensure safety. T4-6 HS-4

Property values. The DEIS Chapter 4 does not state there will be a reduction of property values due to the wind farms. Regardless of what was printed in the local Daily Record, a newspaper, that property values would not be affected, the results of the Lincoln Township, Wisconsin survey showed that turbines within 1 mile lowered property values by 26 percent and 74 percent of the people would not buy within a quarter mile of turbines. Real estate people of Kittitas County have stated that wind farms will affect property values. T4-7 NS-1

The DEIS on page 1-35 states "Some nearby residential users might seek to relocate if they felt that wind facilities, individually or collectively, conflicted with elements of their lifestyles." This made me and other residents very mad. We were here first. How can you invade our beautiful valley and tell us to move. Who would want to live next to these monstrosity turbines? Where is the impact on the Kittitas County property values stated in the DEIS? T4-8 LU-3

Clay White: Thank you Mr. Bates. Ed Garrett.

Ed Garrett: My name is Ed Garrett and I reside at 19205 67th Avenue SE, Snohomish, Washington. I represent myself and my wife Rosemary. In reviewing this DEIS I'd like to make the following comments. First I'd like to comment on the lack of property value effects on the wind power projects. The summary of literature prepared by Huckell/Weinman Associates, groups who promoted the agenda for the Woodinville …(inaudible). The report says "one scoping comment for Desert Claim specifically suggest that a certified real estate appraiser familiar with the local market conditions be engaged in identifying the effects the wind turbines on property values." However, it goes without stating, this request was not pursued, because it's not an environmental issue. Because of the absence of data, the actual sales before and after construction …(inaudible). I believe this to be an important, pertinent part of the EIS. The project area proposed includes 31 non-participating residences and landowners either in as close as 1,000 feet of the boundary and many more non-resident land owners within 250 feet of the property line. **T5** T5-1 NS-1

Second, I'd like to comment on the wildlife study prepared be WEST, Inc. This was a limited 1-year study performed by several 30-minute flight count surveys and all during the daytime. The Kittitas County Audubon has already stated in previous public meetings that this is inaccurate. I won't incur any other comments on this issue (inaudible). T5-2 PA-1

Third, photographic views and visual simulations are not accurate. Most of the simulations were taken at a significant distance from the project area to minimize its overall impacts. I would like to see visual simulations for each of the 31 non-participating residents within and out to 1,000 feet from the project boundary as well as (inaudible). T5-3 ALG-2

Lastly, I have great concerns about building this wind project within such close proximity to nesting bald eagles along the Yakima. The proposed project is among the hunting and roosting grounds of bald eagles and other important mammals. WEST, Inc. attempts to minimize the issue by stating repeatedly "at this time there have been no documented bald eagle fatalities at any wind facility within the United States." I find this statement very irresponsible, very unsubstantiated. I would submit that the bald eagles, just like the golden eagles at Altamont Pass California, are being killed occasionally, but are swept under the carpet because bad publicity …(inaudible)… as well as being a federal crime violating the Bald Eagle Protection Act. WEST, Inc. …(inaudible)… their observation (inaudible) that frequent observation of bald eagles within this project area. On page C1-20 of Appendix C …(inaudible)… problems state "Due to the turbines in the vicinity of important roosting and foraging areas bald eagles …(inaudible)… plant, decreasing their exposure. Page C1-16 states that bald eagles were observed in this zone, but within the zone of risk. They propose to mitigate the risk to eagles by establishing and enforcing reasonable driving speed limits within the wind plant to minimize the potential for road killed wildlife or livestock that may attract foraging bald eagles. Number two, remove and dispose of all carcasses of livestock, big game, and other wildlife from within the wind plant that may attract foraging bald eagles. Number three, ensure that livestock calving areas of participating landowners remain outside the wind plant. But what about all the non-participating landowners with livestock? And I would like to add one more main mitigation issue. How 'bout you just don't build these giant industrial Cuisinarts in the sky and no (inaudible) habitat who are inhabited by innocent human beings? Thank you. T5-4 PA-12

Clay White: Thank you Mr. Garrett. Jeff Howard.

Jeff Howard: My name is Jeff Howard. I have a home at 21 Fawn Road in Cle Elum. And since my experience in real estate does not qualify me to comment **T 6**

accurately on environmental issues, I have to confer with (inaudible) Mr. Garrett and a couple of the others here, as far as that goes. My main and well-known concerns regarding property values and corporate welfare are not within the scope of the Draft Environmental Impact Statement. I would like to note that, to date, few if any large wind turbine installations have been placed in areas as heavily populated communities as this one. And I feel the Kittitas Valley should not be allowed to become a national Petri dish for experiments with huge wind farm installations, in an area already populated with residents and businesses and the tourists who would love this place exactly for what it already is. Thank you very much. T6-1 SO-6

Clay White: Thank you very much Mr. Howard. Bertha Morrison.

Bertha Morrison: My name is Bertha Morrison, I live at 9131 Naneum Road. I'm 85 years old, and my family's lived here for over 100 years. As most of you know, I have spoken in favor of the wind farms in the past. And you can say I am biased if you want to. I won't deny it. I would like to see each of you, pros or cons, join me in thanking our County officials, and Huckell/Weinman, the firm they chose to prepare the Environmental Impact Study, we are here to discuss. Like each of you here tonight, I wanted to …(inaudible)… and educated professional in environmental …(inaudible)… studies. But I can personally guarantee to the time and detail of some of the workers. I never imagined the number of visitors or the detail they would go to. At one time, they had a group of people walk every foot of the project area. I thought at first that maybe they were doing a detailed study of some of the projects and assumed the rest of the projects would be similar. Ask any of the property owners and they tell you the same detail was used throughout. They examined all the plants, animals, wetlands, and every old bottle, or pieces of bottles, anything else they found. And in closing, I would like to say I'm pleased to see that our local officials have shown how capable and professional they are. Thank you. **T7** T7-1 EIS-1

Clay White: Thank you Ms. Morrison. Sandy?

Sandy (Sandall): I'll pass. I concur with what Mr. Bates said …(inaudible).

Clay White: Thank you. Is it Chris Burtchett?

Chris Burtchett: My name is Chris Burtchett. I live at 12611 Reecer Creek Road in the middle of this project area. I've read and reviewed the content of your Environmental Impact Statement. I may not have understood it all, but one thing is crystal clear. Many of the determinations should have been evaluated …(inaudible). It's filled with statements such as that cumulatively insignificant, open mitigation, minimal effect, not measurable, and temporary disruptions. Those of us who live in the project **T8** T8-1 EIS-1

area do not deem any disruptions minimal and we resent the suggestion that the destruction of our way of life is cumulatively insignificant. T8-1 Cont.

You, as the Board of County Commissioners, will make the final permit decision on this project. I ask that you adhere to your own criteria requirements. And based on those you will surely deny this …(inaudible)… application. In your criteria you state your decision will be based on three criteria: The project is essential or desirable to the public convenience. The project is not detrimental or injurious to the public health, peace or safety, or to the character of the surrounding area. The project will not be unreasonably detrimental to the economic welfare of the county and will not create excessive …(inaudible)… costs to the public facilities and services. I fail to see how the project is essential or desirable. Wind power is not necessarily environmentally friendly and is undependable, at best. I would hope someone has noticed that the wind hasn't blown here for months. From what I understand, this is normal from November to February, and the wind is mainly present here in the valley in the spring and summer. To me, that means the turbines can sit idle for at least four months of the year unless operated by subsidiary power. How can that be environmentally friendly or beneficial if other power may be needed to operate them. Addressing the other issue in your first statement, I can guarantee you that those of us who live in the middle of your monstrous project do not consider it desirable. You plan on making us live near towers that whir night and day, with blinking white and red lights, and will obscure our view of the foothills and the valley. T8-2 EIS-4

Whether or not the project is injurious or detrimental to the public health remains to be seen. The jury's still out on what the long-term effects on the populace will be on the increased power transmitted by your turbines to the surrounding power grid. As the editorial in the Daily Record stated, we're facing some of that from Bonneville Power Administration's plans to update their transmission lines anyways. We don't need this from you. You of course know that. Because that was another reason you chose our county for your proposal. If there was ever an instance where measurable effects on people's health that power lines are constant, worrying reflection on …(inaudible), then your project qualifies. As to public health and safety, I can only imagine. Your statement again claims that the potential ice throw, blades coming loose, towers collapsing, or vandalism is all minimal, and will have no significant impacts. That's easy to say, but we've been relatively crime free in the upper valley and your rosy outlook of increased travel and tourism make me realize that now I'll have to lock my doors, keep my animals protected, and watch that my land is secure from …(inaudible)… and trash, not to mention looking over my shoulder whenever I venture outside so that I'm not injured by

one of your towers. You've banned the public from your project area due to the danger of electrocution. I say that's …(inaudible). The increased fire danger is also described as cumulatively insignificant. As far as I'm concerned, any increase in fire potential is too much. In the past year alone, …(inaudible)… personally …(inaudible)… alone to at least three fires. These spread fast and are extremely hard to control. If your presence increases that hazard, then it is disruptive and injurious to the surrounding area. The impact on peace and quiet in the surrounding area should be self-evident. The towers are taller than anything else in the vicinity and will predominate the landscape. T8-2 EIS-4 Cont.

There's a transformer at the base of each tower. There are power collection conduction cables that cross and crisscross the streams that we depend on for water …(inaudible). It will crisscross 17 streams, many of them more than once, and your evaluation calls it a temporary disruption. If the towers aren't bad enough, you plan on building overhead cables and poles connecting the transmission …(inaudible)… substations and more to connect these to the regional transmission lines. The interconnection line varies in length from approximately 200 feet to miles. That's a considerable variance. Your project …(inaudible)… would provide vehicle access to the base of each tower. They will cross and crisscross 15 streams. You say there will be no noticeable disruption and that it will all go away after the initial construction ends. Who are you kidding? Builders around here know how variable the groundwater is. It lies just below the surface in many areas and goes deep in others. Any disruption of all that groundwater and streams will damage the fragile irrigation system that has been put in place by multiple farms and ranchers and especially to those of use who depend on the natural flow of our land irrigation …(inaudible). My time is up, I have obligations in here that I would like to point out, I will leave them with the county. They need to be said. I am truly against this and I think I would like to point out …(inaudible). Thank you. T8-3 WR-3

Clay White: Appreciate your comments, thank you. Dana Lind.

Dana Lind: Hi. I'm Dana Lind – 9421 Reecer Creek Road. I'm representing myself and my family. I'm against the wind power for lots of reasons. One thing I haven't heard talked about is dust. Recently my daughter and I traveled to Walla Walla to watch my son's soccer game. And all I heard about the wind project, I've never known what it was all about until I saw the towers. My daughter saw the towers first and she said, "My gosh, Dad. They're not going to build those towers by us are they?" So, in a way, it really affected her. …(Inaudible). So we went down and watched the game. We returned the next day, had some car problems. So on the way back, on the return trip, I looked at the paper and the winds the first day were 20 – 25 mph. What really shocked me was when you looked at the towers, to the right, it was clear; the air was **T9** T9-1 AQ-1

clear. But to the left, adjacent to the tower, it was, the dust that circulated from the ground all the way to the top of those blades – you know how tall those towers are. It was so dark, and it went on for hundreds of yards. I was just shocked that it generated so much dust and I don't know if …(inaudible). I didn't have a camera, I didn't have a video camera to take a picture of this. I was just amazed to see what really occurs when the wind did blow and where that dust comes from, where that dirt comes from and how …(inaudible). Is there a lot of erosion? Nobody wants that to happen here. Thank you for letting me speak and just say no. T9-1 AQ-1 Cont.

Clay White: David Sager.

T10

David Sager: Hello, my name is David Sager, 290 …(inaudible) Road, PO Box 444, Cle Elum, Washington. I'm here to speak in favor of the wind project because we need electricity and environmentally it's a lot safer than what were doing to the rivers. There's a salmon disaster happening that makes people want to start tearing dams down and taking down generators. You guys will have spent a million dollars for electricity …(inaudible). It's gonna take something to make electricity to run our computers and our MTV, and stuff we want to watch. So I think, environmentally, it's the safest way to produce electricity. And times are changing. Wind power utilizes a natural concept. When my daughter graduated from the University of …(inaudible)… and came back to Cle Elum, there was a speaker and they were speaking highly of wind power. Don't want nuclear power, you think about nuclear power, and what it's done …(inaudible). You think about all the electricity you're getting from the Columbia River. That's not …(inaudible)… and it's just going to escalate. The cost is going to go higher and higher and higher. You want to build a thermal power plant, you're going to fuel it with gas or you're going to fuel it with coal. You can't live without electricity. If you people want to live in the Stone Age, that's fine. Because your land won't be worth a dime if you don't have no power to get water pumped out of your wells. And the other thing is this is a beautiful valley here, if you had a little more water, you could irrigate and make it grow some more apples. Some of that water you're running though those turbines, you could be running right through this valley growing apples. This is a beautiful valley. Sure that it's going to be an eyesore along the creek, but they're going to be located in the hillside where there won't be …(inaudible)… located right down between …(inaudible)… running right along the freeway. So I say you guys wake up and smell the coffee and figure out there's a new world coming and I think it would benefit this county to bring in revenue. You could get responsible contractors to hire local people to do the work and educate and provide medical benefits for them. That will be a hell of a lot easier …(inaudible). It's a change and it's a new way, it's T10-1 SO-5

environmentally safe. And if you all want to turn off all your lights then go ahead. As long as we need electricity, …(inaudible). And this is the new way. T10-1 SO-5 Cont.

Clay White: Thank you very much. Diane Schwab.

T11

Diane Schwab: My name is Diane Schwab. I live (inaudible) south with my husband. Our address is PO Box 290, Maple Valley, Washington. Once again, I'm really disappointed in the results of this DEIS. I think it's full of scare tactics, lies and half-truths. It's far fetched. They give the impression that if these windmills don't go in, they could build as many as 400 homes. Then on page 3-124, they state the housing density consists of one house per 20 acres …(inaudible). All the maps that were included in this report are not legible enough to pinpoint certain areas. And they do not …(inaudible). I want to know where is our property in relation to these windmills. As far as we can determine, we'll be affected by views. We're already (chair squeaking) going to be on the west with the Kittitas Valley Project. Now this one's going to be east-west. T11-1 ALT-1 T11-2 EIS-3

Figure 3.10-3 they're showing viewshed, but it is still not clear. On page 3-225, they claim they can make the project look better, blend in better. How is it possible to hide several hundred foot-tall towers and blades, rotating blades …(inaudible). T11-3 ALG-4

Section 3.5.9.5 claims that although medium noise impacts where identified at several of the agricultural residences, either due to overall sound levels exceeding 50 dBA or due to projected sound level increases, no high (i.e., significant) unavoidable adverse impacts were identified. Do I read this right? Sounds to me like this paragraph …(inaudible). It claims …(inaudible)… levels for equipment …(inaudible), but nowhere, that I find, does it say what the sound level is going to be when they have ten of them at once. And then …(inaudible). T11-4 NOI-1

My other question is who is going to police this company? What about mitigation measures to appease the adjoining property owners? Who's the person going to complain to if the shadow flicker is overwhelming and unbearable? …(inaudible)… I'm not sure where it should be. I've talked to a person in California that lives next to a wind farm and he's had a really hard time. He's complained to the windmill company; he's complained to the county; nobody cares. Sometimes the shadow flicker and the noise is unbearable. Now, keep in mind, he's about as close as some of these turbines are to me. He can't go in the house and watch television because, since they installed the windmills, he has no reception. But nobody cares. After talking to this guy, I get the distinct impression that if us property owners have a problem we're on our own. And I think that this company should step up to the plate before any construction starts and mitigate these issues with the people that have adjoining property. Thank you. T11-5 EIS-10

Clay White: Thank you very much. Jack Boyovich.

T12

Jack Boyovich: My name is David Jack Boyovich, I reside at 18830 Reecer Creek Road, my wife and myself. I'm here on behalf of, besides my wife and myself, 23 families that have entrusted me to speak to you people and, Clay, I've already told you and gave you all the paperwork that I've put together, I've given to you Friday. But, in order to address a couple issues that I have that have been brought up tonight, I need to ask that gentleman a question.

Clay White: I think the best way if you want to do some question and answers we'll have some time after the meeting. I suggest you make specific comments on the draft environmental impact statement.

Jack Boyovich: Yes, anyway, there were a few people up here that said that they were going to tear down dams and electricity is going to go up. I beg to differ with that person. I don't think there's going to be one dam taken out anywhere in these here United States. Number two, in that environmental statement it was stated that there going to be using backhoes, excavators, etc., etc., etc. Not anyplace in that statement as it says, does it say that they're going to have to blast or dynamite some of these holes, because you know and I know that there's an awful lot of rock out there. What happens if you, and by the way if you look on the map you'll see that they're around 360, those things have got me covered all the way around. Sometimes you look at …(inaudible)… of these buggers. Anyway, you blast a couple holes that are above me and it doesn't take one stick of dynamite and my well is gone - history. We have no idea where that water's coming from. I know it's down there. I went down 650 feet to get my water. Let's say you guys blast a couple holes up there and my water goes away, who's going to pay for that? Who's going to make me viable if my well goes dry? Oh, Lord, I got a big …(inaudible).

T12-1
WR-3

T12-2
WR-2

Anyway, and they also, also I should say, they did a study, and I said this the other night. They did a study down in California on the raptor kill down there by Palm Springs, it was a 10 year study, and they estimated that between 22,000 and 30,000 birds were killed by these machines over a 10-year period. That's about 2,200 birds a year. And we do have golden eagles up here as well as bald eagles. We also have lots of red tailed hawks, peregrine falcons. We also have turkey buzzards, which are on the endangered species list. There's an awful lot of animals out there that are going to be wiped out by these …(inaudible). I think I'll just let it go at that Clay and then I'll just turn all that paperwork in to you. I can say it better on paper.

T12-3
PA-13

Clay White: That sounds great. Thank you very much for your comments. Holly Pinkart, please.

T13

Holly Pinkart: My name is Holly Pinkart. I reside at 5900 Robbins Road, I represent myself and my husband. There are a variety of things in the environmental impact statement that need to be addressed. On the part of the fire and emergency medical services, 3.14.2.1, in this case the statement actually …(inaudible)… that there is a …(inaudible)… at the …(inaudible)… site and that a fire protection services contract with Fire District 2 would be required in order to ensure protection for farms and homes in that area. However, it says in the impact statement, in the draft form, Fire District 2 would need some special training for dealing with high-angle rescue. T13-1 PSU-2

The water supply. Water use and discharge needs to be a lot more detailed. They propose putting in a well in the area that would pump less than 5,000 gallons per day and …(inaudible). T13-2 WR-1

Runoff from the construction, if it ends up in the irrigations around here, as it probably will, also needs to be addressed. …(inaudible) and a variety of other things, that water is contaminated with construction materials, …(inaudible), petroleum products. This really needs to be controlled …(inaudible). Also for the handling of waste disposal. These particular turbines …(inaudible)… will create about 24,000 gallons of waste oil for this project per year. So that really needs to be better described …(inaudible). And of course the energy over 30 years of operation, which is my …(inaudible). T13-3 PD-7

My biggest problem with this particular study, and some of the others, most of you are aware of this …(inaudible)… is the inadequacy of the animal studies. In this case, looking that bird populations, the Audubon Society said that this study was inadequate, it's only a year long, the standard estimates of night birds, I guess those weren't even counted in the study, no bat counts were performed, and in spite of no bat counts being performed they still came up with conclusions that mortality would be insignificant. What goes beyond that, what's lacking is any type of ecological modeling. Beyond that, granted when you don't count animals and you don't count birds the lack of presence or absence is very hard to model, but if you spend a lot of that time counting things like birds and animals, they would be able to model …(inaudible)… population fluctuations over time. T13-4 PA-1

As a micro-paleontologist, my particular concern is the fact that we do have West Nile virus in this state now, mosquitoes carry this. If the turbines pick up some of the populations, such as nighthawks and bats, that eat mosquitoes, we might be in trouble. Another potential outcome for reduced raptor activity and other things is an increase in rodent populations. Here in this county between 10 and 20 percent of rodents carry hantavirus …(inaudible)… and if these populations increase then T13-5 PA-16

…(inaudible). Those statistics on the virus in this county can be obtained at the Centers for Disease Control and the Department of Health for the Washington counties …(inaudible). Additionally, there have been documented problems with rodent increases around wind farms. I've included one of those in my statement here. These are studies done by small …(inaudible)… not cited in this particular environmental impact report. They show increased numbers of rodent …(inaudible)… in and around the wind farms and it was such a problem they ended up trying to …(inaudible)… which in turn …(inaudible). Based on this and a variety of other things which I've included here, my conclusion is that this site is completely inappropriate and way too close to people, because it would be a threat to human health and livelihood …(inaudible). Thank you very much.

T13-5
PA-16
Cont.

T13-6
SO-5

Clay White: William Erickson.

T14

William Erickson: William Erickson, 6980 Wilson Creek Road. I'm going to look at the fire stations mentioned in this statement. It says the Fairview Station is west of Highway 97. The last time I drove past it I think it was on the corner of Fairview and Brick Mill Road. The fire potential, I don't think it's addressed. Wildfire, wind driven wildfire. Only the windy sites have been chosen. When wind blows, foliage dries out. I think you've seen that …(inaudible)… areas, that it's brown most of the time of the year. The experts say that there's no need to worry about fires. They have all the safeguards and …(inaudible)… and everything. The experts say the airplanes aren't supposed to go down and planes aren't supposed to collide, but it happens. Early on generally things work pretty good, but 10 to 20 years down the line, you're looking at maintenance that needs to be done and these wind farms aren't producing the revenue they're supposed to then the cost on …(inaudible)… maintenance. I don't know if you've even been in a wind fire, fire driven wind, but …(inaudible)… small experience …(inaudible). It's scary, it can move mighty quick and if those wind towers are 300 feet tall, or whatever they are, and they …(inaudible)… quite an area. And I don't think you can …(inaudible)… fire history to contain it. …(inaudible) all of the resources they show in the statement, is not going to be able to contain that. Because if it's …(inaudible)… I don't know (inaudible) 6 or 7 years or something like that. …(inaudible) I know there's a lot of damage from fires in southern California last summer.

T14-1
PSU-3

T14-2
HS-1

The area also is not agriculturally viable, if you want to call it that. Not like some of it is in the valley, you get out some places …(inaudible). And so it would be the first to be built on I'm sure …(inaudible)… or homes to go in. You're going to cut down on the possibility of homes going in and create a tax base. Homes create taxes. And I don't think it would be extra special, any more than the wind farms are.

T14-3
FIS-3

The other thing is liability insurance. These companies are hiding behind a limited liability corporation. That means that they're only liable for the value of the company. If something happens above that value, they're not liable. There's nothing in the statement that says who's going to pay for that. Who's going to pay for the loss of our homes, ranches, infrastructure, and bridges …(inaudible)? There's nothing about that. As far as energy goes, there's other sources of energy that are on the upcome. There's turbines that can placed in the rivers, not in dams. This technology is in Sweden, it's been in place. There's the tide over on the coast, …(inaudible)… and it's not like wind were it's there part of the time and part it's not. There's hydrogen, …(inaudible)… hydrogen has got to be …(unrecorded).

T14-4
VB-2

T14-5
ALT-5

[END OF SIDE 1, TAPE 1]

(Unrecorded)… in an area where there's very few people. And it's continuing to build, it's going north on the northern part of the valley is where a lot of building is going on now of homes. It's just not a wise place to put it.

T14-6
SO-5

Clay White: Thank you Mr. Erickson. Rocky Farrell.

T15

Rocky Farrell: Good evening. My name is Rocky Farrell and I live at 1284 Cascade Road, Cle Elum. I work on turbines, it's what I do for a living. I've been doing it for 18 years. I like the lady's idea on the tax for schools, I'm more like this lady here, I don't consider myself greatly educated, but I see the basic things that we need in life and I've been listening to people talk up here and the gentleman said that we were here first. I'm sure that's what the Indians thought too. The man who talked about the airplanes; I've never flown one but I have flown in them. He said the landing, take off and air and all that stuff, it's a little beyond me but I'm not, I'm not really educated on that but I figure it that it teaches students how to avoid things. It's just common sense. I drive a Geo Metro. If people think that there's not enough wind here they're really mistaken bad because a 3-cylinder really gets pushed around by it. The man talked about he's never heard of dams being taken down in the state. Currently there are two of them being taken down in Washington State. One is the White River Power Project in Pierce County that supplies Lake Tapps with water. Another one I couldn't recall the name off the top of my head but it's out on the coast. So dams are being removed and I see this as a boon for our economy, not only economically but everybody, everybody wants alternate sources of power. And if we're not willing to ante up to our part then we can't expect anybody else to, I mean we don't want more nukes, we don't want more dams, you know the options are coming down real quick. The technology of this is advancing

T15-1
SO-5

all the time. I think we should take advantage of it while we have the chance. Thank you very much. T15-1 SO-5 Cont.

Clay White: Thank you Mr. Farrell. Roger Weaver.

Roger Weaver: I'm Roger Weaver. I'm the broker/owner of Remax Community Realty in Cle Elum. I've sat on the sideline of this issue, particularly as it leads to property values. Most of mine were colorful comments, on what enXco is really …(inaudible). Zilkha in their public relation process, particularly as it relates to property values …(inaudible). I'm here because they think I'm stupid, they keep saying that there's absolutely no effect on property values. That is absolutely incorrect. (inaudible)… there are some places where it won't be. In a lot of places where they're trying to do it, there will be. And then they created this analysis, which is the only substantive analysis that's been presented so far. And call it - you've seen this report. Here's what they're comparing us to. A community where they put only 20 turbines and the median value of the household is $77,000. The highest median value of any single household any place where they put these is $117,000. If we could provide that type of median pricing for our young people in this county I would tell your first born to …(inaudible). That's not gonna happen, we are way past these days. My point to the public is this, if you could buy a home, and we see it everywhere else in the country, you can buy a home for those kind of prices, you'll be living next to a steel mill. And it won't have that kind of effect on your property values. In this county our property value base is geared on three things; residential, agricultural and recreational. I contend they have never brought this kind of equipment into a county where our value of real estate is this high or …(inaudible). **T16** T16-1 NS-1

And I want to clarify one other thing. The biggest industry we have and the most viable industry we have in this county is the real estate industry. Because, and that's also where we get our agricultural …(inaudible). You're more experienced with me when I talk about the conversion rate. That conversion goes from 2,000-acre irrigated farm to a 10,000-acre building site. That 10,000-acre building site will not exist most anywhere in the community …(inaudible)… at all. Myself and some of the attorneys in town are prepared, if we have the time, and again it's the same old thing. When we went through the MountainStar project, you remember Mr. White, they were much more of an active, involved in the county, not you personally, but the county is much more involved in the process. The mitigation that MountainStar had to go through, the costs that MountainStar had to go through, and time MountainStar had to go through, it's unfair if this is coming in piecemeal …(inaudible)… and nobody's taking a realistic view of its impacts.

I want to see a ban on every wind company here, with every wind machine …(inaudible). I want to see the …(inaudible). Because we can very easily and scientifically get to the point between values of land. All I have to do is simply go to a farm that's close to this area, highest and best use, if they break the farm up and sell it, what is it worth? What is gonna be worth if the windmills are right next door? That is measurable and that is real. When that happens it's not unlike the government did, if they want to do it and the County wants to allow it, then the people should be compensated like any other entities where you're involved with what we call a taking. If you're taking property and you're affecting somebody's value, they gotta be compensated fair market value for that. It's a different type of process. It's one that needs to be taken. And that's all - there are processes available to do this. And again I want them to show us where they've gone to an area that's like us, the land value base like us, and then tell me that they're not affecting property values. Certainly there are places where this has been done, even in our county. But there are specific places where they can't. Anyway this has been a tough issue for me. You haven't known me as long as some people have, I've spent my whole life fighting for property rights. And this is a hard one for me cause this affects some of my friends and some of my clients that will be affected by this. This may personally cost me some business. [Applause] It's the wrong way to go. T16-1 NS-1 Cont.

Clay White: Thank you. Eloise Kirchmeyer.

T17

Eloise Kirchmeyer: My name is Eloise Kirchmeyer and I live at 16281 Reecer Creek Road. I'm a newcomer to Kittitas County. I come from King County. You can imagine how far this project would fly in King County. I enjoy this county and I would like it to stay the way it is and I've only been here since April. I bought into …(inaudible)… neighborhood and I don't want to see it become an industrial problem. What's next, a landfill, or a regional prison? I think the windmills don't belong in this valley. There's an abandoned small windmill on the freeway and it sits idle. Is this a sign of things to come? (inaudible)…as far as the new environmental impacts on the area, I'm going to step out my back door and see several windmills towering over my house. (inaudible)… simulated photos I saw last week. I do not see that portrayed. Do you think I'm just saying not in my backyard? [Applause] You betchya. And not in my front yard either. [Applause] T17-1 SO-6 T17-2 ALG-2

Clay White: Thank you. Michael Gossler

Michael Gossler: Good evening. I don't live on this side of the mountains.

Clay White: Before starting can we get a name and address?

Michael Gossmer: Yes. My name is Michael Gossler. I live at 3212 74th Place SE, Mercer Island, Washington. My office is in downtown Seattle. I own 20 acres of property on …(inaudible). For the last 6, 7 years I've had the pleasure of coming over here on weekends on a regular basis, to enjoy the phenomenal view of the valley, views of the mountains. The views of the sky at night and the stars and the constellations, things that you can't see on the west side. I've invested a fair amount of money developing the property …(inaudible). In the last year there's been a significant turnover of land up in …(inaudible)… for that purpose and I think you'll see property values increase, you'll see a lot of money spent in this county if there's a reason for people like me to come here on weekends for recreation and the quiet and solitude …(inaudible). That's my preamble. And I've reviewed this environmental impact statement. I think it's deficient in a number of respects. I've read your comments, I've read the comments of others, and I'll make a few of my own. **T18**

I think Section 1.10.2 substantially understates the visual impact of the project on the county. It implies if you don't own property that's directly next door, it won't have an impact. I disagree. I think anybody who lives in the county, and certainly in this area, is going to be impacted on a day-to-day basis by looking at it.

Section 3.5.3, I think inadequately discusses the projected consequences. Section 3.5.3 basically says if we don't build this project what might happen. It says, well you might have more residential development. Yeah that's probably true, for what's permitted on a 20-acre lot. But it certainly isn't going to have the type of impact that building a 41-story building, a hundred of them throughout the valley. I look at those all day long, that's because that's where I live, that's why I don't stay there on the weekends and come over here. It's not the kind of impact you want to present to your valley here. I think the flipside of the coin is also not addressed in that section, and that is what does this open the door for. In effect what you're doing is you're, you're, you're permitting industrial development throughout the valley. And once you've opened up 41-story building equivalents, why shouldn't other industrial developers follow? What's there left to preserve? And so on the flipside of the coin of maybe a few more residences …(inaudible), I think is significant additional development of the type you don't want in …(inaudible). T18-1 EIS-16

Section 3.6.1 I think characterizes the valley. It suggests that there's nothing more over here than some cabin and thousands of empty acres. That's not true. This is more characterized by what I would call rural residential and recreational …(inaudible)… than desolate areas where you might appropriately put a wind farm where people are not impacted.

I think Section 3.12 dealing with noise makes good reading if you're an engineer, but to any, any layperson it's almost incomprehensible, there's no point of comparison in terms of what the volume of decibels means in terms of if you were standing next to a freeway or some kind of an industrial use. That should be improved.

There's no adequate discussion, I think, of the economic impact, to adverse economic impacts to the county. As I say, I think a lot of people are buying property here for recreational purposes to develop. That increases the value, that increases the tax base, money is spent by people like me who come over on the weekends, buy groceries, buy ATV's, buy snowmobiles, buy parts and services for those things, that all contributes to the economy you have. T18-1 EIS-16 Cont.

Finally, I don't think it adequately addresses the cost, the cost benefit analysis. What you stand to lose in terms of impact on this area versus what it appears to me that you've got a trivial amount of electricity. One of the speakers here commented that we don't want the valley to go dark. That's true, but I submit that the miniscule amount of electricity that will be generated by these impacts just cannot justify the adverse impact that you're gonna create if this project goes forward. The impact statement should be revised [Applause] as appropriate for these issues. Thank you.

Clay White: Thank you very much. Kirk Diehl

T19

Kirk Diehl: Good evening. My name is Kirk Diehl, 507 South Third, Yakima. I'm a laborer. We build things. But our concern initially with this project was what was the development like? Not all our questions were answered by the draft environmental impact statement so we decided to do some research of our own. It turned out pretty good. After checking out the last project in Iowa built by enXco, it turns out that the contractor paid for family supporting wages, health care, training and pension. That's pretty unusual when you take the average job throughout the country. On that basis, we feel the developer is a responsible developer and will add value to the community in the long run. It's been our experience that when owners will go the extra mile to deal fairly with its workers they will also deal fairly with the rest of the community. We've seen that happen many times. We don't support all power projects 'cause not all projects deal fairly with the community or the environment. We've done our research here and can recommend based on that research that enXco has a track record for dealing fairly with the socioeconomic impacts of the project. That statement, in particular, addressed our concerns from the scoping meeting. T19-1 VB-2

I'd like to go on and address some of the things that I've heard from the other community members here. I've read the draft environmental impact statement with respect to the visual impacts because I know that concerns so many people. I'd like to T19-2 NS-1

comment on the fairness of the five studies. I'm not an expert. I trust that the Planning Department will take a look. Numerous studies have been done and four of the five have indicated the values did not decrease, possibly even increased in value after construction of the wind project. Now I'm sure that's site-specific, but this is a specific site, it has certain characteristics that recommend it. Just putting that into a local perspective. T19-2 NS-1 Cont.

I've observed that there's already development of electrification infrastructure within the project. That is the power lines that parallel the north side of the valley. In addition there's already some natural mitigating view shed screens that exist. Someone mentioned the fact that they're situated just at the base of the, the foothills. It gives it a better aspect visually. I think that …(inaudible)… gray area. An additional item is the ridge that runs west of the project. It serves as another screen from view from the west so that mitigates quite a bit right there. I think that of the projects you've got to deal with here, I think this is one that needs some serious consideration cause I think it will benefit. Thank you sir. T19-3 ALG-1

Clay White: Thank you. David Lee.

David Lee: Good evening, I'm David Lee. I live at 5821 Robbins Road and I'm here with my wife who recently purchased before we were married a piece of property. A place called Sun East. I currently am the president of Sun East Property Owners Association. I'm asked to represent about 170 property owners. I know there's one that doesn't want the wind towers, or who wants it. The other 169, I haven't talked to every one, but I would say at least a hundred of them are in a position opposing the wind farm. You know how hard it is to get at 99 percent of anything when it comes to a public vote. And I speak for the vast, vast, vast majority of people up there and that's probably 168 property owners would say they don't want this thing. **T20** T20-1 SO-5

And I can tell you a little story that goes with it. My wife, before we were married bought a 21-acre piece from a realtor in Spokane. And she is prepared to invest $300,000 to a pretty nice cabin or it would actually become a home. Now in my simple studies, I believe that that money before it leaves this county will turn over at least 10 times. Now that represents $3 million and we're one family, one… entity. How many hundreds of times will it be paid for in the next few years? T20-2 FIS-3

A little bit more about Sun East. There property levels run from about 2,000-foot elevation up to about 5,000 feet. We get to look down on just about every one of the beautiful projects, these so-called beautiful projects. And I do not like the fact that across the country where they have built these there are two things gone bad. They stand there and they're ugly. I'd certainly hope that this county has the foresight not to go ahead

with this project. If it were that case, I would ask you to look at something similar to Alaska when they ran the pipelines. A lot of those people are on what's called the subsidies every year. Because the oil that flows through those lines, they get compensated for. If that's the case I think every man, woman and child in this county is going to be affected by these towers. Good or bad, and divide up the money or the revenues that's supposed to be generated by them, to those people because we're all gonna be in the same position, not just one. We're all gonna have to deal with them, we're all gonna have to deal and I can say for my wife and myself, if that project, if those towers come, that $300,000 isn't coming either. That will represent millions to this county. And a tax base that would go with it for this county for the next hundred years, as long as we own it, would not. Then we talk about a county being 20 acres or a parcel being 20 acres, I have some property in Tacoma, now they're talking density per acre, used to be 5-acre sites. So now they want more and more density, they want more and more people in the county. And I'm sure Ellensburg with its location is going to profit and benefit with those returns from those people many, many times more than a few wind mills [Applause]. Thank you for your time. T20-2 FIS-3 Cont.

Clay White: Thank you very much. [Applause] Did Leslie White still want to speak tonight?

Leslie White: My name's Leslie White. I live at 15021 28th Avenue SW in Burien, Washington, a suburb of Seattle. My wife and I own two properties up in the Sun East area, one of which has a cabin on it. We come over here as often as possible and absolutely love the area. I am speaking against the wind farms. I am very supporting of renewable resources and I don't oppose that. However, in this instance, I don't feel the overall impact of the wind power is really going to be effective or economical. I've seen wind farms in other areas of the country from my travels and I've never seen one in an area that has the concentration of residences that I see in what's proposed in this area. They're usually much more isolated area. I feel that there is a need for wind power, I feel these should be developed in more isolated areas where it doesn't have the impact on personal residence and the quality of people's life in those areas. Thank you. **T21** T21 SO-5

Clay White: Thank you very much. Linda Schantz

Linda Schantz: Hi, my name is Linda Schantz, S-c-h-a-n-t-z. And I live at 4191 Robbins Road, Ellensburg. I'm here representing my husband Charles and my son Michael tonight. And I will turn in my specifics to you later in the week, probably on the very last day. It took me 3 days to go through Zilkha's and I'm sure it will take me more days to through this one. But I did have some comments tonight. **T22**

One, the first one I want to talk about with air traffic, and as stated in the DEIS, 27 turbines will be over the FAA height restriction for the VFR flight pattern. We also have 185 students at Bowers Field that add 44,000 operations to the airport annually, in addition to 39,000 operations or 85 flights daily. The mitigation suggested was to change the takeoff flight patterns for the VFR to a south turn rather than a north turn. I believe that this will increase noise and traffic over the city of Ellensburg and over the university campus. I also think we should look at the impact and I don't think that the DEIS really addresses the, the impact of sending all of our flights southbound on takeoff. I would think that there would be an increased chance of accidents to the traffic all in one direction. I think it's a better mitigation proposal to consider eliminating the 27 turbines or lowering the tower height in the project for approval. T22-1 AT-2

The lighting pattern required by the FAA …(inaudible)… to the residents that live within the project and to those who live to the east, north, south and west of the area. I think that the residents that are going to be in the middle of this project, I find it unacceptable that it would be anywhere near the airport. T22-2 ALG-1

Secondly, noise. On the graphs, as someone else said it's difficult unless you're an engineer to go through, but I did that to the best of my ability. The decibel bit map 003410 shows the result of the decibel ranges and actually approach our range, our sound range, our noise range approximate to the wind tower and residential locations. My home's in the 45, average 45-decibel range. Based on the Lincoln Township moratorium committee survey, the …(inaudible)… turbines will be placed that put the residences in the 50-decibel zone. They asked for 40, settled for 50. And now that they have bought and bulldozed several residences, they would not have placed any turbines closer to an average 35-decibel rating. There are significant sleep problems and health issues that occur with over 60 percent of the residents that reside near that 22-turbine wind farm. There are also errors in the sound measurement predictions or models. A second opinion, I believe, should be added to the EIS to improve the current model and move forward. Other mitigation measures, we need to move turbines far enough from homes that an average 35-decibel rating can occur. But, in essence, moving to a 35-decibel rating, that may allow residents to reasonably live with the turbines, there won't be many turbines to construct. This should tell us that this is not the site to place turbines in the area where people live. T22-3 NOI-1 T22-4 NOI-2

On 3.7 Land and Shoreline, 3.7.1.2 Environmental Impacts of the Proposed Action, on the Direct Impacts, I quote "The proposed wind turbines would be significantly larger than surrounding structures. While this difference in scale would generate additional impacts, it would not inherently conflict with rural land use patterns. Many T22-5 LU-1

agricultural activities include associated large structures and mechanical/industrial equipment; such appurtenances may be considered to be a characteristic or element of rural character." Are they suggesting that 190-foot tower structures, that spin between 10 and 23 times each minute, have flashing red lights at night and white during the day, will be considered part of a rural element or character. The towers are industrial in nature; make no mistake about that impact. The DEIS should treat them as wind factories. T22-5 LU-1 Cont.

May I also suggest that we should really look at the impact of wind turbines in the larger context that they could have …(inaudible)… uses. If there were only participating farmers in the area, I might agree with that. But there's only eight participating farmers in the area and the rest of us are captives. Wind turbines would be located at least a thousand feet from the existing residences and 200, 250 feet from non-public right-of-way and adjoining non-project property lines. Basically it's gonna affect all of the adjoining properties from using their property to its fullest extent. And from a safety reason we'll want to have a thousand foot setback that will cause 700 feet of our land not to be used to its full extent. T22-6 LU-5

The indirect impacts, the DEIS discusses the impact compatibility and incompatibility for residences and suggests by placing turbines here it will encourage agricultural uses and stop the growth of residential use. I agree completely. Who in their right mind would buy land and build their home, their dreams, …(inaudible). I sure in the hell wouldn't if I would have known they were gonna be around me. They go on to suggest some nearby rural residence uses that …(inaudible)… incompatible could seek to relocate. How dare they. This would be an adverse impact to these property owners. Over 90 percent of the residents in this area are small ranchers with horses, small wheat fields and some cattle. In the DEIS it suggests the possibility of over 90 percent of the residents in the area should relocate is a bust. In essence, they're telling us turbines are not compatible with residential ranch use. And based on this, this application should be pulled and the wind farm resisted. T22-7 LU-2

Property values, I'm skipping over in my notes to property values. In the Lincoln Township, after two years, homes one-half mile away from a turbine lost value of 26 percent. Homes with, within 1 mile of wind factories lost 18 percent. I did not find this addressed in the DEIS as I mentioned, but there needs to be mitigation for homeowners. And my suggestion is that each parcel be valued based on the real estate assessment and a market value analysis to find an appropriate selling price. For those residents where impact is incompatible with their residential lifestyle, enXco will buy up the property. For those who choose to stay and lose value over time they should also be T22-8 NS-1

compensated and enXco would have to post a bond to ensure money was available to the wind factory victims. It seems fair, since enXco is convinced that the wind factories will have no effect on property values that they should [Applause] and this does need to be addressed in the DEIS. Thank you. T22-8 NS-1 Cont.

Clay White: Thank you. Desmond Knudson.

Desmond Knudson: Desmond Knudson, 1661 Vantage Highway, Ellensburg, Washington. I support the draft ESI and will comment on some items of it, but (inaudible). Let's start with 1.10, we have people who want to lease and we have the resource to make this leasable. My number one thing, if it's leased it's going to give economical benefit to this county. It's gonna give instant money, not over 15, 20, 30, 40 years. A lot of these people who are against these things have not ever lived here or lived here a short time. I've lived here over 40 years and the wind blows all the time, it's a resource we have. We want to harvest it. **T23** T23-1 VB-3

Safety and health issues. In layman's terms, yeah, I guess if you stand under them and a piece of ice falls on you you're gonna get hurt. We need to make sure the distances are far enough for a reasonable engineer to predict. This is not a flying airplane that will throw ice; these things are sitting still and it's a given how far it will go. They are also safe and not harmful to health because they're on private property, they're not on public property. They're not something you go tour, they're not something you go driving around on. If the private property owner does not want you on their property, please don't go. It's that simple. T23-2 HS-3

They are a positive tax base. In other words, they put money into our tax base and they do not detract from it. In other words, I do not have to hire more deputies, I do not have to hire more police, I do not have to hire more ambulances, I don't have to hire more doctors. You know why? Because these things don't take those things. T23-3 FIS-1

I would like to see the mitigation on the fire side. Let's put 5,000 homes up there, which would be approximately the same amount to drive that economical device, and let's see how many fires you get then. People, kids, animals, bonfires, garbage pails, miscellaneous other cigarette butts. You get the point. T23-4 PSU-2

I see a lot of 'what if' on property values. Well I believe there's a couple of individuals that are very hopeful to all these things and they're not here anymore. You know why, because they sold their property. Anywhere from 3 to 10 times what they paid for it. Public record. Go look at the assessor's office. T23-5 NS-1

Our biggest driving machine in this county happens to be Central Washington University. They are what pay people to live here and those people, most of them live in the city or out in the county …(inaudible). It is not an issue whether they are paying the T23-6 VB-6

rent or not, they are paying, the government pays our way around here. So we need something that is privately owned, not paid for by the government and whether they're getting tax benefits or not, I believe the coal, nuclear and those type of industries have billions of dollars in tax breaks …(inaudible)… our faithful President. So most importantly, the tax issue is, it's positive for this county. Most importantly, these things were based on Forest and Range land and that is where they want to be located. Now, because people have decided to live in their second homes around there and want to deny people who've lived there their whole life the opportunity to make money off their land, I think they need to reexamine their values. [Applause] T23-6 VB-6 Cont.

Clay White: Thank you. We've made it through the sign-up list. Is there anyone else that wishes to speak? I'll certainly have time, you know, just so you understand we want, if people that are gonna come up and speak we want them directly related to the environmental impact statement as closely as possible, for specific information, so that when we do a response document we can, you know, view as much complete information as possible so that we address your specific comments. I'm just gonna go ahead and start on this side of the room and kind of work my way over and if anybody changes their mind we'll give everyone an opportunity to speak tonight. Is there anybody?

T24

Woody Woodcock: My name's Woody Woodcock, 6202 Smithson Road. And I just sort of threw some stuff together here so pardon my rambling on it, but I'd like to start with page 1-4 of the Chapter 1.4 Kittitas County Objectives. "The County's criteria with respect to making a decision on these proposed actions are as follows," blahdy, blahdy, blah, "the project is not detrimental to or injurious to the health, the peace, safety or character of the surrounding neighborhood." Why are we even here? A few people speak up for it, usually attached to the money, and a lot of people whose home or sanctuary happens to be there speak against it. If that's one of your prime objectives, this should be done already, this whole process. T24-1 EIS-4

As far as their footprint, they quote 5,237 acres. But if you look at this it skips around, it's not one footprint. I happen to own the 80 acres in between one of the skips. Come up to my western edge, skip over, take off from the eastern edge. This is multiple footprint and there's a lot more people affected. I think if you go through the addresses there, you'll see that. This thing is sited right below the two largest foothill communities in this valley. It makes no sense. T24-2 PD-9

I agree with Miss Morrison and everybody else that spoke up in terms of us getting more tax money out of it, but a lot of the numbers that are said are the first year of operation. And I was under the impression that this is a 30-year project, which T24-3 FIS-2

depreciates down to 20 percent of its value. I'm not an accountant, I haven't checked into all that. But that would be a lot less as far as the cost analysis goes than those big numbers right now. T24-3 FIS-2

I appreciate Mr. De Palma speaking out with some empathy for the other side of the valley. Right now this is localized but as this unfolds, especially if it gets to the point where power is erected, people are gonna come unglued. Those of us that have lived here long enough remember the Nicholson Boulevard thing where they threw up these power poles and all of a sudden everybody just went ballistic, to the point of getting them rerouted.

Mr. Bates, I think, talked about setbacks and if this were to come to pass, I think the absolute minimum setback should be 2,000 feet of property lines, not the existing residences. And if you go to existing residences, that minimizes or detracts from somebody's property value. Building up close to what the county setback is …(inaudible)… whatever …(inaudible). T24-4 LU-5

The property values, I've got to side with Roger Weaver on that. I mean, I tried selling a piece of ground a few, about a year and a half ago and probably one in three people have called, "Can you see those damn wind farms from there?" "Yeah, but this was the Sagebrush piece. Yeah, they're about 5 miles away," click. To me that's 33 percent of the calls. T24-5 NS-1

Miss Morrison, Bertha Morrison, agreed that it's a pretty impressive impact statement. I see on page v or 5 in the beginning of this stuff, the county says that it's, it calls it the impact statement. I don't know if this automatically becomes the environmental impact statement or if it stays a draft and there's a whole 'nother part of the process that has to receive public comment before it becomes actually final.

Clay White: That's what we're doing tonight.

Woody Woodcock: Okay, so this, what you're taking in tonight will then become grounds for the final impact statement?

Clay White: Correct.

Woody Woodcock: And there's no substantive review needed from that?

Clay White: Well, sir, the County …(inaudible).

Woody Woodcock: But not the public impact?

Clay White: …(inaudible).

Woody Woodcock: This is it, it's not what you finally come up with?

Clay White: There's a whole series of public hearings that will be coming in the next few months. This is the meeting on the Draft Environmental Impact Statement.

Woody Woodcock: Okay. Mr. Lind's comment on the dust I thought was just wonderful, because in here Table 1-1 on page 1-10 says that turbine operation would not increase the normal dispersion of dust and pollen and would not result in dust-related impacts for residences near the project area. T24-6 AQ-1

I see my 1-minute sign is up. I think, at this point, I'm for wind power - it might not sound like it - but this is the wrong place. The county has some wonderful ground where the wind does blow, I agree with Mr. Knudson, not all the time, but often. And this should be sited somewhere or something should be sited so the county could get a good look at it and come up with their own studies. Does the dust blow, what about shadow flicker, what about whirling blades, flashing lights, 400-foot turbines? You could park …(inaudible)… underneath one and it wouldn't even come close to the top of the flag. These things are huge, two-thirds as tall as the Space Needle, almost. And we're gonna have over a hundred of them. Cumulative impact, you're talking just this one may be safe for us, there's a clause in their application that says we'll extend it if we can get landowners to sign on. How come they don't talk about that …(inaudible)… coming closer to town? [Applause] T24-7 SO-6

Clay White: Thank you very much for your comments.

Helen Wise: I'm Helen Wise. I live at 1106 East 3rd Avenue, Ellensburg. I've lived in Ellensburg more than 50 years. I feel it's a wonderful place to be. It's a different place then when I came here 50 years ago and there are lots of things here that have disturbed the pristine …(inaudible). I suspect I was one of those who added we were in Mountain View and that …(inaudible). But back to the DEIS. I plan to refer particularly to …(inaudible)… actually I very much agree with who said this is an incredibly detailed study, a thorough, thorough study and what so impressed me was …(inaudible)… the shadow flicker that we are so concerned about. Of course I, I buy flicker, those little things that hang down outside your window and the sun hits them and they flicker, but that's beside the point. The shadow flicker section in the appendix has 38 pages of very detailed analysis and three pages of summary. What it comes down to is shadow flicker duration is for 9 of the receptors, or people who would see the shadow flicker, for 9 of them it would be 5 hours a year, for 14 it would be 5 to 10. For 13 area places, as I understand it, as I understand it, for 13 of them, 10 to 20 hours a year, for 3 of them, 20 to 30 hours a year. And none of them would affect anything over 30 hours a year. Am I reading this totally wrong? That's what it says, shadow flicker duration …(inaudible). That's what it says, the shadow flicker duration, in hours per year and the number of people or households that would be affected. So I think that's pretty thorough when you go to 38 pages of very detailed observations. **T25** T25-1 HS-7

Anyway, it said there is a very small percentage of our electricity that is generated by wind. This is not at all surprising. It's a new form of generation of wind and some places are …(inaudible)… for visual impacts, that's the only, the only real objection to these wind farms. And it will take awhile for us to get a bigger percentage of our electricity produced by wind power. And it will have to come because we can't dam any more places, we are going to be running out of oil and natural gas in a very few decades, we should not be dependent on foreign oil and it's going come to foreign oil …(inaudible). So we're going to have wind power and solar power for …(inaudible)… next. We've got to have those things if we are to survive …(inaudible)… for my self, for my children, for my grandchildren and great grandchildren and for everybody in the community and in our nation in our world. We need to go to a new kind of power generation. [Applause] Thank you. T25-2 SO-3

Clay White: Do we have someone who hasn't spoken before?

Felicia Persson: My name is Felicia Persson, I live at 3561 Robbins Road in Ellensburg and I'm just gonna expand upon a couple of topics that have been hit on. This environmental impact statement is much more comprehensive than is the one provided by Zilkha. I've got a couple of technical corrections I believe. On Table 1-1, the summary in Chapter 1, overall, doesn't adequately describe the adverse impacts that are addressed. The impacts discussed in detail seem to transfer over to that table as insignificant with adequate mitigation. While they're much, the mitigation measures are either lacking or completely inadequate in Chapter 3. Specifically the table reports on page 1-20 I believe that several simple practical options exist for controlling or preventing shadow flicker at the source. This is in direct contradiction and I believe in error to what's been done in this Chapter 3. According to mitigation measures described in Chapter 3 at 3.8.5.3, two potential mitigation measures discussed are mitigation at the source. And the conclusions there are one is not feasible and the other's viability with respect to project cost has not been evaluated. In other words that one might cost too much. The DEIS states that several practical options exist to reset the locations. All of these involve controlling or preventing the flicker from entering residences through windows. It is not practical to assume that residents will or should be inside their homes when light and wind conditions promote shadow flicker. These options are not feasible or practical and they place the responsibility for mitigation of impacts upon the recipients. **T26** T26-1 HS-8

Table 1-1 is also contradictory in its comparisons to summary of vegetation, it is apparent that the Wild Horse alternative described there and the Desert Claim are not similar, various percentages of vegetation occurring in each of those areas. And in fact Wild Horse has no wetlands at all and a completely different diversification of vegetation. T26-2 PA-22

But then following that in the bird section and on that same summary table it states that the bird impacts at Wild Horse, at Wild Horse alternative, will be the same due to similar vegetation. T26-2 PA-22 Cont.

Also, in general, the alternatives described in this EIS are not realistically representative of the proposed project, and so are really not comparable. We talked about if you looked at the footprint of this project, it looks like a patchwork quilt, it's not like any of the alternatives or the, the Kittitas Valley power project. The project site is identified as 5,237 acres, however the entire collection facility envelops many more. And it actually consists of probably 4 or 5 micro sites that are not connected. That effectively surrounds many unwilling participant landowners. The EIS refers to non-participating landowners, I think that term should be replaced throughout the document with unwilling participants. Or as …(inaudible)… said, captives. Because there are effectively 4 or 5 micro projects the accumulative impacts and mitigation measures should be addressed for those captive properties. The disassociative properties of Desert Claim add a completely different dimension and make it non-comparable [Applause]. Thank you. T26-3 EIS-12

Clay White: Is there anyone who hasn't spoken?

Keith Johnson: I'm Keith Johnson, 3050 Airport Road in Cle Elum. And I'm speaking on behalf of the Kittitas Audubon Society Chapter of Kittitas County. And our mission in the Kittitas Audubon Society is to develop an appreciation for nature through education and conservation of local birds. And on that subject of conservation, we talked about a lot of people have talked tonight about the EIS and power supplies that come from …(inaudible)… whatever. Both in this DEIS and the one for the Kittitas Valley, there wasn't any mention in their statements about a conservation policy, like a national conservation policy or maybe an upgrading of the grid system that would more than offset the need for the power that's going to be generated by this facility, so I think conservation is a big issue on that alternative. **T27** T27-1 ALT-5

The section 3.4.3.3 Impacts of Alternatives, I have the same disagreement with (inaudible) on that section. The no action alternative, they summarize that gas-fired power plants will have to be built if this plant or this wind farm isn't built. And again, there's no statement in there about conservation (inaudible) any other policy to offset power from the wind farm. T27-2 ALT-1

On the studies we agreed with other comments tonight, Kittitas Audubon Society believes all of these need 2-year, all-weather studies. None of these studies have indicated any nighttime observation of migrating birds, bats, and I believe there are T27-3 PA-1

…(inaudible)… know it all, going through in the nighttime. And I believe there are technologies, bird whatever technologies to do those studies. T27-3 PA-1 Cont.

The bald eagle kill is classified in this EIS as minimal and maybe one every 6 years, at least one every 2 years at the most. And our Christmas bird count, this is the 26th year we've done it and …(inaudible)… this year we went out on the 20th of December and have spotted 11 bald eagles on that day …(inaudible). Six of those 11 are on the north side of the valley and on the wind power area and west of them. The majority of the bald eagles that we spotted were in that area in most cases. Everybody knows the 20th of December and I wonder …(inaudible)… if they were really this in 2 years or more of a 3-minute timeframe on the point survey. Maybe they would see more bald eagles in that area again if they participated (inaudible). T27-4 PA-13

[END OF SIDE 2, TAPE 1]

Well, we've noticed, we've noted bald eagles from November on into the April timeframe, so I think they're here a lot earlier than in mid February. Um, decommissioning and I'm, I would like to state that we've spent a lot of time - this is a voluntary organization - so we've been spending a lot of time trying to get our comments in on Kittitas Valley and we're just getting going on this one. So, and we hope to get our good and final comments in by the end of this period (inaudible).

And, with decommissioning, I don't see anything of the brief time I've looked at this DEIS, there's nothing to remove or change or stop, particularly turbines or a string of turbines if they are killing birds, bats, eagles or whatever. And I think you know we'd recommend this be included somehow in the decommissioning plan. Some of the things that we did comment to the Kittitas Valley, which I think are specific to here. The specific action should be identified to minimize harm to eagles. And a turbine decommissioning plan should be specified …(inaudible)… bald eagle, which are a threatened species. And let's see, the lack of nighttime assessment and, and I think that's a pretty important one that we specified and we'll do to this EIS also. T27-5 PA-17

KAS urges that all possible and reasonable steps including the no action alternative be taken based on scientifically valid wildlife studies to ensure that the site is safe for the wildlife. And if there is a technical advisory committee set up, if this does become reality, that we be included as a member of the committee. T27-6 PA-4

Clay White: Thank you. Thank you very much. Is there anybody that has not spoken that would like to speak? We're gonna start taking these in the back.

Ron Nelson: Good evening, I'm Ron Nelson, 1140 Thorp Highway North. And I've lived there about 4 years. One of the reasons I moved to this area is because I've **T28**

lived in Seattle all my life except for when I was in college and 2 years when I was out of the country. And we, we had a nice, kind of an old stadium down there in the Rainier area called Sicks Stadium, and that's where we had to go for baseball and what not. And we were really encouraged when the Kingdome plan was made and, and, and I really enjoyed having an indoor stadium and one of the reasons I left the area is because of, the people that came in and, and forced the, the demolition of that stadium and the construction of the two that we have now. I mean we voted it down and the State and Paul Allen, with their money and their power, forced our hand. And I came in, in here kind of neutral on the issue with wind power. But I sense this same power struggle taking place here and I'm, I'm beginning to, to oppose now to the Desert Claim project for this reason. And I, I appreciate Helen Wise and others like her that point out that we need to have solar energy and energy alternatives. But I think it could be done in a cooperative and collaborative manner. And when Chris Taylor said just two days ago that we can't wait forever, my reaction was, well then take off. [Applause] T28-1 SO-5

I called Clay White a few days ago, or a few weeks ago and asked him if there was any provision for the decommissioning of these things in the event that they were abandoned, and he assured me that there was going to be money set aside by Zilkha or whoever, that it would be required of them to have money in the, in the agreement for the decommissioning of its towers. And I don't see that that's the case, but this is what I mean by forcing our hand, you know we're being promised anything. And I, I just don't feel that's right, I think that, that there ought to be a way to cooperate and collaborate with all the powers that, that we don't have to, to, to play a power struggle, and I'm not talking about electricity here. I do not understand the Daily Record, they run articles that are against the wind power yet they continue to be supportive of the wind power. They want to compare these towers to the tension lines that we have running across the state and I don't see the comparison. Like he pointed out we have 121 towers that, they're two-thirds the size of the Space Needle, I mean and they want to compare that to the high tension lines that are running across our, our, our land. I think it's possible that Zilkha and the others will be out of it as soon as those things are constructed, they're, they're out of here. And we'll, we'll end up buying these things. He wants to sell those to Puget Sound Energy and as soon as Puget Sound Energy purchases them, we'll be purchasing them with our bill, our electric rates. That's all I have. T28-2 PD-3

Clay White: Thank you. [Applause]

Chris Cole: My name is Chris Cole and I'm representing myself and my companion, Roger Binette. And my name is spelled C-o-l-e. (Inaudible)… at this time when emotions run high on both sides of the wind turbine issue. With the negative side **T29**

outweighing any positive good for the sites it should be imperative that other sites and surveys be used as references and resources. Those sites that are already in place at locations around the globe must be heeded as a warning for what is intended here, not including them in any DEIS creates a bias and inadequate survey. The survey such as what was done in Wisconsin resulted in a moratorium on any further construction that should be taken seriously. Studies and surveys in the U.S. as well as in Ireland and England that show wind turbines are being injurious to the population of livestock and wildlife, must be heeded as a warning for what is intended here. EIS sites through …(inaudible)… tunnel vision like your culprit in some cases, but not to use all available resources for the sites intended here is unconscionable.

The fuzzy logic that because we already have population growth …(inaudible)… cell towers and more lights that we should become accustomed to additional structures and let's make them big and amusing but also extremely scary. The additional fuzzy logic is that property values will not sustain any blows because current sales have been profitable is just plain outlandish. Who knows if …(inaudible)… even aware of what is proposed. Bamboozle, snake oil and hypnosis open the mind and we succumb to the power of what to …(inaudible)… susceptible when the promise of economic growth reaches its tentacles and says that embracing …(inaudible)… entangling snare. Dr. Holly Pinkart's testimony on microbiology and the potential drift and the turbines don't seem to be taken seriously because it isn't what is wanted to be heard. However, she does not have a national reputation and large grant monies for the studies she headed on a whim. Obviously, someone cares about our health and safety from threats that appear small and insignificant because the creatures are small but certainly not insignificant. The populace on this side of the Cascades may be small in number compared to Western Washington, but we are not insignificant. Our lifestyle …(inaudible)… and our choice to live in this county is not because we are hicks and insignificant, but because we know how wondrous it is and how fortunate we are. We don't think that an attack on how we and our children live is insignificant to a blatant opinion that doesn't count for much. The group called ROKT (R-O-K-T) and others continue to rebut the flowery claims of greatness for the turbines with documentation that …(inaudible)…but is dismissive of the …(inaudible)…which is ludicrous. Listen to the …(inaudible)… experience where turbines are already in place; these folks have first-hand knowledge of the damage that is occurring. The accounts of the people working in industry of electrical engineering and power companies in order …(inaudible)…were that turbines are a sorry source of economic benefit and don't buy into it, and won't buy into it because they don't buy it and are being ignored. Why? It all comes down to money and

T29-1
EIS-1

federal taxpayer subsidies. How shameful. Should our governing bodies force these issues on us and then leave when their terms are up and move on to other jobs so their legacy of what they have done is in our memories, on our lands and within our sight?

We have a natural corridor for wind, but by the same token a wind tunnel for wildfires. Our fire marshal …(inaudible)… and not take it as insignificant. That is where it comes down to our families or homes and the land and the money and justifiably so. T29-2 HS-1

The eagles and hawks and other birds that fly past our …(inaudible)… that will be level in elevation to the tops of the proposed towers that are not insignificant. Ridgelines, which are perceived as barren by some or …(inaudible)… by others, should not be dismissed as inevitable. There are flight paths for great birds and burrows for their prey. The relationship between the two must be acknowledged, it is their inherent lifestyle and we must allow them to have the same consideration and value that we want for our own lifestyles and ourselves. Put the turbines along the coastline where the breezes are constant and …(inaudible)… high-rise corporations and the public that they don't feel is significant. The green energy proposed comes with the noise of a rock crushing plant as described by residents in Wisconsin. What once started out as a possible and noble experiment to harness the wind to…(inaudible)… monster is now loose. T29-3 PA-13

On a lighter note and maybe appropriately, and one we haven't even talked about as a very serious one, is a study by Washington State University and the Department of Ecology that features enough livestock waste along with …(inaudible)… byproduct in Eastern Washington to power between 4 in 10 homes in the State. When the actual clean energy is processed the result is a new and recyclable product just from the scooping and cutting. It would require processing and of course several EIS studies and public opinion, the figures …(inaudible)… benefit from ranchers and dairy owners that …(inaudible)… can handle and the reduction of complaints from neighbors nearby. Roads, electrical, and water power already exist and are available for use for plants and buildings. Transport vehicles already exist. What a waste of waste that can be pulverized, palletized and otherwise processed for use. We don't want our farmers and ranchers to suffer the inabilities nor the dairies to be short milk and cheese. Why not reward their exhaustive days with the sweet smell of money well spent on a real renewable and sustainable fuel. Often in …(inaudible)… that four legged rule …(inaudible). T29-4 ALT-5

Clay White: Thank you very much. [Applause]

Chris Cole: Included in that was a 76 page study by the Department of Ecology and WSU.

Clay White: Is there anybody else… who would like to speak?

Dan Quinn: My name is Dan Quinn, 501 Kimberly Lane, here in Ellensburg. I live about 2 miles from these towers and for the record I will see these towers. The EIS in the …(inaudible)… non-significance. When these towers go up they're not gonna cause more fire hazard. The turbines are gonna be turning because of the wind, the wind is going to be blowing the fire. If anything the roads that will be put in zigzagging the property will work as a fire break and at least slow it down, also provide more access for the fire crews. So I can understand the non-significance of that. **T30** T30-1 HS-1

The non-significance of the property values, somebody quoted $10,000 per acre; I live 2 miles from there and 4 years ago I paid $4,000 dollars per acre. And the recession that Enron and other things helped deflect, that affected my property values. There's nothing we can do about that. Property values are an investment. Some are good, some are bad. In 4 years since we lived at our property, the property right down the road, my in-laws have bought for $16,000 less than what it was on the market for when I looked at it. And one reason: the economy. The wind power is not going to change that. T30-2 NS-1

Somebody made the comment about the miniscule amount of electricity. I don't think Zilkha or enXco is gonna invest over $100 million per site for a miniscule amount of electricity. The wind that blows creates the electricity, creates revenue, they're gonna make a profit, it's gonna go into our tax base. It's gonna be a quality effect for our economy around here. The people that are gonna work there and build it, that's, that's money in our pockets, we could earn a living and live close to home. T30-2 VB-3

The EPA, Department of Fisheries, Department of Ecology, they're gonna monitor what these people are doing, they're gonna protect people's wealth, they're gonna monitor the dust and what's going on with the strings, there's agencies in charge of that. Our other choice is gas turbines and nuclear plants. I've worked in oil refineries and co-generation plants, the maintenance and the waste products that come out of those are far more detrimental than us losing our view up there on that valley. These things aren't going to affect my view, but a nuclear plant and a coal-fired plant and a natural gas plant affects my children and my grand children that I'll have some day. Look at what Chernobyl did, look at what Three-Mile Island did, that stuff's in our water system and it's circulating around the world in our atmosphere. There is nothing that these wind turbines are gonna do that's gonna go around the world besides put electricity in the system and help society. I want it to be on record to say I will sacrifice part of my view, and it may cost me some property values, but they're not gonna kill anybody, they're not gonna poison my kids, and it will put a, a revenue into our county. T30-4 SO-3

The subsidy generated by the, somebody mentioned up in Alaska—revenue coming in from that, that's not a bad idea, but it can't be so detrimental that it makes it not worth them to do business here. Other than that I just, I want to be on record saying I don't want to be the person that had a, had an impact on a nuclear plant affecting somebody else's family and somebody else's county. Thank you. [Applause] T30-4 SO-3 Cont.

Clay White: Is there anyone else who hasn't spoken who wishes to speak tonight? I thank everyone for coming out tonight. If you have a quick comment that's related to the DEIS and not related to other people's comments, you're welcome to come up and, and give a brief comment.

Jack Boyovich: My name is David Jack Boyovich, I reside at 18830 Reecer Creek Road. I spoke earlier and one of the things that I wanted to ask this gentlemen over here was resolved by another person that was up here, and it was the tax base. And if I'm reading that EIS correctly, that tax base that Desert Claim EIS put out states that it's paying for $1.1 million in taxes the first year. And that is on a decreasing annual basis. In other words, $1.1 million this year, $1 million next year, $900,000 a year after that, etc., etc. That leads me to believe that the tax base is not gonna be as viable as everybody seems to think in the Kittitas Valley. **T12 Cont.** T12-4 FIS-2

One of the other things that I wanted to say was I, I'd like to ask anybody in this room, anybody, do they know where this power is gonna go? Who's gonna buy it? Well I know for a fact the PUD's not gonna buy it, I've already talked to them. I don't know about Puget Sound Energy. So if this power goes into the system it's not going here. So if you people think you're gonna get lower, lower rates on, on your lights, forget it, it's not gonna be here. It's either gonna go west, south or east. T12-5 PD-6

One of the other things that I wanted to say was, I'm not totally opposed to the wind farms, what I'm opposed to is where you guys are putting them. Desert Air needs to start looking at the Wild Horse, Whiskey Dick, Ryegrass area. That has the least amount of impact on the least amount of people. Where you're planning on putting these things, all you're doing is pitting family against family, farmer against farmer, and it's not doing anybody a bit of good. You guys just move those things, you'll probably get a favorable vote out of an awful lot of people that have stood up here and said that they're totally opposed to them. I'd almost bet money on it. [Applause] T12-6 SO-4

Clay White: Thank you very much for your comments tonight. I appreciate all of you coming. Again, the comment period does not end until January 30th, so any comments that you have may be submitted to the Community Development Services Department. We're gonna recess this meeting till 9:30, we'll officially close the meeting then since we sent a legal notice that it'll be open till 9:30. Thank you very much.

[Recorder off]

Clay White: It is 9:29, seeing that no one else has questions we're gonna close this public meeting. This is Clay White for the record.

[END OF RECODING]