

Response to
Kittitas Valley Wind Power Project DEIS Draft December 2003

RECEIVED

DEC 24 2003

From
Roy Draper
608 East 2nd St.
Ellensburg, WA

ENERGY FACILITY SITE
EVALUATION COUNCIL

I have been a resident of the Kittitas Valley since 1942. Except for the time, I was in the Corps and four years in Seattle. I couldn't wait to return to the Kittitas Valley and raise my family here. We plan to stay.

The beauty Kittitas Valley grows on you, returning from short trips away the feeling one gets when they come over the top and look out across our pristine valley always give our residents the fantastic feeling "I'm home."

The Kittitas Valley Wind Power Project DEIO statement says off site alternatives do not satisfy the Current Proposal. I believe you should change your proposal. Your current proposal does not fit areas in question with out causing considerable damage to our valleys best-known qualities it's views. There are not many areas in this state or elsewhere where there is such a wide verity of scenery. Where the great number of differing people can see their own idea of the wild beauty nature has bestowed to our diverse landscapes. There are numerous ways for people look at the landscapes and what they see. One may look upon a pile of manure and that is all they see while another may see a way to make money from it while yet others will see it as a source of pollution. I see a lot of playing on words with in this report .I also see as expected that it is written from what I see as the projects point of view. One of the best illustrations I find is in the depicted pictures with visual quality bars below. It is obvious that who ever made the comparison didn't have or care much about what the towers did to skyline or ridge tops even from a distance. The towers only devastate the view

People do not have to walk or hike miles or even get out of their cars when traveling thru our valley to truly enjoy their surroundings. We have good roads, well maintained gravel roads that will take them to places where they can get close up views of our open grass valleys and rolling hills with mountains in the back ground. It is like opening a history book of photographs. Our picturesque valley with its surrounding hills and wild life is

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truly something to see. Yes, we do have power line towers running through or valley but at least they are held pretty much to in one corridor not spread out over every ridge top or filling the valleys spoiling the landscape. Yes after 40 or fifty years, we are used to them and pay little attention to them but most of the people in this valley don't want to spoil the view for the next 100 years. What beauty is there in looking at 400' tall wind generating towers? Especially when they are scattered over every ridge top or fill a preteen grass valley as in your deputations in figure's 3.9-14*, 3.9-23, 3.9-25, 3.9-25, 3.9-27, 3.9-28 3.14-4, 3.14-5, 3.14-6, 3.14-8, 3.9-15, 3.9, 3.9-17, 3.9-18,3.9-19, 3.9-20, 3.9-21.

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cont.

Another concern to me is that with your meteorological gathering from your data systems will be used to implement an attempt to install additional towers in the future. It only goes to reason that once you get towers in an area and find they work well to want to capitalize on the resource. This really scares me. I can vision doubling the number of towers in fifteen to twenty years. Once towers are in place, it would be that much harder to stop any expansion of the project. I just see more and more towers being added.

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People traveling through our alley remember it. Of those people who stay for a short while whether visiting, going to collage or working in the area seam to want to return once they have moved on, and many do. People just seem to fall in love with the tranquility and beauty You don't have to be naturist a hiker, back packer or hunter to enjoy the magnificent views from almost any place. Looking at the pictures, you have submitted showing what your towers will look like truly shows how little you care. These towers make even our ugly transmission line towers look small and some of them are 200 feet tall and you want to go as high as 400 feet? Then you say the views are only low to moderately affected by insertion of the towers. You must think the people of the Kittitas County just fell off the turnip truck .At least give us some credit for being able to see and being able to distinguish what looks good or bad! We are not apposed to wind power generators but we are concerned about where they are placed and their effect upon the scenic views of our valley. Your towers could be better hidden from the major throughways so they do not blight our landscape.

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People looking to buy property and build homes, look not only at the location and usability they look at the view they will have from their dream home. I don't believe that

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looking out and seeing 200 to 400 foot steel towers scattered across the ridges or filling the valleys is what they have in mind. That adds to property value loss any way you look at it. In 1.9.4 health and safety Chapter 1 summary, you talk about potential shower flicker within 2000 feet of the wind turbines. You say this will be occurring for a varying of hours each year, it is my impression that this flicker will happen any time the turbines propeller turning or generating power. Possibility even at the low speeds before the generator kicks in. If memory serves me right. It has to do with the generators blades cutting or disrupting radio transmission signals. These flicker zones surely would have an effect on land values in each area. This tells me that there will be a cumulative impact on land values in the project areas. 1.9.9 Visual Resources. Your statement, "Wild Horse project is located far from the other two and in an entirely different portion of the landscape, it has limited potential to be seen in the same view as the other two projects. Travelers on Interstate 90 (I-90), however would be likely to recall having seen a collection of wind turbines a few minutes before seeing more wind turbines. This progressive realization could leave the impression with some viewers that wind turbines are plentiful in the Kittitas valley." My feeling or thoughts would be "How in the world did the people around here let someone put something like right there, it ruins such a beautiful view.

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Statements taken from other areas that have wind power towers really has nothing to do with this project. This project must stand on it's own. It must satisfy the local community and local rules and regulations. The people of the Kittitas Valley have a right to pass judgment on the project and it's effects to all its citizens. We have elected people to represent us and given them authority to control local construction, industries to be allowed, and activities with in our borders while retaining our right to voice our opinions on each and every major event that comes before them.

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Another item I haven't heard much about is electrical rates and the effect this Project will have for the local area. I don't see any. The Power will be put in the grid and sold to the highest bidder. We give up our pristine views and property values so that someone else can buy electrical power generated in our back yard. High priced power supported by Government subsidy just doesn't seem like a good trade off. Wind power if it is so well excepted and profitable should be able to standalone. Washington State has for years

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Individual Letter 1

shared its hydroelectric power with the rest of the Nation. However when the powers to be expand this sharing of wind power with out looking at the cost to the areas where it in generated and the cost to the people and their way of life is a slap in the face to our citizenry.

That sounds to me like, you got it we want it and we're going to take it. It's happened before and if we are unable to stop it now I see it happening again.

I am totally opposed to the Kittitas Valley Wind Power Project as it is presented in this draft.

Roy Draper

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cont.

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Makarow, Irina (EFSEC)

From: Mike Nienaber [wallaceranch@hotmail.com]
Posted At: Tuesday, December 23, 2003 1:27 PM
Conversation: KV Wind Power Project
Posted To: EFSEC
Subject: KV Wind Power Project

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DEC 24 2003

ENERGY FACILITY SITE
EVALUATION COUNCIL

Mr. Allen J. Fiksdal, Manager, EFSEC

Dear Mr. Fiksdal:

Our family has owned a ranch in the footprint of the subject project for over 40 years. We will not have turbines on our property for a number of geographic and other reasons. However, many of our neighbors will have turbines sited on their property, well within our viewshed. Fortunately, they will have the economic benefits from the power produced.

It could be argued that we will suffer from the change in scenery and lack of participation in the revenue generated. We disagree. First, we will benefit from a broader base of electrical generation. We will benefit from an influx of tax dollars and jobs into Kittitas County. Finally, we will benefit from an influx of tourism from the Seattle area. In the same way that people love to visit hydro-electric plants to see where their electricity comes from, we believe they will do the same in Kittitas County.

We believe it will be a win/win for all citizens, both in and out of Kittitas County.

We request a positive vote in favor of this project.

Enthusiastically,

Mike Nienaber

Nienaber Advertising Inc. & Wallace Ranch LLC
7829 NE 14th St. Medina, WA. 98039
(425) 455-9881 FAX (425) 646-8714
wallaceranch@hotmail.com

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12/26/2003

481

Message

Page 1 of 2

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JAN 05 2004 104

Makarow, Irina (EFSEC)

From: Fiksdal, Allen (EFSEC)
Sent: Monday, January 05, 2004 8:37 AM
To: Makarow, Irina (EFSEC)
Subject: FW: Our Personal Response to Environmental Impact Statement on Wind Turbines

ENERGY FACILITY SITE EVALUATION COUNCIL

Kittitas Valley Wind PP DEIS Comment - Indiv. 3

-----Original Message-----

From: Chris [mailto:fiber@elltel.net]
Sent: Saturday, January 03, 2004 8:38 AM
To: Perry Huston; Max Galloday; Ed Garrett; ROKT; Fiksdal, Allen (EFSEC); Ann Essko; John Lane; Clay White; Debbie Strand; James Carmody; Bruce Coe
Subject: Our Personal Response to Environmental Impact Statement on Wind Turbines

To all concerned:

Most of the EIS makes us literally, ill. To say that the impact is, in our words, palatable, is nauseating. When talking with some of the folks doing the study for the statement, they could not come to our homes since it was private property. A phone call requesting permission would have had them up here in an instant to see just with what we will be faced. In addition, we were told no other completed projects nor studies could be used as information for these particular proposed local sites, nor historical information used regarding prior construction background statistics by the requesting companies. We find this rather odd but perhaps it is tangled up with legalities which, if true, is a tragic disservice to this community.

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We live north of Smithson Road and will have these overpowering structures in full view, mostly at eye level with the tops no matter which direction we look. The spectacular view we now have that will be destroyed. That is no small thing because it is one reason many live here. We came back home here because of that pristine view and the atmosphere that makes this valley so unique and beautiful. And, NO, we would not have purchased this home and property let alone done so much renovations had these turbines already been in place, thus, the former owner would probably still be trying to sell.

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Our county officials had better take a long, hard look at the moratorium placed on any new turbine construction by the Township of Lincoln in Kewaunee County, Wisconsin. Their document is so demoralizing, downright scary and summarizes existing problems based on a survey of direct impacts to residents. Inability to get away from the noise, shadow flicker, blinking lights and the reduction of homes assessed value and sales decreased to 78% from 104% are only a few items stated in the survey of what has already taken place. Quoting one family response: "Our whole family has been affected. My husband just went to the doctor because of his stomach. He hates them. We have fights all the time about them. It's terrible. Why

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1/5/2004

did you put them so close to our new home and expect us to live a normal life. If it isn't the shadows it's the damn noise. The only people that think they are so great and wonderful are those who really don't know." Another resident stated that "Anyone that thinks there aren't going to be problems resulting from the turbines has got another guess coming. She said that she and other residents felt like the bad guys for opposing the turbine project and warning other residents that the project would spell disaster. She said she hates now that what they feared has come true; there isn't any self-satisfaction in being able to say, "I told you so." The study is overwhelming and the negative effects residents are experiencing should be taken as an extreme warning.

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cont.

We are all creatures of this Earth, whether human or otherwise, and to say that the expendable life of other species such as our birds and wildlife is ok because the added impact is negligible is callous and the EIS can describe all it wants as far as how minimal the impacts might or would be. The already existing sites around the globe show otherwise when you hear from folks who now must live in their shadow, within hearing, and feel the impact, their animals and wildlife included. Don't foist this irreparable damage on this valley and it's inhabitants, human or otherwise. We really don't want the sadness nor self-satisfaction in saying "We told you so."

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The moratorium report lists Dale Massey, Lincoln Township clerk: 920-837-7298 as the source for additional information requests.

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Sincerely,

Chris Cole and Roger Binette
7430 Robbins Rd
Ellensburg, Wa. 98926

509 933-2371

1/5/2004

Makarow, Irina (EFSEC)

From: Dan Green Jr [DanJr@NorthendRental.com]
Posted At: Monday, January 05, 2004 1:44 PM
Conversation: Kittitas Valley Wind Power Project
Posted To: EFSEC
Subject: Kittitas Valley Wind Power Project

Mr. Fiksdal –

I am strongly in favor of the Wind Power Project. There is clearly no other method of power generation that has a smaller environmental impact – both during construction and in its ongoing use. They would be far more aesthetically pleasing than the myriad of high-voltage power-transmission towers and lines that run throughout the area and would provide local jobs. These are facts. All that is being accomplished by delaying this project is wasting time and money – both public and private. This is also a fact. This project needs to get underway now.

Daniel A Green Jr
10929 30th Drive SE
Everett, WA 98203

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JAN 05 REC'D 104

ENERGY FACILITY SITE
EVALUATION COUNCIL

1/5/2004

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement



Name: Daniel A. Green Jr

Address: 10929 30th Drive SE Everett WA 98203
(Please include your Zip!)

**Please write any comments you have with respect to the
Kittitas Valley Wind Power Project DEIS
below and leave this sheet in the Comment Box.**

The DEIS has rigorously proven far beyond any reasonable
doubts that this project is environmentally friendly during
all phases of its implementation - construction, use + long-
term maintenance. The only arguments against this project
boil down to surrounding landowners not wanting to look
at the windmills. These are the same people that have
views of the much more intrusive, not to mention pervasive,
power-transmission lines + towers which already criss-cross
the entire area. People that will not directly financially
benefit from this project. I say directly because the
entire region will benefit in the form of taxes + jobs.

Use the back of this form if you need more room for your comments. (over)

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
 Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
 call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

484

The anti's attempt to refute the work of top experts with opinions and conjecture clearly demonstrates the lack of substance to their arguments and objections.

No one has ever checked with any other surrounding landowners before felling trees on their own property, or building a house - things directly affecting the view of others.

Nothing new will be found from any further studies. This DEIS should be finalized + adopted and the project should proceed without any further delays.

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JAN 16 2004
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EVALUATION COUNCIL

Kittitas Valley Wind PP
DEIS Comment - Indiv. 6

Makarow, Irina (EFSEC)

From: Dan Green Sr [DanSr@NorthendRental.com]
Posted At: Monday, January 05, 2004 12:22 PM
Conversation: Kittitas Valley Wind Power Project
Posted To: EFSEC
Subject: Kittitas Valley Wind Power Project

Dear Mr. Fiksdal,

This is to express my enthusiastic support for this project. We are desperate for power sources in this country and wind power is the way of the future. This project is not only a step in the direction of helping alleviate some of the electrical power shortages but it is the most environmentally sound approach. Add to this an economic boon to Kittitas County and the urgency for its immediate construction becomes paramount.

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Daniel A. Green
715 Carp Lake Road
Camano Island, WA 98282

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ENERGY FACILITY SITE
EVALUATION COUNCIL

1/5/2004

405



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement

Name: DANIEL A. GREEN
Address: 715 CARP LAKE Rd. COMMAND ISLAND, WA 98282
(Please include your Zip!)

Please write any comments you have with respect to the
Kittitas Valley Wind Power Project DEIS
below and leave this sheet in the Comment Box.

The DEIS has demonstrated that the Wind Project
is a viable enterprise and no further time
should be wasted in getting it started. I listened
to the emotional pleas and arguments in this
session and came away astounded at the
attempts to suffocate progress with the
use of rhetoric. Each and every individual
against this project attempted to refute
the studies done by the foremost authorities
in their respective fields and their
credentials are non-existent. I am certain

Use the back of this form if you need more room for your comments. (COVER)

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

The Commission sees this and fully understands that this project and any like them are crucial to the future of this community, State and Country.

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cont.

All their arguments ignore the rights of the property owners that want the project to go forward and are bolstered with confidence due to the DEIS.

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JAN 16 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

Kittitas Valley Wind PP
DEIS Comment - Indiv. 8

January 5, 2004

Dear Allen J. Fiksdal,

I am a landowner effected by the Kittitas Valley Wind Power Project. I write in support of this project. Our country needs to become more self sufficient concerning energy resources. With the world becomming increasingly unstable, here in Kittitas County with the Kittitas Valley Wind Power Project, we can help not only the people who live in our county but also the energy needs of America. I am shocked that there is any opposition to the creation of such a clean energy source. The negative consequences of America's reliance on foreign oil has never been clearer than in this past year. We cannot continue to base our ability to access energy on relationships with foreign powers alone. I support the projects full and quick implementation because of the good it will do my neighbors, the pride it would reflect on my county, and the patriotism it shows for my country.

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Sincerely,

KARL KROGSTAD

homeowner in Roslyn,

landowner within Valley Wind Power Project

mailing address P.O.BOX 95260, Seattle 98145

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2004

JAN 07 DECT

ENERGY FACILITY SITE
EVALUATION COUNCIL

1497

Makarow, Irina (EFSEC)

From: Mitch [meffman@kvalley.com]
Posted At: Thursday, January 08, 2004 10:15 PM
Conversation: wind farm comments
Posted To: EFSEC
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.

mitch meffert
ellensburg, wa
962-5046

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ENERGY FACILITY SITE
EVALUATION COUNCIL

1/9/2004

Makarow, Irina (EFSEC)

From: Mitch [meffman@kvalley.com]
Sent: Monday, January 19, 2004 9:22 PM
To: Makarow, Irina (EFSEC)
Cc: Fiksdal, Allen (EFSEC); clayw@co.kittitas.wa.us
Subject: wind farms

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. 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. 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

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JAN 20 2004
ENERGY FACILITY SITE
EVALUATION COUNCIL

1/20/2004

Al & Diane Schwab
P O Box 290
Maple Valley, Wa. 98038

425-432-3667

**MR. ALLEN FIKSDAL
MANAGER EFSEC
P O BOX 43172
OLYMPIA, WA. 98504-3172**

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JAN - 9 2004

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

DEAR MR. FIKSDAL

WE HAVE READ THE EIS AS SUBMITTED BY SAGEBRUSH POWER PARTNERS FOR THE KITTITAS VALLEY WIND POWER PROJECT AND WE MUST SAY. WE ARE VERY DISAPPOINTED THAT THE ISSUES WERE NOT ADDRESSED AS WE HAD HOPED.

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WE FIND THE EIS TO BE FULL OF SCARE TACTICS, INACCURATE, AND NOT ADDRESSING THE REAL ISSUES AS WE HAVE BEEN STATING FOR THE LAST ALMOST TWO YEARS.

ON THE ORIGINAL APPLICATION IN EXHIBIT 21-1 THEY CLEARLY STATE THAT FROM OUR LOCATION, WE WILL SEE 85-116 OF THE WIND TURBINES. WE HAVE FIFTY ACRES, THE LOCATION OF OUR PENDING HOUSE WOULD BE 500 FEET FROM THE CLOSEST TURBINE, THEY BASED THEIR EIS SECTION 3.12-10 THAT WE WILL BE SOME 2000 FEET AWAY, THIS IS NOT TRUE. HOW COULD THEY EVEN KNOW WHERE OUR HOUSE IS TO BE PLACED? WE HAVE NEIGHBORS THAT WILL BE 164 FEET AWAY FROM TURBINES YET SAGEBRUSH CLAIMS THAT THEY WILL NOT BE ANY CLOSER THAN THE HEIGHT OF THE WIND MILL. ON PAGE 2-9 THEY CLAIM THAT THE WINDMILLS WILL BE NO CLOSER THAN 1000 FEET FROM RESIDENCES. WHICH OF THESE FACTS IS TRUE? THEY SPEAK ABOUT EXISTING RESIDENCES, WHAT ABOUT US PEOPLE THAT HAVE HELD OFF IN BUILDING BECAUSE WE NEEDED TO KNOW WHERE AND IF THESE WIND MILLS WERE GOING TO GO IN. THIS EIS CLEARLY SHOWS US THAT ZILKHA CARES NOTHING ABOUT THE POPULATION IN GENERAL ESPECIALLY US PEOPLE WHO WILL LIVE ON ADJOINING LAND TO THEIR WIND MILLS.

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ZILKHA CLAIMS THAT THE SHADOW FLICKER, FLASHING LIGHTS, NOISE ETC. END UP BEING NON ISSUES. WHEN THEY HELD THEIR FIRST MEETING IN CLEELUM, THESE ISSUES WERE BROUGHT UP AND THEY DANCED AROUND THEM SAYING THAT THESE TURBINES DO NOT MAKE NOISE, DO NOT THROW ICE, DO NOT GET HIT BY LIGHTNING ,THE SHADOW FLICKER DOES NOT BOTHER PEOPLE. NOW IN THIS EIS THE STORY HAS ONCE AGAIN CHANGED, NOW THESE ARE ISSUES. IN 3.12.5 THEY CLAIM "WITH IMPLEMENTATION OF THE PROPOSED AND RECOMMENDED MITIGATION MEASURES OUTLINED ABOVE, NO

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4/20/07

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS FROM NOISE ASSOCIATED WITH CONSTRUCTION, OPERATING, OR DECOMMISSIONING OF THE PROPOSED PROJECT WOULD BE ANTICIPATED". WHEN THE WIND BLOWS, WE WILL STILL HEAR THE WHUMP, WHUMP, OF SEVERAL TURBINES AT 50-55 DECIBELS, DAY AND NIGHT. WE FIND THAT TO BE A PROBLEM THEY INTEND TO BLAST FOR EIGHT WEEKS DURING CONSTRUCTION, BUT BLASTING ACTIVITIES ARE SPECIFICALLY EXEMPT FROM NOISE REGULATION. WE CAN TELL YOU RIGHT NOW, WE CAN HEAR TRAFFIC NOISE FROM BLEWETT PASS ON A QUIET DAY, CAN YOU IMAGINE WHAT IT WILL BE LIKE WITH BULLDOZERS, FRONT END LOADERS, TRUCKS, GRADERS, SHOVELS, PORTABLE GENERATORS, MOBILE CRANES, CONCRETE PUMPS, TRACTORS AND THEN TO TOP IT OFF, BLASTING UP TO 37.5 BLASTS PER WEEK GOING OFF. THEN THEY TELL US THEY MAY HAVE TO WORK 24-7 TO COMPLETE THE JOB IN THEIR ALLOTTED TIME FRAME. IN ANOTHER SECTION THEY CLAIM THEY WILL ONLY WORK DURING DAYLITE HOURS. HOW ARE WE SUPPOSED TO TOLERATE ALL THIS NOISE, EVEN THOUGH THEY CLAIM THERE WILL BE NO IMPACT OF NOISE?

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cont.

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IN SECTION 3.7-9 THEY STATE THAT THEIR IN-MIGRANT POPULATION WOULD INCREASE 16-23 INDIVIDUALS, YET EARLIER IN THE EIS SECTION 3.7.18 THEY CLAIM THAT THESE TURBINES WOULD CREATE THESE NEW JOBS. IT DOESN'T DO ANY GOOD TO CREATE NEW JOBS WHEN THEY WILL BE HELD BY NEW PEOPLE BROUGHT INTO THE COUNTY. THEIR ORIGINAL APPLICATION CLEARLY GIVES THE IMPRESSION THESE NEW JOBS WOULD BE FILLED BY LOCAL INDIVIDUALS.

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IN REGARD TO PROPERTY TAXES, THE FACTS THAT WERE INCLUDED IN THIS EIS WERE BASED ON PEOPLE LIVING IN THE VIEW SHED. WHAT EXACTLY IS A VIEW SHED? WE USE COMMON SENSE AS OUR GUIDE AT IT TELLS US. IF OUR HOUSE IS 500 FEET FROM A STRING OF WIND MILLS AND IWE LOOK OUT OUR WINDOW AND CAN SEE 85-116 OF THESE WINDMILLS AND WE HEAR THE WHUMP WHUMP, AND WE HAVE THE FLASHING LIGHTS IN OUR FACE AND WE HAVE SHADOW FLICKER IN THE AFTERNOON, WHEN WE WOULD LIKE TO SIT ON OUR PORCH. WHO WOULD WANT TO BUY OUR HOUSE AND WHAT PRICE WOULD THEY PAY. THE PEOPLE WHO REALLY KNOW THE MARKET, OUR LOCAL REAL ESTATE AGENTS, CLAIM THAT THESE ADJOINING PROPERTIES WILL DECREASE IN VALUE AND WOULD BE HARD TO SELL. WE ALSO MUST ADD THAT WE CAN GO ON THE INTER-NET AND FIND SURVEY RESULTS THAT PROVE OUR POINT, WHY DIDN'T ZILKHA LOOK AS WE HAVE AND BEEN HONEST ABOUT THIS SITUATION. THIS IS ANOTHER INDICATION THAT THEY ARE ONLY STATING THE FACTS THAT MAKE THEM LOOK GOOD. WHAT ABOUT THE REAL FACTS?

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IN SECTION 3.9.3 THEY CLAIM "THERE IS LITTLE THAT CAN BE

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DONE TO MITIGATE THE VISUAL IMPACT OF A WIND TURBINE". THEY ALSO CLAIM IN SECTION 3.9.13 THAT "GIVEN THE RESTRICTED ACCESS TO THESE ROAD SEGMENTS AND THE SMALL NUMBER OF VIEWERS, THE SENSITIVITY TO VISUAL EFFECTS IS CLASSIFIED AS LOW". WE TAKE THAT TO MEAN THAT BECAUSE THERE ARE NOT THOUSANDS OF PEOPLE WHO ARE GOING TO SEE THESE WIND MILLS UP CLOSE IT IS GIVEN A CLASSIFICATION OF LOW. THIS IS NOT LOW TO US. WE WILL HAVE A VERY CLOSE UP VIEW, AND WHAT WE WOULD CALL EXTREME CLASSIFICATION.

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cont.

SECTION 3.9.2 THEY STATE THAT THERE IS NO SCENIC CORRIDOR MANAGEMENT PLAN FOR US 97, YES THIS IS PROBABLY TRUE, HOWEVER, US 97 WAS JUST RECENTLY DESIGNATED A SCENIC HIGHWAY AND THERE HAS NOT YET BEEN SUFFICIENT TIME FOR THE COUNTY TO DEVELOP A PLAN.

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AS FOR THEIR PLAN FOR FIRE PROTECTION, THEY CLAIM THAT THEY WILL HAVE AN EMERGENCY PLAN TO EVACUATE THEIR PEOPLE FROM THE AREA IN CASE OF FIRE. WHAT ABOUT US PEOPLE WHO WOULD BE TRAPPED, WHO IS GOING TO WORRY ABOUT OUR HOMES, OUR LIVES? ZILKHA MAKES ABSOLUTELY NO MENTION OF THE DANGER TO US. TO US, THIS MAKES THEIR PLAN INSUFFICIENT AND LACKING ANY SENSITIVITY TO US PEOPLE WHO WILL LIVE THERE.

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ZILKHA CLAIMS THAT THERE WILL BE NO NAVIGATIONAL HAZARDS. THIS IS NOT TRUE, WE SEE PEOPLE LAND ON THE PRIVATE DIRT AIRSTRIP ALL THE TIME. PRIVATE PLANES FLY QUITE LOW OVER THIS AREA DAILY. THE FACT THAT NAVIGATIONAL LIGHTS WILL BE REQUIRED ON THEIR TURBINES INDICATE TO US THAT THERE WILL BE A DANGER TO SMALL PLANES.

11

AS FAR AS THE SCARE TACTICS GO, THEY CLEARLY GIVE THE IMPRESSION THAT IF THEIR WIND MILLS DO NOT GO UP, THERE WILL NEED TO BE ANOTHER GAS FIRED PLANT BUILT, THIS 7000 ACRES WOULD BE DEVELOPED WITH HOUSES EVERYWHERE, THE KITTITAS VALLEY WOULD NOT BENEFIT FROM ALL THE MONEY IT WILL MAKE OFF THIS WIND FARM. SCARE TACTICS? IN OUR MIND THIS IS CLEARLY THE CASE.

12

THERE ARE MANY STATEMENTS THAT IF A CERTAIN SITUATION EXISTS IE TELEVISION INTERFERENCE, THAT THEY WILL TAKE ACTION TO MITIGATE THE PROBLEM. WHO IS GOING TO POLICE THIS COMPANY. WHO IS GOING TO CHECK UP ON THEM TO SEE IF THEY ARE TAKING CARE OF BUSINESS. I HAVE SPOKEN TO A PERSON WHO HAS A FARM LOCATED JUST OUTSIDE A WIND FARM IN CALIFORNIA. HE ADVISED US TO MITIGATE BEFORE CONSTRUCTION BECAUSE AFTER CONSTRUCTION IS COMPLETE, ITS TOO LATE. THE WIND MILL COMPANY COULD CARE LESS ABOUT HIS PROBLEMS CONNECTED TO THE WIND FARM. HE

13

ALSO SAYS THAT THE NOISE, SHADOW FLICKER ETC IS UNBEARABLE AT TIMES. HE CAN'T PULL THE SHADES DOWN 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". JUDGING FROM HIS EXPERIENCES, WE HAVE THE DISTINCT FEELING THAT IT WOULD BE UP TO US PROPERTY OWNERS TO SOLVE OUR OWN PROBLEMS. PERHAPS ZILKHA SHOULD STEP UP TO THE PLATE AND DO SOME MITIGATION BEFORE THEIR PLAN IS APPROVED. IF WIND MILLS GO IN, WE DO NOT WANT TO LIVE NEXT TO THEM. PAY US PEOPLE ON ADJOINING PROPERTIES CURRENT MARKET VALUE FOR OUR PROPERTY BEFORE ANY CONSTRUCTION IS STARTED. WE DO NOT WANT TO DO BATTLE FOR OUR REMAINING YEARS FIGHTING FOR OUR RIGHTS.

14

15

IN SUMMARY, THIS EIS TELLS US VERY LITTLE ABOUT THE TRUE FACTS, IS DISTORTED TO MAKE SAGEBRUSH POWER PARTNERS LOOK GOOD, 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 NEXT TO THESE TURBINES.

16

ENCLOSED ARE SOME PICTURES OF OUR VIEW, THIS WILL ALL BE DESTROYED SHOULD THIS WIND FARM BE APPROVED.

17

SINCERELY,

AL & DIANE SCHWAB

8

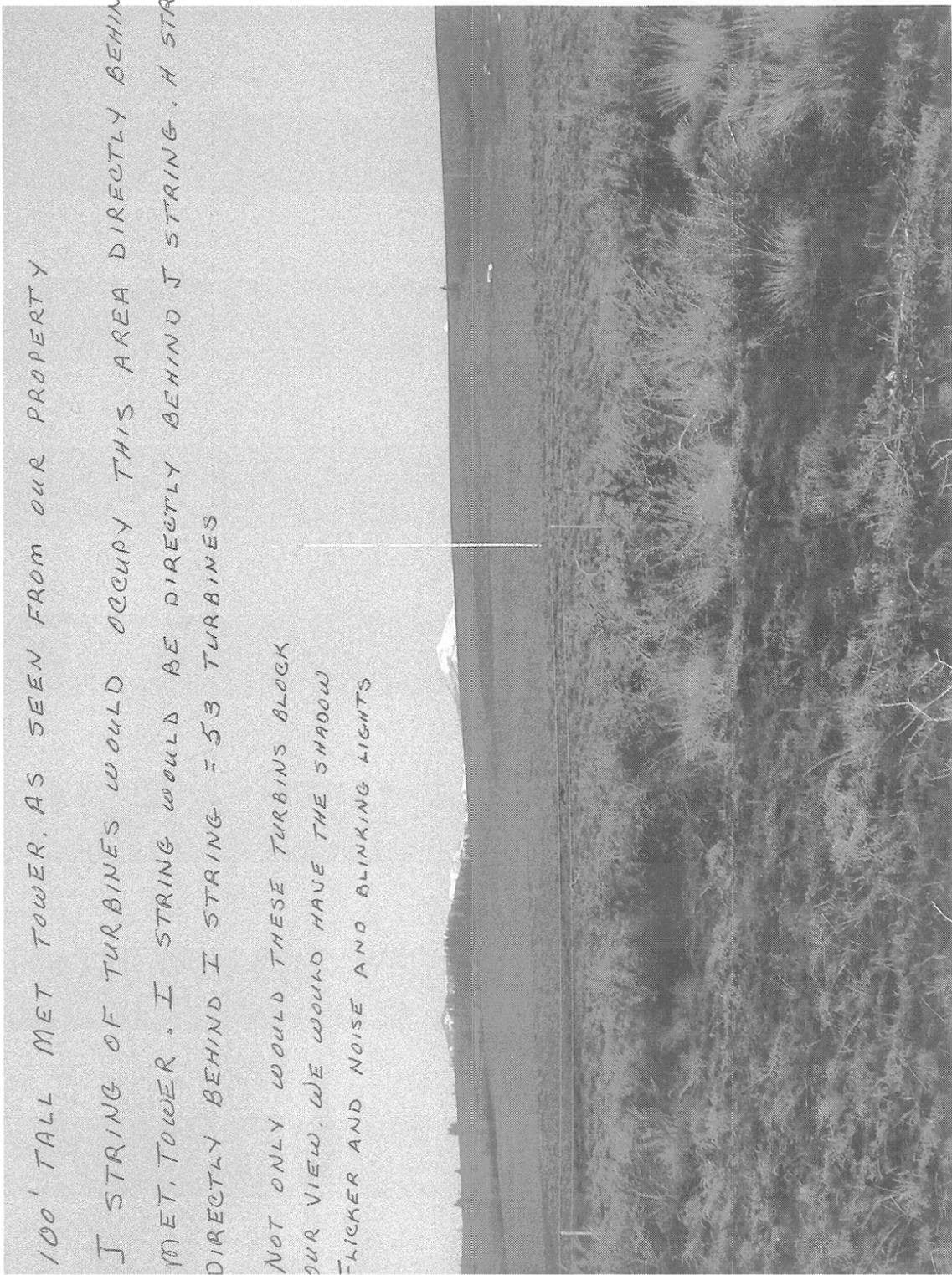
THESE VIEWS WOULD BE LOST. APPLICANT ALSO CLAIMS WE CAN'T SEE THE STUART RANGE, WRONG AGAIN



APPLICANT CLAIMS OUR VIEW IS BLOCKED BY POWER LINES. IF YOU LOOK CLOSELY, THEY ARE THERE, BUT, WE CAN SEE THROUGH THEM.



1-13-04



100' TALL MET TOWER, AS SEEN FROM OUR PROPERTY

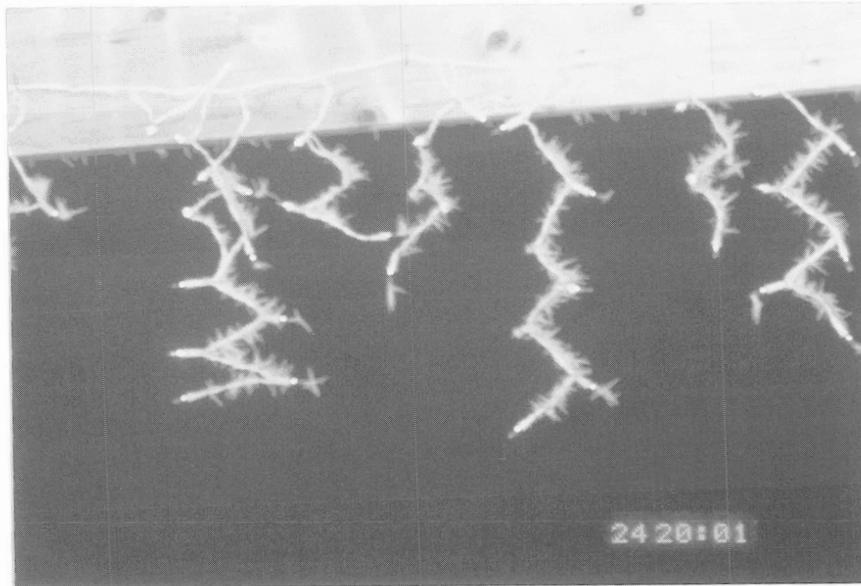
A STRING OF TURBINES WOULD OCCUPY THIS AREA DIRECTLY BEHIND MET. TOWER. A STRING WOULD BE DIRECTLY BEHIND A STRING DIRECTLY BEHIND A STRING = 53 TURBINES

NOT ONLY WOULD THESE TURBINES BLOCK OUR VIEW, WE WOULD HAVE THE SHADOW FLICKER AND NOISE AND BLINKING LIGHTS

1-12-04



ICE BUILD UP ON CHRISTMAS LIGHTS

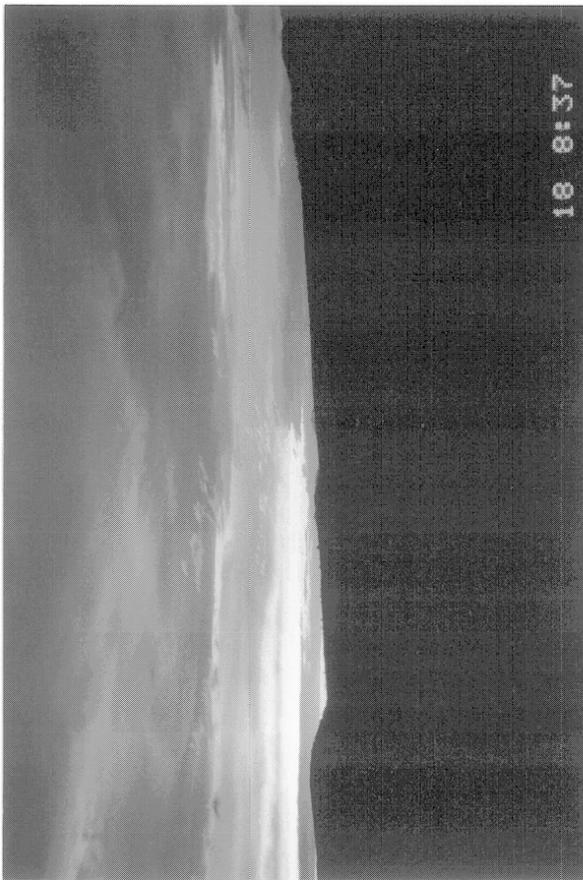
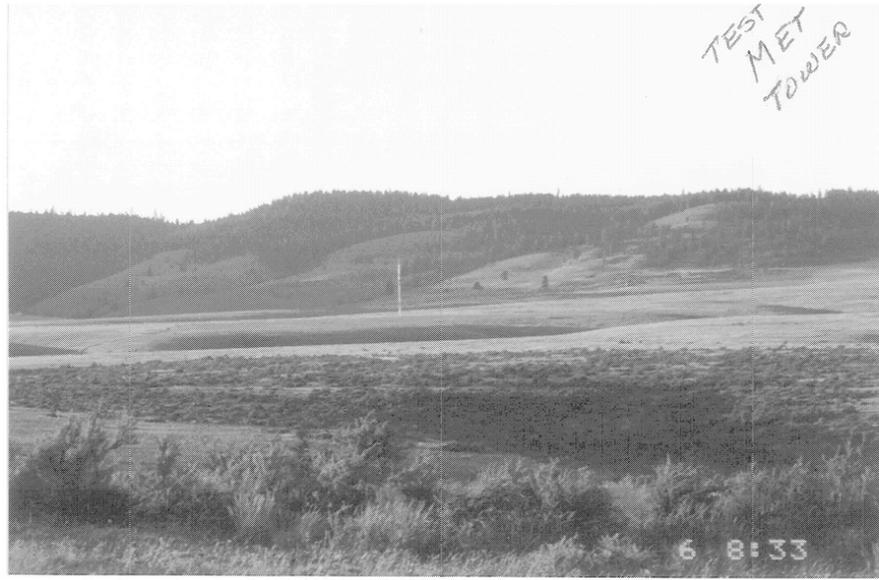


ICE BUILD UP ON CLUMP GRASS



THIS AREA IS 1000' HIGHER IN ELEVATION THAN
ELEVATION

THESE VIEWS WOULD BE LOST TO US



Individual Letter 11



*Looking
Toward
Elk Spire*

1-9-09



*X
is
where
turbine
will be
placed
Looking
North*

1-9-09



Looking West

zibba

Met tower - 1500' in the distance. This tower is 100' tall
We will see about 50+ turbines in this area

1-9-04



zibba



Looking
Tennessee
N.W.

1-9-a

Makarow, Irina (EFSEC)

RECEIVED

JAN 12 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

From: bbest@ellensburg.com
Posted At: Monday, January 12, 2004 3:28 PM
Conversation: DEIS Kittitas Valley Wind Power Project
Posted To: EFSEC
Subject: DEIS Kittitas Valley Wind Power Project

Sirs,

Thank you again for the opportunity to submit my thoughts regarding the Kittitas Valley Wind Power Project; adding to my comments submitted on April 14, 2003, these comments on the project DEIS.

- > I find the information to be very complete, forthright and thorough. 1
- > Regarding the impact to birds and wildlife, the impacts are within acceptable standards and seem to create far less impact in the long term, than would a home site on every 20 arces (aprox. 350 on 7000 acres), as allowed in the Kittitas County Growth Management Act. Interesting to note that no Bald Eagles have been documented as killed in the U.S. by wind machines. Impacts caused by the short term construction period will not be permanent, as I find by my own experience that wild animals tend to adjust quite well and do find other routes to avoid disturbances made by man. 2
- > As for 'shadow flicker', I really don't feel that is an issue in most cases, and would remind you that contrary to what some folks suggest, the applicant has set back standards of at least 1000 feet from any neighbor's (without signed agreements) residences, as well as a 50 foot, from tip of blade, set back from property boundries. "Bona fide", pre-wind farm proposal, permitted home sites (if that is the case), should be afforded the set back of at least 1000 feet. In my opinion, the flicker caused by sunlight filtering through trees moving in the wind can certainly at times, have more affect than that caused by moving blades on wind machines. As for flashing lights, that is already happening and I find that, a lot less disturbing than large outdoor lights being left on all night, every night at several homes in the area. 3
- > As for scenic views; from my home, I do have a view of most of the area on the east side of this project, including 6 sets of metal high power transmission lines and have learned to just look past them without any problem; the same can be done with the wind machines. I feel the shape and proposed color of the wind machines will probably blend with the surrounding area much better than the existing power lines do. 4
- > After the construction period, most land uses will remain the same; I feel the only real change would be the restriction on hunting with firearms and some people will lose what they seem to have considered their 'private' hunting areas on the DNR lands. I feel that alternative forms of hunting, such as archery should still be allowed on the DNR lands adjacent to the project. 5
- > A 2% loss of vegetation is acceptable, as will be the temporary loss of habitat on aprox. 371 acres during the construction phase (no loss of endangered plants is anticipated). Most all disturbed lands will be reseeded with native vegetation. No significant cumulative effects are anticipated on either the wetlands or water resources in the area. 6
- > Fire danger will be at the highest during the construction phase, especially if all three projects are being constructed at the same time, putting additional demand on fire fighting services. The study suggests that proper monitoring and patrolling of the project areas can greatly reduce that risk. 7
- > The applicant has in place a plan to decommission the wind machines, removing and dismanteling them to at least 3 feet below the ground surface and restoring the site to as close to pre-wind farm condition as possible. 8

4/17

Individual Letter 12

- > In a prior meeting, one of the officers of a utility considering on bidding on the power to be produced by this project, confirmed that if their company purchased the energy, it would most certainly be used locally, thereby saving costs of transporting it to other areas out of the state. 10
- > The Kittitas Valley will certainly benefit financially during the construction phase (aprox. \$5,797,000) directly and indirectly and during the first year of operation aprox. \$1,985,500 from this project alone. 11
- > It all boils down to: the negative impacts are far outweighed by the benefits. The needs of the many are far more important than the wants of a few. Historically, a few have been asked to sacrifice for the good of the many. 12

On behalf of myself and my family, I thank you for this opportunity to comment on this issue. Submitted this 12th day of Jan. 2004

Respectfully,

Bernice Best

210 Tomahawk Ln,

Ellensburg, WA 98926

509-962-2403

To: Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Washington 95804-3172

RECEIVED

JAN 13 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

Subject: Kittitas Valley Wind Power Project DEIS

From: Jim Stewart
P.O. Box 209
Cle Elum, Washington 98922

- (1) DEIS Section 2.7, page 2-40 states "The analysis discussed in additional detail below concludes that although other sites for wind power generation may exist in Kittitas County, none would satisfy the test for availability or practicality of the Sagebrush Power Partners LLC proposal."
 - (A) Sagebrush Power Partners LLC did NOT choose to receive site certification from EFSEC for the Kittitas Valley Wind Power Project.
 - (B) "Zilkha Renewable Energy chose to receive site certification from EFSEC for the Kittitas Valley Wind Power Project." Source 1
 - (1) Sagebrush Power Partners LLC and Wind Ridge Power Partners LLC are both wholly owned subsidiaries of Zilkha Renewable Energy.
 - (C) The assertion in (1) appears to be a misrepresentation of the facts.

1

Every business is a dictatorship, completely undemocratic in structure, ideology and procedure. The control over business policy by Zilkha Renewable Energy equates to central command over all of its' subsidiaries, employees and contractors, resulting in a coalition. Central command over the coalition gives way to massed strength which is the equivalent of political power. Power that can be used to influence legislation and command more or less exclusive use of the media for manipulating public opinion. The business is completely intolerant of all opposition from inside or outside the organization; or of any criticism which does not give credit to the advantage of the profit making possibilities of the enterprise. Source 2

2

Chris Taylor and the Zilkha Renewable Energy coalition have been trying to instill in our minds that they, as leaders in economic and political affairs, are endowed with inspired vision accompanied by their wide humanitarian interests. These would include our welfare, our quality of life and the environment. As leaders, they would practice the highest type of social ethics. This would include knowing the difference between what is error and false; and what is accurate and true.

- (2) Zilkha Renewable Energy 's KVVWPP is in non-compliance with Kittitas County zoning. The project is a major industrial activity.
 - (A) The Zilkha Renewable Energy coalition is attempting to minimize the negative impacts on the county, my neighbors, myself and a federally licensed radio station through their propoganda.

3

(B) It appears that the only valid criterion in their program for the public is: "What is effective? What will succeed? What will suppress, deflect, or undermine opposition? What will create a favorable attitude? If this means to suppress the truth and suggest the false, the same will be done. However, if this means to tell some portion, or on occasion all, of the truth, this in turn will be done. And if it means to so redefine the meaning of 'truth' that it becomes whatever is told by those able to enforce compliance with doctrine, then 'truth' will become, ipso facto, whatever is told the people." Source 2

3
cont.

(3) DEIS page 3.13-15 Microwave Communication Pathways

- (A) The Microwave Telecommunication Study was done for Zilkha Renewable Energy by ComSearch in Ashburn, Virginia for commercial communications...business for profit.
- (B) Their study did not take into account any emissions across the microwave portion of the radio spectrum allotted for federally licensed amateur radio use.
- (C) Their study shows parity for 'like humankind', a business for profit.
- (D) Their study shows total disregard for federally licensed radio stations which are not for profit.

4

(4) DEIS page 3.13-16&17 Radio Interference..." The question focuses on the possibility of the emission of "harmful interference" in the frequency band of interest to the local resident."

- (A) I am NOT speaking about the (one) "frequency band" that is alluded to by Shapiro&Associates.
- (B) I am speaking of many bands of interest and the use of the frequencies on those bands...160 meters, 80/75 meters, 40 meters, 30 meters, 20 meters, 17 meters, 15 meters, 12 meters, 10 meters, 6 meters, 2 meters, 70 centimeters...and the microwave bands from 1200 MHz to 10,000 MHz.
- (C) In addition, I am speaking about the sheer size and placement location of the turbines and towers for microwave communications...and degradation of the emission on HF (high frequency) by their presence.
- (D) The use of the amateur radio spectrum is for all federally licensed stations, if their class of license gives them privileges on that portion of the bands.
- (E) The DEIS states "the potential for the proposed wind power project to generate harmful interference and disrupt radio communications in the KVWWP area is identified as an unresolved issue."
 - (1) In the Kittitas County Development Activities Application GPO 8.62(f), it states "The project will not be detrimental to the use of properties in the immediate vicinity of the Project Area."
 - (2) In the absence of any information or study from Zilkha Renewable Energy, it appears that the project could pose a "detrimental" threat to the efficient operation of a federally licensed radio station.

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(5) DEIS Table 3.12-5 , page 3.12- 9 to 13 Predicted Noise Levels on the KVWWP Area

(A) A noise study done by taking sound level measurements at specific sites and using a computer model is only a prediction. It is only as accurate as the information put into it. The study could be “site specific”.

(1) Ellensburg Cement Products did a noise study for the Thomas Quarry site .They took their sound level measurements on Bettas Road and used a computer model.

(1) They contended that their ‘berm’ would block the majority of the noise. Their predictions seem accurate for the site tested on Bettas Road....as I can hear the crusher/ screening operation and the backup alarms from the machinery only faintly , when it is in operation.

(2) However, according to Kittitas County Ordinance No. 96-04 Thomas Quarry , it states “the crusher will be located at or below 2720 feet elevation ...so no line-of-sight exists between crusher and Steward (t) residence.” My residence elevation is approximately 2850 feet.

(1) From my residence, the crusher/screening operation is loud.I can hear the machinery in operation and the piercing sound of the backup alarms. I can see the scalehouse, machinery//trucks in view and the ‘berm’. The crusher/screening operation wakes me up in the morning.

If we are only speaking about dBA levels, why would the crusher/screening operation wake me up? A noise emanating from a source is usually composed of sounds of many frequencies and varying intensity. While the decibel is indicative of sound level, it tells nothing about the frequency distribution of the component frequencies. The response of the human ear to a certain sound pressure depends on the frequency of the sound.

(2) Zilkha Renewable Energy noise study used sound level measurements taken, in part , at Site A on Bettas Road and a computer model to come to their conclusions....which is similar to the Ellensburg Cement Products study.

(1) As in the case of the Ellensburg Cement Products noise study, I have line-of- sight to the east across the expanse of the Kittitas Valley and Ellensburg. I have an outstanding view from the top of a hill.

(2) The distance from the nearest turbine to my property line is “2856 feet” according to Table 3.12-5, which is just past ‘near field’ (2640 feet) for radio communications from my station.

(3) My ‘outstanding view’ will be compromised by the wall of turbines , because I will see the majority if not all of the turbines and towers in the KVWWP.

(4) DEIS page 3.12-8 states “A sound pressure level between 98 and 108 dBA is representative of the range of noise test data for all turbines under construction for the proposed project.”
(Sagebrush Power Partners LLC 2003f)

(3) Another noise study was done, by Andrew A. Piacsek, PhD, Assistant Professor of Physics,Central Washington University, for the Cascade Field & Stream Club, in their Kittitas County Development Activities Application.

The study used “measured sound levels” and “outdoor propagation models” to come to their conclusions for the proposed site.

- (a) In the “Summary”, it states (in part) “ there is a large amount of excess attenuation of gunshot sounds west and north of the proposed firing range ; this is primarily due to sound blockage by the terrain.”
- (b) In the “Conclusions”, it states (in part) “The measurements described above should be considered preliminary. Only SPL was measured; the waveform was not recorded, nor was any spectral analysis done.”
- (c) The proposed site is approximately 2 plus miles south of me, and I am downrange from the gunfire. I can hear the shots, when people are shooting down there.
 - (1) I have line-of-sight to the crest of the hill, ID #9 in the noise study , which shows a peak SPL of 92 dBA.

8
cont.

How does the Zilkha Renewable Energy coalition deny and minimize the noise to my residence and the harmful interference possibilities to a federally licensed radio station? They suppress the truth and suggest the false.

- (B) Source 2 of Table 3.12-5 in the DEIS “N/A indicates that aerial photography does not show a structure on the property.”
 - (1) Figure 3.9-2 Photograph Locations Within Project Area would affirm what is stated in Table 3.12-5 by Sagebrush Power Partners LLC... in that my residence and radio station do not exist.
 - (2) In Appendix D, Exhibit 21-2 (Sheet 2 of 5) under “Legend”, it shows a ‘square with a number. I am number 10...also referred to as Lot 11 Teanaway Heights (Unrecorded). For reference, Slim Jorgensen owns Lot 12 which is south of me.
 - (a) Number 11 is Jake’s place...on the west portion of Lot 8.
 - (b) Number 12 is Bill & Chris Hall...on Lot 9.
 - © Number 149 is Jackson.
 - (3) Contrary to the published information in Table 3.12-5, there is a “structure” at Jackson (#149), Zeller, Boyd & Twogood, L.Schaller, James Stewart (#10), Jakes place (#11) and Hall (#12).
 - (4) Archambeau sold his property in the Spring of 2003 to the Hendley Group. The property was developed and divided into parcels. The development is called Horse Canyon Estates. There are parcels on both sides of Bettas Road.
 - (5) The Anthony property was sold and has a new owner.
- (6) DEIS 3.9-1 Landscape Scenic Quality Scale
 - (A) As in the previous study, if Zilkha can deny that you exist and make other people believe it with their propaganda, they can also assert that you don’t have ‘an outstanding view from the top of a hill.’
 - (B) Contrary to their assertion, I do have an outstanding view from the top of a hill.. and it will be compromised.

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On the first level, the Zilkha Renewable Energy coalition is trying to persuade and educate us. What if their propoganda and pseudo studies don't convince us? Will they add coercion to their persuasion in order to force Kittitas County into submission? Incomplete and false information in the studies only shows the length that Zilkha Renewable Energy coalition will go in the fabrication of their pseudo studies. If a study is contracted out and paid for by the Zilkha coalition, is it impartial? The inaccuracies, incompleteness which includes the omissions in the study shows prejudice in favor of the applicant, Zilkha Renewable Energy.

12

It appears that the purpose of the DEIS is for the public to locate as much of the misinformation contained within it and make these comments to EFSEC.

13

I hope that this is not another 'exercise' in the union of a "condition" and a "myth". The "condition" represents no more than formal extension, through the machinery of the state, of the leading principles of business-as-usual to encompass the the entire population. And the "myth" is that interpretation of the business case which is designed to gain popular support. Source 2

14

'If we don't learn from the mistakes of history, we often repeat the mistakes of history.'

Sincerely,

Jim Stewart

Bibliography

Source 1 The DEIS

Source 2 Robert A. Brady, *The Spirit And Structure of German Fascism*, Viking Press; New York, 1937.

Source 3..... Melvin A. Bernarde, *Our Precarious Habitat*, W.W. Norton& Co., New York, 1970.

Source 4..... Kittitas County Ordinance No. 96-04

Source 5..... Cascade Field & Stream Club Development Activities Application

Makarow, Irina (EFSEC)

From: Jim Stewart [kk7vi@hotmail.com]
Posted At: Friday, January 16, 2004 11:31 AM
Conversation: further comments on KVVWP DEIS....
Posted To: EFSEC
Subject: further comments on KVVWP DEIS....

RECEIVED
JAN 20 2004
ENERGY FACILITY SITE
EVALUATION COUNCIL

To: Allen Fiksdal, Manager of EFSEC

In Regards: KVVWP DEIS

From: Jim Stewart
P.O.Box 209
Cle Elum, WA 98922

I submitted my written comments on the KVVWP DEIS to Irina at the meeting in Ellensburg last Tuesday night, January 13th, 2004. When I got up to speak, I started out with "I am really confused", and I was. I should have just read what I had written, and the four minutes allotted to speak went by quickly. Prior to the beginning of the meeting, I thought you said that Zilkha Renewable Energy supplies the State of Washington the funds (money) in order to contract out the publication of the DEIS by Shapiro & Associates? And you gestured, the relationship is at arms length'.

As I wrote in my comments, I took exception to some of the wording that Shapiro & Associates had expressed in the DEIS under item (4) Radio Interference. Under item (5)(B) Source 2 of Table 3.12-5 of the Noise Study, I submitted a list of the structures (with walls) in the area of my residence. The DEIS by Shapiro & Associates showed the placement of four of the seven structures. It has become crystal clear to me that what Professor Robert A. Brady wrote in his book "The Spirit And Structure of German Fascism" in 1937 (and I have stated in (2)(B)) is as true today as it was in his era.

On the last page of my written comments, I state "I hope that this is not another 'exercise' in the union of a "condition" and a "myth". The 'exercise' to which I refer is in fact "fascism". Professor Brady defines "fascism" as the "wedding of a 'condition' and a 'myth'".

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Sincerely,

Jim Stewart

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

1/20/2004

4/1/07

EFSEC CY
Corrected - E

Kittitas Valley Wind PP
DEIS Comment - Indiv. 15

January 9, 2004

RECEIVED

JAN 13 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

Allen J. Fiksdal
EFSEC Manager
925 Plum Street SE, Building 4
PO Box 43172
Olympia, WA 98504-3172

RE: DEIS Kittitas Valley Wind Power Project Comments

Dear Mr. Fiksdal,

After reviewing the DEIS document for the KVVPP, I have the following statements.

FACT SHEET

Applicant a/k/a Sagebrush Power Partners, LLC (Zilkha Renewable Energy) has stated numerous times to the public that this project would have minimal environmental impact. Applicant has stated the Highway 97 project area was the ONLY place that it can site a wind energy facility (windfarm). Applicant stressed that it would accomplish this minimal impact by using existing roads.

- *Section 3.2.5 Mitigation Measures, subsection on Project Design Features to Avoid and/or Minimize Impacts [page 3.2-53]* states, "Avoiding when possible, construction in sensitive areas ... " as well as "... minimizing new road construction by improving and using existing roads and trails instead of constructing new roads."
- *Page i of the Fact Sheet* now states that they will now need to build 19 MILES of new roads and improvements to 7 miles of existing roads (35 feet wide) as well as 23 miles of trenching for underground lines. This is not minimal impact. In fact the 19 miles of new road will parallel the two already-existing private roads which landowners currently use to access their properties. Those private roads are Elk Springs Road and Cricklewood Lane. The one existing public road - Bettas Road - will have to be substantially modified. The majority of the land around Cricklewood Lane is relatively undisturbed shrub steppe environment. Putting in miles of new roads and trenching will substantially alter and destroy that environment. It cannot be restored once it is gone. The Nature Conservancy is currently trying to save shrub steppe environments in the State of Washington.
- *Page 3.2-29* states, "The Washington Department of Fish and Wildlife (WDFW) is concerned about the project disturbance to lithosol soils (shrub steppe) because they are difficult to restore, sensitive, and may prove to be important in the life cycles in many animal species, including the sage grouse."

The Fact Sheet also mentions that a third scenario of using 3MW wind turbines may be considered. This is the first time Applicant has made public this scenario. This increases substantially all the concerns the public has brought to your attention since the first public scoping meeting. The turbines will now be bigger, some topping 410 feet, further increasing visual blight, public safety concerns, noise impacts and avian mortality. The several studies addressed in this DEIS were modeled around the smaller 1.3 MW wind turbines which are

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1/9/04

substantially smaller at 330 feet in height. This entire DEIS does not address the specific impacts of 410 foot turbines. I would suggest a new DEIS be generated that does its analysis and modeling around the larger machines. Mitigation strategies should also be modified to account for the increased impacts of using larger machines, specifically setbacks from residences and property lines.

2
cont.



400 ft. Turbine in England

CHAPTER 1: SUMMARY

SECTION 1.2 PURPOSE AND NEED FOR PROJECT [page 1-1] tries to make the case that we will need more base generation to absorb the growing demand for electricity and that this added generation should be from renewable sources. And this new generation - wind power - is preferable because "... there has been a proliferation of requests from electric utilities to purchase wind power." This statement is not fact and the economics of wind power should not be part of

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this DEIS. The preparer/author of this DEIS - Shapiro and Associates - failed to consider alternatives such conservation. Shapiro and Associates also failed to address the fact that wind power cannot be used for base generation due to its intermittency, inefficiency and unreliability. They make assumptions that base plate capacity of 180 Megawatts is what will be produced. Statistics consistently state that industrial wind turbines on average produce 30% at best of base plate capacity and only when the wind is blowing. Bottom line - Shapiro and Associated failed to do the research in this section that discusses the true need for this project, based on realistic numbers, and the fact that putting up an industrial wind farm has never replaced traditional forms of electrical generation. Finally, Shapiro and Associates failed to mention that Washington State already produces 60% of base generation from renewable resources, namely hydro power. That makes Washington State one of the "green energy" leaders in the nation.

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cont.
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Section 1.4.3 No Action Alternative [page 1-8] states that if the KVVWPP is not built, "... development by others, and of a different nature, including residential development, could occur at the project site in accordance with the County's existing Comprehensive Plan and zoning regulations." Residential development is occurring. That is exactly what is going on in the project area and why it is so zoned. There are about 60 established residences in and around the project area as well as numerous planned residences. Horse Canyon Estates is a development project in the making with 25 lots for sale and is located on both sides of Bettas Road! Lots are specifically advertised for mountain and terrestrial views and are selling for between \$69,000 to \$189,000. Currently, utility access and access roads are being built to accommodate the building of new residences. Numerous people have either full time or vacation homes on Elk Springs Road. Two landowners on Cricklewood Lane have filed site plans with the Kittitas County Planning Department to build potential homes.

6

Page 1-4, last paragraph states "The Applicant has obtained wind option agreements with landowners for all private lands within the project site boundary necessary for project installation." Shapiro and Associates fails to address those landowners who will have impacted property on that boundary. They fail to discuss that 13 landowners signed agreements. And that only 3 of those 13 actually live in the project area. The remaining 10 do not live there, and most of them don't even live in Kittitas County. Only those 13 landowners will be compensated for losing the use of their land to the detriment of hundreds of others. Shapiro and Associates completely glossed over the fact that about 60 landowners have properties on the project boundary and are opposed to the rezoning to allow industrial development in the area. Applicant has completely ignored the property rights of neighboring property owners and future plans to develop or build new homes.

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Section 1.4.3 No Action Alternative [page 1-8 & page 1-9] Shapiro and Associates makes the assumption that if the KVVWPP was not built, a gas fired combustion turbine facility of 60 MW capacity would have to be built somewhere else with disastrous negative impacts to the environment. This sentiment is riddled throughout this DEIS and is just not the case. Statements such as this lead me to believe that Shapiro and Associates are clearly swayed by the rhetoric of Applicant and is hardly impartial. We currently DO NOT have any shortage of electrical power in Washington State and planned new generation for growth is underway. EFSEC itself has recently sited two new conventional power plants (Sumas and Satsop) for just that purpose.

9

Section 1.4.2 Alternatives Considered but Rejected Subsection: Alternative Wind Turbine Locations [page 1-8] Shapiro and Associates again is only repeating Applicant's misinformation. The statement "The Applicant's proposal for the KVVWPP identified only the proposed project area for development" again is not true. If this were the case, why is the French company enXco filing for a zoning change for a wind resource zone right behind the Sagebrush

10

project area? And Zilkha Renewable Energy formed another LLC, Wind Ridge Power Partners, and filed with EFSEC to create the Wild Horse Wind Power Project outside of Kittitas. This proves that the KVVPP is not the only site, but in all actuality, it would be the most profitable with a high return on investment.

10
cont.

SECTION 1.5 SUMMARY OF PUBLIC INVOLVEMENT, CONSULTATION, AND COORDINATION [page 1-9 & page 1-10] Shapiro and Associates states that the Applicant is cooperating with the public and Indian tribes. But they fail to say this cooperation is very weak at best. The Yakama Nation has publicly stated that they are not for the development of industrial wind farms in the County. I have attended every public meeting and EFSEC hearing and there is little public support for this project other than from those landowners who signed agreements. Shapiro and Associates failed to mention all the negative feedback given by the public and in the local newspapers. They failed to mention that the Kittitas County Commissioners have an adequate process to site industrial wind farms with their new Utility Ordinance. Currently, the French wind developer enXco is using that process. Shapiro and Associates fail to say why Applicant is side stepping the local government and having EFSEC site this project.

11

SECTION 1.7 ISSUES TO BE RESOLVED

Section 1.7.2 Economic Effects of Lower and Upper End Scenarios [page 1-11] states "Although economic effects were fully quantified for the middle scenario, quantifiable economic impacts for the lower and upper end scenarios are not available at this time." The whole purpose of this DEIS is to address ALL IMPACTS at ALL levels. This is work not done and unacceptable.

12

Section 1.7.3 Economic and Environmental Effects on Tourism [page 1-11] is incomplete as well. There is ample evidence from the UK, Australia and Spain that industrial wind facilities affect tourism negatively. For Shapiro and Associates to state, "... in the absence of specific data, the potential economic and environmental effects on tourism are considered an issue of uncertainty that has yet to be resolved" is a gross oversight. And yet **Section 1.10.2 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS - Visual Resources** [page 1-21] states "For many viewers, the presence of the wind turbines represents a significant unavoidable adverse impact because it significantly alters the appearance of the rural landscape over a large area of the Kittitas Valley." Just this statement alone tells me local tourism will definitely be impacted. Ellensburg and Cle Elum economies are heavily based on tourism dollars. This DEIS fails to adequately address this issue completely and honestly.

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Table 1-3: Summary of Impacts and Mitigation [page 1-26 & 1-27]

Wildlife and Habitat It states "Based on the level of raptor use within the project area, raptor mortality is expected to be slightly higher that compared to other wind projects with similar turbine types." ... "It is likely that some bat fatalities would occur at the proposed project site."

Threatened and Endangered Species It states "Potential bald eagle mortality due to the project operation would be confined to the winter and early spring seasons." The Applicant proposes to convene a TEC (Technical Advisory Committee) to evaluate a monitoring program under the auspice of being a mitigation measure.

14

The remote chance that bald eagles could be harmed demands a thorough 2 year avian presence and migration study as recommended by the Kittitas Audubon Society and coordinated with the Washington Department of Wildlife. Twenty minute random car/site observations of birds are

not acceptable, no matter how many statistical games are played to use such phrases as 'low probability', 'potential mortality' and 'unlikely contact'.

14
cont.

Table 3.2.4: Potential Occurrence of Federal and State Protected Wildlife and Fish Species within the Project Area [pages 3.2-25 - 3.2-27] lists that there are about 11 federally and state protected birds that will likely be encountered in the proposed project area. The earlier study analysis by West, Inc is preposterous. A statistical numbers game is no substitute for real time studies day and night. Local organizations (Kittitas Audubon) and landowners should be consulted for known nests and migratory paths. Aerial observations are useless at best.

It is irresponsible for Shapiro and Associates to accept conclusions made by Applicant regarding this issue. The killing and maiming of bald eagles, golden eagles and turkey vultures are serious crimes punishable by imprisonment and heavy fines. The statement "Because there have been no documented bald eagle fatalities to date at wind power projects (Erickson, West Inc.) potential bald eagle mortality estimates based on other wind power projects could not be documented" on page 3.2-49 is about as irresponsible as you can get. I would think the reason there are no verified bald eagle kills is because the wind developers know if they were caught with one, someone might go to jail, pay a hefty fine, or be put under public scrutiny.

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Table 3.2-12: Summary of Fatalities at Operating Wind Power Projects ... [page 3.2-50] is a prime example of omission of facts. It states that only 1 golden eagle has been killed in 2 years at Foote Creek. While at Altamont Pass, CA, approximately 40 golden eagles die every year as a result of collisions with the wind turbines there. Hundreds of Red-tailed Hawks and other raptors suffer the same fate, as do smaller birds such as Meadowlarks. Those gleaming blades drip with blood. The fatality numbers have been documented by years of study performed under the auspices of the Avian Subcommittee of the National Wind Coordinating Council. How could a well-known fact like that be 'overlooked'?

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Shapiro and Associates goes on to say, on page 3.2-49 "Estimates of bird mortality from wind projects may be based on bird use of a site and the propensity for that species to fly within the rotor swept area or zone of risk. Seven observations of bald eagles were documented during the standardized point counts across the project area. Thirty three percent of eagles observed were flying within the project area within the 'zone of risk'."

Figure 3.2-3 APPROXIMATE PERCHES AND FLIGHT PATHS OF BALD EAGLES [page 3.2-14 (figure omits page number)] clearly shows bald eagle perching sites and migratory paths WITHIN the project zone. In Section 3.2.6 **Significant Unavoidable Adverse Impacts** [page 3.2-59] this unbelievable statement is made - "While potential bald eagle fatalities associated with the operation of the project are possible, the likelihood is considered remote because there have been no documented bald eagle fatalities at other wind power projects in the United States." This mantra is repeated numerous times. Shapiro and Associates must think we are idiots.

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Finally, on the eagle issue, bald eagles are very similar to golden eagles. Golden eagles are a threatened species so you wouldn't necessarily be prosecuted under the federal Bald Eagle Protection Act, so wind developers can show this:

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**Decapitated Golden Eagle
(Altamont Pass, CA)**



**2 Griffin Vultures
(Navarre, Spain)**

This whole bird study analysis is a red flag that is being swept under the carpet. West, Inc. advertises itself as experts in avian studies for siting wind farms. This is virtually all they do and most of the reports I have read all say the same thing and cite the same references. They throw out lots of numbers and statistics to just confuse the reader. You know the saying - "If you can't impress them with knowledge, dazzle them with BS." Why should West, Inc. care. They are not held accountable if their analysis 'is off'. Maybe EFSEC should require their accountability on this issue and fine them for every destroyed or injured raptor.

19

West, Inc. recently completed a draft EIS for enXco, a French wind developer who is planning a wind farm on Reecer Creek Road about 9 miles west of Ellensburg. Mitigation recommendations to reduce raptor's from encountering turbines included setting turbines back at least 50 METERS (165 feet) from rim edges and steep slopes. No such recommendation is being made for the Sagebrush Power project which is solely on the higher ridges. This makes no sense and Shapiro and Associates missed it completely.

Section 3.2.5 Mitigation Measures Proposed by the Applicant Subheading Noxious Weed Control [page 3.2-54] states that "noxious weed control measures include... cleaning construction vehicles prior to bringing them into the project area from outside areas." I would think that would take a lot of water resources. **Table 3.3.1 Summary of Potential Water Resources Use and Potential Impacts [page 3.3-4]** only lists "Increased demand for water supplies" and only lists about 2-6 million gallons of water needed for dust control. But in **Section 3.3.2 IMPACTS OF PROPOSED ACTION Subsection Construction Impacts Subheading Water Supply [page 3.3-5]** it states "Estimated water use for all construction related needs other than dust control is 1 million gallons." One hundred trucks or more (supply, transport, concrete, water, workers) are estimated to access the project area daily, some multiple times for

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up to 4-6 months of the construction, especially when pad construction is underway. I think that 1 million gallons will barely make the concrete pads (25,000 to 35,000 cubic yards) let alone clean each truck to reduce noxious week contamination at entry points to the project area.

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cont.

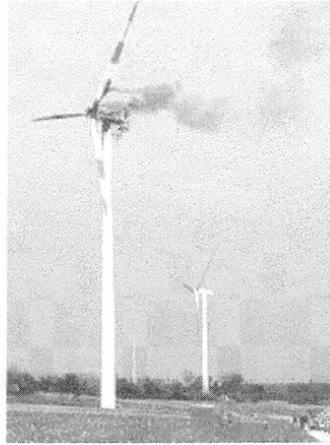
SECTION 3.4 HEALTH AND SAFETY

Subsection 3.4.2 Impacts of Proposed Action Subheading: Operation and Maintenance Impacts - Risk of Fire or Explosion [Page 3.4-4] states "Lighting-induced fires are rare in the project area" and explains that wind turbine generators are specially protected to minimize a lighting-induced fire. It fails to explain that the reason lightening risk is not high is because of all the flat ground and lack of trees in most of the project. Add 120, 350 to 400 foot steel towers and a hot summer night and you will have increased risk of lightening strikes, if not possibly starting fires. It will damage turbine blades or heavily damage the nacelle, releasing hazardous material to the ground. The most-likely parts (forest and range) of the proposed project are out of a fire zone.

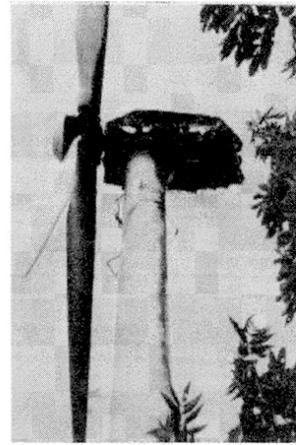
21



USA



Germany

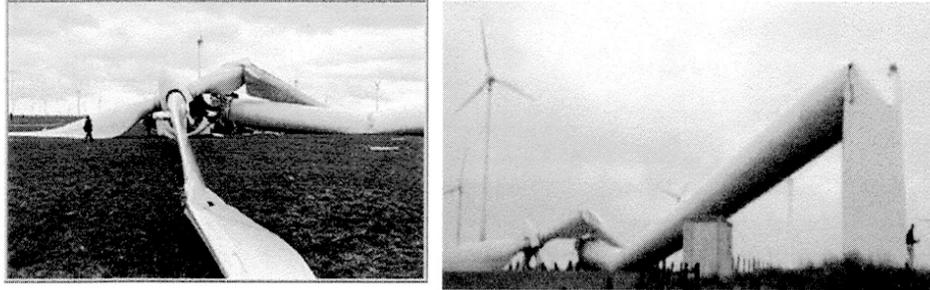


Spain

Subsection 3.4.2 Impacts of Proposed Action Subheading: Operation and Maintenance Impacts - Risk of Turbine Tower Collapse [Page 3.4-8] Shapiro and Associates discusses an interview with Curt Malloy of Worldlink Insurance. He stated his company insures more than 12,000 turbines comprising more than 3,400 MW of capacity and that he personally has 15 years of experience in the wind industry. But according to the Applicant he stated that he was not aware of any tubular wind tower structure collapsing. They then referenced the Danish Society of Windmill Neighbors which has documented evidence of several collapsed tubular towers.

22

Photographic evidence is submitted below. It has happened in the past and it is a real risk in the future. This is not a perfect science and should be treated as such.



Shapiro and Associates states "the specific conditions and circumstances supporting this photographic evidence is uncertain. Minimum setbacks incorporated into the proposed project layout would reduce the safety risk associated with tower collapse and other safety and nuisance concerns." My analysis regardless of why these turbines collapsed gives photographic evidence that this occurrence is more than a nuisance concern.

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cont.

Subsection 3.4.4 Mitigation Measures Subsection: Additional Recommended Mitigation Measures Subheading: Measures to Minimize Risk of Tower Collapse and Blade Throw [page 3.4-22] states "The Applicant proposes setbacks of at least the height of the tower plus the blade from any public roads and residences." The Applicant did not consider those landowners who use the two private roads in the project area, namely Elk Springs Road and Cricklewood Lane. A tower height setback is not adequate for public safety. As seen in the picture above, these machines are huge and catastrophic tower failures could break up and throw tons of metal and blades much further than just their height. Also there have been occasions when unforeseeable high winds have blown over a complete turbine and foundation. This again would throw pieces more than just the tower height. In my case, J String would parallel Cricklewood Lane making travel more dangerous since we are on the East side of the string. Heavy winds (which have been clocked in excess of 70 mph) may increase the risk of a tower collapse across our road. The Applicant then goes on to quote several inspections and manufacturing certifications that may or may not preclude a catastrophic tower collapse. These are huge industrial machines and accidents can and do happen.

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Considering the risks to public safety, including ice throws, I would urge a safety buffer of at least 1,500 feet from public and private roads, as well as non-participating property lines.

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Table 3.4.-1: Summary of Potential Health and Safety Risks [page 3.4-1] I find this table amazing as well as disturbing. For almost 2 years Applicant has been telling the public these turbines are safe and pollution free. No hazards whatsoever. Farmers and cattleman can, with confidence, farm and graze their herds amongst the operating turbines. Now this chart tells me, if even on the middle scenario, some sensitive shrub steppe areas may have to deal with 25,000 of diesel and gasoline, 121 turbines, each of which contains 50 gallons of glycol water mixed coolant (6050 gallons), 85 gallons of turbine hydraulic oil (10,285 gallons), 105 gallons of lubricating oil (12,705 gallons), 500 gallons of transformer mineral oil (60,500 gallons), and a substation with 48,000 gallons of mineral oil in the substation transformers. All of which is classified as a hazardous material.

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Reading through the measure to reduce **Potential Releases of Hazardous Materials to the Environment** [pages 3.4-3 & 3.4-4] during operations, while reassuring to the Applicant, in reality, there is very little operating history for these larger turbines (especially the 3MW version) to really feel secure that all these "safety" features really work. No matter how confident man feels about his technology, huge complex machines can and do fail at times. Sometimes, due to mans work, like poor maintenance practices (to save money comes to mind) and sometimes from the powers of nature. Many of the landowners who live within the project area have wells. Applicant may say it can reduce potential releases, but it doesn't go far enough to say what it **WILL DO** to **CORRECT** a real accidental release that contaminates the local aquifer.

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cont.

Subsection 3.4.4 Mitigation Measures Subheading: Measures to Minimize Risk of Ice Throw [page 3.4-21] A more recent study was submitted by Sagebrush Power Partners back in June 2003, as Attachment 5 Kittitas Valley Icing Conditions Memo. It also contains a report on icing conditions in Ellensburg.

In this memo from Ron Nierenberg, a consulting meteorologist to Chris Taylor on April 11, 2003, he states information taken from the records of the Ellensburg Airport support that during the past 5 years, there were an average of three days per year of freezing rain. Adding that freezing rain is the condition that could cause icing on wind turbine blades. He also advises that the elevation of the wind farm project area is 500 to 1000 feet higher and so the estimate that there could be 4 to 5 days per year where ice may accumulate.

Shapiro and Associates interprets this report in the DEIS stating "Studies of long term weather data for the area from the Applicant's meteorologist indicate icing conditions occur, on average 3 to 5 days per year. This is categorized as a 'moderate icing risk' (1 to 5 days of icing per year) according to the Wind Energy in Cold Climates (WECO n.d.). In contrast, light icing risk is less than 1 day icing per year and heavy icing risk is 5 to 25 days per year."

Their analysis of the icing conditions fails to take into account that the project area is higher than the airport by almost 1000 feet (my lot is about 2600 ft). That is just to the ground, put up a 400 foot turbine and the blades are now 1400 feet or more in the air. This would significantly raise the risk of blade icing putting them most likely in the heavy icing category. Also, the meteorologist failed to mention that heavy fog, which is common in the winter there, dramatically increases the formation of rime ice as the temperature drops. Freezing rain can certainly cause problems, but it is the rime ice buildup that can substantially raise the risk to the public as well as wind farm operators. The thickness of rime ice can be up to about 18 inches in severe conditions and when released be in the range of up to 2.2 pounds in mass. In the Seifert study, he found evidence at operating wind farms that ice chunks were found 15 to 100 meters (49 feet to 328 feet) from the base of the turbines. This is all spelled out in the WECO project report Shapiro and Associates should have read.

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Shapiro and Associates failed to adequately research the growing phenomenon of ice throws from turbines. They reference a study by Morgan et al. 1998 and come up with a safety setback of 50 to 328 feet from a turbine.

The wind industry's "authoritative ice throw guidelines" recommend an ice throw risk of 10-6 -or one strike per million square meters per year. At this risk level, a minimum ice throw safety setback for a 50 meter rotor diameter wind turbine in heavy icing conditions is 400 meters (1,312 feet). For an 82 meter rotor diameter wind turbine in heavy icing conditions, the minimum ice throw safety setback is 656 meters (2,152 feet). That's a big difference than 328 feet. 328 feet is unacceptable. A distance of at least 1,500 feet minimum would ensure public safety in light of

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the information we know. A mitigating measure could be added if evidence is shown that actual ice throws in the project area from particular turbines is greater than 1,500 feet, then the distance around those turbines could be increased to 2,000 feet from public and private roads, and non-participating property lines.

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cont.

Page 3.4-21 Measures to Minimize Risk of Ice Throw goes on to state that select turbines within 328 feet of public roads would be equipped with a fail safe icing sensor system. Unfortunately, such a system does not exist! The wind industry's technical research establishes that "the reliable detection of ice is an indispensable requirement for the operation of wind turbines in cold climates." However, the wind industry's studies over many years establish that de-icing and anti-icing systems have not proven reliable. In addition, the available ice sensors are not reliable. The wind energy technical papers report: "It is important to produce definitions and specifications for measurement of icing and for ice sensors. This information is also required e.g. for safety standards of wind turbines." In fact, standardized conditions for ice sensor design and calibration "are not available yet and have to be defined."

A little history and timeline that Shapiro and Associates has failed to report. These quotes are from the wind industry and accessible on their respective websites:

- Wind turbines operating in cold climates present an inherent, significant and recognized public safety risk-and the scope of the risk is much broader than ice throws. Wind turbine icing, and the resulting unbalance, resonance, over power and fatigue, can affect the structural integrity of the wind turbine itself.
- The technical literature raises serious and on-going questions about the adequacy and safety of current wind turbine designs. There are reportedly no structural safety design standards for wind turbines operating in icing conditions, notwithstanding the fact that 400 large wind turbines (500 MW) are operating in cold climates. The technical papers expressly state that it is up to the project developer and turbine buyer to ensure that the windmill is adequate for the site conditions.
- In 2000, wind industry technical research reported that "there still is little knowledge of precisely [how] the turbine is loaded under icing conditions."
- In 2001, the urgency of the design problem was noted: "Monitoring the operation and loads of the large wind turbines is urgently needed in order to verify the design loads, not only concerning icing but also for wind farm and complex terrain operation."
- In 2002, wind industry technical research reported that the wind turbine and component industry and operators are "poorly aware" about the occurrence and frequency of icing and lack knowledge about safety problems caused by icing especially iced blade safety problems.
- By 2003, not much had changed-wind industry technical research was still reporting that "there is very little knowledge and data about the parameters needed to use the produced [theoretical ice and snow accretion on structures] formulas in the most proper way."
- In 2003, it was also noted that atmospheric icing occurs during a much wider range of temperature and humidity than usually expected-which may lead to significant error in wind turbine design loads used in many countries. In 11 European countries a 5-year, \$4.3 million

28

study was launched to address the many issues associated with windmills operating in cold climates.

Subsection 3.4.4 Mitigation Measures Subsection: Additional Recommended Mitigation Measures Subheading: Measures to Minimize Shadow-Flicker Effects [page 3.4-22]

Again, Applicant denied that this phenomenon ever existed. The analysis is here and the effects are real. My property is only a few hundred feet east of J-String. Every sunrise I will be getting shadow flicker effects from about 80 turbines. This is not an occasional nuisance. The analysis reports show that many residences will be affected. This alone shows that this area IS NOT the right place for a wind farm. These machines belong in isolated areas where only the land owners who want them can suffer their ill effects. Shapiro and Associates failed to compare the locations of other established wind installations (Stateline, Wasco) in much more isolated areas in respect to established residences and varied land ownership.

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Subsection 3.12.2 Impacts of Proposed Action Subheading: Operations and Maintenance Impacts - Modeled Noise Levels / Upper and Lower End Scenarios [page 3.12-15]

states "It is anticipated that noise levels from either scenario (upper end versus lower end) would be very similar to the modeled middle scenario (see Appendix D) in which distances from a receiver to the closest wind turbine would dictate noise levels." Again, Shapiro and Associates failed to require noise analysis reports for each scenario. The vast difference in the size and number greatly alter the analysis. Believing Applicant on face value is very irresponsible. Using the current Wind Pro software to model noise variances is not a fully-tested tool. Most of the wind developers use it and from reports I read about after the wind farm goes in, most developers got it wrong. In the UK, one of the most consistent complaints was over noise and how it was underestimated. People that have the unfortunate opportunity to live within a mile complain about the noise, especially at night.

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Subsection 3.12.4 Mitigation Measures [page 3-12-19] The suggestion that residences within a mile plant a 100 foot vegetative buffer to reduce the noise level by 5 dBA! This gives one an idea of how impacting these machines will be, and yet the Applicant still insists on placing turbines within 1000 feet on established residences and 50 feet from neighboring property lines.

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The offered mitigation measure states, "if compliance is not demonstrated (to WAC 173-60) turbines should be relocated or removed, to the extent necessary, so that the project meets applicable regulatory thresholds." This is not strong enough. It should read if any residence, or planned residence determines the noise to be detrimental, then the offending turbines must be removed.

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Also Shapiro and Associates fails to mention that Oregon has an effective noise setback distance (based on FPL Energy Stateline 2 and 3) of 4,000 feet (although the Oregon DOE attempted to argue that the FPL Energy distance should not be considered a "setback" per se) between the turbine and noise sensitive receptors. This is necessary in order to keep the increase in noise from windmills (compared to pre-existing ambient) at less than 10 dB(A). They should also be sure that any noise analysis take into account the cumulative noise effect of multiple turbines. The rule of thumb (according to CH2MHill--who is working with Applicant--and also participated in the Oregon email discussion) is an increase of 3 dB(A) with each doubling of the number of turbines--for example from 1 to 2, 2 to 4, 4 to 8, 8 to 16. An increase in turbines from 1 to 16--therefore would result in an increase in noise of 12 dB(A) (to account for cumulative noise effect of multiple turbines) over the predicted noise of an individual turbine. The CH2MHill guy

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actually attempted to argue that multiple turbines would have to be at least 6,000 feet from noise sensitive receptors in order to comply with the Oregon regulations.

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SECTION 3.7 SOCIOECONOMICS

Subsection 3.7.2 Impacts of Proposed Action Subheading: Direct Operations and Maintenance Impacts Subtitle: Property Values [page 3.7-15] states "A new analysis of impacts to property values of wind energy projects was beyond the scope of this EIS." Unbelievable! But then Shapiro and Associates goes on to parrot the outdated and biased studies bought and paid for by the wind industry and their lobbyists to say there is no PROOF that living near a wind farm reduces property values.

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I just finished reading in the Seattle Times of people in Seattle residential areas complaining about reduced property values because the phone company wants to put a 75 foot cell tower in their view. Yet this DEIS is trying to make the case that putting a string of 13, 410-foot wind turbines with 292 foot blades, 300 feet from my proposed home making noise, with constant flashing lights, filled with hazardous material and placed directly at my western view so that shadow flicker will blast through every sunrise, will not decrease my property value, but maybe even enhance it. This is laughable and how ignorant does Shapiro and Associated think I am.

Subsection 3.7.4 Mitigation Measures [page 3.7-22] Shapiro and Associates addresses only the tourism issue. It basically states that if recreational tourism is affected negatively by the wind farm operating, then they will build a kiosk and public viewing area to draw the hoards of new visitors to the County. No mention of what will happen to the hundreds of landowners within sight and sound of this proposed industrial complex and what Applicant will do to mitigate (compensate) these landowners for their losses while this Texas company profits.

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Recently, in Kewaunee, Wisconsin, the towns of Red River and Lincoln have had operating wind farms since June of 1998. Thus far, the utility that owns the project has offered to buy at least six homes to tear down because they were rendered uninhabitable by the noise of the windmills. They now call it a wind buffer zone or noise buffer. In addition, zoning administrator Joe Jerabek compiled a list of properties that have been sold in the township, and their selling prices. Results showed homes within 1 mile of the windmills declined in value by 26% and within two miles by 19%. In addition, the Town of Lincoln did a resident survey that established that 52% of the respondents (high response rate) would not want to live within 2 miles of the turbines. More proof that windmills adversely affect property values. The comprehensive report of problems and issues that the County has had is available from the Town Clerk for a cost of \$25.00.

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Mitigation measures should include purchasing of properties, whether or not a residence exists, for fair market value before construction, of all landowners within 1 mile of the proposed project site.

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Section 3.9 VISUAL RESOURCES

Subsection 3.9.1 Study Methodology Subheading: Visual Sensitivity Assessment [page 3.9-1] Shapiro and Associates and Applicant have tried to convince the reader that views from one's home or recreational property are inconsequential. To make the argument that a view is subjective to the viewer is obvious. The whole issue regarding view is boiled down to who purchases the land. The Project Manger for Applicant, upon first arriving and starting this process, told people (myself included) that our property wasn't worth anything. It was just sagebrush and desert. That is his opinion, and again, is very subjective.

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Shapiro and Associates, along with Sagebrush Power Partners, have done a fantastic job of taking pictures using photographic trickery, concealment and misjudging the whole issue of viewshed in Upper Kittitas County. This has been probably the most heated issue brought to light in community meetings as well as EFSEC scoping meetings.

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cont.

Subsection 3.9.1 Study Methodology Subheading: Related Policies and Studies

[page 3.9-2 states "The Federal Highway Administration designed the 100-mile segment of I-90 beginning at the Seattle Waterfront and extending East to Thorp as a National Scenic Byway in 1998. This highway segment is also part of the Mountains-to-Sound Greenway. . . is conceived as a scenic, historic and recreational corridor intended to function as a scenic gateway to Seattle." It also states "US 97 in this area is a State designated scenic recreational highway." It then goes on to discount this designation because of lack of FORMAL regulatory control of aesthetic impacts within US 97 corridor.

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If I understand this DEIS, then this section is telling me that even though State and local ordinances have chosen to protect this area of natural beauty that Shapiro and Associates interprets this designation as there is no FORMAL law that states this area cannot be industrialized and ruined - therefore, recommending counter to what the State and people living and owning property in this area have strived to save.

The discussion of visual quality and aesthetics mentioned in the next 50 pages is purely developer and corporate rhetoric to try and prove a point that cannot be justified. Industrial development of this size and scope is obvious and there is no way this DEIS can show or demonstrate otherwise. This proposal will destroy the lives and livelihood of residents and landowners for miles around. These turbines are visible for 25 miles on a clear day. This can not be disguised or hidden from the view from Interstate 90. Many people have purchased property and built homes to enjoy the evening sunsets to the West. The proposed siting of this project is directly in view of these sunsets.

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Subsection 3.9.2 Affected Environment Subsection: Viewpoints Subheading: Ridges East of US97: Viewpoint 4 - Visual Sensitivity [page 3.9-12] This area being described is the area where my property is located. It states "Because portions of Cricklewood Lane and most of Elk Springs Road are in areas with open views that lie within 1/2 mile or less of proposed turbines, the views from these roads are considered sensitive. Because these are private, dead end roads whose primary function is to access to abutting properties, the number of road users affected area assumed to be relatively small. Given the restricted access to these road segments and small number of viewers, the sensitivity to visual effects is classified as low. For the 11 residences located along Cricklewood Lane and the lower and middle sections of Elk Springs Road that are within half a mile of proposed turbines and which would have unobstructed views of them, the sensitivity of views is high." Shapiro and Associates, I believe, is trying to make the case that since there are a few land owners that have the privilege of their properties bordering the proposed project and being small in number that we are just plain discounted as to our sensitivity to visual effects. On the other hand, if I understand this correctly, our unobstructed views of turbines 300 feet in front of us means our sensitivity is very high. This logic defies all intelligence. The preparers of this DEIS are definitely giving me the impression that they will stop at nothing to walk over citizens and violate their property rights without due compensation under the guise of the political green agenda.

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As far as views are concerned, there are no acceptable measures. Once the project area is compromised due to the size and scope of this industrial project, the world class viewshed that Ellensburg has enjoyed for over more than one hundred years will be gone forever. It's ironic.

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that Shapiro and Associates would side with the wind developers to promote a project intending to "save" our environment from the damage of man and in the process of only one year destroy what took nature million of years to make in the name of improving the "environment".

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cont.

Section 3.9.5 Mitigation Measures Subheading: Additional Recommended Mitigation Measures [3.9-51] The last bullet point states "To compensate for visual impacts, the Applicant should acquire conservation easements on land in important foreground views of the wind turbines so that no further development occurs in these areas until after decommissioning. This approach would conserve natural areas to that the visual contrast between the wind turbine and the land maintains its order and purity." Shapiro and Associates fails again to define the term "conservation easement". The last sentence implies the land will be improved to maintain its 'order and purity' when in fact it will be defaced and the views destroyed forever.

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Section 3.9.6 Significant Unavoidable Adverse Impacts [page 3.9-51] states "For many viewers, the presence of the wind turbines represents a significant unavoidable adverse impact because it significantly alters the appearance of the rural landscape over a large area of the Kittitas Valley. The constant flashing of lights on the tops of turbines would similarly be considered a significant unavoidable adverse impact. The degree to which impacts are adverse depends on the viewer's location and sensitivity and the impact on view quality. In the final analysis, it is the comparative number of viewers most affected by the project that determines the overall impact. A project that significantly affects a small number of viewers may be offset by the fact that it may have a relatively low impact on a large number of viewers."

Shapiro and Associates' true motivations for providing an unbiased third party review and drafting of the DEIS is apparent in this paragraph buried in the middle of this extensive document. As a landowner who has bought and paid for 50 acres of recreational lands that has the privilege of being located in a sensitive area 300 feet from J String I can only say that their comments make me acrimonious. For Shapiro and Associates to recommend that those of us privileged landowners in the project area turn over our land for the "public good" is blatantly irresponsible. For a company such as Sagebrush Power Partners who plans to make millions of dollars on this project and to virtually 'condemn' their neighbors without compensation is criminal. In the light of the dubious benefits of this project economically, environmentally and politically, I cannot believe a consulting firm such as Shapiro and Associates would release such tripe at taxpayer expense.

46

In closing I would hope that the members of the EFSEC council will consider this DEIS as biased, incomplete, intentionally organized to confuse the reader with lack of continuity and finally, not doing a complete review of the literature, including the downside of industrial wind farms in the United States as well as abroad.

47

I urge the members of the EFSEC council, in light of this DEIS, to recommend to the Governor that this project has no merit, is disruptive to the Kittitas Valley community, is poorly sited within a growing residential community and finally, is a blatant attempt of an out-of-state company to sidestep local government for their own financial gain under the guise of political greenness.

48

Respectfully submitted,

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References Available on Request

SUBMITTED BY ED GARRETT

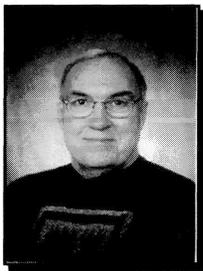
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Lot 12	9.54 Acres	\$101,000
Lot 13	10.88 Acres	\$97,000
Lot 14	8.19 Acres	\$109,000
Lot 15	8.47 Acres	\$105,000
Lot 16	8.58 Acres	\$104,000
Lot 17	7.98 Acres	\$104,000
Lot 18	9.08 Acres	\$105,000
Lot 19	19.65 Acres	\$189,000
Lot 20	10.32 Acres	\$99,000
Lot 22	10.33 Acres	\$119,000
Lot 23	10.00 Acres	\$117,000
Lot 25	10.00 Acres	\$99,000



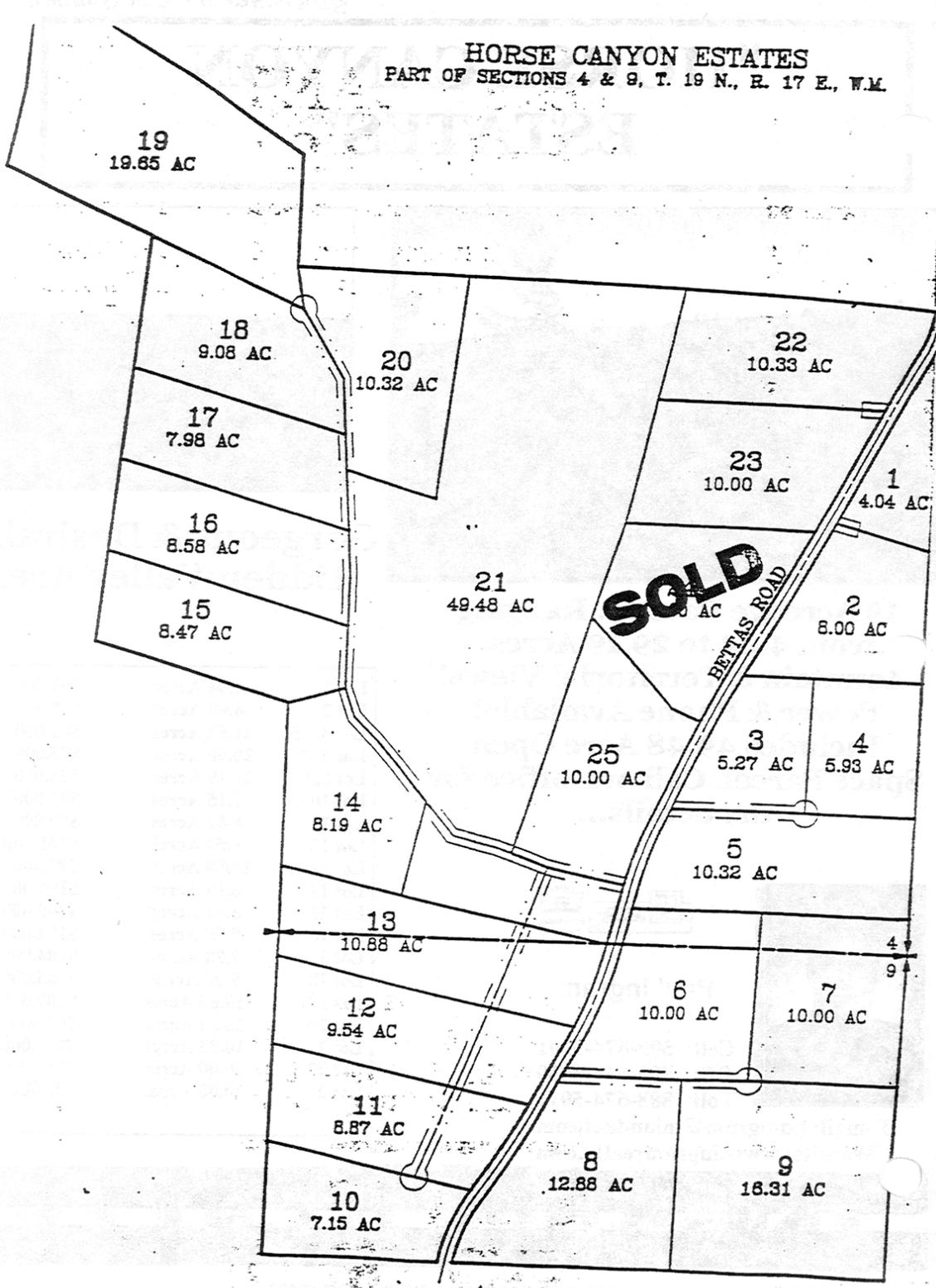
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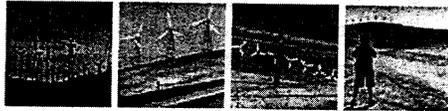


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Bird killings at Altamont Pass Environmental group files suit against wind turbine companies

Jane Kay, Chronicle Environment Writer
Tuesday, January 13, 2004
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[URL: sfgate.com/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U321.DTL](http://URL:sfgate.com/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U321.DTL)



Operators of giant wind turbines in Altamont Pass should be ordered to stop the routine, illegal killing of about 1,000 eagles, hawks and owls every year, an environmental group argues in a lawsuit filed Monday.

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.

The lawsuit is asking for a jury trial and a judgment that would stop the alleged harmful activity and force the companies to return profits.

The wind turbines were erected in the Altamont Pass starting in the early 1980s. Since then, biologists have recorded thousands of deaths of golden eagles, red-tailed and ferruginous hawks, American kestrels, turkey vultures and great horned, barn and burrowing owls.

The group is filing the suit now because Alameda County is issuing new use permits and the turbine operators are upgrading technology and enlarging the turbines.

Studies show that Altamont Pass has the worst bird-kill problem in the world among wind farms, because the turbines are located in a major migration route for birds of prey in North America that attracts among the highest concentration of golden eagles in the world.

"Altamont has become a death zone for eagles and other magnificent and imperiled birds of prey. Birds come into the pass to hunt and get chopped up by the blades," said Jeff Miller, a spokesman for the Center for Biological Diversity.

<http://www.sfgate.com/cgi-bin/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U...> 1/15/2004

The group isn't trying to shut the Altamont Pass Wind Resource Area, a state-designated area in Alameda and Contra Costa counties.

Wind power provides a small percentage of the state's total energy needs but is a promising, fast-growing technology, environmental groups say.

The Center for Biological Diversity is asking for several immediate protective measures at the wind farms.

Measures include letting grass grow tall around the wind turbines so raptors can't see their rodent prey; reducing populations of ground squirrels and other rodents; removing turbines from certain canyons and valleys; and clustering the turbines and making the blades more visible to birds.

In Juno Beach, Fla., Steve Stengel, spokesman for FPL Energy, a subsidiary of FPL Group, said his company hadn't yet seen the suit and couldn't comment on it.

The company, which has 42 wind farm projects nationwide, has been working for years on measures to lessen the impact on birds, Stengel said.

FPL generates 220 megawatts from 2,000 turbines, about a third of those in the pass.

"We've been active participants in giving research money. We've installed screens and perch guards for the birds, done tests on painting rotor blades in alternative colors and participated in a rodent control program," Stengel said.

When looking at bird deaths per turbine, Altamont Pass doesn't have the worst bird-kill record, he said.

"Clearly we realize there's an issue in the Altamont. That's why we're so active in research activities and mitigation measures," Stengel said. FPL has been talking with the U.S. Fish and Wildlife Service and the California Energy Commission for the past 18 months on a set of mitigation measures and expects to have a plan early this year.

Benito Perez, special agent in charge of the U.S. Fish and Wildlife Service's office of law enforcement in Portland, said that every time a migratory bird gets killed at a wind turbine in Altamont Pass, it is a violation of the law.

"We've been engaged with Altamont Pass at the regional as well as national level," Perez said.

"We know the birds are being killed, but we see the industry is trying to do something about the problem. As long as the industry is taking active steps," Perez said, "we'll hope for the best for the conservation effort."

E-mail Jane Kay at jkay@sfnchronicle.com

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Page A - 13

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Makarow, Irina (EFSEC)

From: Ed Garrett [garrett_ew@netos.com]
Sent: Thursday, January 15, 2004 12:13 PM
To: Fiksdal, Allen (EFSEC); Makarow, Irina (EFSEC); johnL1@atg.wa.gov
Subject: Addendum to my testimony

Hi Alan, Irina and John,

I would like to have this release added to my testimony and placed in the legal record.

It makes the point I did not have time to make Tuesday night due to time limits. It backs up my DEIS comments about how wind developer sweep the issue under the rug and are not held accountable for the environmental damage they cause. Also, Shapiro and Associates, as well as WEST, Inc. would rather ignore or minimize bird kill information to get gigantic wind turbines sited for the least amount of money.

Respectfully Submitted,

Ed Garrett
1920S 67th Ave SE
Snohomish, WA

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FOR IMMEDIATE RELEASE January 12, 2003
Contact: Jeff Miller (510) 663-0616 ext. 3 or cell (510) 499-9185 Center
for Biological Diversity e-mail jmillier@biologicaldiversity.org

Richard Wiebe (415) 433-3200 or cell (415) 505-8793, e-mail wiebe@pacbell.net Attorney for Plaintiffs

Livermore, CA - The Center for Biological Diversity ("CBD") filed a lawsuit today against Florida energy producer FPL Group, Inc. (NYSE symbol: FPL) and Danish wind power company NEG Micon A/S for their part in the illegal ongoing killing of tens of thousands of protected birds by wind turbines at the Altamont Pass Wind Resource Area ("APWRA") in the San Francisco Bay Area of California. Through their subsidiaries and associated entities, FPL Group and NEG Micon own or operate roughly half of the approximately 5,400 wind turbines at the APWRA. Each year, wind turbines at the APWRA kill up to 60 or more golden eagles and hundreds of other hawks, owls, and other protected raptors. These bird kills have continued for 20 years in flagrant violation of the Bald Eagle and Golden Eagle Protection Act, the Migratory Bird Treaty Act, and several California Fish and Game Code provisions. The lawsuit alleges that these violations and bird kills are unlawful and unfair business practices under the California Business and Professions Code.

"Altamont Pass wind turbines are causing extremely high levels of bird mortality along a major raptor migration route and are likely depleting eagle, hawk, and owl populations not only locally but throughout the western U. S.," said Jeff Miller, spokesperson for CBD. "We absolutely support wind power, but it is past time for the primary turbine owners, FPL Energy and NEG Micon, to address this problem."

"Altamont Pass has become a death zone for eagles and other magnificent and imperiled birds of prey. Recent studies have proposed numerous recommendations for mitigating the devastating effect of Altamont Pass wind turbines on birds, yet the industry is blindly charging ahead replacing existing turbines with new and much larger turbines without any requirement of effective preventative measures or remediation for ongoing bird kills," said Richard Wiebe, attorney for the plaintiffs.

Individual Letter 16

The APWRA was established in 1982 on 160 square kilometers of private cattle ranches in eastern Alameda and Contra Costa Counties. Due in part to the local abundance of raptor populations in the region, wind turbines at APWRA cause more bird deaths than any wind facility in the world, a result of poor planning that allowed wind turbines to be built along a major raptor migration corridor and in the heart of the highest concentration of golden eagles in North America. Wind turbines at Altamont Pass kill over a thousand birds each year, including up to 60 or more golden eagles, 300 red-tailed hawks, 270 burrowing owls, and additional hundreds of other raptors including kestrels, falcons, vultures, and other owl species. In 20 years of operation, the wind power industry has yet to implement any effective measures to reduce the killing of protected raptors or come up with meaningful mitigations to protect bird populations affected by the wind farms. In recent months, the County of Alameda approved repowering and renewed permits for the majority of the wind turbines at APWRA without conducting any public environmental review or requiring any meaningful mitigation measures to reduce or compensate for bird deaths. CBD and Californians for Renewable Energy filed a formal appeal of the permit renewals with Alameda County in November 2003.

The extraordinary numbers of raptor deaths continue unabated, due in part to the complete regulatory failure by federal, state, and local officials to enforce wildlife protection laws. "The U.S. Fish and Wildlife Service, U. S. Attorney's Office, California Department of Fish and Game, and Alameda and Contra Costa Counties bear equal responsibility for the ongoing bird atrocity at Altamont for their failure to impose any meaningful mitigation requirements or protective measures on the Altamont Pass wind power industry," stated Miller.

To add insult to injury, the Altamont Pass wind power industry has been receiving massive tax credits as well as government cash grants funded by surcharges imposed on California's electricity consumers as part of the state's flawed deregulation plan, all of which serve to subsidize the killing of birds. "The wind power industry receives tens of millions of dollars in revenue from California's consumers, as well as enormous tax credits and government subsidies, based on the perception that it provides 'green' energy, yet continues to kill thousands of protected birds annually," said Miller. "The Altamont companies routinely kill rare birds that are the natural heritage of all Californians, and take taxpayer subsidies home to Florida and Denmark." According to wind industry reports, the Altamont Pass fiasco has tainted public perception of wind energy and hampered wind power development, as concerns about bird impacts has delayed or discontinued other wind facilities.

The magnitude of bird kills at APWRA has been known since at least 1988, when the first of many studies of raptor mortality was published. To date, the industry has not implemented effective mitigation measures to reduce bird kills, protect and maintain existing bird populations, or to compensate for killing large numbers of birds from imperiled populations, despite numerous studies by the California Energy Commission, the National Renewable Energy Laboratory, and others. "The birds have literally been studied to death, yet the Altamont Pass turbine owners have failed to take action to reduce the risk to birds of prey," said Miller. In fact some efforts at APWRA, such as a small mammal poisoning program, have actually increased the risk to raptors while also threatening other endangered species inhabiting Altamont Pass such as the San Joaquin kit fox and California red-legged frog. Recent research at APWRA determined that bird mortality has not lessened over time, that the industry's minimal mitigation measures have been ineffective, and that the actual number of bird deaths is likely 8 to 16 times the industry-reported number of bird kills.

The lawsuit, filed in Federal District Court in San Francisco, is brought under California's Unfair Competition Law (California Business and Professions Code section 17200), which prohibits businesses from violating other laws, in this case federal and state wildlife protection laws, in the course of their business activities. The lawsuit also alleges that FPL has

violated California's false advertising laws and the federal Lanham Act by making untrue or misleading statements in publicly asserting that it complies with all federal and state environmental laws.

The issue at Altamont is not wind power versus birds, but rather whether the wind power industry is willing to take simple steps to reduce bird kills. Raptor experts have suggested numerous measures to reduce bird deaths, including retiring particularly lethal turbines, relocating turbines out of canyons, moving isolated turbines into clusters, increasing the visibility of turbines to birds, retrofitting power poles to prevent bird electrocutions, discontinuing the rodent poisoning program, and managing grazing to encourage rodent prey away from turbines. Raptor experts have also suggested mitigation through raptor habitat preservation to maintain the stability of the bird populations that are being depleted.

Concerns about the potential for wind turbines at Altamont Pass to kill endangered condors recently scuttled plans by the U.S. Fish and Wildlife Service to reintroduce condors into the Diablo Range east of Morgan Hill and Gilroy. The turbines may also be severely impacting local populations of the western burrowing owl, a declining species for which the CBD and bird conservation groups are requesting protection under the California Endangered Species Act.

The Center for Biological Diversity is a nonprofit environmental organization dedicated to the protection of native species and their habitats. The Center works to protect and restore natural ecosystems and imperiled species through science, education, policy, and environmental law. For more information about the impacts of wind turbines on raptors and the Altamont Pass issue visit <http://www.biologicaldiversity.org/swcbd/programs/bdes/altamont/altamont>

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Makarow, Irina (EFSEC)

From: Emilia Burdyslaw [ecarmelagb@hotmail.com]
Sent: Monday, January 12, 2004 6:39 PM
To: Makarow, Irina (EFSEC)
Cc: ClayW@co.kittitas.wa.us
Subject: Comments on DEIS for KVVWPP

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Kittitas Valley Wind Power Project DEIS Comments

The Draft Environmental Impact Statement for the proposed Kittitas Valley Wind Power Project submitted by Zilkha Renewable Energy fails to address or mitigate the impacts on neighboring property even though this is a requirement for EFSEC certification.

"An applicant requesting certification from EFSEC is required to submit detailed information on the proposed project and impacts the project may have on the natural and built environment. The applicant is also required to describe the means to be used to minimize and mitigate possible adverse impacts on the physical or human environment (WAC 463-42-085). Further, the applicant is required to set forth insurance, bonding, or other arrangements proposed to mitigate damage or loss to the environment (WAC 463-42-075)." (p. 3.6-14, paragraph 2)

These requirements have not been fulfilled in relation to neighboring properties because the proposed setbacks from adjacent properties without structures are a mere 50 feet from a turbine blade.

"Setback from property lines of neighboring landowners: 50 feet beyond the tip of the blade at its closest point to the property line." (p. 2-10, paragraph 1)

It is apparent that no allowances are being made for planned or future residence building. My new home site, in Section 2, and two others in Section 13 were in the permitting process prior to the application to the County for a wind-overlay rezone. Although the applicant was informed of this planning in May of 2003, turbines are currently proposed near the new residential sites. For example, the front porch of my new home will be 75 feet from a turbine blade. Since it had been previously stated by the applicant that turbines would be 1,000 feet from neighboring residences, it was understood that the turbines would be located this distance from the new structures.

"Setbacks from residences of neighboring landowners (i.e., those without signed agreements with the Applicant): 1,000 feet." (p. 2-9, paragraph 4) Also, lack of consideration is given to the fact that portions of Section 4, purchased by the Henley Group from David Archambeau, have been divided into several parcels for residential development. I have been informed by various landowners and real estate agents that the majority of the property in the project area was purchased with the intent to build residences or recreational structures. The wind project will prevent this from happening.

The close proximity of turbines to adjacent lot lines will cause property to be unfit for habitation or residence building because of the danger, damage, and nuisance created. Adverse impacts from ice throws, blade throws, turbine collapse, shadow-flicker, noise pollution, and blasting for foundation construction have not been properly addressed. The mitigation measures for health and safety that are mentioned (pp. 3.4-21 and 3.4-22) pertain to roads and current residences, but omit the project's affect on neighboring properties without structures.

Safety distances for ice throws are determined to be 350 meters for icing levels for moderate icing conditions if 50 meter blades are used. (Clarification Information for EIS p. 120) Since the proposed turbine blades will be 231 feet in diameter, an appropriate distance would be 400 meters or over 1,300 feet. Much of the project area will be unsafe as many

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turbines will be closer than this distance to adjoining properties.

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cont.

In cases of blade throw or tower collapse, the applicant proposes tip height setbacks.

"Tip height setbacks are primarily safety-related (e.g., if an entire tower and turbine were to collapse from a massive earthquake either combined with or independent from hurricane force wind, they would not fall on a public road or a neighbor's property)." (p. 2-9, paragraph 3)

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Since there is no way to predict the direction of movement or magnitude of an earthquake nor hurricane winds, the path that a blade throw or tower collapse will take can not be predetermined. The nearness of the turbines to some neighboring lots will be less than tip height which exposes these properties to the likelihood that, in the event of blade throw or tower collapse, blades and towers will fall onto these properties and cause extensive damage.

Shadow-flicker is mentioned in reference to current residences. "Shadow-flicker caused from low-angle sun shining through rotating wind turbines would effect several residences in proximity to the project site."

(p. 3.4-22, paragraph 5)

The shadow-flicker simulations that are depicted in Appendix B are limited mainly to current structures. No separate simulations were done for other neighboring properties close to the turbines that will be equally, if not more, bothered by the annoyance of shadow-flicker. It is also stated that shadow-flicker nuisance will affect areas within 2,000 feet of a turbine. "Potential shadow-flicker impacts from the three proposed wind power projects would be limited to the immediate vicinity (approximately 2,000 feet) of the wind turbines within each respective project area". (p. 3.14-12, paragraph 1)

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If shadow-flicker is limited to a radius of 2,000 feet, it will adversely impact most of the adjacent properties in the area.

The applicant acknowledges that noise levels can have a cumulative effect when turbine noise can be heard from more than one direction. "Predicted noise levels during project operations at the residences closest

to the measurement location (owners Nelson and Steinman/Geisick) ranged between 46 to 48 dBA. Therefore, the anticipated difference between the measured ambient and predicted noise levels in this part of the project area could be subjectively heard as approximately a doubling in loudness and would likely cause an adverse community response." (p. 3.12-15, paragraph 4)

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The effect would be even greater for levels of 50 to 55 decibels that would be tripled or quadrupled for neighboring properties that are encompassed by the turbines. Landowners will be kept from their property because they would not be able to tolerate this degree of noise. Yet, no mitigation is proposed to lessen this impact.

"However, on the rangeland portions of the site, planting dense landscaping of sufficient depth to reduce noise would require a change in use of adjacent agricultural and residential properties. Therefore, vegetative buffering to reduce noise is not considered to be a reasonable mitigation measure for those properties." (p. 3.12-18, paragraph 4)

The applicant's justification for not screening neighboring property from noise is not valid. Gary Geisick is the only neighboring landowner who uses property for grazing, the two other owners that graze on their land have turbine leases, and, to my knowledge, the DNR land which is also leased for turbines has not had grazing leases for over eight years.

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It is very likely that a landslide would occur during foundation construction.

"Areas prone to landslides include steep slopes more than 10 feet tall with thick soils. These conditions are not typical of the KVVPP site." (p. 3.1-6, paragraph 7)

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"Projects would not be located on unstable slopes or landslide-prone terrain. Therefore, risk of a seismic or precipitation-induced landslide in the soils and rock is minimal." (p. 3.1-12, paragraph 1) Although designated turbine locations are not on steep slopes, the landscape of some adjacent properties contains areas with steep hillsides that are

unstable and outcroppings of rock can be seen where previous slides have occurred. The blasting that is proposed for turbine foundation construction will place extreme stress on these slopes from ground vibrations and dislodge parts of hillsides. Since slope instability is not on the ridge tops but on the sides of the hills of neighboring properties, the risk of an induced landslide is great and not minimal.

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cont.

It is evident that industrial wind turbines are incompatible with residential living if they are in close proximity to home sites. Since no mitigation is proposed to protect neighboring properties, land devaluation is certain for this wind project will force owners to forfeit the rights of property use. Furthermore, measures that are recommended to mitigate for aesthetic impacts do not mitigate for loss of use, but rather remove the development rights of neighboring property owners.

11

"To compensate for visual impacts, the Applicant should acquire conservation easements on land in important foreground views of the wind turbines so that no further development occurs in these areas until after decommissioning. This approach would conserve natural areas so that the visual contrast between the wind turbine and the land maintains its order and purity." (p. 3.9-51, bullet paragraph 4)

Conservation easements are usually donated to protect the environment's natural habitat and current land use from major development such as this proposed wind power project. The only way the land will maintain its order and purity would be if this project were not built at the proposed site. I doubt that anyone would be foolish enough to grant such an easement for by removing the land's development potential, the easement lowers its market value. Even in an eminent domain situation, which this is not, just compensation is paid to property owners.

12

Emilia Burdyslaw
Ellensburg Landowner

Current Address:
2806 SW Adams
Seattle, WA 98126
Phone: 206-937-5697

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Kittitas Valley Wind PP
DEIS Comment - Indiv. 18

H. S. "Sandy" and Maren Sandall
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January 6, 2004

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RE: Kittitas Valley Wind Power Project
DEIS

Figure 3.6-1 Existing Land Use: This map is out dated for the number of structures listed in Section 35 & Section 2. 1

Page 3.9-12 & 3.9-13: The impact statement suggests that only 5 existing residences may have potential visual effects from the wind farm project. This is false. See the enclosed map of Section 35 (Exhibit A). This Section is made up of 33 parcels with 29 landowners. There are presently 19 homes or weekend cabins in the area. Whether or not all of these residences have a direct view of the project does not mean they will not be affected in an adverse way. Any person who wants or needs to access Section 35 will be forced to travel through the project area. Elk Springs Road is our **only** legal access from Hwy 97 to Section 35. If for any reason road travel is delayed or stopped due to activity on turbine string H1, landowners in Section 35 will be adversely impacted. 2

Page 3.14-11: Paragraph 2 states that access to the project area would be limited. To what extent? Are 29 landowners in Section 35, their family and friends going to be restricted from free access to homes or cabins? Will there be restrictions placed on commercial delivery (such as propane, gravel, cement trucks, lumber trucks, etc.)? 3

Figure 2-1 Project Site Layout, Middle Scenario: It should be noted that there is an error on this map in regards to the location of Elk Springs Road. The map shows the road traveling through the southeast corner of property belonging to Pautzke Bait Co. The actual location is to the east of the Pautzke Bait/Genson property line traveling through the west portion of Mike Genson's property. 4

Page 3.9-51: (Additional Recommended Mitigation Measures) The last paragraph states "To compensate for visual impacts, the Applicant should acquire conservation easements on land in important foreground views of the wind turbines so that no further development occurs in these areas until after decommissioning." What does this actually mean? Is this to say any property owner who has plans to build on their currently vacant land within or near the project area will no longer have this option? Is their land being condemned? A good example of this is private property within Section 2 (just south of Section 35). Emilia Burdyshaw owns parcel 19-17-02000 lots 6 & 7. Her property is in direct view of the base of several proposed wind turbine towers (the closest 5

tower being within a few feet of her eastern boundary line (see Figure 2-1). She purchased her property with plans to build. Lot #8 (located to the south of Ms Burdyslaw and now owned by Dave Morraitis), has a small dry cabin, which is not shown in Figure 3.6-1. Lucas Oberhansly who also planned to build a cabin owns parcel 19-17-02000, Lot 4 (just to the north of Ms Burdyslaw). Parcel 20-17-35000, lots 34 & 35 are now owned by Paul Stewart. There is currently a small dry cabin on lot 35 not shown in Figure 3.6-1. Paul and his wife purchased their property with the intent to build a home. What are their options now and what option does anyone else in the same situation have?

5
cont.

3.13.4 Mitigation Measures: Page 3.13-21 Communication services; Currently there is no conventional phone service to Section 35. We are totally dependent on cell phone for emergency or non-emergency communication. It is crucial that our cell phone service is not interrupted or impaired in any way. The language used in the proposed mitigation measures suggest that the Applicant "should" implement certain measures but does not state that they will be "required" to implement certain measures to assure uninterrupted cell phone service (the same would go for T.V. and radio interference). What guarantee do we have that these mitigation measures will be handled in a top priority and timely manner (or at all for that matter)?

6

Table 3.2-12: Summary of Fatalities (re: Bird kill) The 2002 Survey Results shown in this study contradicts a recent Fox News article concerning this subject. See the enclosed article (Exhibit B) obtained from FOXNews.com on Dec. 23, 2003 where they report **one to two thousand or more** birds are killed each year in the area of Altamont Pass alone.

7

Page 3.7-15, 16, & 17 Property Values: The DEIS leads you to believe that property values will increase once the wind farm project is online. The analysis does not specify which properties in the project areas increased in value. If it were including the land on which wind turbines were constructed, of course the value would increase. I would argue that surrounding properties within the project area, but not a part of the project, would have their land values adversely affected. Residents of Lincoln, Wisconsin are troubled over the wind turbines that went online in June 1999. Refer to enclosed Exhibit C. This article is based on actual property sales and concludes that there was a decrease in sales by 26 points. If the Kittitas Valley Wind Power Project is allowed into our neighborhood, we will sell our home. Will the State, County, or the Applicant make up the difference when we are not able to sell our home and property for the appraised value (appraised value prior to the project development)?

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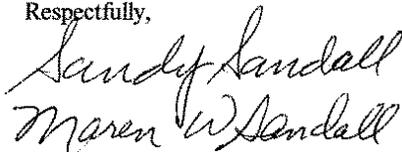
Page 3.4-7 & 8 Ice Throws and Blade Throws: 23 of the 121 proposed turbine towers would be constructed within a stone throw from Elk Springs Road. The study shows ice throws can occur up to 328 feet. This creates a risk to the safety of the residents traveling along Elk Springs Road to and from home. A set back of more than double the throw distance (1000 ft) from any private or public roads or property lines should be imposed. The same should be considered in regards to potential blade throws.

9

Thank you for your time and consideration to the above comments regarding the Kittitas Valley Wind Power Project DEIS. These are only a few of the issues we have reviewed from the large volume of information. Time has not allowed us to review the entire contents of the DEIS. As a footnote, watching the weather for the past month of December 2003 it is note worthy to say that there has been relatively little wind. The fog has drifted in and out of the valley as it usually does during the winter months. Relatively little wind during 3 to 4 months of the year translates in to 3 to 4 months of non-productive wind power.

10

Respectfully,



- 4. Jim Wilson
- 7. Lew Schuele
Cabin w/ horse corral
- 8. Michael Borsveld
Laney Goad Home
- 7 Wayne Neilson
Cabin
- 10. Paul Absou
Cabin
- 11. Jerry Jarwig
Cabin
- 12. Michael Siegl
Home/Cabin
- 14. George Saunders
Home/Cabin
- 15. David Zappone
Cabin
- 16. Robert Amundson
Cabin
- 17. John Hartzel
Cabin
- 18. Saway Sandra
Home
- 19. Mark Hampton
Home
- 20. John Kendig
Home
- 21. Fred Kegowski
Cabin
- 22. Kevin Slape
Cabin
- 23. Clifford Mannheim
Cabin
- 24. John Neely
Trailer w/ cover
- 25. Tim Merrigan
Cabin
- 26. Vince Bergman
Home
- 27. Reed Fothergill
Out Bldg
- 18. Michael Dickson
Cabin
- 19. Todd Swen
Cabin
- 21. Chris
Blat

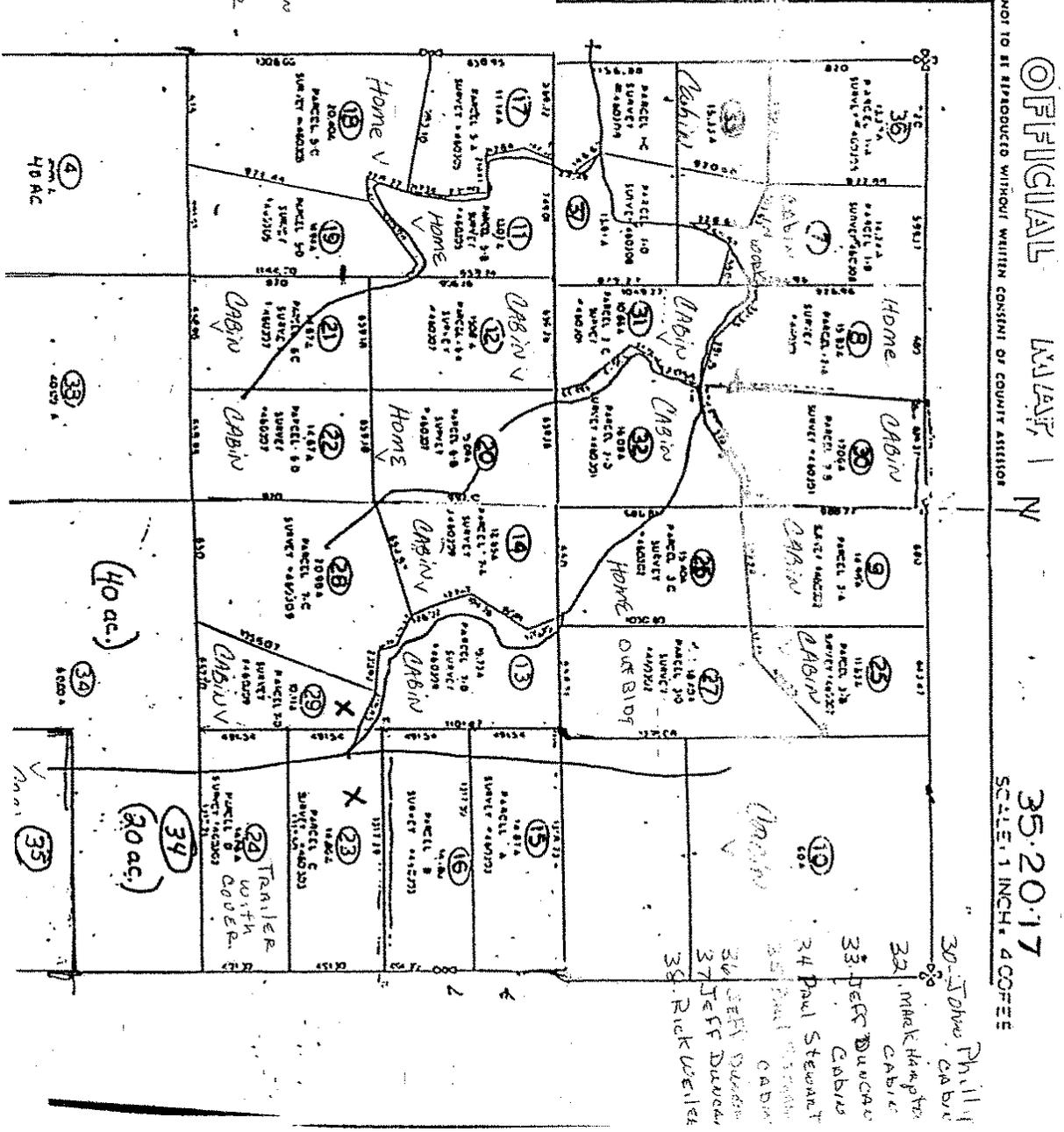


Exhibit B (i)



FNC SHOWS TOP STORIES POLITICS BUSINESS FOXLIFE VIEW NEWS LOCALS WEATHER

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REAL ESTATE

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Alternative Energy Proves Deadly for Birds

RESPOND TO EDITOR EMAIL THIS ARTICLE PRINTED FRIENDLY BECOME A FAN

Tuesday, December 23, 2003

FOX NEWS

The alternative energy movement is ruffling the feathers of animal rights activists.

COMPARE Mortgage Rates at NexTag.com

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NexTag

Wind turbines, lauded for being an environmentally friendly energy source, are killing thousands of birds that fly into their propellers in the Altamont Pass (search) just east of Oakland, Calif., where more than 5,000 turbines have helped power the Bay Area for 20 years.

Jeff Miller, of the Center for Biological Diversity (search), said the latest research indicates that one to two thousand or more birds are killed each year in the area. Included in the yearly death toll are approximately 60 golden eagles, 300 red-tailed hawks, and 270 burrowing owls.

Two environmental groups are trying to stop the renewal of the windmills' permits to prevent more birds from dying in their blades.

The Alameda County (search) zoning board renewed a batch of permits in November angering green activists who demanded an environmental impact report and mandatory concessions from the energy industry to make the mills more bird-friendly.

"The public is owed an open environmental review of the issue," said Miller. "If the board of supervisors doesn't see it our way, I'm sure we'll look very carefully at serious kind of legal action."

But the board felt the confrontation with the utilities was the wrong way to go.

"What we have is a conflict developing over the best environmental approach and that conflict is moving into a much larger scaled war than is necessary," said Larry Gosselin, of the zoning board. "We need a progressive study."



RELATED INFORMATION

- Related Video
 - Windmills Enrage Anim
- Top Stories Home

COMING UP ON FNC

- Screening Room
 - Best of 2003 — Your Video I
 - From the battlefield to behind the scenes, we've collected the year's best to the Screening Room.
- FNC Schedule

Exhibit B(2)

MSN Hotmail - Message

Page 2 of 3

Washington Post, December 26th, 2003
LOS ANGELES

The freezers at the U.S. Fish and Wildlife Department in the Sacramento Valley are overflowing with the decapitated and mangled bodies of golden eagles, kestrels and red-tailed hawks, victims of the whirling blades of wind turbines.

It's estimated that as many as 44,000 predatory birds have been killed over the past two decades in the Altamont Pass, east of San Francisco.

Although the rows of spinning blades turn wind into electricity and make Alameda County less dependent on fossil fuel, they are also the end of the line for many birds whose annual migration route includes the pass.

Concentrating on their prey on the ground, the birds fly into the blur of the windmill blades. The bird deaths have led some environmental groups that support wind power to oppose permits for the Altamont site, arguing that the industry is not doing enough to stop the deaths.

In Alameda County, several environmental groups are trying to persuade the county to stop reissuing permits for the turbines without requiring additional environmental studies.

The county zoning board approved permanent permits for 1,400 windmills in November, but Californians for Renewable Energy and the Center for Biological Diversity say the county approved the permits illegally.

"The level of bird kills is just astronomical. You couldn't have picked a worse place to put a wind farm. It's just been an accepted cost of doing business out there," said Jeff Miller of the Center for Biological Diversity.

Steve Stengel, a spokesman for Florida Power & Light Co., which owns about half of the 7,000 wind turbines at Altamont, said the industry has been trying to find ways to reduce bird kills.

Past attempts included painting the tips of turbine blades to make them more visible, installing screens around generators and adding devices to discourage perching on the towers. But these failed to substantially reduce deaths. Among measures now being discussed is letting grass below the turbines grow taller and removing rock to provide cover for prey and discourage birds from flying in the area.

Exhibit C

Fellow ROKT Supporters,

This information was sent to us from our friends in Lincoln, WI, who are dealing with a windfarm that was installed in June 1999. Their name is C.A.R.E. (Coalition Against Rural Exploitation)

Adjacent land owners are still trying to deal with the downside of the wind farm. A short survey below shows their complaints.

Next is the first study about declining property values based on actual sales data, not assessors' assertions.

Conclusions are as expected but at least it is quantified and backs up what we have been saying all along.

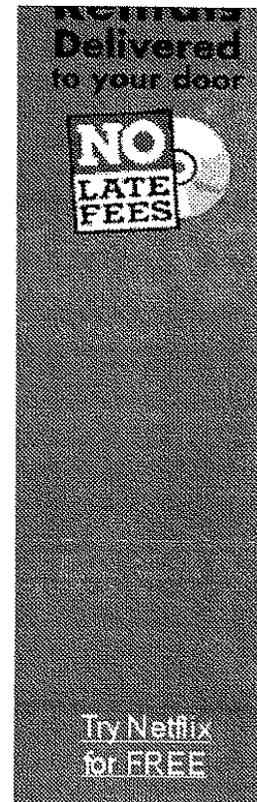
Best Regards and Happy Holidays

Ed

Excerpts from the Final Report of the Township of Lincoln

Wind Turbine Moratorium Committee After the wind turbines went online in Kewaunee County, Wisconsin, the Lincoln Township Board of Supervisors approved a moratorium on new turbine construction. The purpose of the moratorium was to delay new construction of wind turbines for eighteen months, giving the township the opportunity to assess the impacts of the 22 turbines installed by Wisconsin Public Service Corporation (WISC) and Madison Gas and Electric (MG&E), which went online in June, 1999.

The following document summarizes some of the problems the Moratorium Committee faced in trying to address problems the township hadn't faced prior to turbine construction and some of the resulting changes the committee proposed as a result of its study. Verification of this



<http://w9fd.law9.hotm...msa.com/cgi-bin/getmsg?msg=MSG1070764526.3&start=1113...> 12/22/2003

information can be obtained from Lincoln Township officials.

The Moratorium Committee met 39 times between January 17, 2000, and January 20, 2002, to 1) study the impact of wind factories on land, 2) study the impact on residents and 3) review conditional use permits used to build two existing wind factories in Lincoln Township.

Survey

Question: Are any of the following wind turbine issues currently causing problems in your household?

	Residents
within 800 ft. - 1/4 mi.	1/4 mi. - 1/2 mi.
a. Shadows from the blades	33%
yes	41% yes
b. Blinking lights from on top of the towers	9%
yes	15% yes
c. Noise	
44% yes	52% yes

Declining Property Values

Town of Lincoln zoning administrator Joe Jerabek compiled a list of properties that have been sold in the township, and their selling prices. The list compared the properties' selling price as a function of the distance to the wind factories, using real estate transfer returns and the year 2001 assessment roll.

Conclusions were as follows:

- "Sales within 1 mile of the windmills prior to their construction were 104 percent of the assessed values, and properties selling in the same area after construction were at 78 percent, a decrease of 26 points."
- "Sales more than 1 mile away prior to construction were 105 percent of the assessed values, and sales of properties 1 mile or more after the construction of the turbines declined to 87 percent of the assessed value, an 18 point decline."

Furthermore, not taken into account in Mr. Jerabek's conclusion are the homes that were bought out and bulldozed by WPSC.

Also not taken into account is the fact that of the homes that sold within

<http://lw9fd.law9.hotmail.msn.com/cgi-bin/getmsg?msg=MSG1070764526.3&start=1113...> 12/22/2003

one mile of the turbines since their construction, four of them were owned within the Pelnar family as the family members shuffled houses. One brother sold to another brother. One brother purchased his father's home. The father built a new home. And a sister purchased land from one brother and built a home. It is important to note that two of the family members are turbine owners themselves.



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement

Name: Maren Sandall

Address: 8560 Elk Springs Rd. Ellensburg WA
(Please include your Zip!) 98926

Please write any comments you have with respect to the
Kittitas Valley Wind Power Project DEIS
below and leave this sheet in the Comment Box.

The Ellensburg Blue (gem) is only found
in Kittitas County, on the ridges.
Jilka proposes to construct their
wind towers - Rock hounds from all
over come to this valley to look
for these stones - If the KVWPP
is allowed, the search for Blues,
and the Blues themselves will be
lost forever!

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Use the back of this form if you need more room for comments

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

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Jan. 13, 2004

Allen Fiksdahl
EFSEC Manager

DEIS Kittitas Valley Wind Power Project Comments

Dear Mr. Fiksdahl

After having gone over the DEIS for KVVPP, I make the following statements:

This DEIS is 1 3/4 inches thick. It is full of summaries, suppositions, and distorted conclusions. The average person who doesn't have a vested interest in what this DEIS says, would read some of it, get bewildered, get tired and complacent, and then shrug and accept it.

1

The conclusions offered in it are distortions. Averaging its impacts with the two other proposed facilities has lessened the impacts on the environment for this facility. This is done with a view of the impact on the whole valley, the Yakima River and the Columbia River

Key words used: "NOT EXPECTED TO BE CUMULATIVELY SIGNIFICANT". The impacts on one site may differ from others. The topography varies from site to site. The assessment of this site should have nothing to do with Desert Claim or Wild Horse. The effect of averaging is to soften the perceived impact and make approval more palatable. All these sites are very special in their own ways. A SITE SPECIFIC analysis for each of them should be mandatory.

2

Setback There is some new information from a German spreadsheet that gives statistics on ICE THROWS. New information for different sizes of turbine range from 2152 feet for the smaller, to 2985 feet for the larger (see attachments 1 & 2). These figures make it clear that present setbacks may need to be adjusted.
On Scenic Highway #97, 47 turbines are closer than 2985' - 32 are within 2152'.
Betas Rd. - 19 within 2152' - County
Hayward Rd - 27 within 2152'
Elk Springs Rd - 23 within 2152'
Cricklewood Lane - 15 within 2152'
Setbacks for houses and property lines may also be in order.

3

If it turns out that proper setbacks can not be achieved, we would be highly pleased if you would reach a finding of NO ACTION on this project, and relay your recommendation to the Governor, so we can get on with our lives.

Thank you,

Earle Price
Earle Price
430 Cricklewood Lane,
Ellensburg, WA

Attachment (2)

Earle and Gerri Price

From: <CMLawton3@aol.com>
To: <CMLawton3@aol.com>
Sent: Monday, January 12, 2004 1:45 PM
Attach: 1-11-2004 Letter to Riffle re ice throw & foth FIN00.ZIP
Subject: Windmills - Important Information: Ice Throw Calculation Spreadsheet

All--

I have learned that some of you are having difficulty opening the attachments. I am not sure what the problem is--but I am resending the last email. Let me know if you are still having trouble. The attachment is 2 .PDF files in a ZIP file.

If you would like to be removed from this list, let me know.

Thanks.

Catharine M. Lawton

1/12/2004

All--

I have attached two letters that contain important data and information that will help you.

1. ICE THROW SPREADSHEET: The first letter identifies the location of a spreadsheet (accessible on the internet) that you can use to estimate the potential ice throw distance based on the parameters of the wind turbine that the wind developer in your area has proposed. You will need the following info:

- Tower Height
- Blade Length
- Rotor Speed (RPM)

This spreadsheet is in German--but see Attachments A & B to the letter that include translations.

* As I have discovered, ice throw and the related data is widely known and available in Germany. The first letter also includes a chart from a law firm website in Germany that outlines throw distances for "typical machines." See Exhibit C. The reported ice throw distances range from 390 meters to 995 meters.

2. INTERCONNECTION QUEUE: The second letter addresses transmission planning--and the interconnection "queue." Your regional transmission company (ATC in Wisconsin) likely maintains a similar "queue" which will give you important intelligence and a "heads up" as to the scope and timing of proposed wind farm development(s) in your area.

If you have questions or need additional information, let me know.

Catharine M. Lawton
West Bend, Wisconsin

01/13/2004

Attachment 1

Earle and Gerri Price

From: <CMLawton3@aol.com>
To: <SnL2gether@worldnet.att.net>; <saschmidt@core.com>; <rrgumm@nconnect.net>; <j3john4@msn.com>; <kathyh93@yahoo.com>; <roger.horst@honeywell.com>; <nelli@hnet.net>; <rsmfwic@westbend.net>
Cc: <EMPAInc@aol.com>; <Hewson@evainc.com>; <jac@adams.net>; <jdonelan@saveoursound.com>; <gpbal@netnet.net>; <eleanortillinghast@att.net>; <elisebittner@yahoo.com>; <mstepleg500@yahoo.com>; <gabaker@dowellbaker.com>; <bateslee@elltel.net>; <Cornfield1@aol.com>; <editor@cambridmagazine.com>; <evelyn1930@gis.net>; <gjstraub@torchlake.com>; <gtwilson@integrity.com>; <hector@mcsi.net>; <jeffgarfield@yahoo.com>; <john.white@state.or.us>; <kiteleyfarms@torchlake.com>; <markduchamp2@hotmail.com>; <MaturenAppraisal@aol.com>; <pburt@netzero.net>; <Rhurley@Theaccordgroup.com>; <rich@southbristolviews.com>; <robert.carlson@verizon.net>; <suelindberg@worldnet.att.net>; <swilbur@ix.netcom.com>; <TALAHIDAVE@msn.com>
Sent: Monday, December 22, 2003 12:09 AM
Attach: 12-21-2003 Ltr to Riffle - Wind Turbine Icing.ZIP
Subject: Windmill Icing, Ice Throw, Safety - T. of Addison, Wisconsin

All-

Attached is the letter and technical papers (2 .PDF Files) that I submitted by fax tonight to Town Attorney Riffle in the pending Town of Addison windmill CUP matter. A decision on this matter is likely to be made on January 8, 2004.

The 19-page letter includes an approx. 1-page Executive Summary which is pasted in below. The .PDF files include 7 of the referenced technical papers as attachments to the letter (Exhibits A - G). Other papers are referenced in footnotes.

If you have comments or questions, let me know.

Catharine M. Lawton

December 21, 2003

BY FACSIMILE: (262) 548-9211

H. Stanley Riffle, Esq.
 Arenz, Molter, Macy & Riffle, S.C.
 720 N. East Avenue
 P.O. Box 1348
 Waukesha, Wisconsin 53187-1348

Subject: Addison Wind Energy LLC CUP - FOR THE RECORD
 Risk of Wind Turbine Ice Throw & Required Safety Setbacks, Wind Turbine Ice Sensor Reliability, Wind Turbine Icing Safety Issues, and Adequacy & Safety of Current Wind Turbine Designs

Dear Attorney Riffle:

The purpose of this letter is to address the limited evidence presented by the Applicant on the following subjects:

- " the risk of wind turbine ice throw & required safety setbacks,
- " wind turbine ice sensor reliability,
- " wind turbine icing safety issues, and
- " adequacy & safety of current wind turbine designs

EXECUTIVE SUMMARY

01/13/2004

The Applicant's limited evidence on each of these matters is not only incomplete and inadequate, but it is also highly misleading and directly contradicted by the wind industry's own research, investigation and authoritative technical papers that have been published and available since at least the mid-1990s. This evidence establishes the following:



1. The wind industry's "authoritative ice throw guidelines" recommend an ice throw risk of 10⁻⁶ -or one strike per million square meters per year. At this risk level, a minimum ice throw safety setback for a 50 meter rotor diameter wind turbine in heavy icing conditions is 400 meters (1,312 feet). For an 82 meter rotor diameter wind turbine in heavy icing conditions, the minimum ice throw safety setback is 656 meters (2,152 feet).

2. The wind industry technical research establishes that "the reliable detection of ice is an indispensable requirement for the operation of wind turbines in cold climates." However, the wind industry's studies over many years establish that de-icing and anti-icing systems have not proven reliable. In addition, the available ice sensors are not reliable. The wind energy technical papers report: "It is important to produce definitions and specifications for measurement of icing and for ice sensors. This information is also required e.g. for safety standards of wind turbines." In fact, standardized conditions for ice sensor design and calibration "are not available yet and have to be defined."

3. Wind turbines operating in cold climates present an inherent, significant and recognized public safety risk-and the scope of the risk is much broader than ice throw. Wind turbine icing, and the resulting unbalance, resonance, over power and fatigue, can affect the structural integrity of the wind turbine itself.

4. The technical literature raises serious and on-going questions about the adequacy and safety of current wind turbine designs. There are reportedly no structural safety design standards for wind turbines operating in icing conditions, notwithstanding the fact that 400 large wind turbines (500 MW) are operating in cold climates. The technical papers expressly state that it is up to the project developer and turbine buyer to ensure that the windmill is adequate for the site conditions.

a. In 2000, wind industry technical research reported that "there still is little knowledge of precisely [how] the turbine is loaded under icing conditions."

b. In 2001, the urgency of the design problem was noted: "Monitoring the operation and loads of the large wind turbines is urgently needed in order to verify the design loads, not only concerning icing but also for wind farm and complex terrain operation."

c. In 2002, wind industry technical research reported that the wind turbine and component industry and operators are "poorly aware" about the occurrence and frequency of icing and lack knowledge about safety problems caused by icing especially iced blade safety problems.

d. By 2003, not much had changed-wind industry technical research was still reporting that "there is very little knowledge and data about the parameters needed to use the produced [theoretical ice and snow accretion on structures] formulas in the most proper way."

e. In 2003, it was also noted that atmospheric icing occurs during a much wider range of temperature and humidity than usually expected-which may lead to significant error in wind turbine design loads used in many countries. A 5-year, \$4.3 million study was launched to address the many issues.

* * *

01/13/2004

Jan 13, 2004

Kittitas Valley Wind PP
DEIS Comment - Indiv. 21

BACKGROUND

Washington is at an energy crossroads. If we only build more natural gas plants to meet future increases in our energy demand and do not improve our energy efficiency and diversify our energy sources, we will continue to leave ourselves vulnerable to energy shortages and massive price increases.

For much of the past 50 years, Washington has relied heavily on hydroelectric power to meet its energy needs. In 1998, approximately 60% of Washington's energy was produced by its extensive dam system and 25% was produced by burning fossil fuels like coal and natural gas. Only 2% of our energy was produced by clean renewable sources like wind and solar power. What's more, from 1993, utilities in Washington cut their investments in energy efficiency programs by 75%.

In 2001, however, a combination of events exposed the cracks in the foundation of Washington's energy supply:

1. Energy Shortages in California - Normally, we buy electricity from California during our winters when we need more power and sell them electricity during our mild summers, but because of the massive energy problems in California in 2001 we were not able to import power. In fact, the federal government ordered Washington to sell power to California regardless of our energy shortages.
2. Lack of Rain in the Northwest - We would normally make up the power shortfall with an increase in hydroelectric power by running more water through our dams, but that year we were in the midst of a drought that left water levels at record lows so we couldn't make up the deficit with hydroelectric power.

As a result, Washington utilities did not have the capacity to generate enough power to meet the needs of citizens and businesses, so they had to buy power on the open market. Unfortunately, spot prices on the open market increased dramatically because many states in the west and northwest (especially California) experienced energy shortages and had to buy energy on the open market as well. For instance, most utilities could produce electricity for \$20-\$50 per megawatt hour, but prices on the open market were as high as \$750 per megawatt hour.

As utilities bought more power on the open market instead of producing it themselves, they passed the higher costs on to their customers. As a result, many citizens and businesses saw their electricity bills double, triple and even quadruple. And today, 2 years after the crisis, we continue to pay high electricity bills as utilities continue to pay down the debt they accumulated in 2001 and natural gas prices continue to increase.

Unfortunately, utilities haven't learned their lesson and they are planning to meet our increasing energy demands by building several natural gas plants, so if we have another drought and natural gas prices continue to skyrocket (which many studies predict they

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will), we will be just as vulnerable to another massive energy crisis as we were in 2001.

We can avoid another energy crisis, improve our economy, and reduce pollution by generating more power from renewable sources and increasing investments in energy efficiency technologies. According to a study from the WashPIRG Foundation, meeting Washington's future energy demand through wind energy and energy efficiency instead of natural gas would generate approximately \$474 million for Washington's economy in the next 20 years, compared to \$192 million if we build natural gas plants. Furthermore, clean, renewable energy sources - including wind, solar and geothermal power - do not pollute our air or water and will never run out, unlike coal, natural gas and other fossil fuels. And renewable resources - unlike oil and natural gas - are not subject to price spikes and supply interruptions.

Washington is at an energy crossroads. If we only build more natural gas plants to meet future increases in our energy demand and do not improve our energy efficiency and diversify our energy sources, we will continue to leave ourselves vulnerable to energy shortages and massive price increases.

1
cont.

January 13, 2004

Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

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Dear Council Members,

There are two issues that are part of the Draft Environmental Impact Statement (DEIS) I wish to address. First, is the compatibility of a wind farm in the proposed site. Two-thirds of the proposed turbines (78 given the middle scenario) are situated in Forest and Range 20, where the wind blows hard and often as tests have shown. The rest are located in Agriculture 20. The purpose and intent of the Forest and Range zone "...is to provide for areas of Kittitas County wherein natural resource management is the highest priority and where sub-division and development of lands for uses and activities incompatible with resource management are discouraged"(Kittitas County Zoning). If water power is considered a natural resource then how can wind power not be considered a natural resource? So, how can the utilization of this natural resource not be the highest priority in this zone?

1

That part of the wind farm that is in the Agriculture 20 zone is also compatible with the purpose of their zone, which is "...to preserve fertile farmland from encroachment by non agricultural land uses and to protect the rights and traditions of those engaged in agriculture" (Kittitas County Zoning). Wind farming is a way for the rancher to make additional income from the land with no negative affect to the present use, grazing livestock.

The second issue is the effect the wind farm would have on the value of property in close proximity to the turbines. The following is a list of the sales of properties located adjacent to or within the proposed wind farm. This list includes sales after April 19, 2002 when the Daily Record first reported Zilkha's intent to file permits for their wind farm, and for comparison, some recent property sales dated before the wind farm became public knowledge. This information is of public record and was obtained from the Kittitas County Auditor's office and the Kittitas County Treasurer's office.

2

Individual Letter 22

Sales after the announcement of the wind farm:

	Parcel Number	Acres	Purchase Price	Affidavit #	Date of Purchase
#1	20-17-35000-0022 P325436	14.67	\$98,000	14984	05/24/2002
#2	20-17-35000-0019 P925436	14.94	\$26,000	15076	06/05/2002
#3	19-17-02000-0004 P477634	20	\$24,950	15647	08/19/2002
#4	20-17-35000-0009 P655635	14.98	\$50,000	16005	10/04/2002
#5	20-17-35000-0010 P665635	60	\$240,000	16482	12/12/2002
#6	19-17-01000-0008 P911836	47	\$80,000	17056	03/07/2003
#7	20-17-35000-0015 P715635	14.87	\$52,000	17228	03/27/2003
#8	20-17-35000-0017 P805436	11.14	\$85,000	17234	04/02/2003
#9	20-17-35000-0029 P635436	10	\$110,000	17766	06/17/2003
#10	19-17-02000-0008 P921836	20	\$29,950	17958	07/07/2003
#11	20-17-35000-0034 P337936	60	\$145,000	19143	12/02/2003
	20-17-35000-0035 P568136	20	(80 acres total/ two parcels)	19143	
#12	Large piece of property purchased for development				
#13	Large piece of property purchased for development				

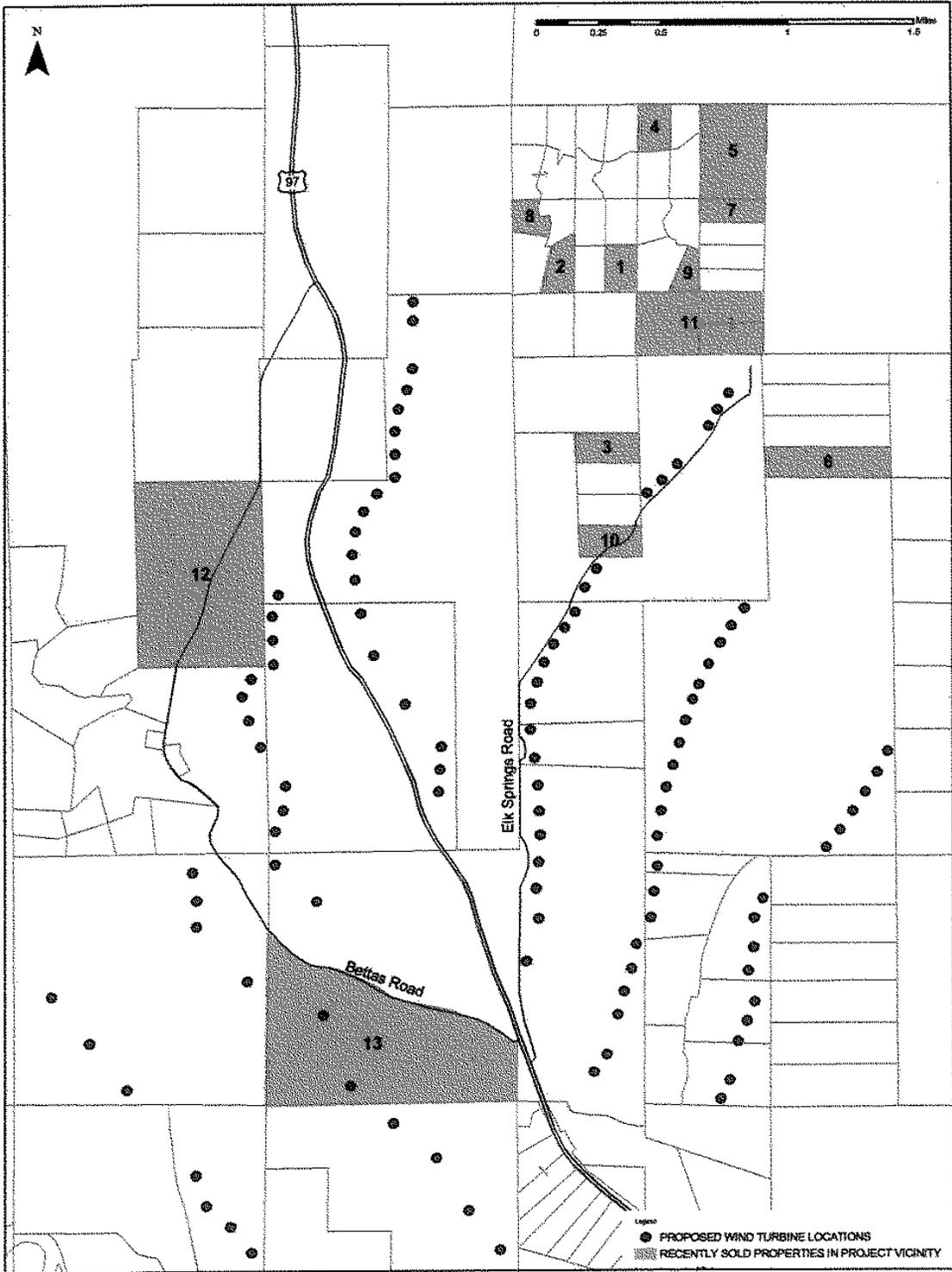
Sales before the announcement of the wind farm:

	Parcel Number	Acres	Purchase Price	Affidavit #	Date of Purchase
#6	19-17-01000-0008 P911836	47	\$19,950	35884	04/01/1993
#8	20-17-35000-0017 P805436	11.14	\$55,000	10333	07/18/2001
#9	20-17-35000-0029 P635436	10	\$17,000	7771	04/08/1999
#10	19-17-02000-0008 P921836	20	\$22,000	38064	04/25/1994
#11	20-17-35000-0034 P337936	60	\$76,950	12270	03/27/2001
	20-17-35000-0035 P568136	20	(80 acres total/two parcels)	12271	03/27/2001

**The above parcels are all accessed from the Elk Springs Road, with the exception of #'s 12 and 13. See the attached map.

**RECENTLY SOLD PROPERTIES IN THE
KITITAS VALLEY WIND POWER PROJECT
SITE VICINITY**

January 8, 2004



Individual Letter 22

Comparisons:

Lot #6:	Purchased:	April 1, 1993 for \$19,950.
	Improvements:	driveway, well, small outbuildings.
	Sold:	March 7, 2003 for \$80,000.
Lot #8:	Purchased:	July 18, 2001 for \$55,000.
	Improvements:	minor if any
	Sold:	April 2, 2003 for \$85,000.
Lot #9:	Purchased:	April 8, 1999 for \$17,000.
	Improvements:	driveway, septic system, 1000 gallon water storage, small log cabin.
	Sold:	June 17, 2003 for \$110,000.
Lot #10:	Purchased:	April 25, 1994 for \$22,000.
	Improvements:	none, improved land
	Sold:	July 7, 2003 for \$29,950.
Lot #11:	Purchased:	March 27, 2001 for \$76,950.
	Improvements:	driveway, small post and pole type cabin.
	Sold:	December 2, 2003 for \$145,000.

Another comparison can be made for unimproved land accessed from the Elk Springs Road: from April 1999 until Zilkha's announcement, eight unimproved lots sold for an average price of \$1,338 per acre. Since then, six unimproved lots have sold for an average price of \$2337 per acre.

This information, which is public record, indicates that:

1. It is not difficult to sell land in this area.
2. Since April 19, 2002 (date of Zilkha's announcement):
 - a. Unimproved land in this area has increased by \$1000/acre.
 - b. Improved land has increased from about double to about six times in value.

The last information I would like you to notice is the two very large parcels to the south and west of these other properties. These properties have been purchased by developers since Zilkha's announcement and have been subdivided for homes, which is another indication of increasing land values.

In summary, this information supports the Renewable Energy Policy Projects study finding in the DEIS. Therefore, we can conclude that local properties (Kittitas County) in close proximity to the wind farm will not be negatively impacted by the project and will most likely be enhanced.

Michael K. Genson
101 Elk Springs Road
Ellensburg, WA
509-964-9082

2
cont.

3

4

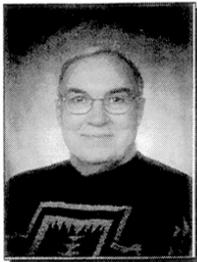
"HORSE CANYON ESTATES"



**Gorgeous & Desirable
Hidden Valley Area!**

**19 Acreage Parcels, Ranging
from 4.04 to 29.19 Acres.
Mountain & Territorial Views!
Power & Phone Available!
Includes 49.48 Acre Open
Space Parcel. Call our office for
the details...**

Lot 1	4.04 Acres	\$69,000
Lot 2	8.00 Acres	\$79,000
Lot 3,4,5	21.52 Acres	\$82,000
Lot 6,7	20.00 Acres	\$75,000
Lot 8,9	29.19 Acres	\$78,000
Lot 10	7.15 Acres	\$91,000
Lot 11	8.87 Acres	\$99,000
Lot 12	9.54 Acres	\$101,000
Lot 13	10.88 Acres	\$97,000
Lot 14	8.19 Acres	\$109,000
Lot 15	8.47 Acres	\$105,000
Lot 16	8.58 Acres	\$104,000
Lot 17	7.98 Acres	\$104,000
Lot 18	9.08 Acres	\$105,000
Lot 19	19.65 Acres	\$189,000
Lot 20	10.32 Acres	\$99,000
Lot 22	10.33 Acres	\$119,000
Lot 23	10.00 Acres	\$117,000
Lot 25	10.00 Acres	\$99,000



Paul Ingram

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INGRAM REALTY

107 West First Street * Cle Elum, WA 98922

FIGURE DESCRIPTION (???)

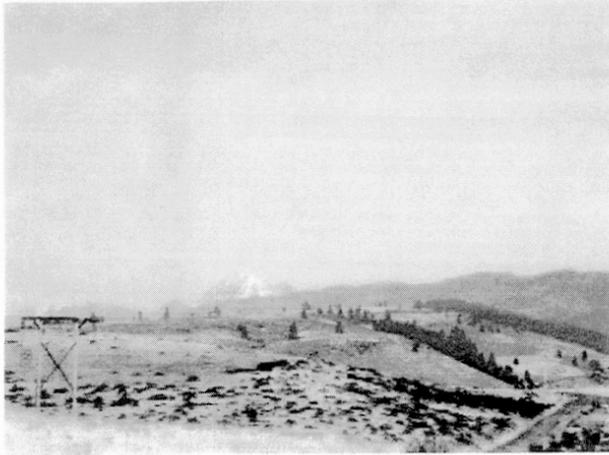


385 Front Street N., Suite 102
 Issaquah, WA 98027
 Office: 425-391-1997 or 1-800-790-7405
 Fax: 425-391-0626

[Quick](#) [Standard](#) [Custom](#) [Address](#) [Listing #](#) [Tax ID](#) [Radius](#)

Listing Pictures

100 Bettas Rd Ellensburg, WA 98926

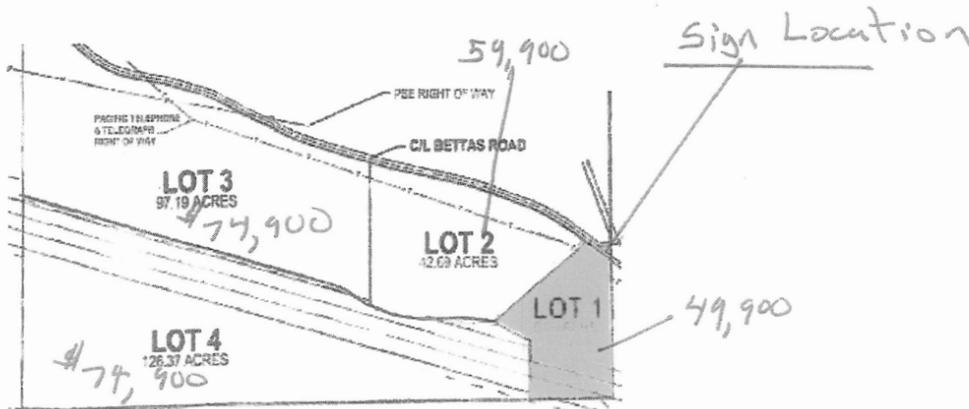


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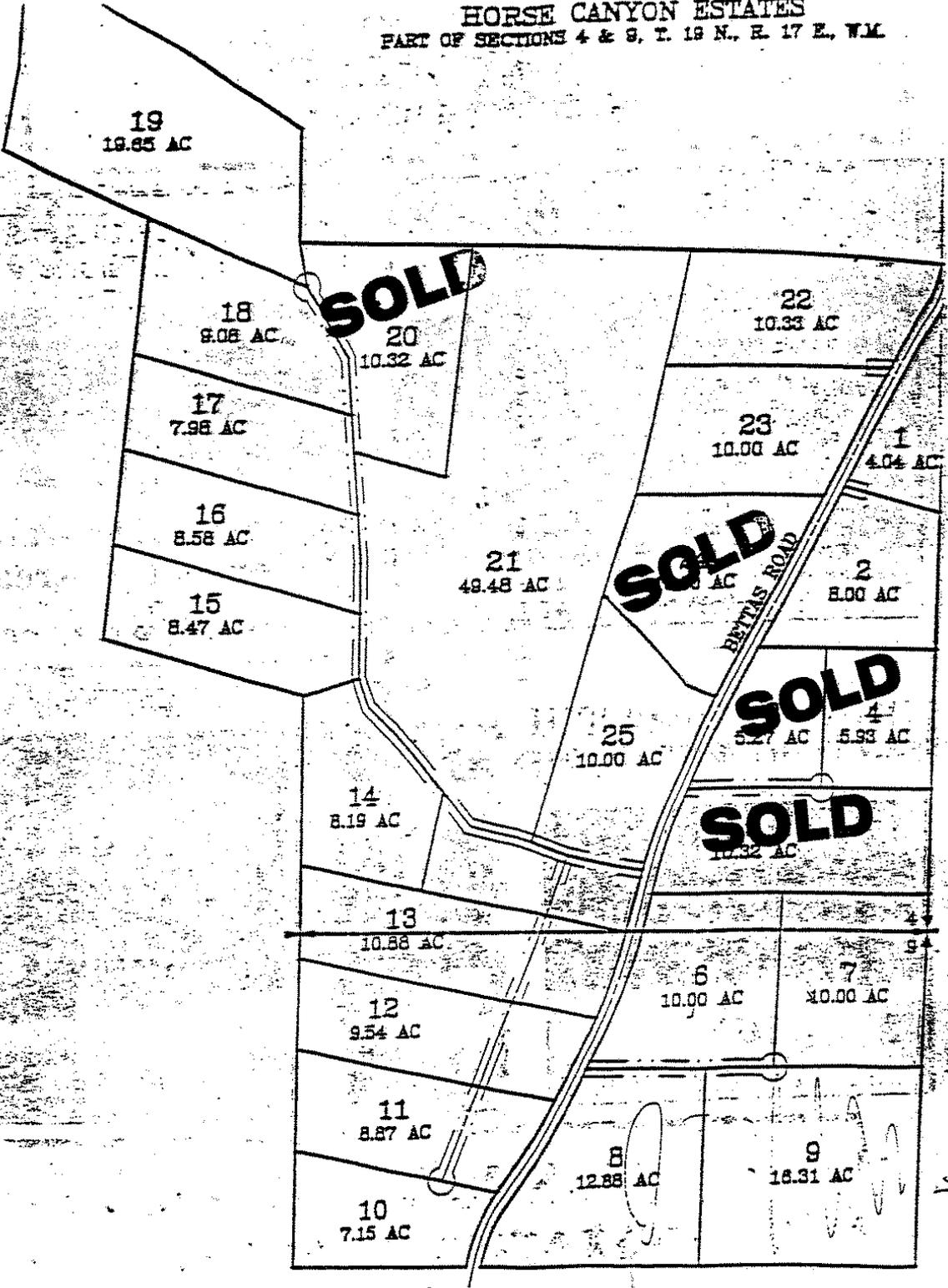
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Vacant Land Only; also available
 w/water & septic Add \$20,000 per lot

of 2

5/31/2003 6:50 PM

HORSE CANYON ESTATES
PART OF SECTIONS 4 & 9, T. 19 N., R. 17 E., W.M.



Jan 13, 2004
Kittitas Valley Wind PP
DEIS Comment - Indiv. 23

Comments pertaining to the accuracy and completeness of the:

Kittitas Valley Wind farm Project
DEIS
December 2003

(Summary of Comments starts on Page 12 of this document)

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

RECEIVED
JAN 13 2004

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Fact Sheet

The original **Kittitas Valley Wind Power Project application** states:

2.3.1.2 Overview

The Kittitas Valley Wind Power Project consists of several prime elements which will be constructed in consecutive phases including roads, foundations, underground and overhead electrical lines, grid interconnection facilities, one or two substations, an operations and maintenance (O&M) center and associated supporting infrastructure and facilities.

Approximately 90 acres of land area will be required to accommodate the proposed power plant and related support facilities. A general site layout illustrating these key elements is contained in Exhibit 1, Project Site Layout.

The Project will consist of up to 121 wind turbines for an installed nameplate capacity of up to 200 megawatts (MW). The Project will utilize 3-bladed wind turbines on tubular steel towers each ranging from 1.3 MW to 2.5 MW (generator nameplate capacity) and with dimensions as shown in Figure 2.3.6-1.

This Draft EIS attempts to evaluate the environmental impacts of three distinct project scenarios described as "Lower End Scenario", "Middle Scenario", and "Upper End Scenario". The "Lower End Scenario" utilizes turbines (with a 3 MW nameplate capacity) that are not even described in the application. The DEIS states that between 93 and 118 acres of land will be utilized; at odds with the application statement of only 90 acres being used.

1

Immediately one can determine this DEIS document is inaccurate at best and realistically, incomplete in its analysis.

2

This proposed project is being treated as a single power generation facility when in fact; the applicant states they would like it to be considered as a project consisting of 82 to 150 separate power generating turbines of different sizes and power generating capacities. This is inconsistent with the evaluation and oversight of large energy facilities in a single location that is in the EFSEC charter. The project should be clearly defined and the individually placed turbines evaluated as to their singular environmental impacts, then as to their aggregated impacts as part of a wind generation facility, and finally the whole facility evaluated as to the impacts relating to combined effects of multiple wind power generation facilities in the context of the Kittitas Valley as a whole. This document is very large, but there is no excuse for accepting flawed and incomplete scientific analysis.

3

502

**Chapter 1
Summary**

1.2 Purpose and Need for Project

The stated nameplate capacity of this project proposal is between 246 MW (although this configuration will most likely not be built due to the liability of increased utility regulations for any power generation facility over 200 MW) and 181.5 MW. Actual (or effective power generation) from commercial wind power facilities is in the area of 30 percent. It follows that this project's real (useable) potential capacity is between 73.8 MW and 54.45 MW.

Information noted in Table 1-1 (Projected Pacific Northwest Electricity Demand, 2000-2025) suggests that there will be a 1,854 MW (Medium Low forecast) and up to 15,817 MW (High forecast) increase in power demand through 2025. Using the "Middle Scenario" wind facility configuration (54.45 MW effective), this project would only contribute between 3% (Medium Low forecast) and 0.3% (High forecast) to this growth. This is an insignificant contribution to the public's potential need for anticipated increased power consumption in the Northwest. To contrast, the Sumas Energy 2 Generation Facility (SE2GF) is a nominal (and dispatchable) 660 MW natural gas-fired electrical generation facility and would contribute between 36% and 4% of anticipated need and would only occupy a portion of a 37-acre site within the industrial area of Sumas, Washington.

4

Commercial wind power generation is a diluted (requiring vast tracts of land) and intermittent power source. Net new conventional power generation capacity must be added to the regional grid for every wind power nameplate capacity MW added to generate power when the wind does not blow. This requirement makes this project's contribution even less viable.

5

The applicant states there is a growing demand for "green resources", but in fact all utility offered voluntary programs have a very low participation rate. Washington State already has the highest participation per capita rate of "green sources" power consumption in the nation derived from low cost hydro-electric power generation. The net effect of adding additional commercial wind power generated capacity to the regional supply is to raise the rates of all utility customers due to increased costs associated with stabilizing our current supply. This is a form of power generation that relies on tax payer subsidies, legislated markets, and increased user rates to be viable. Offering incentives to the public to reduce demand and subsidizing research to produce products that consume power more efficiently would better serve the public interest. There is no demonstrable need for this project.

6

Alternative Wind Turbine Locations

1.4.4 Offsite Alternatives

Remoteness from nearby transmission lines with sufficient load carrying capacity has absolutely no bearing on suitability for consideration as an alternate location for the purpose of this EIS. This factor only involves business case decisions relating to profitability. As stated previously, there are plenty of other sources of power generation where the construction of power transmission capability has been part of the project. This is not a concern for an EIS evaluation. The only consideration to meet this requirement is whether there is sufficient wind to produce power at the proposed alternative site.

7

1.9 CUMULATIVE IMPACTS

1.9.1 Earth Resources

The breaking of ground for tower construction and electrical interconnection will provide inroads for invasive noxious weeds that are already a serious problem within Kittitas County and impacts farming yields. This is an ongoing and cumulative impact.

8

1.9.2 Vegetation, Wetlands, Wildlife, and Fisheries

Wildlife

Cumulative mortality rates for raptors are based on insufficient data. A minimum two year base line avian population study of the whole Kittitas Valley is required to determine actual avian flight patterns in the area where these projects are being proposed. No studies were even performed to estimate bat mortality rates. 9

Local elk calving areas will be impacted and will most likely result in this population avoiding the area until the facility is decommissioned. 10

Socioeconomics

The three combined projects would not increase the amount of annual property tax revenue to the county. The amount of property tax generated revenue collected is limited to 1% annual growth with the passage of Initiative 747. This rate of increase in property tax revenue has been more than met year after year with increased valuations on existing property and new construction within the county. Any potential lowering of individual tax liability will be lost by the increase in average consumer electrical rates due to the introduction of this type of generated power to the regional grid. 11

Visual Resources

The cumulative effect of the KVVPP and Desert Claim projects on the viewshed in an area that the State of Washington has designated as a Scenic Byway (Highway 97 corridor) is severe and may even be a highway safety issue due to driver inattention. The night time disturbance of multiple blinking red warning lights will contribute to this visual pollution and add to the background ambient light that is considered undesirable by a large number of amateur astronomers who visit this area for its quality of night time viewing. 12

Noise

The noise modeling offered for this EIS did not include low frequency analysis and as such, the conclusion that there is no cumulative effect is most likely incorrect. Low frequency noise carries much farther than the frequencies measured. This noise is generated when the blades pass in front of the supporting tower structure and the more turbines there are, the more intrusive this noise source becomes. 13

**Chapter 2
Proposed Action and Alternatives**

2.2.2 Project Location and Project Site

Project Setbacks

The desired general setback criteria suggested conflicts with data supplied by the noise, shadow flicker, raptor collision impact analysis, and safety analysis. | 14

2.7 CONSIDERATION OF OFFSITE ALTERNATIVES

Site Selection and Suitability Criteria

An alternate site selection should not be limited to only sites that the applicant has personally studied. Wind resource maps of the area indicate there are many more potential (and remote) areas that the applicant has not evaluated. | 15

(2) Proximity to existing transmission facilities and adequate capacity

Distance from and capacity of existing transmission facilities is not a consideration in an EIS unless the construction of new transmission capability is required and would effect the environment. This is a profitability issue to the developer of this type of power generation. | 16

Site Screening Process

Springwood Ranch
Sufficient wind resource is present. Accessibility to transmission facilities is not an eliminating criterion. | 17

Manastash Ridge
Sufficient wind resource is present. Accessibility to transmission facilities is not an eliminating criterion. | 18

Chapter 3 Affected Environment, Impacts, and Mitigation Measures

3.1 EARTH RESOURCES

3.1.2 Impacts of Proposed Action

Construction Impacts

No analysis was provided on the potential impact (or proposed mitigations) to drinking water well contamination due to blasting used in the excavation for the construction of the tower turbine bases and interconnecting trenches.

19

3.2 VEGETATION, WETLANDS, WILDLIFE AND HABITAT, FISHERIES, AND THREATENED AND ENDANGERED SPECIES

3.2.1 Background

Methods

Extensive wildlife surveys were in fact not performed. cursory point count and in-transit surveys were conducted from February 2002 through early November 2002 by Western Ecosystems Technology, Inc. (WEST). In addition, aerial surveys were used to identify visible raptor nests. WEST was the same consultant used to analyze the adjacent enXco Desert Claim project and was the consultant used to site the Foote Creek Rim wind project in Wyoming.

20

The local Kittitas County Audubon Society chapter has recommended a two year baseline study of the entire Kittitas Valley to more accurately site wind power facilities in the context of potential cumulative impacts to wildlife and especially avian wildlife.

Wildlife and Habitat

Birds

Besides the fact that the study was insufficient in length; a mapped summary of raptor observations and flight paths by species or group was not performed. This analysis was performed on the Desert Claim project and four significant areas of raptor activity were identified that involved raptor hunting behavior associated with ridge lines in the project area. This raptor behavior was also noted in the Foote Creek Rim project in Wyoming. WEST recommended 50 meter setbacks in both projects from existing ridge lines to limit raptor mortality. One can only speculate as to the reason Zilkha Renewable Energy (Sagebrush Power Products LLC) did not perform this analysis, or if it was performed, why it was not included in this EIS. It is my opinion that this information was not provided due to the fact that it would show an unacceptable risk to raptor populations. The majority of this project as proposed exists on ridge tops which are prime raptor hunting territory.

21

Aerial raptor nest surveys are insufficient. No residents in the area were contacted to discover known nesting sites and since Kestrels are a cavity nesting species, no amount of aerial surveys are likely to discover their nests.

22

No night observations were performed (radar or otherwise) which means owl populations and bat populations were basically ignored.

23

No sound observations were performed to estimate 'unsighted' bird populations. | 24

No rodent population surveys were performed to determine preferred raptor habitat. | 25

No Bald Eagle roosting sites were searched for outside the project area to determine if their travel patterns might intersect with the proposed wind power facility. | 26

No avian baseline studies were offered from other operating wind power facilities to determine possible effects over time. | 27

This project violates several recommended guidelines developed by the US Fish and Wildlife Service; specifically, recommendations numbers 2, 4, 6, 9, and 10. | 28

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.
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.
- 10. Reduce availability of carrion by practicing responsible animal husbandry (removing carcasses, fencing out cattle, etc.) to avoid attracting Golden Eagles and other raptors.

3.4 HEALTH AND SAFETY

The applicant quotes at every opportunity, risk assessments based on documented instances of injury and/or damage. The reverences to injury based on numbers of turbines installed are particularly irrelevant due to the fact that most wind farms are built away from populated areas (unlike this proposal). Many times the words "rare" or "of low probability" are used. But by their own admission, the implementation of turbine technology of this size is relatively new. There has not been sufficient time for a historical database to build up so that empirical data can be relied upon to assure safety standards for large scale wind facilities. This being the case, it should be evident that safety margins be created to anticipate potentially unforeseen problems with this technology within a changing environment; something that most certainly will occur over the stated 20 year life of the project. One of the things that history has shown (and we can rely upon) is that man does not anticipate all the impacts of technology that he implements.

29

3.4.2 Impacts of Proposed Action

Operations and Maintenance Impacts

Rotor blade tip throws were not listed as operational impacts.

30

Risk of Fire or Explosion

There are no negotiated fire response plans with existing fire districts for this project. 80% of the project lies outside of existing fire districts. The situation that must be anticipated is the time it takes for a wind driven wildfire to cover 1,000 feet of tinder dry shrub steppe. This distance is the unacceptable setback that the applicant proposes for turbine placement from an existing home. Common sense says the most probable time of fire initiation is when the turbine is either running at its extreme limits or attempting shut down. This is an operational upper limit of around 55 MPH. 55 MPH is 4,840 feet a minute. Fire breaks have very little effect on wind driven wildfire, so residents living in this increased fire risk zone must have fast fire district response. Proposed turbine D1 is 1,300 feet from my home's back door.

31

Risk of Turbine Tower Collapse

A 3 MW turbine has a combined height of 410 feet. The access road (my driveway) to my home comes within 400 feet of proposed turbine D1.

32

Risk of Turbine Blade Throw

Using the classic maximum trajectory case from standard physics texts; a 3 MW turbine is capable of throwing a blade over 500 feet. Proposed turbine D1 is within 400 feet of my access road.

33

Risk of Ice Throw from Turbine Blades

There have been documented instances of ice throws over 1,300 feet. The contention that icing occurs on average 3 to 5 days is already exceeded this winter season. Icing at the string D area has occurred at least 7 days as of 12/22/2003. The risk of ice throws is not an insignificant potential and can result in damage and/or injury. I have attached a photo below from this morning showing that icing is not a rare occurrence in the project area.

34

Shadow Flicker

This effect is not just a nuisance impact. If these shadows sweep across public or private roads, a transportation safety impact is present due to operator distraction.

35

No non-participating resident within this project area should have to endure a single second of this effect in their home. Further, zero effect individual setbacks from non-participating property lines should be required to respect individual property rights (i.e. where a property owner can build, board horses, or enjoy viewing wildlife as examples).

36

The recommended mitigation of planting trees and/or installing shades on affected windows is unacceptable. The residents affected by this effect bought property in the area for the view, appreciation of wildlife, or even the boarding of horses. This effect limits their prime viewing time during early morning hours and inhibits the use of their property which may involve the boarding of horses.

37

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.

38

3.4.4 Mitigation Measures

Mitigation Measures Proposed by the Applicant

No analysis or discussion of possible increased risk of the Hantavirus to the residents within the proposed project area due to the potential of increased rodent populations as a result of decreasing raptor populations was presented.

39

Fire and Explosion Risk

The applicant should provide 7 day, 24 hour, 10 minute emergency response times for fires within the project zone. 40

Measures to minimize Risk of Tower Collapse and Blade Throw

Blade tip throw should be included in this risk and a minimum 1,500 foot setback from any turbine to any public or private road is required. This same setback is required from non-participating property lines. 41

Measures to Minimize Shadow-Flicker Effects

The recommended mitigation of planting trees and/or installing shades on affected windows of non-participating property owners is unacceptable. The only mitigation for this effect is to move the turbines to a distance where this effect is not present. This requires individual shadow-flicker analysis on a turbine by turbine basis based on topography to assure that this effect does not cross public or private roads and non-participating property owner property lines. 42

3.7 SOCIOECONOMIC

3.7.2 Impacts of Proposed Action

Property Values

The applicant contends that an analysis of potential property devaluation as it relates to the construction of a wind farm was beyond the scope of this EIS. This assertion is absurd. The studies noted (especially the REPP study) are flawed and do not relate to this specific site area. This area has one of the fastest appreciating property values in the State Of Washington. These appreciating values are based on zoning restrictions, world class scenic views, and a rural lifestyle. These qualities are all threatened by the introduction of this proposed industrial land use and will result in property devaluation of non-participating land owners in the proposed site area. 43

Local Government Taxation and Revenue

If this facility were constructed, any increase in locally collected property tax revenue (and potential reduction in individual property owner tax burden) will more than be offset by increased monthly power rate increases due to increased utility cost to stabilize the regional grid to accommodate this low capacity, intermittent power source. 44

3.9 VISUAL RESOURCES

3.9.2 Affected Environment

Viewpoints

The applicant visited my property twice, obtained GPS readings of my home's location, and promised to produce visual simulations of the project from my home. This promise has not been kept even though I have repeatedly requested them. I have obviously what is termed by the applicant as a "predictably high level of sensitivity to visual impacts". I purchased my property for its spectacular views and the applicant has suggested I plant trees or put up blinds to mitigate the effect of shadow-flicker on my home. This would obviously limit my view with resultant property devaluation. 45

The cumulative effect of multiple turbines that are 400 feet tall, with spinning 295 foot rotors, and blinking strobe lights designed to warn aircraft of their presence is a visual blight in what is considered a Washington State Scenic and Recreational Highway corridor. If this project were built, there is no denying that the prominent feature noted within the project area will be wind turbines. Anything that moves or blinks naturally draws attention.

46

All simulations are (intentionally?) unrepresentative of the normal weather conditions that exist in the proposed site area. Every simulation has cloud cover in the background which is not representative. Very low rainfall exists in the area and it follows the majority of our days are cloudless. A white, 400 foot structure against a crystal clear blue background has a large visual impact. None of the simulations involve rotor movement. None of the simulations involve the effects of blinking white strobe lights. The simulations do not model the "Lower End Scenario" utilizing the much larger 3 MW turbines. The larger the turbine used, the more visually impactful the project becomes.

47

3.9.5 Mitigation Measures

There is no acceptable mitigation to the cumulative visual impacts associated with this project. The suggestion in section 3.9.4 (*Impacts of No Action Alternative*) that not building this facility would result in some other facility being constructed with similar visual impacts is without merit. Traditional power generation facilities have minor visual impacts.

48

49

3.10 TRANSPORTATION

3.10.4 Mitigation Measures Proposed by the Applicant

Roadway Maintenance

No commitment was made to repair damage to Bettas Rd. due the movement of heavy equipment and/or trucks either during construction or operation. This road has been damaged in the past with heavy equipment movement.

50

3.12 NOISE

3.12.2 Impacts of Proposed Action

Operations and Maintenance Impacts

Wind Turbine Noise

Noise is defined as unwanted sound. One of the reasons that most residents purchased their property was to enjoy the peaceful solitude that exists in the proposed project area. Any wind turbine noise above the ambient noise produced when the wind blows will be noticed and resented regardless of what current law specifies as permissible. Land property valuation is partially based on maintaining this rural, peaceful environment. This is one very important noise measurement that is missing in this analysis which is a low frequency 'thumping' noise produced when the blades pass in front of the wind turbine tower structure. This low frequency sound carries much further than the frequencies measured in the analysis and is cumulative in its effect. Common sense says this effect will only become more noticeable as the size of the turbine increases. Some residents living next to modern operational wind farms have described this noise source as

51

52

sounding like helicopters in the area. This is a noise source that can not be mitigated.

52
cont.

3.13 PUBLIC SERVICES AND UTILITIES

3.13.4 Mitigation Measures

Mitigation Measures Proposed by the Applicant

General

It is suggested that tax revenues generated by the Applicant's project would mitigate potential impacts to public services and utilities. This is incorrect due to Washington State law (I-747) that limits the growth rate of locally collected property tax to 1% per year. The installation of this project what put demands on the existing public service and utilities infrastructure in excess of revenues collected.

53

Examples of possible sources of increased support are noted following.

Law Enforcement

The potential for increased call rates to the sheriff's office to respond to property access violations of non-residents to the area.

54

Fire Protection

80% of this project lies outside of existing fire districts. The service level today offered by these districts to respond to fires is 'best effort'. This wind facility project introduces a significant increased fire risk to the area and the service level response must be increased. DNR helicopter based water drops will be ineffective due to the danger of approaching these very large structures by air in a windy environment. The suggested mitigations do not adequately address this increased fire risk.

55

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. **56**

This DEIS is abundant in quantity, but extremely lacking in quality of scientific analysis and entirely deficient in analysis in certain areas. Various mitigations offered are unacceptable or unworkable. **57**

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. **58**
- 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. **59**
- Mapped raptor flight pattern study to determine local raptor hunting behavior. **60**
- Study to locate Bald Eagle roosting sites outside of the project area to assess risk traveling to and from as it relates to the wind facility. **61**
- Rodent population survey to determine raptor habitat desirability. **62**
 - 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. **63**
 - Radar or other
- Night time point count and in-transit surveys to estimate potential owl mortality rates. **64**
 - Night vision enabled.
- Visual simulations utilizing 3 MW wind turbines, on a non-hazy day, and against a cloudless sky. **65**
- Visual simulations from the homes of residents living within the proposed project site. **66**
- Low frequency noise analysis relating to the sound made when a rotor blade passes in front of the tower structure. **67**

Mitigation measures offered in some cases are unworkable, insufficient, or unacceptable to local residents. In some cases, mitigations were not even offered.

In the general area of mitigating setbacks associated with individual turbine placement, conflicting or missing data indicates that the following generalized statements are insufficient.

- 1,000 foot setback from non-participating, neighboring land owner residences. **68**
 - Shadow-flicker analysis provided indicates that a much greater distance is required to eliminate this effect.
 - A wildfire safety buffer zone to provide sufficient response time for local fire districts is needed. **69**
 - Low frequency noise mitigation would suggest a much larger distance is required. **70**
- 50 foot setback beyond the tip of the blade at its closest point to non-participating neighboring landowner property lines. **71**
 - The same setbacks associated with neighboring land owner residences should apply to property lines in general. If not, then neighboring land owner's rights are being violated by limiting their ability to use their property in a fashion that may be impacted by wind turbine impacts.
- Turbine tip height setback from county/state roads. **72**
 - Distance should be far greater due to the distracting influence of the shadow-flicker effect.
 - This should include private roads as well. **73**

- o Additional safety impacts for blade throw and ice throw potential indicates this distance should be greater.

74

No setback mitigations were analyzed or offered to mitigate the observed hunting behavior of raptors along ridges at other operational wind facilities. This should be at least 50 meters (164 feet).

75

No operational mitigations to address cumulative impacts associated with the opportunity of noxious weed inroads due to tower base and turbine interconnect trench construction were offered.

76

Shadow-flicker mitigations offered are unacceptable to locally affected residents.

77

Icing at the Robertson residence (Bettas Rd.) – 1/13/2004



Kittitas Valley Wind PP
DEIS Comment - Indiv. 24

To: Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Wa. 98504-3172

January 10, 2004

RECEIVED

JAN 13 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

Subject: Comments to Kittitas Valley Wind Power Project [KVVWPP]

Dear Mr. Fiksdal;

My concern is 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.

1

Given the need for these evaluations, I submit these comments to the Dec. 2003 KVVWPP DEIS.

Summary Item 1.2 Purpose and Need - Chapter 1 page 1-1

The purpose of the KVVWPP to meet a portion of the projected growing regional demands for electricity as stated in the DEIS is questionable, from the perspective of the 9 dams on the Columbia river, 4 dams on the Snake river, and the South Eastern Washington Wind Farms, in that the State of Washington is supplying more than its` share of clean electrical energy.

2

Upgrading the national and regional power grids and a national policy of energy conservation would most likely offset the NEED for KVVWPP.

It is a concern to me that there isn`t any mention of these alternative items in the Need section of the DEIS.

1.4 Description of Alternatives; page 1-3

1.4.3 page 1-8- No Action Alternative.

2.5 page 2-32 Description of No Action Alternative

3.1.3 Impacts of No Action Alternative page 3.1-12

The No Action alternative assumes that if KVVWPP is not built that a gas fired power plant would have to be built, which would result in more adverse environmental effects than the KVVWPP.

3

It is a concern to me that there isn`t any mention in this No Action Alternative of conservation policy or more efficient power distribution grids to offset the NEED for KVVWPP.

Table 3.6-3 Project Facilities by Zoning District. Page 3.6-19

The proposed Wind Farm Resource Overlay Zone is not a normal land use for Kittitas Valley.

The majority of property owners are in Forest & Range or Ag. 20 Forest & Range and their ownership was made with no indication of a zoning change to allow heavy industry such as KVVPP or any other energy producing plant.

This zoning change will effect the environmental quality of this area by increasing bird and bat kill and destroying limited shrubstep habitat.

4

Summary Item 1.9 Cumulative Impacts; 3.14.1 Cumulative Impacts Page 3.14-1, 8 and 9. 1.9.2 page1-15 Wildlife

Studies of migratory bird patterns are insufficient for duration of seasons and time of observation.

It is not clear how the determination of low mortality was reached when no nighttime observation methods were used.

The 3 wind farms across the valley floor present the possibility of increased Avian mortality. The DEIS has not presented a study of actual cumulative mortality rates where wind farms are 1.6 miles apart, there are only estimates.

5

In the DEIS, Bald Eagle cumulative fatalities are classified as not measurable.

During the December 2003 CBC by Kittitas Audubon Society there were 11 Bald Eagles sited North of Ellensburg. This was during a foggy, cloudy, snow covered day for a period of approximately 7hrs and poses the question of adequacy of the WEST study of Eagles in the proposed KVVPP.

6

Bald and Golden Eagle Protection Act [16U.S.C. 668-668d] makes unauthorized taking of one Eagle a violation of the law. There is no mechanism for authorizing individual take "after the fact" [Ref. U.S. Dept. of the Interior FW Service Ltr of 9-5-03 to Zilka Renewable Energy]

The USFW must authorize the Take level of Bald or Golden Eagles prior to issuing a permit.

What is the level of Bald Eagle kill that supports the Bald Eagle endangered species act.

What is the turbine-decommissioning plan if the Take is exceeded?

7

There are no formal studies for Bat populations in the proposed wind farm areas.

I strongly recommend that Bat populations be studied using methods such as BIRD RAD, other modified marine radar or ocoustical methods and supplemented by visual observation to ensure sufficient accounting of migrating birds and bats in various weather conditions, [eg. fog, rain, low clouds ceilings, clear skies and nighttime].

8

Are there Bat caves [homes] that are within the possible flight path of nighttime foraging into the proposed Wind Farms.

If technology is not available at this time then the Permit should be withheld until it is and then be used to properly study bird, bats and Eagles during day and night in all types of weather. Page 3.2-45 DEIS

3.2.2 Affected Environment page3.2-13

PREY Effect on Bird Kill

Raptors will fly into the turbines in quest of ground prey.

The DEIS must develop a habitat restoration plan for the proposed KVVWP site that avoids or minimizes attracting high densities of prey animals [rodents, rabbits, etc] used by raptors.

9

Observation of Bald Eagle in the KVVWP maybe increased if the study was run for the suggested 2yr period and take into account for carrion source of food which includes deer, elk and calving remains from contributors such as; the BNSF, highway 10 or highway 97 and ranches where KVVWP is in the middle of these sources.

10

Decommissioning;

The DEIS does not state the level of bird mortality that would require decommissioning of a turbine. Example of the need for this is the Altamont WF in California where the raptor and Eagle kill is high but there hasn't been any decommissioning of turbines.

11

Decommissioning Impacts page 3.1-12

Turbine foundation removal is to a depth of 3ft below ground level. That still leaves 22ft of concrete. The DEIS doesn't state this clearly for the land owners consideration.

12

In closing, I urge that all possible and reasonable steps be taken, based on scientifically competent wildlife studies to ensure that the site is safe for wildlife. I currently do not feel that these studies have been accomplished and therefore I can only recommend the NO ACTION alternative as the proper alternative.

13

Keith Johnson



3050 Airport Rd.

Cle Elum, Wa. 98922

13 JAN 04
Mr. Allen J Fiksdal
EFSEC Manager
P.O. Box 43172
Olympia WA 43172-3172

RECEIVED
JAN 13 2004
**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Dear Mr. Fiksdal:

Having examined the DEIS for the Kittitas Wind Power Project proposed by Zilkha and Sagebrush Power Partners, here are a few comments for your consideration:

Upon perusing the entire document, several items raised questions. A couple may be just misprints or a lack of cross checking. For instance, at the end of each chapter, there is a section deducing the results of not building the wind project. In each, the impacts of a natural gas fired plant are assessed. In some places a number of 234,297 tons of CO2 are specified. In other chapters the same plant is said to produce 2,000,000 tons of CO2 per year. This looks like some sort of oversight, but which statement is really true? At least one noise map is also grafted onto the wrong quadrant in Appendix 4. The final EIS will probably have such items corrected.

1
2

On page 1-8, the Applicant has identified the project area as the "only" place in Kittitas County with sufficient wind resources to make the project "commercially feasible". The actions of the Applicant and other firms since in applying for projects elsewhere in the valley render this statement totally untrue. It is assumed that this information was well known to the applicant when this proposal was made.

3

The radio interference chapter is problematic in that it just leaves the study with an "unresolved" status. What happens when the project is built and interference becomes a real problem? On page 3.13-16, it is stated that information requested from the applicant has "not yet been provided". This situation should be resolved prior to any approvals or construction going forward.

4

The Visual Resources section is 51 pages long with only one source reference while the rest of the report contains multiple source referrals. What or who produced this section and on what were the conclusions based on? The use of 6"X 9" printed photos with windmill figures ghosted in the background are not sufficient to dramatize the stark, real visual effects of witnessing the real thing after construction. These photos do no justice whatsoever to what the finished project will do to the character and views of this area and the producers of this report know this full well.

5

My own personal expertise is in real property sales and development and the section covering property value effects is, in my opinion, incomplete and faulty in its entirety. Five studies were used as source material in this section starting on page 3.7-15. The REPP, ECONorthwest, and Damborg studies were prepared by organizations in favor of wind power development. The Damborg poll basically states that, and I'm paraphrasing here: "only uninformed people are negative" about wind power. The Sinclair Knight Metz 2001 study seems to prove that properties with turbines actually on them increase in value while nearby properties suffer. Any accountant will explain that the net present value of a lease cash flow will increase a specific property's value. Of course, the owners who lease their land to the Applicant will see an increase in value, but what about all the surrounding parcels?

6

The Jorgensen analysis seems to point to the truth of the matter in some small way. However, it is dismissed as not being of sufficiently large samples to be statistically significant. Plain old common sense would seem to inform even the casual, disinterested observer that such a massive installation within sight and/or sound of any property would tend to reduce its usefulness for residence, recreation and investment.

It is very interesting to note that not one question was addressed to anyone in this area who might have expert knowledge of present and potential future property values. Not a single real estate person or bank appraiser was quoted. On page 3.7-15, the idea is casually dismissed as "A new analysis of impacts to property values of wind projects was beyond the scope of the EIS". I'm pretty sure such a study would have been included if a dam were to be built in the valley.

7

There seemed to be no consideration of the environmental effects of back-up power sources for the wind power project. Exactly what power and from which sources will the intermittent wind generation replace? In theory, if it replaced hydroelectric power only, there would be no measurable negative effect. However, if it were used to replace fossil fuel power, the effects would be measurable in the combustion byproducts produced during partial load and/or standby reserve operation of a fossil fueled plant. Similar to a car idling in heavy traffic, a fossil fired plant at no or partial output is running at inefficient levels with more pollutants being generated per unit of output than at full power. Absolutely no consideration of these effects was noticed in the EIS. Has this, or will this be considered, or did I just miss it somewhere?

8

The last comment will be addressed to the source materials for the EIS. Sources outside of the applicant and local governments were mostly wildlife, historical, plant and power studies that were referenced, often in groups of 2-5 as sources for the same piece of information. Methodically counting each, a total of outside source references came to 184.

9

Washington and Kittitas County governments and individual officials provided a total of 70 source references.

The applicant, their representatives, backers and consultants provided a whopping 235 source references. In other words, Sagebrush Power Partners (186), Chris Taylor (20), and other related or supporting parties (29), made up the majority of the sources for the EIS. The appearance is that the applicant basically wrote the EIS to conform to their way of thinking. To an uneducated observer of the process, this seems to be a classic case of the fox guarding the henhouse.

I would respectfully call on EFSEC to look into these concerns and consider the drastic negative impacts on the quality of life, property values, and various present uses of this area. Once this monstrous project is in place, the long term effects will be beyond mitigation.

Jeffrey S. Howard
21 Fawn Rd., Cle Elum

9
cont.

10

Allen J Fiksdal, EFSEC Manager
P.O. Box 43172
Olympia, WA 98504-3172

January 13, 2004

Comments on the DEIS for Kittitas Valley Wind Power Project by Sagebrush Power Partners, L.L.C.

Dear Mr. Fiksdal

1. Fire Potential

The Application address the available fire fighting resources, but did not address the potential of a wind driven fire. The site is on a natural wind tunnel. 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. As time goes by for 10 to 20 years and 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 and farms downwind that would be in the path of a fire? It doesn't make good sense.

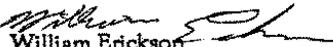
1

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 Sagebrush Power Partners 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 Zilkha 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, Zilkha Renewable Energy and its owners. This could be included in the conditional use development agreement.

2


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

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JAN 13 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

Sirs and Madams:

Wind turbines will make our valley look like an industrial playground. There is no benefit to us from windmills. A few people will get lots of money. That is the only benefit. It is very elitist that the benefits go only to a few wealthy landowners and to the tax base of the county. But our federal government gives very significant tax advantages to them, which means that we the taxpayers are actually funding the metal nightmare that awaits us.

1

I cannot believe that our valley would welcome an invasion of the huge metal monsters that would make us look like a snare for King Kong. Actually, it will look a lot like the movie of Godzilla, lurching through Tokyo. I personally saw such a valley in Canada. If you had seen it, you would not want this to happen to us, either. A small, relatively low populated area bears the brunt of the "feel good" environmentalism of the liberal big cities of the Americas. You and I are the poor suckers who are being flattered and, basically, forced into the slavery of an industrial wasteland. If Walter Cronkite and Ted Kennedy don't want them in their backyards and Martha's Vineyard, then why would we. What's good enough for them is good enough for us.

2

Better wake up and veto this while you can. You will not like what they will turn our lovely home into. Do not be fooled!

3

Linda Waits
40 Cove Lane
Ellensburg, WA 98926

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Kittitas Valley Wind PP
DEIS Comment - Indiv. 28

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement
JAN 13 2004



Name: WALT FARRAR ENERGY FACILITY SITE EVALUATION COUNCIL

Address: 1650 GAME FARM RD, ELLENSBURG, WA 98926
(Please include your Zip!)

Please write any comments you have with respect to the
Kittitas Valley Wind Power Project DEIS
below and leave this sheet in the Comment Box.

① Please improve your PA system so speakers can be heard better. 1

② Suggest EFSEC schedule a presentation by an energy expert / group to learn of the efficiency of wind turbines (and tax credits). 2

③ The DEIS lacks information on alternative sites in the Kittitas Valley which are available for turbine farms. What happened to the Geoping comments? How did they contribute to the DEIS? 3
4
Use the back of this form if you need more room for your comments.

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

Kittitas Valley Wind PP
DEIS Comment - Indiv. 29

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement

JAN 13 2004



RECEIVED

Name: Ken Fyall ENERGY FACILITY SITE EVALUATION COUNCIL

Address: 303 W 3rd Ave. Ellensburg Wa 98921
(Please include your Zip!)

**Please write any comments you have with respect to the
 Kittitas Valley Wind Power Project DEIS
 below and leave this sheet in the Comment Box.**

On Nov 7th 2003 the Cascade Field & Stream Club filed an application for a conditional use permit to operate a large gun firing range at 2410 Hayward Road Tax Parcel # 19-17-21000-001.

Zilka is proposing to place wind turbines on this site. The turbines are part of Turbine String "B" and it appears that 4 to 5 wind turbines will be placed on the Cascade Field & Stream Club property.

Use the back of this form if you need more room for your comments.

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
 Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
 call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

Neither application, Zilkha, nor the Gun Club mentions ~~the~~^{this} dual use.

1
cont.

Are wind turbines and destination gun firing ranges compatible? Has public safety been studied? Has the effect of rifle shot on wind turbines been considered?

2

Has the wind turbulence on rifle shot been studied?

3

Has ice thrown ^{from} ~~turbines~~^{blade throws} been studied as to the potential impact on gun range participants?

4

Will gun shot impact transmission lines

5

Will gun shot impact structures that support the wind complex project?

6

The compatibility of these two projects must be studied and use permits not issued until these questions are answered and mitigated.

7

The Zilkha project will destroy a world class viewshed appreciated by thousands of people daily.

8

Major Industrial wind projects should not be sited in residential areas such as this.

9

DWIGHT LEE BATES

1509 Brick Road
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RECEIVED

JAN 13 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

December 23, 2003

Allen J. Fiksdal
Manager, EFSEC
P.O. Box 43172
Olympia WA
98504-3172

Dear Mr. Fiksdal,

This letter contains my comments on the Sagebrush Power
Products DEIS.

Bird Kills

The summary of projected mortality of birds and bats (page 3.2-43
to 45, Table 3.2-11) shows the research for this DEIS is
incomplete. Studying other studies and giving a range of
information does not substitute for doing an actual two year study
of the turbine sites near Ellensburg. The species listed (Table A-1)
offers a reason for a thorough study.

1

Bird Kill Mitigation

The seven mitigation methods to reduce bird kills listed (page 3.2-53) are a band aid approach. 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. 2

Study on Bird Kills

The promise to do a thorough study (page 3.2-53) is not good enough! A two year study is needed before even writing this Draft Environmental Impact Statement (DEIS). Promises do not get it. We should halt this process until the two year study is done. Table 1 (page 17) shows a complete two year study needs to be done. 3

Passerine Bird Kills

The estimated 740 kills of Passerine birds (page 3.14-8) is unacceptable for the minor amount of electricity generated by these bird and bat killing turbines. 4

Fire

The fire mitigations (page 1-54) are not good enough. 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 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! Promises to provide a plan in the future is not good 5

enough.

Visual Impact of Turbines

The 410 foot high turbines (Figure 2-2) 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.

6

Highway 97 (Figure 2-8, page 3.9-2) 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! 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.

7

The simulated views of turbines (pages 3.9-20, 3.9-21, 3.9-22, 3.9-28, 3.14-4, 3.14-6 and 3.14-8) 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.

8

Shadow Flicker

Planting trees to prevent shadow flicker (page 1-36) and installing automatic shades are not solutions for shadow flicker. People living near these monstrosities report health problems which

9

should be studied at these turbine sites. People living near the Lincoln Township Wisconsin Wind Farm stated in a survey (available upon request) 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?

9
cont.

10

Blade Throw

A 410 foot set back (page 1-36) from these monstrosity turbines is not sufficient. 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. The listed measures to reduce blade throw (page 3.4-21) are both mandatory and common sense. What report can the public see to ensure these inspections take place on a regular basis? Why is not a maintenance plan included in this DEIS?

11

Ice Throw

The mitigation measures (page 1-34) to locate these monstrosity turbines 1000 feet from residences should be changed to ensure safety. Who monitors the sensors to make sure the system shuts down in icing conditions? The 328 foot set back from public roads (page 1-35) is not safe enough to prevent a 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

Tax Savings

The tax savings for this project (page 1-11) are not given. Why

13

publish this DEIS without doing this study? This DEIS is insufficient, incomplete and lacking data. It should be redone. To say it is a draft is not good enough. It should be written as thoroughly as possible before being submitted to the public for review. Does not the writer know the impact of these monstrosities in the Kittitas Valley for years to come? 14

Impact on Historical Culture

No information was given on the impact of this project on Historical Culture. Stating it is an unresolved issue (page 1-11) is ludicrous! There was plenty of time to study this. This DEIS is insufficient, incomplete and lacking data. It should be redone. A Supplemental EIS needs to be done per Section 106 Regulations of the National Historic Preservation Act (NHPA). The respect for the Yakama Tribe is lacking. The tribe’s culture depends on preserving Historical Sites. 15
16
17

Wildlife

The mortality rates (page 1-15) 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) are listed as potentially occurring in the project area. This is not good enough. 18

Power Generated

The level of generated power listed (page 1-17) shows that 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 19

generate. We now sell our power to other states due to our dams high output. We do our part to generate national electricity. Let other states do their share by building efficient dams in their states as we have done. Wind farms are not the answer!

19
cont.

Lights

These turbines will cumulatively contribute to increased nighttime lighting in the Kittitas Valley (page 1-18). These lights are likely to have an adverse cumulative effect on views from residential properties in the Kittitas Valley (pages 1-18, 2-20, 3.9-47) are quotes from the 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.

20

The mitigation measures (pages 1-28, 3.2-58) 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) are too intense and will ruin views.

21

Noise

The statement in the DEIS that the residents will not experience elevated noise levels (page 1-20) is not true. 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) for these

22

monstrosity turbines will affect the local residents. The 50 dBA noise level (Table 3.12-5) 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.

22
cont.

Decommissioning

The Decommissioning Plan (page 1-23) 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 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 Zilkha should post so we can tear down the turbines when they result in being eyesores, inefficient and a waste of taxpayer money? I think Zilkha will be long gone having sold the wind farm when we tear them down.

23

Aircraft Safety

I disagree with a ruling of “ No Hazard to Air Navigation” (page 1-49). 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) proves these monstrosity turbines are a hazard to flight.

24

Setbacks

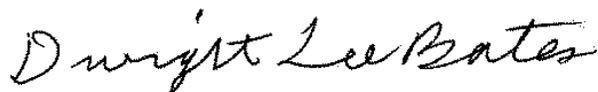
The setbacks (page 2-9) of 1000 feet are inadequate to protect from shadow flicker, flashing lights, noise, ice throw and blade throw. These set backs as I mentioned earlier should be 2000 feet to ensure safety. This is especially true in our litigation society.

25

Property Values

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 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. 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 one year 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?

26



Dwight Lee Bates
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Ellensburg WA
98926
(509) 925-5055
bateslee@elltel.net

Page 8

Kittitas Valley Wind PP
DEIS Comment - Indiv. 31

Makarow, Irina (EFSEC)

From: Lee Bates [bateslee@eburg.com]
Posted At: Tuesday, January 13, 2004 9:52 PM
Conversation: Bird killings at Altamont Pass - Environmental group files suit against wind tu
Posted To: EFSEC
Subject: Fw: Bird killings at Altamont Pass - Environmental group files suit against wind tu

1

info
Lee Bates
----- Original Message -----
From: jaybates
To: Lee Bates
Sent: Tuesday, January 13, 2004 12:23 PM
Subject: Bird killings at Altamont Pass - Environmental group files suit against wind tu

<http://www.sfgate.com/cgi-bin/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U321.DTL>

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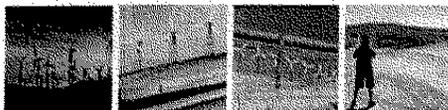
Bird killings at Altamont Pass Environmental group files suit against wind turbine companies

Jane Kay, Chronicle Environment Writer

Tuesday, January 13, 2004

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URL: sfgate.com/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U321.DTL



Operators of giant wind turbines in Altamont Pass should be ordered to stop the routine, illegal killing of about 1,000 eagles, hawks and owls every year, an environmental group argues in a lawsuit filed Monday.

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.

The lawsuit is asking for a jury trial and a judgment that would stop the alleged harmful activity and force the companies to return profits.

The wind turbines were erected in the Altamont Pass starting in the early 1980s. Since then, biologists have recorded thousands of deaths of golden eagles, red-tailed and ferruginous hawks, American kestrels, turkey vultures and great horned, barn and burrowing owls.

The group is filing the suit now because Alameda County is issuing new use permits and the turbine operators are upgrading technology and enlarging the turbines.

Studies show that Altamont Pass has the worst bird-kill problem in the world among wind farms, because the turbines are located in a major migration route for birds of prey in North America that attracts among the highest concentration of golden eagles in the world.

"Altamont has become a death zone for eagles and other magnificent and imperiled birds of prey. Birds come into the pass to hunt and get chopped up by the blades," said Jeff Miller, a spokesman for the Center for Biological Diversity.

<http://www.sfgate.com/cgi-bin/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U...> 1/15/2004

Bird killings at Altamont Pass / Environmental group files suit against wind turbine comp... Page 3 of 3

<http://www.sfgate.com/cgi-bin/article.cgi?file=/chronicle/archive/2004/01/13/BAGF748U...> 1/15/2004

Makarow, Irina (EFSEC)

From: Robert Green [Robert@NorthendRental.com]
Posted At: Thursday, January 15, 2004 2:40 PM
Conversation: Kittitas valley wind power project
Posted To: EFSEC
Subject: Kittitas valley wind power project

After having reviewed the Draft environmental impact statement and numerous other materials regarding the imminent construction, the conclusion that must be come to is that this is a viable alternative power venue, that when properly facilitated will be nothing but a boon to the local economy. There seems to no question as to the lack of effect that this will have on anything to do with reality, other than a start in the right direction of low impact power production. There are certain parties presenting arguments, which must always be considered in a democracy, but there is the key word, democracy. We must all come together and decide on a direction, and I must say that the reports do not give me the kind of concerns that a "hydroelectric project" would most certainly produce. This is a tried and tested method of power production, and I propose that a forward move is the most prudent choice. To accept and adopt this impact statement that is comprehensive and professional, would be an excellent start. Sincerely,

1

Robert G Green

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1/16/2004



1-14-07

Kittitas Valley Wind PP
DEIS Comment - Indiv. 33

Attn: Allen Friskal

Dear Sir,

Regarding the Environmental Review (SER) your office recently forwarded to many local effected persons. I had the opportunity to check over Zilkha research of the area of their proposed wind farm. In my opinion as a 60yr. citizen of Ellensburg. I find many justifiable analyses they projected to lessen the impact they would create to both wild life, residence of landowner in the Area. As decision makers I wonder where our priorities should be. Historically that land has been used for grazing cattle in spring & early summer. Its also been in use for recreation, such as bird habitat & hatchery for ground nesting birds like hawks I have traveled extensively in the Valley in the service of electrical equipment & specialized in S.E. manufactured products for 37 yrs. In my travels & service I met & visited with almost every family at one time or another. The Valley is composed of some very family & entrenched folks. They have invested their lives to making the Valley a accommodating place to live. Zilkha represents a intrusion, almost by force to destroy their tranquility of living. If a vote were taken County wide, perhaps as high as 75% of the people would cast a negative vote on Zilkha Projects. The people's preference should be the #1 consideration in this decision.

Second how are the people, wild life, and adjacent property owners going to cope with this intrusion. Their wild life report which I read is very generalized. The area would no doubt be closed for recreation. Wild life such as deer and

Bird life would be decreased or eliminated which is being done now by Zilkha low fly-over. From what I understand, some 25 to 30 female deer aborted their fawns this past spring as a result of fright. The bird issue, the Coy. & wnts & Boulder falls place at least 25 to 30 nesting boxes for blue birds. These will probably be ripped out to accommodate Zilkha Purpose. I have gone up this many times in late May & early June. It's virtually a wonderland of flowers & bird life. I know Mr. Schuler very well who owned the most land above Hayward Hill. They have been very accommodating folks allowing people into the area over the years. This access will be destroyed to accommodate Zilkha wind farm which is not economically sound and is not a need for our Northwest power needs.

According to Bonneville during the Enrad crisis, they had ample power sources. They lacked transmission capacity. The new 500 MW line is going to give them the ability to serve the South and a better. I know electricity and I spent over 50 yrs working with it & studying different phases from generation, transmission to actual multiple usage. Zilkha is a poorly thought-out project. A investment at best, a 2 to 25% production time. As I said in my last letter, for all practical purposes I would recommend highly you advise the Governor to deny the project here at this proposed location.

Another point I wish to make, which I informed Clay White, is those towers would be in line with runway 29 at the Airport.

Page # 2

During W.W. I spent fall of 43 all of 44 & spring of 45 as the Air Traffic Controller out there. For your consideration information runway 29 is used about 75% of those landings & take-offs. The airport now is used heavily by R.O.T.C., flight training thru our college program for future Military Pilots. These are all small Aircraft equipped with small 456 Cylinder engines.

After take off the normal turn out is towards the right. When the late spring to early summer winds occur a down draft occurs slowing a aircrafts lift from ground level. Over the years we've lost several aircraft due to down drafts along the south foothills of our Valley.

Our winds here are created by temperature differences between the high snow capped hills of Cold River moving down the Valley slopes to Sun warmed Valley floor. Now these tower blades will rise about 400 plus feet above the landscape.

In case your not familiar Aircraft are permitted as low as 500 ft above land terrain. A down draft could easily drop a aircraft into the blades of these wind towers. Also if a power loss is experienced on take-off it might be difficult to gain enough lift to clear these wind towers.

From this point of view the project is poorly thought out, and should not be permitted to proceed.

Just but not least, the County is seeking a Federal grant to extend runway another 1000 ft to the NW. to accommodate larger aircraft or perhaps small jets. A clear unobstructed path should be provided for future aircraft usage.

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cont.

We are a growing Population Center, because of our proximity to the Seattle Area. In this respect it's better to preserve now than to allow poor usage of planning, as Seattle & Yakima airports experienced in recent years.

8
cont.

In my opinion & with my varied experience over 60 yrs here, Zilkha proposal is short sighted and their approach over-bearing, literally creating a tetter and many of the land owners & people in the Area. Much of the information as presented in the Press is

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propaganda & half truths. Example they will have a maintenance staff of 15 full time employees, according to our union bulletin. Standard was 6 union employees on call. Big difference. Also after those plants are constructed the maintenance is very low for at least 5 yrs. Economically we have approx 4 months of usable winds which vary

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from 0 to 60 M.P.H. with occasional strong gusts. Like it can vary from 25 to 55-60 M.P.H. in a matter of less than a minute. I sat in the tower & monitored those wind speeds, and had advised planes not to land, as a fact small aircraft could not touch ground. This is just not the area or location for wind farms as we don't have lateral type winds like

11

state line, Iowa or Minnesota, I lived there as a growing person, so I very strongly urge your staff & you as a thoughtful person to recommend to Gov. Locke to not approve any future consideration of Zilkha or the California's group

12

Wind Projects here. Thanks for your time and

we are writing in strong support of the wind farms. Our nation has been talking about the need for alternatives to fossil fuels for a long, long time and we now have the opportunity to make advancements in this area. We realize that the main objections are based on aesthetics, however Helen Wise is correct when she points out that this area is no longer the pristine wilderness it once was. Houses are being carved out of the hillsides at an alarming rate which we find aesthetically objectionable. Wind Power can do so much for so many people in the long run - we need to look ahead and not just at self interests. This is the perfect opportunity to think globally and act locally!

Sincerely,
 melissa bates
 jim briggs
 Cle Elum, WA

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Kittitas Valley Wind PP
 DEIS Comment - Indiv. 34

1

Makarow, Irina (EFSEC)

From: Joseph Powell [powellj@cwu.EDU]
Posted At: Thursday, January 15, 2004 9:05 PM
Conversation: Draft environmental impact statement: Kittitas Valley
Posted To: EFSEC

Subject: Draft environmental impact statement: Kittitas Valley

Dear Allen Fiksdal:

I would like to express my disappointment with this study. I have maintained elsewhere that the present siting of wind farms (13 miles west of Ellensburg on both sides of Highway 97) is a poor choice aesthetically, and the study does not address the advantages and disadvantages of sites which I believed were under consideration. The Park Creek site is a much better proposal because of its distance from the city and nearby populations (which is part of the "noise" issue), the lack of impact on the view; certainly the wind blows just as hard and consistently there. I think the property devaluation issue assumes an awareness by buyers that does not really exist; why weren't these buyers interviewed? There has been a natural escalation in land prices for the last 14 years; the threat of the windfarm is a different issue than living under and with them. Instead of selecting communities to compare, it would be interesting to do a collective analysis of all sites. Sincerely, Joseph Powell

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Allen Fiksdal, Manager
EFSEC
PO. Box 43172
Olympia, WA 98504- 3 172

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JAN 16 2004

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

RE the DEIS for Zilkha Inc.'s Kittitas Valley Wind Power Project
(KVVWPP)

Dear Mr. Fiksdal,

First, addressing the issue of need; do we need the additional electrical energy the 120 or so wind turbines are purported to be capable of adding to the grid. If the goal is simply to feed the too-often wasteful manner in which the U.S. utilizes its energy sources, then the answer would be yes. The U.S. today does not have an energy policy – other than to continue along the road we've been traveling - in large fuel-inefficient cars and too many of them. There has been a lack of commitment to quality public transportation causing increasing reliance on an inefficient form of transportation where one 150lb person creeps along at a snails pace in a 2-ton vehicle along with thousands of others doing the same thing. We are building very large homes – often second (even third) homes – homes that are not affordable for the average person. There has been a history through the past 2-3 decades of neglecting basic federal-supported research into alternative energy sources especially including solar. Our energy supply situation is serious, and is deserving of a coordinated national effort to resolve – much as are many of the challenges facing our country today. But today there is no energy policy, and no attempt to enlist the general public in a national effort to address the issues associated with energy use and supply.

The proposal to build the KVVWPP project is supported by a tax-credit policy, and would not be profitable without it. We don't object to the policy of providing federal (or other public) support to develop alternative energy sources. We do object to a system that permits the conversion of more than 5000 acres of land already occupied by homeowners into a relatively inefficient and visually impactful industrial complex. A system that operates at 25-30% efficiency and then only when the wind blows is not efficient. The contribution of wind energy is further compromised by the fact that back-up energy sources are needed for times when the wind doesn't blow. The Kittitas Valley has a reputation for being windy, but winds of sufficient force are not common in the fall and they are rare in winter.

5/15

Comparisons of CO2 emissions between a wind farm and fossil fuel driven power plants don't take into account that when the wind doesn't blow a CO2-producing energy source will need to be used.

2

The KVVPP is the first that we know of to be proposed for a site that already includes significant numbers of developed homesites within and/or so very close to the project area. The distance proposed for set-backs of turbine installations from other homes or property lines is about the same as the distance from our house and a line of beautiful old cottonwood trees. These trees we estimate to be about 120 feet tall. We see them every time we sit down to eat, and even though they aren't on our property, they are part of 'where we live'. How are people who already live in, near and on the border of the wind farm site going to accomodate the introduction of whirling wind turbines more than three times as tall as our trees – turbines many of them with blinking lights?

3

Within the year we visited a wind farm installation immediately below Biggs, Oregon – then called the Klondike project. It was our first visit to see a windfarm and one using turbines similar to those proposed for the Zilkha project. We were favorably impressed. Of the 16 then installed (we understand that more have been or are being installed), one was down for repair. The project site is open wheat country – there was only a single house about one quarter to one half mile distant. This is the sort of place to site wind farms – one virtually uninhabited or sparsely so, and the community (those we talked with) supportive of its being there.

4

Zilkha bypassed Kittitas County and made its proposal to EFSEC because they said it would take to long through the County – citing the likelihood of legal actions as one reason. Likely that is so. A large majority of participants in the many public meetings held to date on this issue have expressed strong opposition to Zilkha's wind farm development. We've attended all of the public meetings, and aside from those on whose property the turbines would be situated, and people who stand to gain from involvement in the construction phases, the support was minimal – one or two people. A count of Letters to the Editor in the Ellensburg Daily Record would, we feel confident, reveal a similar ratio favoring opposition.

5

Zilkha's move to EFSEC rather than going through Kittitas County places the final decision in the hands of people who don't live here, and therefore clearly cannot feel about this Valley, this part of the valley, as their home.

For most people who live here the major issue at stake in the KFWF proposal is the impact of these 120 giant wind turbines on an historic and beautiful landscape – our ‘home’. And it receives the least attention in the DEIS.

The other issue that we wish to address is the potential threat to wildlife, and the steps taken to assess what that might be. Zilkha, to their credit, has provided for a wildlife assessment by WEST – a company that routinely does these assessments for wind farm developers. We don’t have the expertise to assess the overall quality of WEST’s wild life study for the project site area. However there are certain weaknesses that don’t require an expert to see. One is the lack of night-time studies. Birds migrate at night as well as day, and night time is bat time. The threat that wind turbines are having on bats is an unexpected development. In West Virginia, for example, a string of some 40 large (360 plus feet tall) wind turbines located on a ridge has accounted for some 475 bat kills within a five month span. The Stateline project accounted for about 26 bat kills for the month of October 2003 along with a like number of bird kills. The two bat species with the largest mortality were the Hoary and the Silver Haired – both migratory species associated with forests which characterizes the area immediately north of the Zilkha project site.

There needs to be some level of night-time study done to determine if there is a threat for significant avian mortality from whirling blades. Bats migrate at night, and they likely don’t use echo-location when not hunting. If so, radar detection would be needed – a technology that exists although it would be expensive to employ. Needed, in the event the decision is made to allow the KVWF development, is some reasonable level of assurance that avian wildlife travelling at night is not put at risk from wind turbines.

One of the major problems with the relatively recent development of wind farms is the lack of prior-to-installation wildlife studies – studies done with sufficient lead time to plan. Altamont is the classic example of a large installation which site was not preceded by prior assessment of wildlife conditions. Now the turbines – thousands of them, are in place and the bird and bat kills are ‘off the wall’ – something in the neighborhood of 60 Golden Eagles annual for example (an Endangered bird under the ESA).

No one expects the KVWF site to share Altamont’s capacity for killing birds. WEST’s study should be capable of laying that to rest. However the

killing of even a single Bald Eagle would be a “take” under provisions of the ESA. The DEIS comments that Bald Eagles are a rarity during the winter months. Actually they are here sometimes in good numbers along the Yakima River, and this winter with the river frozen they have been found in the proposed wind farm site. Their roaming flight paths can take them about anywhere. We often see them during the Audubon Christmas Bird Count in areas north and northeast of Ellensburg.

9
cont.

The KVWF project is one of three now proposed for the Kittitas Valley. enXco proposes a 150-turbine wind farm adjacent to the KVWF project. If both were to be built, there would be more than 250 very large turbines with blade tips travelling nearly 250mph installed on about 10,000 acres of land. In such case there would be bird and bat mortality greater than there would be from a single wind farm, and greater still, perhaps, because of the cumulative effect caused by the much large number of turbines and the larger area encompassed plus other factors such as flight-path disruption.

10

The DEIS does not adequately cover the wildlife threat and doesn't address the major issue of scenic impact on the viewscape – not only for those who live within or very near the KVWF site but also for those, like ourselves, who have lived in the Valley for many decades and consider the natural landscape including views of the Stuart Range of mountains as important values to be protected and preserved.

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Hal Lindstrom



Gloria Lindstrom

1831 Hanson Road
Ellensburg, WA 98926

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**ENERGY FACILITY SITE
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Kittitas Valley Wind PP
DEIS Comment - Indiv. 37

Makarow, Irina (EFSEC)

From: Tim Henebry [timhenebry@elltel.net]
Sent: Friday, January 16, 2004 9:46 AM
To: Makarow, Irina (EFSEC)
Subject: Kittitas Valley Wind Farm Project

January 16, 2004

I strongly oppose Zilhka's Kittitas Valley Wind Farm Project. There are many reasons to proceed very cautiously with any windfarm proposals for Kittitas County. But this one in particular would have a wide spread negative impact on the county and its people. LOCATION DOES MATTER! Many arguments opposing wind farm projects have already been brought to your attention-permanently degrading the scenic vistas in this beautiful valley; incompatibility with the scenic highway corridor of US 97; issues of negative impact on the many individuals living in this rural residential and recreational area-whether through shadow flicker, noise or communications interference; detrimental effects on birds, their migratory patterns and other wildlife; etc.

1

But the primary reason that I have for opposing the Zilhka Kittitas Valley Wind Farm Project in particular is simply that it would permanently degrade the appearance and general nature of the Kittitas Valley. The area they wish to build in is mainly rural residential, recreational, agricultural, and scenic land. There are hundreds of photos, drawings and paintings made every year of the very same view-shed that Zilhka wants to build on. An industrial wind farm doesn't belong there. Even the Ellensburg paper-the Daily Record-shows this same area of the county as one of its "logos" at the top of the paper's front page. Arguably, this scenic area is one of the finest in the entire state-certainly in Central and Eastern Washington. It certainly is one of the defining views in Kittitas County.

2

There are many areas in this county where the wind blows strongly and a wind farm would have far less impact-Zilhka themselves have even shown this in another project they have proposed. But once the natural character of the land is gone-as would happen with the Kittitas Valley Wind Farm Project-a hundred or so 400 foot spinning blades by day and red flashing lights by night fronting the Mt. Stuart view shed-it cannot be restored. If this isn't obviously a negative environmental impact-I don't know what is.

3

As with the homeowner who has a beautiful property that s/he is proud of and appreciates-there are some things you just don't put in your front yard.

Tim Henebry
Ellensburg, WA

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Makarow, Irina (EFSEC)

From: Chris [fiber@ellitel.net]
Sent: Saturday, January 17, 2004 6:28 AM
To: Makarow, Irina (EFSEC)
Subject: Fw: DEIS Response 1-13-04 Ellensburg

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----- Original Message -----

From: Chris
To: Allen Fiksdal
Cc: John Lane
Sent: Friday, January 16, 2004 7:41 PM

Please review our response to the DEIS and to the public meeting held in Ellensburg this last Tuesday, 1/13/04. More importantly, please read the attachments on BioEnergy. Thank you.

At this time when emotions run high on both sides of the wind turbine issue, with the negative side outweighing any positive good for the siting, it should be imperative that other sites and surveys be used as reference resources. Those sites already in place and impacting the lives of residents, livestock and wildlife around the globe must be heeded as a warning for what is intended here. Not including them in this DEIS creates a biased and inadequate survey. Surveys such as that done in Wisconsin, resulting in a moratorium on any further construction should be taken seriously. Studies and surveys in the US as well as in Ireland and England of sites that are now deemed injurious to the population, livestock and wildlife must be heeded as a warning for what is intended here. EIS site surveys with tunnel vision might be appropriate in some cases, but not to use all available resources for the sites intended here is unconscionable.

1

The fuzzy logic that because we already have population growth, housing growth, cell towers and more lights, that we would become accustomed to additional structures and lets make them big, is amusing, but also extremely scary. The additional fuzzy logic that property values will not sustain any blows because current sales have been profitable is just plain outlandish. Who knows if the new owners were even aware of what is proposed?

2

Bamboozle, snake oil and hypnosis all come to mind and we succumb to the power of what can line pockets. We're susceptible when the promise of economic growth rears it's tentacles and sets an embracing lure that becomes an entangling snare.

Dr. Holly Pinkart's testimony on microbiology and the potential threat from the turbines doesn't seem to be taken seriously because it isn't what is wanted to be heard. However, she does not have such

3

1/20/2004

a national reputation and large grant monies for the studies she heads on a whim. Obviously, someone cares about our health and safety from threats that appear small and insignificant because the creature studied is small, but certainly not insignificant.

3
cont.

The populace on this side of the Cascades may be small in number compared to Western Washington but we are not insignificant. Our lifestyle and lucky choice in having the chance 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 take this attack on how we have freely chosen to live as insignificant but a blatant opinion that we just don't account for much.

The group called ROKT and others continues to rebut the flowery claims of greatness of the turbines with documentation to the contrary, but it is dismissed as "unsubstantiated" or "manufactured, which is ludicrous. Listen to the world of experience where the turbines are already in place. Those folks have first-hand knowledge with the downside and small praise for any upside and are saying so.

4

The counsel from people working in the industries of electrical engineering and power companies, who know that wind turbines are a sorry source of economical benefit and won't buy into it because they don't buy into it, seems to be ignored. Why? It all comes down to the money and federal taxpayer subsidies. How shameful. Should our governing bodies force these machines upon us, and then leave when their terms are up or move on to other jobs, the legacy of what they have done will long be in our memories, on our lands, and within our sight.

We may have a natural corridor for wind, but by the same token, a wind tunnel for wild fires. Our fire marshal asked that the legacy left to him be thoughtful, and not taken as insignificant. That is where it comes down to our families, our homes, the land and the money, and justifiably so!

5

The eagles and hawks and other birds that fly past my front windows that will be level in elevation to the tops of the proposed towers are not insignificant. Ridgelines, whether perceived as barren by some or scenic by others, should not be dismissed as uninhabitable. They are flight paths for great birds and burrows for their pray. The relationship between the two must be acknowledged. It is their inherent lifestyle and we must allow them to have same consideration and value that we want for our own lifestyles and ourselves.

6

Put the turbines all along our coastlines where the breezes are constant and you will hear from high-rise corporations and the public that does not feel they are insignificant.

1/20/2004

The green energy proposed comes with the noise of a rock crushing plant as described by residents in Wisconsin. What once started out as possibly a noble experiment to harness the wind has turned into Frankenstein's monster and is now loose.

7

On a lighter note, or more appropriately, a very serious one, a study by Washington State University, the Department of Ecology and INTEC states there is enough animal waste along with vegetable matter by-products in Eastern Washington to fuel four out of ten homes in the state, and with actually clean energy in the process. That is a very renewable and recyclable product, just for the scooping and cutting. It would require processing and of course, several EIS studies and public opinions, but figure how many would literally benefit from the farmer/rancher and dairy owner that has more than a shovel can handle and the reduction of complaints from the neighbors nearby. Roads, electrical and waterpower already exists and available in perhaps unused and renovatable plants and buildings. Transport vehicles already exist. What a waste of waste that can be pulverized, pelletized and otherwise processed for use. We don't want our farmers and ranches to stop feeding our bellies, nor the dairies to leave us short of 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 a compact four-legged movable package? Our ancestors burned cow and buffalo chips; some parts of the world still do. India has become a front runner is utilizing the always available cattle wastes with processing into usable fuel. Why not us on an American-sized basis? It may not be glamorous but the smell of profits comes in many odors and one is the combination of paper and leather in our wallets. The bi-products in the origin of that wallet could heat our homes. It's worth more than a casual checking into. The above study for bioenergy is quite lengthy and too long to attach here but is available on-line. Of special note are Pages 9 & 10 of that 76-page study and in part, is quoted here. "Thus effective collection and anaerobic digestion of Eastern Washington's available biomass could potentially meet about 40% of Eastern Washington's residential electrical energy needs." A copy of Pages 9 & 10 is attached as it includes the Highlights and Methodologies of the study. The first paragraph of Page 9 in the Introduction shows that this potential far outdistances wind turbines as the first avenue to select for Green Energy "with benefits ranging from controlling greenhouse gas emissions and reducing air quality impacts to protecting surface and ground water that may be adversely affected by management of these residues and wastes."

8

It gets better the more one reads!

Why did that environmental agency that offered testimony on 1/13/04 not jump on the bioenergy available rather than encourage such a controversial structure as a wind turbine? It seems to be a contradiction to laud these structures when something much less

1/20/2004

damaging appears to be a more viable and constantly available alternative.

Sincerely,

Chris Cole & Roger Binette

7430 Robbins Rd

Ellensburg, Wa. 98926

509 933-2371

Attachments - 2

1/20/2004

INTRODUCTION

Washington State through its strong agriculture economy has a variety of agricultural residues, by-products, and waste material in addition to municipal organic resources that are excellent biomass sources with great potential for generating energy or producing products. For example, according to the US Department of Energy, it was estimated that 14.4 million MWh of electricity could be generated using renewable biomass in Washington, an amount that is enough to fully supply the annual needs of 1,443,000 average homes or 45% of the residential electricity use in the state.¹⁰ Utilization of the biomass also creates environmental benefits, ranging from controlling greenhouse gas emission and reducing air quality impacts to protecting surface and ground water that may be adversely affected by management of these residues and wastes. Additionally, energy, soil amendments, and chemical production from biomass can contribute to the development of local economics.

Capitalizing on Washington's underutilized resources has attracted increasing interest. In their recently released document entitled "A new path forward: Action Plan for a Sustainable Washington", the Governor's Sustainable Washington Advisory Panel recommended "reliance on renewable energy", "no waste", and "enduring natural resources" as three of the eight essential strategic outcomes for 2030.¹¹ To realize these visions, the same panel recommended priority actions including investing in clean energy, committing to greenhouse gas reduction targets and mitigation strategies, and sustaining Washington's natural resources through collaborative efforts in planning, monitoring, protection, etc.

Conducting an inventory of Washington's bioresources is the first essential step for all related planning and implementation efforts. Information on types and geographic distribution of biomass is critical for feasibility analysis and project prioritization. The purpose of the project is to geographically map, identify, and categorize potential sources for convertible bioenergy in eastern Washington. The sources include field residues, animal manures, food packing 'culls', field processing waste, food processing waste, and municipal biosolids and solid wastes in each of the 20 counties in eastern Washington. The products of the project include a computer database and this report. This project is the most comprehensive effort to date on bioenergy source inventory and analysis in Eastern Washington. The data will be of great value for a wide range of users.

We chose to emphasize anaerobic digestion of these organic resources because the process is stable and well understood. Anaerobic digestion yields energy in the form of methane that is directly combustible for heat and convertible to electrical power through standard generator design, provides potential for secondary co-generation projects, and creates an excellent organic amendment to stabilize soils and provide crop nutrients.

¹⁰ The Biomass Research and Development Initiative document *Washington-Biobased Fuels, Power, and Products State Fact Sheet*, December 2001.

¹¹ *A New Path Forward: Action Plan for a Sustainable Washington-Achieving Long-Term Economic, Social, and Environmental Vitality*, Submission by Governor Gary Locke to the Sustainable Washington Advisory Panel, February 2003.

This project is a collaborative effort between the Washington Department of Ecology (DOE), INTEC, and Washington State University (WSU), with DOE and INTEC providing the funding and WSU performing the work. During the course of the project, Mr. Mark Fuchs of the Department of Ecology provided technical assistance, and Ms. Julie Wallman of INTEC helped with project coordination. The project team thanks the cooperation from agencies, organizations, commodity groups and producers for providing data and related information that made the inventory and assessment possible.

HIGHLIGHTS AND METHODOLOGIES

A five-step method was used for calculating the potential energy available from the anaerobic digestion of Eastern Washington's underutilized biomass. First, agriculture and population censuses along with personal interviews with agriculture and processing leaders led to the development of a county biomass inventory. This inventory covered 6 key areas of biomass production prevalent in Washington State: field residue, animal waste, food packing 'culls', field processing waste, food processing waste, and municipal waste including biosolids from wastewater treatment. Second, the resulting biomass figures were adjusted according to their respective moisture content to represent dry matter numbers. The dry matter numbers were then converted to quantity of volatile solids (VS) present using individual data from literature for each of the 24 Biomass categories. During the fourth step, methane production values from assumed anaerobic digestion of the biomass were obtained directly from calculations based upon the volatile solids and respective coefficients. Lastly, the methane values led to calculations of potential heat and energy production for an average range of typical conversion efficiencies (30 %). This phase of the assessment aggregated total biomass inventory by type of material for the county. Individual biomass project location and feasibility were left to a next phase and were not evaluated in this report.

Final compilation of the data shows that Eastern Washington, alone, produces over 4.3 million tons of dry matter biomass available for bioenergy projects. If this annual biomass production were to be collected and anaerobically digested, the corresponding methane gas production would be 33.4 billion ft³, representing an energy potential of 35 trillion BTU's or 3 trillion W hrs of electrical energy. Washington State's overall 2000 residential electrical power consumption was 33 trillion W hours.¹² Since Eastern Washington's population is 1.33 million or 22% of the State's overall population, this total electrical energy consumption would correspond to 7.3 trillion W hrs for Eastern Washington.¹³ Thus effective collection and anaerobic digestion of Eastern Washington's available biomass could potentially meet about 40% of Eastern Washington's residential electrical energy needs.

The county level statistical data achieved and represented in the following tables are an important first step in calculating the state's overall biomass and corresponding hidden and underutilized energy assets. The tabulated data were obtained from crop production and processing statistics, telephone surveys, and estimates based on national per capita averages. Independent verification processes for each organic resource type are needed to provide

¹² http://www.eia.doe.gov/emeu/states/sep_use/res/use_res_wa.html

¹³ <http://www.ofm.wa.gov/pop/coseries/C60T02.xls>

Washington State Energy Facility Site Evaluation Council
925 Plum Street SE, Bldg. 4
P.O. Box 43172
Olympia, WA 98504-31172

1/16/04

Council Members:

I strongly support the Kittitas Valley Wind Power Project. The DEIS for the project is thorough and the mitigations submitted by the Applicant plus the additional mitigations meet all reasonable concerns about the possible impacts of the project.

1

The impact on the value of property in the area of the proposed wind farm area is referred to in the conclusion on page 3.7-18 states that studies of projects elsewhere "provides no evidence that wind development had harmed property values within the viewshed." On the other hand, as I am sure you are aware, in the area of the proposed project property has been selling in the last year and a half at significantly increased values. The prospect of a wind farm in that area apparently did not depress land values. Let me quote from my Letter to the Editor of the Daily Record of August 2,2003.

2

"Though a wind farm has not yet been permitted let alone constructed, the proposed wind farm location has been known to the public since it was announced April 19, 2002. Here are properties in or within a mile of the proposed Sagebrush wind farm location which have been sold in the last 12 months:

Acres	Purchased	Sold	Increase in value
19.95	10/86 \$475/A	8/02 \$1,251/A	136%
47	4/93 424/A	3/03 1,689/A	298%
11.14	7/01 4,937/A	4/03 7,630/A	55%
10	4/99 1,700/A	6/03 6,708/A	295%
19.65	4/94 1,120/A	7/03 1,524/A	36%
283.29	'83-'92 \$193,475.00	4/03 \$1,065,000.00	450%

3

Most recently, as I mentioned at the January hearing, the 80 acres purchased on March 27, 2001 for \$76,950 by Steve and Amy Osland was sold December 2, 2003 for \$145,000. They had built a small cabin on the property but they didn't lose on the value of the land.

Certainly there legal issues that I am not aware of, but I hope your committee can help speed up this permitting process. Having gone to all the meetings related to this project since June,2002, I share the frustration that all of you must feel. I have lived in Ellensburg more that 50 of my 82 years and love the valley dearly. I hope to live to see three wind farms in the Kittitas County.

4

Sincerely,
Helen Wise
1106 East 3RD Ave.
Ellensburg, WA 98926

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JAN 20 2004

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EVALUATION COUNCIL

Arthur DePalma
6991 Manastash Rd
Ellensburg, WA 98926

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.
 - b. 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.
 - c. 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.

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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.

5

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

6

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 values will be affected?

6
cont.

I would like to emphasize four points.

1. The visual effect will ruin views and lower property values (notwithstanding the cited so called studies).
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.
3. 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.
4. 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.

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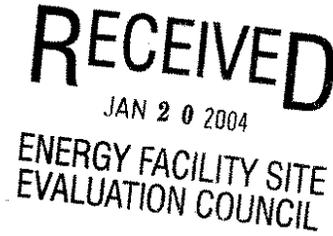
10

Thank you.

Arthur DePalma

Makarow, Irina (EFSEC)

From: Felicia Persson [fpersson@televar.com]
Sent: Sunday, January 18, 2004 4:38 PM
To: Fiksdal, Allen (EFSEC); Makarow, Irina (EFSEC)
Subject: EIS Comments



Felicia M Persson

3561 Robbins Rd

Ellensburg, WA 98926

**Comments on Draft Environmental Impact Statement
Kittitas Valley Wind Power Project:**

There are many adverse impacts to the environment and the quality of life for those of us living, working and playing in close proximity to the proposed wind project. These wind turbines, in addition to impairing the visual resources, we enjoy, also produce significant noise and shadow flicker. They are detrimental to the avian population and impede aerial fire fighting tactics.

1

While the noise is estimated to be less than maximum limits established for agricultural zones, noise levels in a turbine free area agricultural area fluctuate. The introduction of the wind turbines will effectively introduce a constant noise (when the wind is blowing). The noise during construction is exempt from the maximum standards and is estimated to be excessive. It is exempt from meeting the limits ordinarily imposed due to its temporary nature. If construction is expected to occur over 9 to 12 months its duration hardly seems temporary. Blasting is also exempt from noise limitations. At a minimum, additional mitigation measures should be implemented to advise residents within the audible distance of the blasting of the specific dates and hours that blasting will occur and provide a complete construction schedule for the project. Sensitivity of residents and recreational users to noise during the operation phase should be considered and mitigation options outlined.

2

The EIS addresses shadow flicker impact on residences only. It states that there is only an adverse impact if windows are located on the east or west sides of residences. The shadow flicker models assume that all affected will be inside their residences. It is reasonable to assume that people will be outside their residences and will experience shadow flicker from any number of locations. Pets and livestock will be exposed to the flicker as well. While the flicker is below standards shown to cause epileptic seizures, it can still produce a sense of vertigo which could result in injury. Mitigation measures for this adverse effect are directed towards receptors as opposed to the source. Mitigation measures to reduce or eliminate the adverse effect at the source should be incorporated. For example, turbines producing shadow flicker stopped during those times when the flicker is most prevalent (ie. early morning or late afternoon).

3

It appears that few studies have been conducted concerning avian fatalities related to wind turbines. Estimates appearing in the EIS Chapter 1 summary, do not reference any published studies. Who has estimated that raptor fatalities across all three projects will total 15 per year? Under the mitigation measures summary in Chapter 1 the applicant has commissioned extensive studies but presented no data from those studies. I personally observe numerous hawks and eagles in the area of the proposed Desert Claim site. The eagles are especially abundant during calving. If these wind turbines are introduced in and around the agricultural areas where calving occurs it stands to reason that the eagles will be at greater risk. Additional studies should be completed regarding the potential effects on bird populations before we dismiss these impacts as insignificant based upon unsupported estimates made by the applicant.

4

The proposed project area experiences fires during the hot, dry summers. Although only a few are caused by lightning strikes, in the past accidental and arson fires have occurred. The primary and most effective means of fighting these fires is by air. The presence of the wind turbines will not only increase the potential source of fire in

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the area but will also impede effective aerial fire fighting tactics. The proposed project creates a greater obstruction in regards to fire fighting than the existing BPA lines, due to their height and inconsistent layout. While additional trained personnel and firefighting equipment will be on hand during the construction phase of the project, those resources will not be available during operation. Mitigation measures need to be developed to compensate for the loss of aerial fire fighting ability within the proposed project site. This may include seasonal firefighting staff and equipment on site.

5
cont.

These are only a few of the adverse impacts to the environment and quality of life for residents in and around the project area. Many items touched on in the EIS are unresolved. Many plans regarding operations, decommission and mitigation are not complete. It has not been demonstrated that there is a need for the energy that will be produced. It seems there are many questions that should be answered before this project proceeds

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1/20/2004

#

#Felicia M Persson
3561 Robbins Rd
Ellensburg, WA 98926

##

Comments on Draft Environmental Impact Statement Kittitas Valley Wind Power Project:

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While the noise is estimated to be less than maximum limits established for agricultural zones, noise levels in a turbine free area agricultural area fluctuate. The introduction of the wind turbines will effectively introduce a constant noise (when the wind is blowing). The noise during construction is exempt from the maximum standards and is estimated to be excessive. It is exempt from meeting the limits ordinarily imposed due to its temporary nature. If construction is expected to occur over 9 to 12 months its duration hardly seems temporary. Blasting is also exempt from noise limitations. At a minimum, additional mitigation measures should be implemented to advise residents within the audible distance of the blasting of the specific dates and hours that blasting will occur and provide a complete construction schedule for the project. Sensitivity of residents and recreational users to noise during the operation phase should be considered and mitigation options outlined.

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The proposed project area experiences fires during the hot, dry summers. Although only a few are caused by lightning strikes, in the past accidental and arson fires have occurred. The primary and most effective means of fighting these fires is by air. The presence of the wind turbines will not only increase the potential source of fire in the area but will also impede effective aerial fire fighting tactics. The proposed project creates a greater obstruction in regards to fire fighting than the existing BPA, lines due to their height and inconsistent layout. While additional trained personnel and firefighting equipment will be on hand during the construction phase of the project, those resources will not be available during operation. Mitigation measures need to be developed to compensate for the loss of aerial fire fighting ability within the proposed project site. This may include seasonal firefighting staff and equipment on site.

These are only a few of the adverse impacts to the environment and quality of life for residents in and around the project area. Many items touched on in the EIS are unresolved. Many plans regarding operations, decommission and mitigation are not complete. It has not been demonstrated that there is a need for the energy that will be produced. It seems there are many questions that should be answered before this project proceeds.

January 19, 2004

Mr. Allen J. Fiksdal
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Washington 98504-3172

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RE: Comments on KVVWPP Draft EIS

Dear Mr. Fiksdal:

Please consider the following comments when determining the need for additional studies and before making any decision to allow Zilkha Renewable Energy's "Sagebrush Power Partners" Kittitas Valley Wind Power Project (KVVWPP) near Ellensburg, Washington.

The Draft Environmental Impact Statement (DEIS) prepared by Shapiro and Associates for EFSEC contains data deficiencies and flawed analyses that greatly underestimate the magnitude of environmental impacts posed by the project. Proposed mitigation is also deficient in some cases. The DEIS appears to be primarily a repackaging of the original application prepared by Zilkha, with a lot of redundant information added, and also with some honest attempts to address concerns from previous public comment.

1

Throughout the public process that has led up to Zilkha requesting EFSEC to review the KVVWPP application, it has become apparent that Zilkha has no regard for the existing non-participant residents or wildlife in the area of the proposed project. Omission and misinformation has been their standard operating procedure. Zilkha has recently gone as far as trying to take the local land use approvals out of Kittitas County's hands. Zilkha recently stated publicly that the DEIS proves that there will be no environmental impacts because of their proposed project other than views and aesthetics. This is obviously not the case as I will specifically comment in the following sections.

SPECIFIC DEIS COMMENTS:

Section 1.1 - Introduction: In the DEIS, the proposed project has suddenly been amended to consist of between 82-150 wind turbines. The three proposed scenarios are described in Section 1.4 and consist of several different possible turbine sizes, numbers, and heights. These differences will absolutely affect the estimates of all other aspects of the DEIS, and cannot simply be assumed to be similar to the original analysis. If three scenarios are to be used, then the DEIS must be explicit in evaluating these three scenarios on every aspect.

2

January 19, 2004

Page 2

Section 1.4.2 – Alternative Wind Turbine Locations: This paragraph states that the proposed site is the only possible location for a wind power project and other locations are not possible due to lack of wind resource. Zilkha also stated publicly in meetings I attended that this was the only feasible spot in the County to develop. This is not true because Zilkha has decided to develop a second site and enXco is also proposing another location that has sufficient wind resource.

3

Section 1.4.3 – No Action Alternative: the DEIS describes the need to build a gas turbine power plant that would be needed if KVVPP were not developed. This is absolute speculation and editorializing about the “evils” of fossil fuels and should be removed. However, if the DEIS is going to talk about the need for additional power plants, it should also note the likelihood that such power plants will be needed to provide stability to the grid when wind generators are not functioning.

4

Section 1.7.5 – Television Interference: the DEIS states the effects of the project on television interference are unknown. It does not mention that this has been a documented problem at other wind power locations Zilkha has developed. A specific mitigation program such as providing satellite or cable television should be required. Same general comment for Section 1.7.6 – Radio Interference.

5

Section 2.2, Figure 2-2 – Typical Wind Turbine Dimensions: The figure is misleading because it compares the various wind turbines to “Existing Bonneville Transmission Towers” shown to be 170 feet. Only the tallest BPA transmission towers are that high, and most are much shorter. A person unfamiliar with this would greatly underestimate the true impacts of the various turbine heights in the proposed setting.

6

Section 2.2.3 - Lighting: The specific numbers of lights on turbines should be determined and described in this section and shown on Figures.

7

Section 2.2.5 – Operations and Maintenance Activities: Describe the blade washing procedure and plans for handling of any wastes generated by such activities.

8

Section 2.5 – Description of No Action Alternative: The DEIS again describes the need to build a gas turbine power plant that would be needed if KVVPP were not developed. This is absolute speculation and editorializing about the “evils” of fossil fuels versus wind power and should be removed.

9

Section 2.6, Figure 2-6 – Comparison of Various Wind Turbine Technologies: The figure is misleading because it compares the various wind turbines to “Existing Bonneville Transmission Towers” shown this time to be up to 200 feet. The tallest BPA transmission towers are not that high, and most are much shorter. A person unfamiliar with this would greatly underestimate the true impacts of the various turbine heights in the proposed setting.

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January 19, 2004
Page 3

Section 3.1.3 – Impacts of No Action Alternative: The DEIS once again describes the need to build a gas turbine power plant that would be needed if KVVWPP were not developed. This is absolute speculation and editorializing and should be removed.

11

Section 3.2.1 – Federal Laws and Regulations/State Laws and Regulations: This section describes Federal and State laws that prohibit the taking of endangered and threatened species and migratory birds. In the sections that follow, the DEIS goes to great lengths to downplay the estimated bird “taking” that will undoubtedly be a side-effect of the project. In fact no less than eight separate times the DEIS states that no bald eagle fatalities have been observed at an operating wind power project. I guess if they say it that many times it must mean something with regard to the proposed KVVWPP site – right? These 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 (based on the inadequate avian study and statistical analysis by WEST-October 2003). This is contradictory to the other DEIS assertion that average raptor fatalities will likely be higher at KVVWPP 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.

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.

12

It will be tragic to discover the KVVWPP 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. 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.

Section 3.2.3 – Impacts of Proposed Action: This section of the DEIS discusses models 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 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 KVVWPP 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

13

C:\Eric's Documents\Zilkha DEIS Comments.doc

January 19, 2004

Page 4

bats. 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.

14

Section 3.2.5 – Mitigation Measures –Additional Recommended Mitigation

Measures-Lighting: This section of the DEIS states that WDFW recommends the use of white strobe lights to reduce nocturnal avian collisions. If this is considered then the aesthetics and glare section should reflect the recommendation, as white strobe lights will be much more difficult for non-nocturnal species (i.e., humans) to live with.

15

Section 3.12.2 – Impacts of Proposed Action-Operations and Maintenance

Impacts-Shadow Flicker Effects: In numerous public meetings Zilkha previously denied that shadow flicker even existed. The DEIS shows significant shadow flicker impacts to existing properties and residences will occur. 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.

16

Section 3.5.3 – Impacts of No Action Alternative: The DEIS once again describes the need to build a gas turbine power plant that would be needed if KVVPP were not developed. This is absolute speculation and editorializing and should be removed.

17

Section 3.7.2 – Impacts of Proposed Action-Direct Operations and Maintenance

Impacts-Property Values: The DEIS states that "a new analysis of impacts to property values of wind energy projects was beyond the scope of this EIS". The section then goes on to editorialize and describe five subjective, non-scientific studies performed in various places that conclude wind farms do not impact to property values, and concludes therefore the KVVPP will not impact property values here. If it is beyond the scope of the EIS, omit the entire remaining part of this section. If Zilkha truly believes there will be no impact to property value and wants to do the right thing, perhaps they should offer to mitigate the issue through buy-out of the affected properties at current fair market value. They should have no problem making a profit by re-selling those properties after the project is built if what they assert is true. This is something commonly done when other big projects for the public good affect surrounding properties beyond reason.

18

Section 3.9 – Visual Resources: This section 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 overemphasized, and the actual area on the photos where turbines are simulated is too small to even see them. I

19

C:\Eric's Documents\Zilkha DEIS Comments.doc

January 19, 2004

Page 5

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. I really doubt they will be so hard to see with the naked eye.

19
cont.

Regardless of the photo tricks utilized, it should be obvious to anyone that this area has world-class views from almost anywhere you are. Trying to classify which views will be more impacted is meaningless. Construction of the KVVWPP will forever change a beautiful landscape that has been the primary reason many people bought property here. 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.

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Figures 3.9-14, 3.9-15, 3.9-16 : These figures reportedly show views of the three different turbine scenarios. The turbines in each photo look identical, which is not consistent with the different turbine heights described for the three scenarios.

21

Section 3.9.6 – Significant Unavoidable Adverse Impacts: The DEIS states that “a project that significantly affects a small number of viewers may be offset by the fact that it may have a relatively low impact on a large number of viewers”. If EFSEC determines that the public benefit of developing KVVWPP outweighs the impacts to a small number of non-participant property owners, mitigation in the form of buy-out offers to those impacted should be a condition of project approval. The amount of money this would probably require is quite minimal compared to the investment (and potential profit) of the KVVWPP.

22

Section 3.11.3 – Impacts of Proposed Action-Indirect Operations and Maintenance Impacts: This entire section is an editorial on global warming and promoting attributes of wind power and is not appropriate in an EIS. The section also refers to the gas turbine plant referred to several times before. The section should be omitted.

23

Section 3.11.4 – Impacts of No Action Alternative: With the exception of the first paragraph, this entire section refers to the gas turbine plant referred to several times before, and other speculation that is not applicable. The section should be omitted.

24

Section 3.12 – Noise: I recall all the public meetings where Zilkha assured everyone that noise was not an issue with modern wind turbines. Now the DEIS shows significant noise impacts across the project site, and the analysis did not even take into account low frequency tonal noise that can be very intrusive. The background noise measurements collected by Zilkha in the area ranged from the equivalent of library-quiet to leave-rustling quiet, according to Table 3-12.2.

25

Section 3.12.2 – Impacts of Proposed Action-Operations and Maintenance Impacts-Modeled Noise Levels: The applicant quotes Class C EDNA industrial/agricultural as the allowable noise standard at the property line of 70dba (also interesting because Zilkha said publicly over and over that this was not an industrial project).

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January 19, 2004
Page 6

Most of the property in the proposed project area is 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 Table 3-12.2 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.

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cont.

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Section 3.12.2 – Impacts of Proposed Action-Operations and Maintenance

Impacts-Vibration: The second paragraph of this section refers to the vibration created by combustion turbines and the impacts of such. I believe this was meant to be wind turbines because it otherwise does not make sense.

28

Section 3.12.3 – Impacts of No Action Alternative: With the exception of the first paragraph, this entire section refers to the gas turbine plant referred to several times before, and other speculation that is not applicable and should be omitted.

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Section 3.12.4 – Mitigation Measures: Should include buy-out option for those properties impacted by noise that cannot otherwise be mitigated to the satisfaction of the owner.

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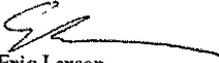
CLOSING

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 is obvious potential for a number of significant environmental impacts to surrounding properties if the KVVWPP is approved and is built. EFSEC has a responsibility to the people of Kittitas County to ensure that mitigation measures are required and enforced, and that there will be a procedure to report problems and obtain appropriate remedies before the project is operating.

31

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

Sincerely,


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

C:\Eric's Documents\Zilkha DEIS Comments.doc

Makarow, Irina (EFSEC)

From: John & Barb Foster [bears@elltel.net]
Sent: Monday, January 19, 2004 3:20 PM
To: Makarow, Irina (EFSEC)
Cc: Fiksdal, Allen (EFSEC)
Subject: Zilkha Kittitas Valley Wind Project

I am strongly opposed to the siting of the Kittitas Valley Wind Power Project in the Kittitas Valley. I do not believe all the facts are in as to problems with wind farms and I believe wind farms are an ineffective producer of power.

1

The placement of windmills by Zilkha shows no regard for property owners in the area and destroys views of everyone living in the Kittitas Valley. Why didn't the company propose building towers to the east of the valley away from property owners? Placement to the east of our valley would not have obstructed views by valley citizens.

2

I do not think sufficient studies were made of the siting of this project so I believe Zilkha should not get permission to build this monstrosity. Many other wind farm projects in the United States and Europe have been abandoned or had a moratorium placed on them until more study can be done as to ill effects of the wind towers.

3

Please do not let Zilkha build towers at the proposed site and destroy our views of the beautiful Cascades. The environmental study is insufficient. It is unconscionable to allow Zilkha to build the towers at the proposed site.

4

Sincerely,

John and Barbara Foster
2261 Killmore Road
Ellensburg, Washington 98926

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JAN 20 2004
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EVALUATION COUNCIL

1/20/2004

**COMMENTS ON THE KITTITAS VALLEY WIND FARM
PROJECT DEIS**

JANUARY 19, 2004

*Geoff Saunders
8241 Elk Springs Rd. Ellensburg WA 98926
daytime (206) 619-4707*

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**ENERGY FACILITY SITE
EVALUATION COUNCIL**

The DEIS states that if the KVVPP is not built, "residential development, could occur at the project site in accordance with the County's existing Comprehensive Plan and zoning regulations" Residential development is occurring, the area is zoned residential, and that is why the area is not compatible with wind farms.. The DEIS seems to be arguing that interfering with residential development is a reason why this project should be approved, when that is a reason why it should be rejected.

1

This project hurts the county and provides no offsetting benefit. It will reduce property taxes on neighboring properties. It will reduce tourist revenues. It will slow the growth of the county, and will limit the areas that Ellensburg can expand in the future.

2

This project would not increase property tax revenues to the county, since the amount of property tax generated revenue collected is limited to 1% annual growth with the passage of Initiative 747.

3

Only 13 landowners signed agreements for this project, and that only 3 of those 13 actually live in the project area. Only those 13 landowners will be compensated for losing the use of their land to the detriment of hundreds of others.

4

The EIS makes the unwarranted and irrelevant claim that if the KVVPP was not built, a gas fired combustion turbine facility of 60 MW capacity would have to be built somewhere else. This is not relevant, and is not justified. In fact WA has an electricity surplus, already gets most of its electricity from clean sources – hydroelectricity – and wind farm output is not wanted by energy utilities because of its intermittent and unreliable nature, and because of its high cost.

5

ALTERNATIVE SITES

An alternate site selection should not be limited to only the few sites mentioned in the EIS. Wind resource maps of the area indicate there are many more potential, and more remote, areas that the applicant has not mentioned.

6

The EIS rules out the few alternative sites mentioned on the ground that they would be too costly for Zilkha to run it's own transmission lines. This has absolutely no bearing on suitability for as an alternate location for the purpose of this EIS – it is only a factor in a business decision for Zilkha.

7

NOISE

The noise modeling offered for the draft EIS did not include low frequency analysis and this is inadequate. This noise is generated when the blades pass in front of the supporting tower and sounds like the thump of helicopters in the distance. Low frequency noise carries much farther than the frequencies measured and is much more subjectively disturbing. 8

The EIS noise analysis does not take into account the cumulative noise effect of multiple turbines. Since Zilkha's turbines will be clustered, and will be in some cases only 1,000 feet from existing homes, the cumulative effect of noise is very significant. 9

The draft EIS suggests that residences within a mile plant a 100 foot vegetative buffer to reduce the noise – this is completely unacceptable, and would reduce the noise, according to the EIS, by only 5 dB anyway. 10

A 4,000 foot setback from dwellings is a minimum to mitigate the effects of turbine noise. 11

ICE THROWS, BLADE THROWS, TOWER COLLAPSE

In the EIS the Applicant proposes safety setbacks of at least the height of the tower plus the blade from any public roads and residences. This is grossly inadequate. 12

There have been documented instances of ice throws from wind turbines of over 1,300 feet. Ice throws may occur when icing conditions exist. The contention in the EIS that icing occurs on average 3 to 5 days per season has already been exceeded this winter. 13

Blade throws do occur regularly in windfarms and blade parts may be thrown almost as far as ice. The wind industry's own guidelines state that a minimum ice throw safety setback over 2,000 feet for a rotor diameter the size of those proposed by Zilkha. 14

The EIS quotes as supporting evidence a conversation with an executive from Worldlink Insurance who states that he was not aware of any tubular wind tower structure collapsing. However, many photographs are available of collapsed tubular tower wind turbines, which demonstrates the strong bias of this EIS in favor of Zilkha. 15

The applicant quotes risk assessments based on documented instances of injury and damage. But Injury based on numbers of turbines installed is irrelevant since most wind farms are built away from populated areas (unlike Zilkha's proposal). 16

By the applicant's own admission, the implementation of turbine technology of this size is relatively new. There has not been sufficient time for a historical database to be built up so that safety standards can be set for large scale wind facilities. Thus EFSEC and the county should use the most conservative safety setbacks. A 2,500 foot safety setback from public and private roads, and non-participating property lines is the minimum required for Zilkha's wind farm. 17

SHADOW FLICKER

The EIS does not adequately address the issue of shadow flicker. The EIS recommends mitigation by planting trees and installing window shades - this is unacceptable. The residents affected by shadow flicker bought property in the area for the view, and 17

appreciation of wildlife. Obviously blocking their view to reduce shadow flicker is not a solution. 17 cont.

Shadow flicker is not just a nuisance. Shadows will sweep across private roads and highway 97 posing a danger to drivers. 18

Setbacks should be determined for each turbine such that shadow flicker does not impinge anywhere on non-participating properties. 19

FIRE MANAGEMENT PLAN

80% of the project lies outside of existing fire districts. It is well-documented – and acknowledged by the US government – that Wind Farms create an increased fire hazard. Yet the EIS states that there are no negotiated fire response plans for this project. A wind driven wildfire caused by a turbine failure, lightning strike, or by Zilkha staff using welding or other equipment would destroy a large number of houses, and local fire brigades could not and would not respond. 20

To mitigate this risk a setback from wooded areas of at least a mile is necessary, and the applicant should provide onsite fire fighting equipment and have a plan for manning this equipment, 21

VIEWSHED ISSUES

Residents in the immediate area are the most impacted. The DEIS acknowledges that the 11 residences on Cricklewood Lane and the lower and middle sections of Elk Springs Road “the sensitivity of views is high”. But the project will also be visible and intrusive across the entire valley, affecting thousands of people. 22

The effect of the KVVPP project on the viewshed in an area that the State of Washington has designated as a Scenic Byway (Highway 97 corridor) is severe and may even be a highway safety issue due to driver inattention. This is not addressed in the EIS. The scenery in this area is a major asset to the county which brings in tourist revenue, attracts land buyers and recreational users, attracts new residents to the county and creates a high quality of life here. All this will be lost if this huge industrial project is permitted in the middle of the most beautiful part of the county. 23 24

CONSTRUCTION

Zilka’s project calls for the construction of 19 miles of new dirt roads and the widening of 7 miles of existing roads, as well as 23 miles of trenching for underground lines. All of this will cause dust and soil erosion, inroads for invasive noxious weeds that are already a serious problem within Kittitas County and which impact farming yields. The EIS does not address this. 25

No analysis was provided in the EIS on the impact on well contamination due to blasting used in the excavation for the construction of the tower turbine bases and the interconnecting trenches. 26

PROPERTY VALUES

Many homes will be little more than 1,000 feet away from a string of spinning, flashing, noisy 400 foot turbines. The DEIS claims that property values will not be affected. This does not pass the laugh test.

Makarow, Irina (EFSEC)

From: Randy Fischer [randyjo@elltel.net]
Sent: Sunday, January 18, 2004 11:14 AM
To: Makarow, Irina (EFSEC)
Subject: Comments concerning Kittitas Valley Wind farm Project

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JAN 20 2004
**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Comments pertaining to the accuracy and completeness of the:
Kittitas Valley Wind Farm Project
DEIS

Respectfully submitted,

The deficiencies and inadequacies of the draft EIS have been more than adequately addressed by the responses of Clay White, Ed Garret, Geof Saunders, and Mike Robertson. I wholeheartedly agree with their statements and findings.

"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".

If Zilkha can sidestep our county government through preemption, to have this huge industrial facility placed in an inappropriate site with little benefit to anyone other than themselves, it is a sad day for our state, our country, and democracy.

I sincerely hope that I am not being naive in believing that fair and impartial judgment will prevail and if this industrial facility is allowed to happen it will be placed in a more suitable location.
Sincerely,

Randy and Joanna Fischer
6440 Hanson road
Ellensburg, Wa. 98926

1

1/20/2004

Makarow, Irina (EFSEC)

From: Janet Lee [ponderosa53@hotmail.com]
Sent: Monday, January 19, 2004 3:13 PM
To: Makarow, Irina (EFSEC)
Subject: No to Wind Turbines

Dear Irina Makarow:

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 Zilkha 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. 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.

Janet Morris

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1/20/2004

Makarow, Irina (EFSEC)

From: Forrest Wilbanks [hykeandpsyche@charter.net]
Posted At: Monday, January 19, 2004 12:37 PM
Conversation: AGAINST THE KITTITAS VALLEY WIND OWER PROJECT
Posted To: EFSEC
Subject: AGAINST THE KITTITAS VALLEY WIND OWER PROJECT

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I attended the meeting in Ellensburg on Jan 13th. I would like to submit my comments for the record.

I am against this project for the following reasons.

I believe that wind power systems will not be efficient per dollars invested. According to the U.S. Energy Information Administration (EIA) solar and wind power systems contributed only 0.1 percent of U.S. energy consumption in 2000 and the EIA projects that will rise to only 0.25 percent by 2020 because of their inefficiency. Hundreds of windmills in California have been abandoned.

A single 555-megawatt natural gas-fired electric power plant in California produces more than all 13,000 windmills in that state. Current renewable energy technologies can't meet humanity's energy needs, so fossil fuels will likely supply the bulk of energy for the immediate decades ahead.

RENEWABLE ENERGY: EIA statistics show that in 2000, hydroelectric supplied 85% of the the renewable generation in the U.S. EIA also said "wind power can involve noise, visual intrusion, significant land use, strikes and interference with electromagnetic communications." The EIA pointed out that a wind farm equivalent in output and capacity to a 1,000 megawatt fossil fuel or nuclear power plant would occupy 2,000 square miles of land and would produce electricity at double or triple the cost of fossil fuels. (Amato, "The Crusade Against Chlorine," P. 154.)

A typical gas fired 2,000 megawatt power plant would need to be replaced by 20,000 windmills of the typical 100-kilowatt capacity.

INCENTIVES: The current administration proposed almost identical subsidies as those advanced by Clinton-Gore. These include tax credits, accelerated depreciation, production tax credits (1.7 cents per kilowatt-hour from the federal government), state tax breaks, mandates such as "renewable portfolio standards" in several states and decisions by corporate executives to "look green" or to appease advocacy groups in an attempt to ease rate cases and environmental permit proceedings. All of the actions have the effect of shifting costs from renewables developers to taxpayers.

The U.S. Department of Energy (DOE) has spent hundreds of millions in its dollars on renewable energy R&D and millions more have been allowed in tax credits. Even with all these dollars contributed, the EIA non-hydro renewables in 2000 supplies only 3.7% of total U.S. energy consumption. Of these, solar and wind systems contributed only 0.1% in 2000 with an expected contribution of 0.25% in 2020.

The Cato Institute says, "without policy privileges, the renewable energy industry, the portion that produces electricity for the power grid, would cease to exist."

He also points out that "False claims about wind energy are leading members to extend unwise wind energy subsidies."

In conclusion, conventional energy production is likely to remain cheaper and more efficient than renewable energy production for the foreseeable future.

According to an August 16, 2001 USA TODAY article, "Green Power Gets Second Wind", Schleede warned that the article unfortunately contributed to the false impression in the public, media and Congress that windmills actually might be a realistic way to supply electricity when, in fact, windmills are huge structures, high cost, produce very little electricity, destroy scenery and damage neighbors property values

Sincerely,

1/20/2004

1

2

Forrest Wilbanks
561 Strange Road
Ellensburg, WA 98926

1/20/2004

January 19, 2004

Allen Fiksdal
EPSEC Manager
925 Plum Street SE, Building 4
Olympia, WA. 98504-3172

RECEIVED
JAN 20 2004
**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Subject: DEIS Kittitas Valley Wind Farm Project Comments

Dear Mr. Fiksdal,

After reviewing the DEIS document for the Kittitas Valley Wind Farm Proposal, I have the following comments;

Page 1 Fact Sheet; The project as applied stated 121 wind turbines. The DEIS states 82 to 150 turbines. Regardless of the reason for this, the DEIS should analyze the impacts for all scenarios. The fact that they are now considering more of less has an impact on the citizens concerns and affects the scoping requirements that the public and county created months ago.

1

Page 1-1, 1.1 Introduction, 3rd paragraph; The last sentence states that "EFSEC's Environmental consultant, Shapiro and Associates, Inc. did not perform additional studies during the preparation of this Draft EIS." I have a very large concern with this statement. After the public participated in the scoping of the Environmental Statement requirements, does this mean, that no additional work from environmental experts and consultants was performed? If this is what this means, than I must conclude that this DEIS should be null and void and that this situation might be the "public citizen participation" and "government process" at it's worst. I hope I am wrong on this issue.

2

Page 1-8, Paragraph 1; This paragraph states that this site is the only possible location for a wind farm. This statement is obviously untrue and should be eliminated.

3

Page 1-8-9, 1.4.3; The assumption that a gas fired combustion facility will be built as a result of no action is simply not true and this statement should be removed.

4

Page 1-9, 1.4.4- The last sentence states that none of the alternate sites would satisfy the test for availability or practicality for the current proposal. This statement is untrue as Zilhka has another site already slated in the Wild Horse Canyon area. If it is a true statement, they should explain or this statement should be removed. It seems to me that there is double talk as they state, while there may be other potential sites for wind farms in Kittitas County, didn't they just say in 1.4.2, the opposite?

5

Page 1-10, 1.5 Paragraph 3; While this states that ongoing discussions are happening with the Yakima Indian Tribe, nowhere in this document explains what the concerns are, how the tribe uses their cultural sites and how the wind turbines themselves might affect their ceremonies.

6

This section also leaves off the actual county as a party to work with...hmmm.

Page 1-11, 1.7.1; Incomplete. This must be resolved before a DEIS can be approved.

7

Page 1-11, 1.7.2; Incomplete. This must be resolved before a DEIS can be approved.

Page 1-11, 1.7.3; Incomplete. This must be resolved before a DEIS can be approved. There are other Wind Farm sites that can be used to model and project Tourism impacts. The residents that moved to these rural locations did not count on busloads or heavy traffic for “site seeing”. The current roads are not built for this type of traffic and would need to be considered and covered in the DEIS as well as the impact on the residents of their property moving from a rural designation to an industrial and organized tourism site. In fact Lincoln Township, Wisconsin have found that vehicles stop in the middle of the road when they come upon the wind towers. There will need to be roadwork done to assure public safety. This needs to be addressed.

8

Page 1-11, 1.7.4; The impact on the Yakima’s tribe and their cultural sites and ceremonies is very incomplete. It is apparent if conversations have taken place, they have been few and absolutely no fieldwork has been accomplished. Specifically, how will these archaeological sites be impacted? How will the tribe members be affected? Will they have egress? How will the towers themselves affect any ceremonial structure? This is what I expected to see in a Draft Environmental Study.

9

Page 1-12, 1.7.5; Television Reception survey should happen and be reported upon before an EIS can be approved. The industry knows this is a problem and residents should not have to wait months after the fact for a fix. Any issues should be accounted for as part of the initial project. In fact in the Lincoln Township Moratorium survey, they found that while promised this wouldn’t happen, it did and took 2 years to correct the problem. This is unacceptable and a survey to account for TV reception needs to be a part of the EIS.

10

Page 1-12, 1.7.6; Radio interference should be accounted for as part of the initial project. The industry knows this is a problem and has mitigated it in other states. In fact, in the Lincoln Township Moratorium survey, they found that while promised this wouldn’t happen, it did and took 2 years to correct the problem. This is unacceptable and a survey to account for Radio interference/reception needs to be a part of the EIS.

11

Why do I keep seeing that EPSEC has requested information of the applicant and they have not responded? This concerns me as a citizen of Kittitas County, how will they respond to issues AFTER the wind towers are in?

12

CHAPTER 2

Introduction, page 2-1; The introduction states the alternative sites do not meet the project objectives, are not practical or feasible and may result in higher environmental

13

costs. I believe a supporting chart should be constructed that proves this statement. While we are not from Missouri, we still have the right to say, "Show me". This statement needs to be substantiated. Why then is Wild Horse Canyon a viable location and as the Zilhka Representative stated for the Daily Record, "Wild Horse Canyon has some of the best wind in the valley." 13 cont.

2.2.1; 181.5-246 megawatts should be either reduced by the estimated % of time the wind will blow, or made clear this estimate is based on wind blowing 24/7, 52 weeks each year. It is untrue how it is currently stated. 14

2.2.2; Suggested setbacks are unsafe at best. I would like to see engineering results of looking at maximum distance a rotor would fly based on 30-70 mph winds in the EIS. In addition, if a tower fell, how far would it and the parts that broke off fly? This should be accomplished for all 3 scenarios and all 3-rotor blade sizes. This information has to be known by the applicant. In the current DEIS, they state 410 foot set backs (or rotor tip height) as the safe set back from roads and leasing landowners. I am no engineer, but I instinctively know this is unsafe. 15

In addition, the 1000-foot setback was mentioned because of noise, what proof has the applicant shown us that from 82 to 150 rotors turning 10-23 times a minute will be mitigated by setbacks of 1000 feet? In the Lincoln Township Moratorium Study, they had 1000-foot set backs and noise affected residents greatly. 16

Towers; Painting the Towers gray will not make them less obtrusive to those living in the immediate area. In fact, at 410 feet tall, they will be seen from vast distances, gray or red. 17

Lightning Protection, page 20; How will the lightning protection for the towers themselves affect lightning hitting the ground, rather than the towers. In the Lincoln Township, Minn. Survey, there has been an increase in lightning hitting the ground around the towers, meteorological towers, although none have hit the actual towers themselves. Stray electricity has been a problem at other wind sites as well. How will the electricity being diverted into the ground, affect nearby residents and cattle/animals? This needs to be addressed in the EIS. 18

2.2.4 Construction Activities: How will the dust and dirt blowing into homes be mitigated?? 19

2.5, Page 33, 1st paragraph; Remove the statement that the NO Action alternative would likely result in a gas powered energy facility. This is simply not true. 20

Table 2.9, page 34: Remove table, it is not applicable to this project or DEIS. 21

Suitable Alternative Sites, Page 42, paragraph 4: This paragraph states that power lines of less than 115 kilowatts cannot carry the load of a wind farm over 100 megawatts. 22

If the max megawatts are 246, based upon a 24/7, 52-week period, then I estimate the highest megawatt at 82. These lines should suffice.

22
cont.

Page 47, last paragraph; If 26000 acres are good wind sites and Zilhka has 8000 acres for the Whiskey Dick/Wild Horse site, then I believe, the additional 18000 acres are a viable alternative. The DEIS says nothing about the owners not being open to more wind towers and I would suggest that Zilhka already has this in their Whiskey Dick growth plan.

23

Conclusion: There is a feasible site alternative. If Zilhka doesn't agree, ask them to please relocate.

Page 54, 2.8; Remove or re-write, it is simply not true.

24

CHAPTER THREE

3.1.2, 3.1.3, 3.1.4, Impacts on Earth Movement will be huge. The 19 miles of roads up to 24 feet wide, the 80000 cubic feet of rocks crushing, the cubic tons of disturbed ground. This construction will have an impact on the surrounding area that will never be mitigated. The land will be changed forever and the "living environment" for those who use their land will be also changed forever. The dust blowing is also a huge concern for those living in the area.

25

26

Please remove paragraph 2 on 3.13 as it states a gas powered energy facility would be required for the no action alternative. Simply not true.

27

3.2.1, Wildlife and Habitat, pg 3;

This EIS references a Avian Study performed by West, In. for EnXco and Desert Claim Wind Farm proposal. The study is insufficient in length as it was only a 1-year study. It was also insufficient in the number of observers that performed weekly observations for 20-30 minutes. As stated by the Sierra Club, more than one observer is needed to cover a 360-degree area.

28

Bats were dismissed as being inconsequential. That is totally untrue. Holly Pinkard, PHD and a Professor of Biology has stated several times the danger to Bat populations affecting the growth or West Nile Virus and the potential Raptor kills affect the rodent population and growth of Hunta Virus. Neither of these concerns were addressed.

29

Re; the West Avian Study, no aerial Eagle nests were observed. A quick question to the residents of Reecer and Wilson Canyons would have directed them to where the Eagles roost and the number of Eagles that fly down from the mountains every morning.

30

In addition, this project violates the recommendations form the Dept of US Fish and Wildlife for Wind Farm placement. Specifically the following items 1,2,3,4,5,6,9:

31

**INTERIM GUIDELINES TO AVOID AND MINIMIZE
WILDLIFE IMPACTS FROM WIND TURBINES**

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.
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.

10. Reduce availability of carrion by practicing responsible animal husbandry (removing carcasses, fencing out cattle, etc.) to avoid attracting Golden Eagles and other raptors.

3.22 pg 3.3-2-7; Soils

As stated in the DEIS, soil conditions along the majority of the ridge tops and strings is in good condition. This includes the litho soils.

The mitigation provides a 550-acre site where soils and habitat will not be destroyed. However, in section 3.1 Earth, states up to 328,000 cubic yards of dirt and rock will be cut out to provide for the turbines. From 231 to 371 acres will be destroyed over a 5000-acre site.

This leaves the area open to noxious weeds and other non-natural species a good chance to take over. The one site of 550 acres is like a zoo or land preserve, we will wipe out all but a few of the animals and then provide them one space to live and tourists to come see. It is important to the Kittitas Valley that these pristine areas, stay that way as much as possible. The cumulative impact of litho soils and natural species is huge, as shown in Pictures 3.14.4, 6 and 8.

32

3.3.3, page 3.3-7; Water

Please add a mitigation plan for potential well damage.

33

Eliminate 2nd paragraph on 3.3-7 as it assumes the no alternative will require a gas powered energy facility, which is simply not true.

34

3.4. , page 3.4-1; Health and Safety

As stated in the 1st paragraph of this section currently fire is the #1 Hazard in this area. Unfortunately, if wind turbines are allowed in this area, there will be several new hazards in this area where people live and play.

35

Impacts

I find it very interesting that the DEIS states indirect impacts are not anticipated because project is not apt to substantially induce regional growth to the extent it would cause indirect impacts. How true, the landowners will not be able to sell their land to get away from the 410-foot structures next to their homes and the developers will not be able to sell their investment. This

36

also implies that tourism will be affected negatively. This DEIS contradicts itself in many areas and should be started over. 36 cont.

Table 3.4.1 Page 3.4-2; Construction Impacts

108740 gallons of hazardous material to build and operate 82-150 wind towers. Green? I think not. We prefer residential growth to the chance these hazardous materials will get into our wells, ground water and the Yakima River. 37

Electric and magnetic field hazards. You may want to reference the Lincoln Township Survey where this was a result of allowing 22 wind turbines. Excerpts from the study below; 38

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.

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.

Two of Mr. Neubauer's clients, who were interviewed in October, are dairy farmers who have spent over \$250,000 and \$300,000 trying to rewire their farms to reduce stray voltage. That cost does not include herd loss or losses from diminished milk production. Mr. Russ Allen owns 550 dairy cows in DePere, Wisconsin. His farm is in a direct line between nearby WPSC turbines and a substation. Mr. Russ said he was losing one or two cows a day during the three years prior to his installing electrical equipment to help reduce currents on his farm. About 600 cows died, he said. Mr. Russ said he has so much electrical current on his farm that he laid a No. 4 copper wire around his farm for 5,000 feet. The wire is not attached to any building or additional wires; yet it can light up a light bulb from contact with the soil alone. Mr. Russ has scheduled a media day on October 24 to draw awareness to the problems of stray voltage and he said to encourage everyone in Bureau County to attend.

"What scares me more is that I know . . . they're pumping current through people. They're pumping current through kids," Mr. Allen said.

It is important to note that Mr. Noe and his electrical engineer, Mr. Pasley, deny that there will ever be EMFs or stray voltage resulting from the proposed Indiantown/Milo turbines. Just as WPSC has dismissed any problems in the face of mounting evidence, Mr. Noe testified that he will never implement electrical pollution studies and that he thinks they would be a waste of money.

Needless to say, there needs to be more done in this area on the DEIS. Electrical tests should be administered to assure there will be no stray voltage.

39

3.3.4 2nd paragraph, page 3.3-7

Lightning induced fires are rare in Washington State." Quite the opposite is true. Hundreds of lightning induced fires happened last summer and every summer. The concern here is that this land will have to be fought by air to get a hold on the flames before they spread to other areas. In addition, the addition of these 410-foot towers may incite lightning to hit here more often.

40

An excerpt from the Lincoln Township Wind Factory Moratorium results

On the survey, several residents showed concern over the perceived problem of increased lightning strikes in the area.

- "bring lightning (sic) strikes closer to our home."
- "More concern over seeing more lightening (sic) than in the past -- before generators were erected."

According to Township Chairperson Monfils, the wind developers declared prior to construction that lightning would not affect the turbines; however, lightning later struck and broke a blade that had to be replaced.

In addition, Mrs. Yunk said that one month after the turbines went online, in July, 1999, a lightning and thunderstorm sent enough electricity through the power grid that Mrs. Yunk and Mrs. Heling both lost their computers to what the service technician called a "fried electrical system" -- even though both computers were surge protected. The reason that Mrs. Yunk attributes the electrical surge to lightning striking a turbine on that particular night is that on the night of the storm, her relative, Joseph Yunk, whose television set was also "fried" that same evening, reported seeing lightning move from one of the turbines along the power grid to the nearby homes, which is a common occurrence with wind factories since nearby strikes to either turbines, external power systems or the ground can send several tens of kilovolts along telephone and power lines. Replacements for the computers and television were paid by the residents.

How will KVVW mitigate the potential lightening damage to homes? How will fire protection plans handle the additional fire potential? These items should be added to this DEIS. | 41

3.5.3 Energy, Impacts of No Action, page 3.5-13

Remove paragraph 2 as it assumes a gas powered energy facility will be needed as a result of No Action. Simply not true. | 42

3.6., page 3.6-12; Land Use

Impacts

Remove paragraph 2 as it assumes a gas power energy facility will need to be built, if no action is taken on the Wind Turbine Facility. | 43

GPO 2.118 states "Encourage projects whose outcome will be the significant conservation of farmlands." | 44

93-118 acres of cement, industrial towers over a 5000-acre project area, over 100,000 gallons of hazardous materials in use daily does not fit this ordinance and the project should be dismissed.

Industry and farming do not often coincide compatibly. You must also remember, **ALL** landowners purchased their property based upon current zoning and ordinances. The land use will be so dramatically different if Wind Towers are allowed, we might as well zone this land to be a Port Authority and start throwing warehouses up.

45

3.7 Socioeconomic

Property Values

The REPP study referenced was a biased study paid for by the US Dept of Energy. The results did not quantify information enough to compare with other Wind Farm sites. For instance, the homes that were sold were in a 5-mile radius. It didn't specify whether the homes were in view of the turbines or not. In addition, most sites that could be compared with our projects were only 20 turbines or less and in Connecticut and some other eastern sites, there were many leafy trees between the turbines and homes as stated in the study drawings. The results are very general and cannot be used accurately for Kittitas Valley.

46

The Lincoln Township Wind farm/ Property Values findings are as follows;

Declining Property Values

Town of Lincoln Wisconsin zoning administrator Joe Jerabek compiled a list of properties that have been sold in the township, and their selling prices. The list compared the properties' selling price as a function of the distance to the wind factories, using real estate transfer returns and the year 2001 assessment roll.

Conclusions were as follows:

1. "Sales within 1 mile of the windmills prior to their construction were 104 percent of the assessed values, and properties selling in the same area after construction were at 78 percent, a decrease of 26 points."
2. "Sales more than 1 mile away prior to construction were 105 percent of the assessed values, and sales of properties 1 mile or more after the construction of the turbines declined to 87 percent of the assessed value, an 18 point decline."

Mitigation should include a paid Real Estate Assessment, a current market analysis for each of the property's affected within a 2-mile radius. A buy out program should be in place for 1 year after the Wind Farm is built and for those who choose not to sell. When the property is sold, any loss should be compensated for to the property owners. The Applicant should have to post a bond for these funds.

47

3.8, Cultural Resources, pg. 3.8-1

While this section gives us some great information about the Valley, it is really incomplete because of the Yakima Tribes lack of involvement in the impacts. This section is incomplete and should be completed before the EIS can go forward.

48

3.9 Visual Resources, 3.9-1;

Impacts to property owners within one half mile will be devastating to the point most be unable to live or play there. There will be a cumulative impact of view, movement and noise as well as shadow flicker and sun/glare flicker on the blades. The pictures provided are an excellent attempt to pull the wool over the eyes of Kittitas Valley. All one needs to do is to visit other wind farms and know that you can see them 25 miles away! The cloudy skies are one example of their manipulation. Also missing are any simulations of moving blades and blinking lights. Pictures 3.14-4-6-8 tell the devastating story of how our view shed will be affected and there is nothing positive about it. It really gets down to the fact that people live here and that this site is not acceptable.

49

3.10 Transportation, pg 3.10-1;

This section should include mitigation to roads such as Bettas Rd. for damage done by high levels of use with heavy equipment.

50

In addition, this section should include mitigation measures for traffic to pull off the Hwy 97 safely and pull outs for tourists. A tourism plan should be incorporated into this mitigation.

51

3.12 Noise, pg. 3.12-1;

Below are the noise impacts taken from the Lincoln Township, Wisconsin Wind Farm Survey:

Are any of you affected by the following in the past year?

Noise

Residents within ½ mile YES 44%

Residents within ¼ mile YES 52%

Sounds like a gravel pit crushing rock nearby."

- "Sometimes so loud it makes it seem like we live in an industrial park. The noise dominates the 'sound scape.' It's very unsettling/disturbing especially since it had been so peaceful here. It is an ongoing source of irritation. Can be heard throughout our house even with all the windows and doors closed."
- "The noise can make it impossible to fall asleep. It makes an uneven pitch not like the white noise of a fan. Can be heard through closed windows making it hard to fall asleep anytime of the year."

- "You can hear them at times as far as two miles away."
- "It is the annoyance of never having a quiet evening outdoors. When the blades occasionally stop its (sic) like pressure being removed from my ears. You actually hear the quiet, which is a relief."

The most illustrative description of turbine noise was that of reverberating bass notes from a neighbor's stereo that penetrate the walls and windows of a home. Now imagine having no recourse for asking anyone to turn down that noise, whether it's during the day or in the middle of the night.

Question: In the last year, have you been awakened by sound coming from the wind turbines?

Residents within ¼ mile YES 67%

Residents within ½ mile YES 35%

Additional write-in comments from survey:

- "Enough to go to the doctor because I need sleeping pills. Sometimes it absolutely drives you 'nuts.'"
- "I wake up with headaches every morning because of noise. Causes my (sic) to have very restless sleep at night!"
- "Enough to go to the doctor because I need sleeping pills. Sometimes it absolutely drives you 'nuts.'"
- "I wake up with headaches every morning because of noise. Causes my (sic) to have very restless sleep at night!"
- "We have no way of knowing long-term affects (sic). Growing concerns with stray voltage and its affect (sic) on health. We've had frequent headaches, which we didn't have before. Especially in the morning, after sleeping at night. We need answers!"
- "Not awakened but found it hard to fall asleep!!!"

The residents of this project area should not be subjected to the whooshing, thumping sound of 82-150 turbines. Quality of life and health will be affected. This is one of the main reasons this

wind farm should be re-sited. Property values WILL be affected by noise, as most potential buyers are interested in a rural, peaceful setting.

52
cont.

In Summary

There are several areas that not addressed accurately or thoroughly enough. The DEIS is incomplete at best. EPSEC needs to step back and re-access the site of the proposed wind farm. As a part of this assessment, impacts to other residents of similar type wind farms should be looked at to assure our EIS is accounting for all serious issues honestly and accurately.

53

Once we have the turbines, we are stuck with them and all the problems that **WILL** result.

While I do not think wind energy is a viable resource with today's technology and is not viable financially without subsidies, it is really the site that is the issue at the forefront of this EIS. Had Zilhka chosen to place wind turbines in an area where people don't live, where endangered species don't live and where the view is not the # 1 asset of the county, they would have found a much easier time in getting this permitted (pending a completed EIS). I doubt Wild Horse Wind Farm will have any problem being approved (pending a completed EIS).

Kittitas County and EPSEC as governing bodies who are to make their recommendations for final approval or disapproval need to protect the safety and health of KV residents and assure that proper zoning and land use fits into the growth plan.

54

There is nothing in this DEIS that assures me that these requirements will be met. I am sure you take your responsibility very seriously and can see the same concerns and issues.

The DEIS should be completed and made to be an honest, accurate assessment of the true impacts to our valley before final decisions can be made.

I have attached the Lincoln Township Excerpts and the Moratorium Committee's findings for back up. You may send for the official copy. An address is provided at the bottom of the documents.

Sincerely,

Charles & Linda Schantz
4190 Robbins Rd.
Ellensburg, WA. 98926
509-925-1441

Excerpts from the Final Report of the Township of Lincoln
Wind Turbine Moratorium Committee

After the wind turbines went online in Kewaunee County, Wisconsin, the Lincoln Township Board of Supervisors approved a moratorium on new turbine construction. The purpose of the moratorium was to delay new construction of wind turbines for eighteen months, giving the township the opportunity to assess the impacts of the 22 turbines installed by Wisconsin Public Service Corporation (WPSC) and Madison Gas and Electric (MG&E), which went online in June, 1999.

The following document summarizes some of the problems the Moratorium Committee faced in trying to address **problems the township hadn't faced prior to turbine construction and some of the resulting changes the committee proposed** as a result of its study. Verification of this information can be obtained from Lincoln Township officials.

Agenda

The Moratorium Committee met 39 times between January 17, 2000, and January 20, 2002, to 1) study the impact of wind factories on land, 2) study the impact on residents and 3) review conditional use permits used to build two existing wind factories in Lincoln Township.

Survey

The committee conducted a survey on the perceived impacts of the wind turbines that was sent out to all property owners residing in the township. Each household received one vote. The results were presented on July 2, 2001, to the town board, two years after the wind factory construction.

Question: Are any of the following wind turbine issues currently causing problems in your household?

	residents w/i 800 ft. - 1/4 mi.	residents w/i 1/4 mi. - 1/2 mi.
--	------------------------------------	---------------------------------------

a Shadows from the blades **33% yes**
41% yes

Here are additional write-in comments from the survey:

- "We get a 'strobe effect' throughout our house and over our entire property (40 acres)."
- "Shadows are cast over the ground and affect my balance."
- "We installed vertical blinds but still have some problems."
- "They catch my eye and I look at them instead of the road. They are dangerous."
- "Strobe light, headaches, sick to the stomach, can't shit (sic) everything up enough to stop the strobe coming into the house."

An additional comment from Lincoln Township Supervisor John Yunk:

- "The strobing effect is so terrible that turbines should not be any closer than 1 mile from schools, roads and residences . . . They should never be set on East-West."

Dr. Jay Pettegrew, researcher, neurologist and professor for the University of Pittsburgh, testified before the Bureau County Zoning Board of Appeals that strobe effect could cause drivers to have seizures, which could result in fatal traffic accidents. At the very least, drivers could become disoriented and confused, he said. He testified that the turbine spacing (sited on top of hills

instead of in a single field in orderly rows) would increase the likelihood of seizures.

It is important to know that according to Lincoln Township Chairperson Arlin Monfils, the wind developers publicly stated that strobe and shadow effect would not occur once the turbines were operating. In reality, strobe and shadow effects were problem enough that residents vehemently complained and the power company anted up for awnings, window treatment blinds and small trees to block the light at certain times of the day. Strobe and shadow effects take place for about 40 minutes during sunrise or sunset if the angle of the sun and the light intensity create the right conditions. Mr. Jeff Peacock, Bureau County highway engineer, has recommended denying permits for 8 turbines due to safety concerns, including strobe effect.

Diane Heling, whose property is adjacent to the WPSC turbines, said the utility purchased blinds for her home, but especially in the spring and fall when there are no leaves on the trees, the strobing is at its worst in her home. "It's like a constant camera-flashing in the house. I can't stand to be in the room," Mrs. Heling said. Her neighbor, Linda Yunk, whose property is adjacent to the WPSC turbines, describes the strobe effect as unsettling. "It's like somebody turning something on and off, on and off, on and off . . . It's not a small thing when it happens in your house and when it affects your quality of life to that extent," Mrs. Yunk said.

	residents w/i	residents
w/i		
1/2 mi.	800 ft. - 1/4 mi.	1/4 mi. -

b TV reception 33% yes
37% yes

Additional write-in comments from survey:

- "Ever since they went up our reception is bad."

- "At times you can see shadowing on the TV that imitates the blades' moves, also poor reception."
- "Minimum of 50' antenna tower proposed but no guarantee that would be high enough. Such a tower is unacceptable."
- "At times we get black and white TV. Two channels come in hazy!!"

w/i	residents w/i	residents
1/2 mi.	800 ft. - 1/4 mi.	1/4 mi. -

c Blinking lights from on top of the towers **9% yes**
15% yes

Additional write-in comments from survey:

- "Blinking red lights disrupt the night sky. They make it seem like we're living in a city or near a factory."
- "At night it is very irritating because they flash in the windows."
- "We have to keep drapes closed at night."
- "Looks like a circus, live in the country for peace and quiet."

w/i	residents w/i	residents
1/2 mi.	800 ft. - 1/4 mi.	1/4 mi. -

d Noise **44% yes**
52% yes

Additional write-in comments from survey:

- "Sounds like a gravel pit crushing rock nearby."
- "Sometimes so loud it makes it seem like we live in an industrial park. The noise dominates the 'sound scape.' It's very unsettling/disturbing especially since it had been so peaceful here. It is an ongoing source of irritation. Can be heard throughout our house even with all the windows and doors closed."
- "The noise can make it impossible to fall asleep. It makes an uneven pitch not like the white noise of a fan. Can be heard through closed windows making it hard to fall asleep anytime of the year."
- "You can hear them at times as far as two miles away."
- "It is the annoyance of never having a quiet evening outdoors. When the blades occasionally stop its (sic) like pressure being removed from my ears. You actually hear the quiet, which is a relief."

The most illustrative description of turbine noise was that of reverberating bass notes from a neighbor's stereo that penetrates the walls and windows of a home. Now imagine having no recourse for asking anyone to turn down that noise, whether it's during the day or in the middle of the night.

As the result of so many noise complaints, WPSC paid for a noise study. However, residents are still upset that the study was inadequate in that it measured decibel levels for a maximum of five days per season, sometimes only for a few minutes at some sites, and included days when rain and high winds blotted out the noise from the turbines. In addition, many measurements were taken when the turbines were not running. WPSC claimed it did not have the funds for a more comprehensive study, according to resident Mike Washechek, whose home is victim to some of the worst noise caused by the turbines, due to its location downhill and downwind from the WPSC turbines.

e other problems

On the survey, several residents showed concern over the perceived problem of increased lightning strikes in the area.

Additional write-in comments from survey:

- ". . . bring lightning (sic) strikes closer to our home."
- "More concern over seeing more lightening (sic) than in the past -- before generators were erected."

According to Township Chairperson Monfils, the wind developers declared prior to construction that lightning would not affect the turbines; however, lightning later struck and broke a blade that had to be replaced.

In addition, Mrs. Yunk said that one month after the turbines went online, in July, 1999, a lightning and thunderstorm sent enough electricity through the power grid that Mrs. Yunk and Mrs. Heling both lost their computers to what the service technician called a "fried electrical system" -- even though both computers were surge protected. The reason that Mrs. Yunk attributes the electrical surge to lightning striking a turbine on that particular night is that on the night of the storm, her relative, Joseph Yunk, whose television set was also "fried" that same evening, reported seeing lightning move from one of the turbines along the power grid to the nearby homes, which is a common occurrence with wind factories since nearby strikes to either turbines, external power systems or the ground can send several tens of kilovolts along telephone and power lines. Replacements for the computers and television were paid by the residents.

e Other problems *(continued)*

On the survey, several residents showed concern over hazardous traffic conditions during and after construction of the turbines.

Additional write-in comments from survey:

- "People driving and stopping."
- "While they were being installed the destroying of the roads, noise, and extra traffic have been negative."
- "More traffic and have to back out of driveways (live on hill, hard to see)."
- "More traffic. I used to feel safe walking or riding bike (sic)."

In addition, Mrs. Yunk said that especially when the turbines first went up, other drivers would be looking up at them and they would "dead stop in front of you." She said she narrowly avoided colliding with a car that had stopped abruptly in front of her.

Question: In the last year, have you been awakened by sound coming from the wind turbines?

w/i	residents w/i	residents
1/2 mi.	800 ft. - 1/4 mi.	1/4 mi. -
67% yes		35% yes

Additional write-in comments from survey:

- "Enough to go to the doctor because I need sleeping pills. Sometimes it absolutely drives you 'nuts.'"
- "I wake up with headaches every morning because of noise. Causes my (sic) to have very restless sleep at night!"
- "We have no way of knowing long-term affects (sic). Growing concerns with stray voltage and its affect (sic) on health. We've had frequent headaches, which we didn't have before. Especially in the morning, after sleeping at night. We need answers!"

- "Not awakened but found it hard to fall asleep!!!"

Question: How close to the wind turbines would you consider buying or building a home?

The results for all survey respondents in the study, including those living over 2 miles away are as follows:

- **61% would not build or buy within 1/2 mile of turbines**
- **41% would have to be 2 or more miles away from turbines in order for them to build or buy**
- **74% would not build or buy within 1/4 mile of turbines**

These are people who know first-hand about the problems caused by the wind factories. They have lived with the turbines for three years. Again, 74% responded that they would not build or buy within 1/4 mile of turbines. Common sense dictates that if a 38-story skyscraper is built next to any home and it obstructs the view, that home would not be as valuable on the market as an equivalent home sited away from such an obstruction. Common sense also dictates that if the skyscraper had moving parts that contribute to or have the potential to contribute to blinking lights, strobing, noise, stray voltage, ice throws, and health problems, that home would not be as valuable as it had been previously. The above numbers from Lincoln Township corroborate that common sense.

Additional write-in comments from surveys:

- "Ugly, would not buy in this area again."
- "25+ miles. They can be seen from this distance."
- "Would never consider it. Plan on moving if we can sell our house."

- "No where near them never ever!! Not for a million dollars."

A sampling of some of the overall write-in comments from the survey is as follows:

- "I live approximately 1 1/2 miles from the windmills. On a quiet night with the right wind direction, I can hear the windmill noise. People living within a 1/4 mile should probably be compensated for the noise and the nuisance."
- "The noise, flashing lights, interrupted TV reception, strobe effect and possible effect of stray voltage has created a level of stress and anxiety in our lives that was not present before the turbines' installation. From the beginning there has been a lack of honesty and responsibility."
- "Let other counties or communities be the guinea pigs with the long-term effects or disadvantages of having the windmills. All the landowners who put the windmills up have them on property away from their own homes but on the fence lines and land near all other homeowners."
- "Our whole family has been affected. My husband just went to the doctor because of his stomach. He hates them. We have fights all the time about them. It's terrible. Why did you put them so close to our new home and expect us to live a normal life. If it isn't the shadows it's the damn noise. The only people that think they are so great and wonderful are those who really don't know."
- "When we were dating back in the 1970's we always said that someday we were going to build a home here. It was great and then you guys did this . . . This should have never happened. If only you would have taken the time and study this more. Everyone was thinking about themselves and money. No one cared about anything else."

WPSC's buyout offer

During the two years of the Moratorium Committee work, **Wisconsin Public Service Corporation made offers to buy houses and property to six property owners** around the WPSC wind factory site. Offers were made to property owners who vocalized complaints about the wind factory's effects on their quality of life after construction. According to Lincoln Township Supervisor John Yunk, some of these residents were identified on the Noise Complaint Log record kept by the township. Over 90 complaints were logged in one year.

According to the Moratorium Committee report, **WPSC publicly stated the buyout was to establish a buffer zone around the wind factory.** The Noise Complaint Log was discontinued by WPSC after the buyout offer.

According to the Moratorium Committee report, WPSC's intention was to bulldoze the houses and subsequently keep the property from being developed for rural residences. Owners were allowed only one month to consider the offer.

According to the Moratorium Committee report, "This tactic did not sit well with the Committee. In response the Committee drafted and approved a resolution condemning the WPSC ploy, and requesting that WPSC meet with the town board to develop a better solution for the township."

WPSC officials met with the town board and concerned citizens at the August 6, 2001, regular board meeting, reiterated their policy to purchase property and destroy the homes, and stated that they had no intention of meeting with the town board or changing their policies at the request of the town board.

Mrs. Heling was offered the buyout, but she said she and her family were allowed only one month to make the decision and only six months to move. **In addition, the buyout offer was based solely on an appraisal by someone hired by WPSC.** Mrs. Heling said WPSC refused to consider independent appraisals. Mrs. Heling said she couldn't obtain another property within six months, so she and her family rejected the buyout.

- The Gabriel household was set back 1000 feet from the nearest turbine. The family took the buyout. The county no longer receives property taxes on that raised homestead. The family no longer lives in the area.
- The Kostichka household was set back 1200 feet from the nearest turbine. The family took the buyout. The county no longer receives property taxes on that raised homestead. The family no longer lives in the area.
- Four remaining homeowners are suing WPSC.

The most recent development is that one homeowner contacted Township Supervisor Yunk during the week of September 11, 2002, and asked what the process would be to request MG&E to buy out her home. She said she has a new baby and two other young children and that she does not want to live in her house any longer because she is too scared about the effects on her family by electronic radiation, stray voltage and other electricity associated with the turbines.

Property values

The following information will directly refute the "Market Analysis: Crescent Ridge Project, Indiantown & Milo Townships, Bureau County, Illinois" report submitted by Michael Crowley to this board.

Mr. Crowley, a paid consultant to the Crescent Ridge developers, alleges in his report that property values won't be affected in Bureau County, based on his analysis, in part, of property values in Kewaunee County.

However, Town of Lincoln zoning administrator Joe Jerabek compiled a list of properties that have been sold in the township, and their selling prices. The list compared the properties' selling price as a function of the distance to the wind factories, using real estate transfer returns and the year 2001 assessment roll.

Conclusions were as follows:

- **"Sales within 1 mile of the windmills prior to their construction were 104 percent of the assessed values, and properties selling in the same area after construction were at 78 percent, a decrease of 26 points."**
- **"Sales more than 1 mile away prior to construction were 105 percent of the assessed values, and sales of properties 1 mile or more after the construction of the turbines declined to 87 percent of the assessed value, an 18 point decline."**

Furthermore, not taken into account in Mr. Jerabek's conclusion are the homes that were bought out and bulldozed by WPSC.

Also not taken into account is the fact that of the homes that sold within one mile of the turbines since their construction, four of them were owned within the Pelnar family as the family members shuffled houses. One brother sold to another brother. One brother purchased his father's home. The father built a new home. And a sister purchased land from one brother and built a home. It is important to note that two of the family members are turbine owners themselves.

Subsequent to the zoning administrator's report, homes have gone on the market that are still for sale.

- 1 home, sited across the road from the wind factory, was constructed after the turbines were built and has been on the market for over 2 years.
- 2 homeowners adjacent to the turbines are contemplating selling to WPSC, which may bulldoze the homes, according to neighbor Scott Srnka.

- 1 homeowner is in the process of finding out if MG&E will buy out her home.
- 1 homeowner, Mrs. Heling, who previously was offered the WPSC buyout, said she would sell if she thought she could get fair value for her home and if it would sell quickly enough that she wouldn't be paying on two properties at once. She said she doesn't believe that can happen, so she has not put up her home for sale.
- 1 homeowner, Mrs. Yunk, who lives across from the WPSC turbines, said she and her husband have decided that after having lived in their home for 28 years, they will be putting it up for sale to move to property farther away from the turbines. She said they are worried about selling their current property because of its proximity to the turbines. They will have to find a buyer who doesn't mind the turbines, she said.

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.

I other homeowners."

- **"Our whole family has been affected. My husband just went to the doctor because of his stomach. He hates them. We have fights all the time about them. It's terrible. Why did you put them so close to our new home and expect us to live a normal**

life. If it isn't the shadows it's the damn noise. The only people that think they are so great and wonderful are those who really don't know."

- "When we were dating back in the 1970's we always said that someday we were going to build a home here. It was great and then you guys did this . . . This should have never happened. If only you would have taken the time and study this more. Everyone was thinking about themselves and money. No one cared about anything else."

WPSC's buyout offer

During the two years of the Moratorium Committee work, Wisconsin Public Service Corporation made offers to buy houses and property to six property owners around the WPSC wind factory site. Offers were made to property owners who vocalized complaints about the wind factory's effects on their quality of life after construction. According to Lincoln Township Supervisor John Yunk, some of these residents were identified on the Noise Complaint Log record kept by the township. Over 90 complaints were logged in one year.

According to the Moratorium Committee report, WPSC publicly stated the buyout was to establish a buffer zone around the wind factory. The Noise Complaint Log was discontinued by WPSC after the buyout offer.

According to the Moratorium Committee report, WPSC's intention was to bulldoze the houses and subsequently keep the property from being developed for rural residences. Owners were allowed only one month to consider the offer.

According to the Moratorium Committee report, "This tactic did not sit well with the Committee. In response the Committee drafted and approved a resolution condemning the WPSC ploy, and requesting that WPSC meet with the town board to develop a better solution for the township."

WPSC officials met with the town board and concerned citizens at the August 6, 2001, regular board meeting, reiterated their policy to purchase property and destroy the homes, and stated that they had no intention of meeting with the town board or changing their policies at the request of the town board.

Mrs. Heling was offered the buyout, but she said she and her family were allowed only one month to make the decision and only six months to move. In addition, the buyout offer was based solely on an appraisal by someone hired by WPSC. Mrs. Heling said WPSC refused to consider independent appraisals. Mrs. Heling said she couldn't obtain another property within six months, so she and her family rejected the buyout.

- The Gabriel household was set back 1000 feet from the nearest turbine. The family took the buyout. The county no longer receives property taxes on that raised homestead. The family no longer lives in the area.

- The Kostichka household was set back 1200 feet from the nearest turbine. The family took the buyout. The county no longer receives property taxes on that raised homestead. The family no longer lives in the area.

- Four remaining homeowners are suing WPSC.

The most recent development is that one homeowner contacted Township Supervisor Yunk during the week of September 11, 2002, and asked what the process would be to request MG&E to buy out her home. She said she has a new baby and two other young children and that she does not want to live in her house any longer because she is too scared about the effects on her family by electronic radiation, stray voltage and other electricity associated with the turbines.

Property values

The following information will directly refute the "Market Analysis: Crescent Ridge Project, Indiantown & Milo Townships, Bureau County, Illinois" report submitted by Michael Crowley to this board.

Mr. Crowley, a paid consultant to the Crescent Ridge developers, alleges in his report that property values won't be affected in Bureau County, based on his analysis, in part, of property values in Kewaunee County.

However, Town of Lincoln zoning administrator Joe Jerabek compiled a list of properties that have been sold in the township, and their selling prices. The list compared the properties' selling price as a function of the distance to the wind factories, using real estate transfer returns and the year 2001 assessment roll.

Conclusions were as follows:

- "Sales within 1 mile of the windmills prior to their construction were 104 percent of the assessed values, and properties selling in the same area after construction were at 78 percent, a decrease of 26 points."
- "Sales more than 1 mile away prior to construction were 105 percent of the assessed values, and sales of properties 1 mile or more after the construction of the turbines declined to 87 percent of the assessed value, an 18 point decline."

Furthermore, not taken into account in Mr. Jerabek's conclusion are the homes that were bought out and bulldozed by WPSC.

Also not taken into account is the fact that of the homes that sold within one mile of the turbines since their construction, four of them were owned within the Pelnar family as the family members shuffled houses. One brother sold to another brother. One brother purchased his father's home. The father built a new home. And a sister purchased land from one brother and built a home. It is important to note that two of the family members are turbine owners themselves.

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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.

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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.

Two of Mr. Neubauer's clients, who were interviewed in October, are dairy farmers who have spent over \$250,000 and \$300,000 trying to rewire their farms to reduce stray voltage. That cost does not include herd loss or losses from diminished milk production. Mr. Russ Allen owns 550 dairy cows in DePere, Wisconsin. His farm is in a direct line between nearby WPSC turbines and a substation. Mr. Russ said he was losing one or two cows a day during the three years prior to his installing electrical equipment to help reduce currents on his farm. About 600 cows died, he said. Mr. Russ said he has so much electrical current on his farm that he laid a No. 4 copper wire around his farm for 5,000 feet. The wire is not attached to any building or additional wires; yet it can light up a light bulb from contact with the soil alone. Mr. Russ has scheduled a media day on October 24 to draw awareness to the problems of stray voltage and he said to encourage everyone in Bureau County to attend.

"What scares me more is that I know . . . they're pumping current through people. They're pumping current through kids," Mr. Allen said.

It is important to note that Mr. Noe and his electrical engineer, Mr. Pasley, deny that there will ever be EMFs or stray voltage resulting from the proposed Indiantown/Milo turbines. Just as WPSC has dismissed any problems in the face of mounting evidence, Mr. Noe testified that he will never implement electrical pollution studies and that he thinks they would be a waste of money.

Moratorium Committee findings

As a result of the aforementioned concerns and problems with wind factories in Lincoln Township, the Moratorium Committee recommended, in brief, the following changes from the original conditional use permit:

Insurance. The town is named as an additional insured and the town is held harmless in any litigation.

Fees. Wind developers pay for all costs associated with the permitting process, including hearing costs plus attorney fees -- up front.

Wells. Residents' wells are protected against damage from any type of foundation construction, not only blasting, within a 1-mile radius of each turbine. This includes the requirement that wind developers will pay for independent testing of wells within 1 mile of the project for flow rate and water quality. Developers also must pay for remediation and fix problems within 30 days of complaints.

It is important to note that no well water studies of properties adjacent to the proposed Indiantown/Milo project are planned to assure that all well will retain the same quality of water before and after turbine construction.

• **TV reception.** Wind developers will pay for testing of television reception prior to construction and pay to correct degradation of TV signals. Wind developers will expand the potential problem area to a 1-mile radius for all complaints -- period.

It is important to note that despite claims that television reception would not be affected, the wind factory developers in Lincoln Township had to pay for power boosters and reception equipment to counteract the effects of the turbines. The residents also had to fight with the utilities when an additional local station was added and the utilities refused to pay for any more TV reception improvements for the duration of the 30-year turbine contract. Residents had to fight to get the power company to add the station. Three years later, residents are still unhappy about how the turbines continue interfere with their reception, in many cases observable in unclear stations and in the color flashes that coincide with the turning of the blades, according to Mrs. Heling.

It also is importation to note that no television reception testing is planned prior to turbine construction in Indiantown or Milo townships and that Mr. Noe said steps taken to correct reception problems would have to be reasonable.

- **Noise.** 50 decibels for noise is too great. Noise shall not exceed 40 to 45 decibels, though 35 decibels was recommended unless there is written consent from affected property owners.

It is important to note that the noise study submitted by Illinois Wind Energy, LLC, uses theoretical generalizations about topography and noise conduction and does not use the same height or turbine models proposed for Indiantown and Milo.

As a side note, according to Walgreens Drug Store Web site, the "most sensitive" earplugs they sell only block out noise at 30 decibels.

- **Tower removal.** Turbines and all relegated aboveground equipment shall be removed within 120 days after the date the generators reach the end of their useful lives, the date the turbines are abandoned, the termination of the landowner lease, or revocation of the permit. An escrow account will be established or bonding provided by the wind developers to ensure tower removal.

- **Tourism.** Wind developers are banned from promoting the project as a tourist destination, will not provide bus or tourist parking and will not provide promotional signs located at the projects or elsewhere.

It is important to note that despite the ordinance prohibiting promotion of the wind turbine project, WPSC was caught red-handed by Township Supervisor Yunk last month in August filming a promotional video with child actors riding bicycles in front of the turbines. Mr. Yunk ordered the film crew to leave, but they refused and continued filming. The township has found that once the turbines were constructed, it has been practically impossible to enforce the ordinance or gain cooperation from WPSC or MG&E.

- **Road damage.** Wind developers will pay for the total cost to return the towns' roads to town standards, not just pay for damaged areas. Any

road damage caused by the wind developers during the repair, replacement, or decommissioning of any wind turbines will be paid for by the wind developers. An independent third party will be paid by the wind developers to pre-inspect roadways prior to construction.

It is important to note that Township Chairperson Monfils said that it's not a matter of "if" there will be road damage. There will be road damage. The wind factory developers in Lincoln Township said originally that they would fix the roads if there were damage. But when it came time to fix the roads, the township had to "scrap with them to get it done," according to Mr. Monfils. He said the developers disputed the costs and he had to battle with them two or three times to get repairs paid.

- **Periodic review.** Every year the project will undergo a periodic review for the purpose of determining whether wind developers have complied with the permit and whether wind projects have had any unforeseen adverse impacts. Any condition modified or added following the review will be of the same force and effect as if originally imposed. Wind developers will send a representative at least once a year to report the operating status of the projects and to receive questions and comments from the governing body and township residents.

It is important to note that even with the review, Lincoln Township residents reported being dissatisfied with the developers' response to their complaints. Mrs. Yunk said the developers were readily available prior to construction, but afterward were scarce. She said she fielded calls from residents who could not reach developers and residents who were given the run-around, being told they needed to contact other people within the organization. She said residents' concerns and problems were deflected by the developers, who said residents had to prove that problems did not exist previously and residents had to prove that without a doubt the problems were the result of the turbines.

- **Health and safety.** If a serious adverse unforeseen material impact develops due to the operation of any of the turbines that has a serious detrimental effect on the township or a particular resident, the township has a right to request the cessation of those turbines in question until the situation has been corrected.

- **Setbacks.** The minimum suggested setback from the nearest residences or public buildings is 1000 feet, though 1500 feet was recommended. Setbacks from adjacent property lines will be no less than the tower height plus the length of an extended blade. Minimum distance between turbines will never be less than 800 feet.
- **Strobing effect, blade shadows and stray voltage earth currents are some other issues to be addressed.**

In effect, with these guidelines, Lincoln Township is making construction of new turbines unattractive to further development. They are finding it almost impossible to remedy problems with the current turbines and restore a former quality of life to residents. However, they are trying to ensure no more mistakes will be made.

As Mrs. Yunk plainly said, "Anyone that thinks there aren't going to be problems resulting from the turbines has got another guess coming." She said that she and other residents felt like the bad guys for opposing the turbine project and warning other residents that the project would spell disaster. She said she hates now that what they feared has come true; there isn't any self-satisfaction in being able to say, "I told you so."

The board must weigh heavily the situation of Kewaunee County and the voices and experiences of residents who have no vested interest in wind development in Bureau County. They have no vested interest in telling anything but the truth. They are telling it like it is, and unfortunately, like it was.

For additional information

Dale Massey, Lincoln Township clerk: 920-837-7298

Prepared by Elise Bittner-Mackin, former Chicago Tribune reporter

Kittitas Valley Wind PP
DEIS Comment - Indiv. 49

RECEIVED
JAN 20 2004

Washington State Energy Facility Site Evaluation Council
COMMENT FORM

Kittitas Valley Wind Power Project – January 18, 2004
Public Comment Meeting on the Draft Environmental Impact Statement

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Name: Patsy A. PRASZOWSKI

Address: 4221 ELLENSBURG RANCHES Rd. ELLENSBURG WA.
(Please include your Zip!) 98926

Please write any comments you have with respect to the
Kittitas Valley Wind Power Project DEIS
below and leave this sheet in the Comment Box.

Wind farms belong where there is no residential
land. This project affects thousands
of Home owners. This project should
be placed East of here Towards Vantage
They don't mind the wind farms in that
area. We do!

We did not ask for this in and around
our beautiful town. They do not want
to wait for our county commissioners to make
their ~~own~~ own decision. It shows their arrogance

Use the back of this form if you need more room for your comments.

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

This will become uncontrollable.
Please do not open the door to
this monstrosity.

2
cont.



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement

Name: ~~XXXXXXXXXX~~ PRASZYNSKI, MICHAEL
 Address: 4221 Ellensburg Ranches Rd. Ellensburg, WA. 98926
 (Please include your Zip!)

Please write any comments you have with respect to the
 Kittitas Valley Wind Power Project DEIS
 below and leave this sheet in the Comment Box.

Everybody is so politically correct about
 Renewable energy concerning the
 Windfarms. Give me a break!
 The Dams are a renewables energy
 also. and they have done a wonderful
 job for us and will continue to so
 What happens to this windfarm Project
 when the wind doesn't blow That's
 about 6 months out of the year.
 Do NOT allow this Project to swallow up
 OUR County Please.

Use the back of this form if you need more room for your comments.

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

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Nov. 7, 2002

Dear Editor

Towards the end of October , I observed a new one hundred and fifty foot (estimate) tower being erected. This is the second one on the hill north of highway 10 and West of Ellensburg Ranches. The first one was put up well before the moratorium. I asked one of the workers about the tower and they told me they were hired by Zilkha to put it up.

I then went to the county commissioner and talked to Mr. Bill Hinkle. He told me that the Wind Farms are approved to come to the valley. The moratorium is to evaluate and find the best locations.

Does Zilkha already know where they have been approved to build their wind farms? Was the moratorium just a smoke screen for the rest of us? Was I the only one that didn't realize that the Wind Farms were a done deal?

Patsy A. Ptaszynski
Ellensburg

4

MICHAEL & PATSY A. PTASZYNSKI

4221 Ellensburg Ranches Road
Ellensburg, Wa. 98926
509-964-2731
ptaz @ elltel.net

January 15, 2004

Dear Sirs:

The Wind farms, (Zilka in Particular) are being shoved down our throats..... We didn't ask for them, we don't want them here.

Please take time to drive around the county , and impartially look at the scenery in the vicinity of the proposed wind farms. Do you honestly think that those huge turbines are going to blend in, and or enhance the area? These towers are going to be the predominate feature in Kittitas Valley. They will be in the foreground of every view. Once they are constructed there will be no going back.

5

We are not opposed to renewable energy. We are opposed to the placement. There are so many desolate and windy areas east of Ellensburg. Consider the blessing for Vantage and the negative impact of our beautiful Valley.

6

We have a personal interest also, as one proposed turbine is due west of our home by one quarter mile. We put up with alot of inconviences to have the tranquility that we so much enjoy. We resent this intrusion. Do you want to buy our home after the turbines are in place?

Sincerely

Michael and Patsy A. Ptaszynski

106 E. 10th Avenue
Ellensburg WA 98926

January 19, 2004

Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia WA 98504-3172

RECEIVED

JAN 20 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

RE: Kittitas Valley Wind Power Project
Draft Environmental Impact Statement

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS).

Safety

Cell phones

The relative position of user, antenna, and intervening object (turbine tower) could affect existing cell phone signals (pg 3.13-16). Under communication Systems (pg 1-56 and 3.13-20) the DEIS states the applicant would locate towers to avoid line of light interference with communication microwave paths. The applicant **must** rather than should be required to mitigate for any interference. If towers cannot be relocated, than another communication system must be made available to the landowner by the applicant.

1

Traffic

Roadway navigation hazards increased risk of accidents and potential for accidents at US 97/Bettas Road. (pg 3.10-8&9, Table 3.10-4) Half of all employee vehicles would be parked at the O&M facility. Assuming a peak work force of 160 people. (pg 3.10-12) Traffic volumes are underestimated. (page 3.10-14 and 3.10-4)

2

In the majority of the document, the O&M facility is discussed alone and impacts and mitigation are addressed for the O&M facility. In visual resources the DEIS discusses a kiosk and public viewing area near the O&M facility off Bettas Road. (pg 1-46) Signs would be provided to direct tourist to the kiosk and public viewing area. (Tourism-induced traffic, pg 1-48) The number of tourism-induced traffic is unknown. (pg 3.10-15) During scoping public and Kittitas County Dept of Public Works requested addressing impacts of tourism on Bettas and Hayward roads. (pg 3.10-17) The impacts are unknown. With a kiosk, the risk of accidents would certainly increase substantially.

3

Highway safety mitigation for the safety hazard should include a left hand turn lane on Hwy 97 northbound, and Bettas Road south junction.

4

Visual Resources

Shadow Flicker Effects

The list of residence affected by shadow flicker effect is not complete. (page 3.4-11, table 3.4-2) Every resident included in the solid line on figure 3.6-1 page 3.6.2 should be included in the shadow flicker analysis. Window shading must be provided until planted tree provide a screen from the turbines shadow flicker.

5

The DEIS states screens or buffer views should be carefully examined “because a failed attempt to screen the turbines could have a greater negative impact than no attempt at all.” (page 3.9-50) If screening is determined to be the best mitigation, the applicant must be required to ensure the “attempt” does not fail, and if it should fail, then the applicant must reinstate the screen.

6

The applicant cannot be allowed to avoid mitigation because it may fail.

Scenic and Recreational Highway

US 97 is much more than a route between Ellensburg and Wenatchee. (page 3.9-5) It is a major inland route from Canada to California. With this proposal, travelers traveling US 97 through the project “would have a moderate to high visual impact.” (page 1-44)

US 97 is a state-designated Scenic and Recreational Highway. Typically scenic corridor management plan would be prepared to provide guidance in local adoption of comprehensive planning. (pg 3.9-2) I am assuming since the zoning is Agricultural 20 or Forest 20, there was no need to develop a comprehensive plan. Since US 97 is designated Scenic and Recreational Highway, wind power turbines should not be allowed within the viewshed. Setbacks should be at least five miles from the highway (page 3.9-50).

7

Visual impact from both east and west

The project has high levels of visual impact ... from the ridgeland east of US 97.” (page 1-44) The “high levels of visual impact” would also be from the ridgeland west of US 97.

8

Scale

The existing Bonneville Transmission towers are 170 feet tall. (page 2-6) The height (page 2-36) of the three scenarios differs with full height with blades of lower end, middle, and upper end being: 410, 330, and 260 feet respectively. All three scenarios propose towers much taller than the existing Bonneville Transmission towers.

9

Valley views

Kittitas valley attracts nature lovers. Views of the valley from the Wenatchee National forest could also impact visitors (page 3.6-10) especially from Table Mountain as indicated by viewpoint 11, (figure 3.9-28, page 3.9-46)

The DEIS states, "For many viewers, the presence of the wind turbines represents a significant unavoidable adverse impact because it significantly alters the appearance of the rural landscape over a large area of the Kittitas Valley." (pg 3.9-51) A large area of Kittitas Valley is affected with this proposal in a significant adverse impact of loosing the rural landscape and acquiring constantly flashing lights atop the turbines. These are avoidable impacts. **The site for this proposal should not be in Kittitas valley.**

10

Land use

Land use and recreation impacts (page 3.6-9, table 3.6-2) do not include impact of recreational activities other than hunting. Kittitas County actively promotes recreational activities. Skiing, hiking, birding, bicycling, are but a few recreational activities Kittitas residence and visitors to the valley enjoy. Most outdoor activities would be impacted within, adjacent, and within view of the project area.

11

The Kittitas County Board of County Commissioners may not rezone for the wind power overlay because it will change the character of the surrounding neighborhood. (pg 3.6-19) If that happens the applicant may file to exclude the County from the EFSEC process. EFSEC should not exclude the County in the process of determining if the applicant should be sited in Kittitas valley.

12

Property values

The DEIS states (page 1-42):

The comprehensive statistical analysis provided in the May 2003 study evaluating the correlation between wind development projects and nearby property values in the U.S. by the Renewable Energy Policy Project provides no evidence that wind development had harmed property values within the viewshed of the projects (defined as properties within 5 miles of the outermost turbines in a wind power project). Therefore, no long-term impacts on property values are expected as a result of the proposed project.

If there is no impact on property why is one of the mitigations: "To compensate for visual impacts, the Applicant should acquire conservation easements on land in important foreground views of the wind turbines so that no further development occurs in these areas until after decommissioning." (Pg 1-46 and pg 3.9-51) "This approach would conserve natural areas so that the visual contrast between the wind turbine and the land maintains its order and purity." (page 3.9-51) What does that mean?

13

Economic Effects (pg1-11) must include economic effects on landowners affected by the project.

14

Shrub steppe/Lithosol habitat

Cumulative impacts, are inadequately addressed in section 1.9. Cumulative impacts must include geographical and temporal impacts. In vegetation section (pg 1-14), the lithosol habitat must be addressed. Lithosol is a unique habitat associated with shrub steppe found primarily on ridgetops (Figure 3.2.1 located after pg 3.1-6 and before pg 3.2.6 [Pages 3.1-6 through 3.2-5 are placed backwards in this document.] All three wind power projects are located on and affecting the ridge tops, therefore, there is a geographical cumulative effect.

15

Shrub steppe fragmentation has already occurred by previous activity. (page 3.2-10) This project and the two additional proposed projects will further the fragmentation by impacting the ridges in a north/south direction as opposed to the current BPA lines that run east/west.

16

Temporally, lithosol habitat is considered by Department of Fish and Wildlife as difficult to restore, sensitive and important (page 3.2-29). Lithosol habitat has an extremely long recovery time, 50 – 100 years, making any and all impacts extend far beyond the scope of the proposed project. A large amount of lithosol habitat is impacted by the project by both temporary and permanent impacts. (pg 3.2-30, tables 3.2-6 and 7)

Impacts to the shrub steppe, and to the lithosol habitat are extensive and must be mitigated immediately, throughout the project, and at decommissioning. Summary of Potential O&M and Decommissioning impacts does not list shrub steppe nor lithosol habitat. (page 3.2-39, table 3.2-10). The DEIS states, “Loss of this habitat type would be considered a permanent adverse effect of project operations but would be adequately mitigated with proposed and recommended mitigation measures identified in Section 3.2.5.”

17

The mitigation measures proposed by the applicant (3.2.5) consists of plant, avian, and non-avian wildlife surveys, and habitat mapping. Results incorporated into design, construction, operation, and mitigation. (pg 3.2-53) Additional studies **must** be conducted, evaluation **must** be conducted, and all additional measures determined **must** be implemented. (page 3.2-55). The Proposed mitigation ratios and replacement acres do not list lithosol habitat. (page 3.2-57, table 3.2-13) Add lithosol habitat to the mitigation table.

18

The Department of Fish and Wildlife (WDFW) states:

Priority habitats are those habitat types or elements with unique or significant value to a diverse assemblage of species. A priority habitat may consist of a unique vegetation type or dominant plant species, a described successional stage, or a specific structural element.

WDFW identifies Shrub steppe habitat as a priority:

Large Tracts: Tracts of land >259 ha (640 ac) consisting of plant communities with one or more layers of perennial grasses and a conspicuous but discontinuous layer of shrubs. Large tracts of shrub-steppe contribute to the

overall continuity of the habitat type throughout the region because they are relatively unfragmented, contain a substantial amount of interior habitat, and are in close proximity to other tracts of shrub-steppe. These tracts should contain a variety of habitat features (e.g., variety of topography, riparian areas, canyons, habitat edges, plant communities). Another important component is habitat quality based on the degree with which a tract resembles a site potential natural community, which may include factors such as soil condition and degree of erosion; and distribution, coverage, and vigor of native shrubs, forbs, grasses, and cryptogams.

Small Tracts: Tracts of land <259 ha (640 ac) with a habitat type consisting of plant communities with one or more layers of perennial grasses and a conspicuous but discontinuous layer of shrubs. Although smaller in size and possibly more isolated from other tracts of shrub-steppe these areas are still important to shrub-steppe obligate and other state-listed wildlife species. Also, important are the variety of habitat features and habitat quality aspects as listed above.

Criteria: Comparatively high fish and wildlife density and species diversity; important fish and wildlife breeding habitat and seasonal ranges, limited availability, high vulnerability to habitat alteration, unique and dependent species.

Summary of Habitats associated with the project indicates that every turbine string has shrub steppe habitat and most have lithosol habitats. (Table 3.2-1, page 3.6)

Wildlife

The DEIS states the Migratory Bird Treaty Act (16 USC 703-711) prohibits the taking, killing, or possession of migratory birds (pg 3.2-2). The project is located within the Pacific Flyway, a north/south bird migration route (page 3.2-18). The DEIS does not state if the applicant has received a permit for the killing of birds by turbines. | 19

Unavoidable Adverse impacts

In Significant unavoidable Adverse impacts (section 1.10, pg 1-20 & 21) the DEIS states visual resources are unavoidable. In certain locations, mitigation of planting a barrier can shield the landowner from the impacts, therefore the impacts are not unavoidable. | 20

“A project that significantly affects a small number of viewers may be offset by the fact that it may have a relatively low impact on a large number of viewers” (pg 3.9-51) **The significantly affected viewers must be compensated.** | 21

Decommissioning

Decommissioning Plans should be outlined in the EIS and must include dismantling and removal of all equipment, restoration of sites, with yearly follow up to ensure full restoration occurs and including all needed weed control. A sizable decommissioning fund must be available for the project. | 22

The DEIS (page 1-46) references under Decommissioning “aboveground facilities not **removed** during decommissioning”. All facilities must be removed during decommissioning. 23

Decommissioning would have land disturbance and magnitude described for the project construction (pg 1-40). Additionally, restoration funds must be included for at least a decade after decommissioning of the turbines. 24

Implementation of a noxious weed control plan must continue during decommissioning of the project **and through the post-decommissioning restoration period** for all impacted areas. (pg1-26 and pg 3.2-55) 25

No action alternatives is misleading

The document discusses no action alternatives in terms of other power generation facilities “would be constructed and operated in the region to meet the long-term need for power, most likely a gas-fired combustion turbine.” (pg 1-30) Two points: first, there are other “green” power sources, and there are other locations for wind power, neither of which has been adequately addressed. 26

Power needs

Another important point, additional power is primarily needed during severe weather conditions, i.e. extreme cold and extreme heat. In the Kittitas valley, there is no wind during extreme cold or extreme heat, therefore the wind power generated in this valley would not help the residence in the valley were it is generated. 27

Alternative sites

In a letter to EFSEC dated June 12, 2003, I proposed an alternative site for a wind power site on the west slopes of the Columbia River gorge. That proposal was deemed unreasonable.

Now, in this DEIS, it states Zilkha Renewable Energy submitted a request for a Potential Site Study to EFSEC in July 2003. And therefore this site would not meet the test of a reasonable alternative for this project. 28

It seems unreasonable that the new site on Whiskey Dick Mountain cannot be considered an alternative. It is a location much more suited to wind power production, where landowners of the Kittitas valley would not have to be impacted by the project.

Plans

All plans (example: Emergency plans, Pg 1-23) that the applicant develops must be approve by the appropriate oversight agency prior to construction. All plans must be 29

implemented fully during construction, during O&M, and during and after decommissioning.

29
cont.

Misleading labeling of scenarios:

The three scenarios are labeled (page i) Lower End, Middle, and Upper End based on number of turbines (82, 121, 150). However the Lower End Scenario consists of over double the capacity in each turbine (3 MW vs. 1.3 MW and 1.3 MW). Furthermore, the height (page 2-36) of the three scenarios differs with full height with blades of lower end, middle, and upper end being: 410, 330, and 260 feet respectively (page 2-6). Finally, the total capacity is highest in the Lower End Scenario (246 MW) and lowest in the Middle Scenario (181.5 MW).

30

Throughout the document when addressing the three scenarios, number of turbines may be included, in tables the individual capacity is stated, but the height of the turbines are not stated. (Arbitrarily picked a table, example Table 3.13-2 on page 3.13-8.)

Inconsistent Lower End, Middle, and Upper End comparisons:

Fact sheet: (lower end scenario) 3MW/82 turbines=246 MW,
 (middle scenario) **1.3 MW**/121 turbines=181.5 MW,
 (lower end scenario) 1.3 MW/150 turbines=195 MW.

Pg 1-4: (lower end scenario) 3MW/82 turbines=246 MW,
 (middle scenario) **1.5 MW**/121 turbines=181.5 MW,
 (lower end scenario) 1.3 MW/150 turbines=195 MW.

31

Pg 3.2-30, Tables 3.2-6 & 7 list three scenarios with no turbine or MW info

Pg 3.6-9, Table 3.6-2:
 (lower end scenario) 82 Turbines/**2.5 MW**,
 (middle scenario) 121 Turbines/1.5 MW,
 (lower end scenario) 150 Turbines/1.3 MW.

Another inconsistency in the document is in the color of the turbines. In the description of proposed action (pg2-11, Table 2-4) color is stated as neutral gray. Why were brown turbines shown in Figure 3.9-18, within pages 3.9-29 & 39.

32

Library

The DEIS state tax revenues generated by the project would mitigate for public services and utilities including fire, police, roads, etc. There is a cap for fire services and that cap includes library funding. (I don't understand it either, but library funding and fire funding comes from the same pot.) If in the future fire services need additional funding, that increase **must not negatively impact funding for the library.**

33

Corrections

Pages 3.1-6 through 3.2-5 are placed backwards in this document.

█ 34

Bettas Road has two entrances to US 97. (pg 3.10-2)

█ 35

Sincerely

Chris Hall

LWHS

Fax: 5099628093

Jan 20 2004 15:46

P. 02

Kittitas Valley Wind PP
DEIS Comment - Indiv. 51

Lathrop, Winbauer, Harrel, Slothower & Denison L.L.P.

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January 20, 2004

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JAN 20 2004

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Allen Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
925 Plum Street SE, Building 4
Post Office Box 43172
Olympia WA 98504-3172

Re: Application No. 2003-01
Sagebrush Power Partners LLC, Kittitas Valley Wind Power Project
DEIS COMMENT LETTER

Dear Mr. Fiksdal:

I. Introduction and Purpose of this DEIS

The environmental impact statement for the Kittitas Valley Wind Power Project must provide sufficient information to EFSEC to allow it to comply with all statutory and regulatory review criteria and to Kittitas County to evaluate land use consistency issues. Being nothing more than a regurgitation of the application of Sagebrush Power Partners LLC, the DEIS is inadequate to do either, and it is anything but an independent study. WAC 463-47-090(3).

To confirm these conclusions, one only need reach page ii of the DEIS where it is stated: "The primary source of information used to prepare this (DEIS) is the Application for Site Certification..." prepared by the applicant and its consultants.

Comments critical of the DEIS have been submitted to EFSEC by Kittitas County, Mike Robertson and Ed Garrett, among others, and, to avoid repetition, all of these comments are incorporated in this letter by reference. However, as opposed to a page by page review, this letter of comment deals with the legal requirements that establish this DEIS to be a functionally hopeless and totally useless document.

II. Policy Controlling the EFSEC Process - RCW 80.50.010.

The overriding purpose and total reason for EFSEC's being is to assist with the orderly development of energy facilities to fill the energy needs of *this state at a reasonable cost*. The

DEIS COMMENT LETTER

1/20/04

Page 2 of 5

DEIS commences with this premise but provides no analysis as to whether this application meets the dictates of the policy. For instance the DEIS fails to mention, let alone analyze the following:

- The applicant has no contract to sell the power it proposes to generate, and the Bonneville Power Administration has announced that, for the foreseeable future, it has no budget for the purchase of wind power. Where is the demonstrable demand? 2 cont.
- Although there is no reference in the DEIS, the applicant has announced that it will only build the project if Congress renews the various energy credits which expired at the end of 2003, and it is problematic if this legislation is passed this year. How is the application presently ripe for consideration by EFSEC? Assuming the energy bill is passed, what are the actual amounts of subsidy (both for capital expenditure and operation) for this project; what will the true cost of power from this project be to the consumer, including all subsidies; and how will EFSEC make "a reasonable cost" determination without this information? 3
- The DEIS recites that this project is estimated to be approximately thirty (30%) efficient, that it will only produce power about that amount of the time thereby necessitating a "spinning" generating reserve capacity to cover the other seventy (70%) percent of the time. Is this capacity presently available, what form does it take and at what cost, and is it presently under contract to the applicant? Will its utilization by this project take capacity away from another user? If it has to be built, then it needs to be examined as a direct, cumulative effect of this project. How does the cost of this reserve power add to the effective cost of the power to be generated by this project? 4

III. Site Description – RCW 80.50.020(4); WAC 463-42-125.

The "site" is not 7000 acres. The application is for a series of 83 to 150 individual turbine sites each of which is unique with specific elements and impacts. "Site" is clearly defined in RCW 80.50.020 as is "energy facility." By statutory definition this project encompasses between 83 to 150 energy facility sites as defined in the RCW. The DEIS fails to discuss the impacts of each site spread over 7,000 acres. Each is required to be studied so that it can be evaluated. One can only assume the applicant is proposing an "all or nothing" project where the loss or relocation of any turbine would cause the project to be cancelled or not permitted. At the location of each turbine, at a minimum the following questions should be, *but are not*, addressed by the DEIS: 5

- 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? 6
- 7
- What view sheds and sight lines are impacted by each turbine and to what extent? 8
- Are there no turbine locations that are being recommended to be moved or eliminated due to their impacts?

DEIS COMMENT LETTER

1/20/04

Page 3 of 5

- 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. 9

IV. Earth, Natural and Built Environment – WAC 463-42-302, 342, and 362.

The review of these elements is nothing more than “cheerleading” for the project with conclusions rather than analysis.

- Do none of the turbine locations impact cultural or archaeological resources or have storm water runoff or erosion impacts due to construction or road cuts? Section 3.8 may or may not be applicable to a particular site. 10
11
- The scale set out in Table 3.9-1 refers to its sources which, together with the State of Washington have each done visual studies that would include part or all of the area of the sites. None of these studies are cited. The USFS, for example, did a study as to the view impacts its timber sales and the resulting clearcut logging would have and determined not to sell timber in certain areas as a result. Why is that study not mentioned? 12
- The landscape scenic quality scale is clearly subjective. There is no discussion of this nor any discussion of steps taken to account for the subjectivity of the scale as applied to this project. 13
- The landscape scenic quality scale is not applied to each site as the WAC requires. 14
- I-90 and Highway 97 are scenic highways and also covered by the county's planning policies. Where is the comparison of each turbine location as to its compatibility to those standards and requirements? 15
- 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 gage the scale of a turbine from a given distance in relation to common experiences? WAC 463-42-362(d)(4). 16

V. Socioeconomic Impact – WAC 463-42-535.

This is an all encompassing analysis of a host of factors that must be reviewed with respect to the application in both positive and negative fashion.

- 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? 17
- The DEIS actually says that analysis of impacts on property values was beyond its scope. Page 3.7-15. When and where will it be done and by who? WAC 463-42-535 specifically requires primary and secondary and a positive and negative analysis of the impact of each site on property values. To say this is “beyond the scope” of the DEIS is 18

DEIS COMMENT LETTER

1/20/04

Page 4 of 5

nothing more than the applicant ignoring the rules EFSEC is obligated to follow in order to maintain the integrity of the process.

18 cont.

- Are the impacts of turbines on property values in Denmark and Australia or the wind power lobby or landowners who have rented to wind farms actually helpful, let alone relevant, to EFSEC in assessing the impacts to property values in this county?

19

- 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 no guidance as to the areas, maximum number of turbines (whether for this project alone or in combination with the Desert Claim project), maximum dimensions, or other possible limitations that might be necessary to adequately mitigate impacts.

20

- There are a number of ways it could be approached, both objective and subjective, but the DEIS makes no attempt whatever at a cost-benefit analysis of the project. The only references are to the business needs of the applicant which are not relevant.

21

- There is no discussion of the cumulative impact costs of the project. The DEIS fails to look at the cumulative costs to the community of this project as required by WAC 463-42-535.

22

VI. Alternatives – WAC 463-42-645.

The DEIS analysis of alternatives is simply not credible.

- The applicant makes the claim that no other sites are available, yet the DEIS for the Desert Claim project estimates a wind turbine capacity in the county that exceeds the cumulative total of the three current projects and the applicant, subsequent to making what is nothing more than an untruth, proposed the Wild Horse project on the eastern part of the county. All of the alternative location analyses need to be redone in their entirety.

23

- The elements used to evaluate alternatives are largely inappropriate (see Section 2.6.2) and limiting the alternatives to Kittitas County is likewise wrong if the applicant's statements about regional power needs are to be believed.

24

VII. Consistency with County Land Use Policies.

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.

- Where are the recitations to the multiple County Comprehensive Plan Goals and Policies that counter the approval of any of the applicant's turbine sites? The DEIS only discusses a handful of Kittitas county planning goals polices and objectives and fails to mention a host of GPOs which do support this type of land use. Each turbine site is in

25

DEIS COMMENT LETTER

1/20/04

Page 5 of 5

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.

25 cont.

- 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 but, although the applicant proposes total construction of the project in approximately a year, the actual timing of construction could be delayed by other factors, not the least of which is the applicant's own business plans vis a vie the Energy Bill, 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?

26

27

VIII. Conclusion

The DEIS fails to address far more than it purports to cover. In its present form and without substantial revision, it is legally inadequate and any decision made based upon it will be unsupportable.

28

Very truly yours,



Jeff Slotower

Enc: as noted

deis comment letter

MICHAEL E. GOSSLER
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RECEIVED

JAN 20 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

January 20, 2004

Allen Fiksdal, Manager
EFSEC
925 Plum Street SE, Building 4
P.O. Box 43172
Olympia, WA. 98504-3172

Re: RE: Comments on Kittitas Valley Wind Power Project DEIS

Dear Mr Fiksdal:

I am an owner of 20 acres of real property located in Sun East adjacent to the proposed project. I have reviewed the DEIS for the Kittitas Valley Wind Power Project, and the comments submitted thereon by Clay White of Kittitas County Community Development Services, and by Michael H. and Elizabeth F. Robertson of Cle Elum. I concur with their comments, incorporate them herein, and will not repeat those issues, concerns and criticisms.

I write to comment on the following additional aspects of the DEIS.

1. At Section 3.5.3, the DEIS suggests that in the absence of this project, other development may occur, including residential development, that may have a similar or greater impact on energy and natural resources than the proposed project. No empirical evidence or documentation is submitted to support such a proposition, and it defies common sense. No other permissible residential or recreational development could possibly have the impact on views, on the aesthetics and ambience of the valley, and on the night time lights, and the peace and tranquility of the area than does the proposed development.

1

2. The DEIS does not address the potential for further industrial development once the landscape is littered with over 100 windmills reaching over 400 feet into the air. Once the precedent is set for industrial development, and the justification for maintaining the current environment has been irrevocably terminated, what is to prevent the entire valley from becoming an industrial park.

2

January 20, 2004
Page 2

3. The DEIS, at section 3.6.1, mischaracterizes the valley, and implies that it is nothing but a few cattle and thousands of acres of remote, largely uninhabited, open space. That is not the case. There are many tracts of 20 acre ownerships, and the farms and ranches are held by many. It is a residential and recreational area.

3

4. The DEIS does not measure or attempt to measure the economic impact on property values, or on the loss of recreational users and visitors to the county if the project is build.

4

I enjoy the area because of its views, peace and quiet, and the clear evening and night views unimpeded by the lights of the city. The DEIS does not adequately deal with any of this.

5

Sincerely,

Michael E. Gossler

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January 19, 2004

Allen J. Fiksdal
EFSEC Manager
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PO Box 43172
Olympia, WA 98504-3172

RECEIVED
JAN 20 2004
ENERGY FACILITY SITE
EVALUATION COUNCIL

RE: DEIS Kittitas Valley Wind Power Project

Dear Mr. Fiksdal:

Attached are my comments on the Draft Environmental Impact Statement for Kittitas Valley Wind Power project as submitted by Sagebrush Power Partners, (Zilkha Renewable Energy).

I am not a professional biologist, geologist, botanist nor a collaborator of these. However for the past twenty years I have worked in real estate services for the city. During these years I have reviewed numerous Land Use Reviews, LBA's and EIS submittals by other government agencies and the private sector for Seattle City Light and Executive Services. I find this draft to be not only incomplete but confusing. It is hard to review this draft EIS since adequate information is not provided. Even in the exact proportion of the project is not defined. Three different proposals have been described (82-150 wind turbines) yet only one application submitted for review (121 turbines) Such an EIS even in draft form would never be accepted in King County. Why should the standards be different for a smaller, eastern county?

As a landowner and homeowner in the Kittitas Valley I am biased but may my comments remain as discernable as possible.

Sincerely,

Jill D. Kuhn

P.O. 926
Kittitas, WA 98934
Att

COMMENTS
: EIS KITTITAS VALLEY WIND POWER PROJECT
SAGEBRUSH POWER PARTNERS (ZILKHA RENEWABLE ENERGY)

1.1 Introduction:

No additional studies were conducted by the consultants for EIS documentation and thus this EIS becomes a mere expansion of the original application form.

2

1.2 Purpose and need for project: The actual need for this power is in great disagreement. If the power were so needed then why wouldn't the generated power be used within the State even more so to supplement power for Kittitas County. Also, there have not been shown any power arrangements with Bonneville Power, City Light or Puget Sound Energy to purchase this power. In addition if the generated power is to be generated through existing Bonneville Power Administration lines where are the agreement and the costs for such usage. Information provided in this EIS is misleading residents to believe that they will be receiving power directly from this project and in turn less electricity rates.

3

1.4.1 Proposed action: This returns to the question that the application was for 121 turbines yet three different scenarios are proposed. All alternatives should be addressed separately in their own EIS review.

4

1.4.2 Alternative Wind Turbine Locations: -It is stated that there is only one possible site for this project in Kittitas County yet Zilkha has submitted a project for another wind farm at Whiskey Dick. Thus, this statement is obviously untrue.

5

1.4.2 No action alternative: Subdivision of the property adjunct to this project is already being subdivided. The approval of this project will not necessarily stop subdivision of nearby plots. In addition there are no plans for comprehensive building projects (i.e. gas combustion plant). Also, if this region is so in need of the power why is that the power generated would not be used within the county, state, and region?

6

1.7.2 Economic Effects of Lower and Upper End Scenarios: No information is provided. This is incomplete and must be provided if the project does actually have three different scenes.

7

1.7.3 Economic and Environmental Effects of Tourism: There are no studies provided to show that tourism will increase due to this project. In fact I the reverse would be true since this area is now used for mainly recreational

8

purposes. Wind turbines and recreational activities do not go hand in hand. Studies should be done to demonstrate these claims.

8
cont.

1.7.4 **Impacts on Historical and Tribal Resources:** The Kittitas Indians as documented in references through the *University of Washington, Kittitas County Museum, and Yakima Indian Confederation* have used areas of the proposed project site for centuries. I alone have met offspring's off Kittitas Indians who have relayed stories of that area. There is obvious evidence of archeological significance yet nothing has been done in reference to this critical area. The ignoring of these historical properties should halt further development until a proper EIS addresses this issue.

9

1.7.5 and 1.7.6 Television and Radio Interference: There is no information as to what the various types of interference there could be or the velocity. How will this be mitigated with the affected people? Many of the affected people are landowners who are not signed sites of Zilkha and this is one off the many reasons that wind turbines should not be allowed in such residential areas. All issues need to be finalized on how mitigation will be addressed in the final EIS.

10

1.9.6 Land Use and Recreation: This cannot be evaluated. This project is neither in compliance with Kittitas County Comprehensive Plan nor the county zoning. Both would have to be revised in order for the project (projects) to proceed.

11

1.9.11 Air Quality: It cannot be presumed that the air quality will diminish if this project is not approved. This does not mean that other fuel methods would have to be built and utilized affecting poor air quality. In fact if the concern is for air quality then why isn't the energy going to the residing county, state?. -This is basically a mute point.

12

1.10.2 Visual Resources: Of all the statements made throughout the draft EIS, the stipulation that visual impacts would be significant and are unavoidable is true. However you cannot analyze the visual impact when it is not detailed how many turbines there will be, the exact locations and the turbine heights.

13

2.2.3 Meteorological Towers: No locations are identified for the towers or the numbers of towers. Thus, no review can be made.

14

3.1.3 Impacts of No action alternative: If the project is not built there will undoubtedly be more subdivision. But unless the zoning is changed the land is still in minimal 20-acre plats. This area is zoned for agricultural and recreation uses. I would purpose that there would be much greater agricultural and recreational usage without the KittitasValley Wind Power Project.

15

3.4.2 Construction Impacts: The construction would have tremendous impact not only on the environment but the residents of the area. There would be not only be significant increase in the use of Cricklewood Lane but the alteration of roadways and construction of proposed additional 19 miles. Disturbance of the natural environment and habitat would of course be affected. To what measure? Those are the questions that should be answered by this EIS –

16

3.4.2 – Risk of Turbine Tower Collapse: Not enough information provided to evaluate. Mitigation responses not included.

17

3.5.1 Affected Environment: Since Zilkha has state that the power will not be sold within the Northwest this is irrelevant.

18

Kittitas Valley Wind PP
DEIS Comment - Indiv. 54

Comments on the Draft Environmental Impact Statement for the KVVWPP

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JAN 20 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

TO: Allen Fiksdal, Manager EFSEC
FROM: Charles S. Wassell, Jr.¹
DATE: January 20, 2004

The following are comments on the draft environmental impact statement (DEIS) for the proposed Kittitas Valley Wind Power Project (KVVWPP). I address some omissions from the DEIS with respect to impacts/costs of the project, point out some inconsistencies, and comment on the appropriateness of the literature used to assess property value impacts. I would ask that you pay particular attention to the last issue, as the methodology used in the principal study referred to in the DEIS is egregiously flawed.

Please contact me if you would like clarification of any of the issues addressed below. Also, note that I have attached a copy of the document referred to in footnote 2, below.

Incremental Costs from Integrating Wind Energy:

There are some project and operation costs that are not included at any point in the Draft EIS relating to integrating the KVVWPP into the existing electricity production and distribution system. These costs are external to Sagebrush Power Partners LLC, but are paid by consumers both within and outside of Kittitas County.

Integrating large-scale wind power facilities with an existing grid entails incremental costs over hydroelectric or combustion-turbine facilities. In particular, fluctuations in wind speed, and hence the energy produced by the turbines, necessitates modifications in reserve strategies (introducing day-ahead planning complexities), requires the availability of 'peaker' facilities to provide "intra-hour" load following, and may introduce additional expenses for load following reserves. Computations of these costs are highly complex and idiosyncratic, however, a representative study is provided for the impact on operations at Xcel Energy – North. The study, prepared by Electrotek for the Utility Wind Interest Group, placed these incremental costs at \$1.85/MWh.² Other studies (including one relating to BPA), prepared by Electrotek and others, placed integration costs at between \$1.47 and \$5.50/MWh; a summary of these results, along with discussion of the issues at hand, can be found in "Wind Power Impacts on Electric-Power-System Operating Costs – Summary and Perspective on Work Done to Date, <http://www.uwig.org/UWIGOpImpFinal11-03.pdf>.

1

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² "Characterizing the Impacts of Significant Wind Generation Facilities on Bulk Power System Operations Planning" <http://www.uwig.org/UWIGOpImpactsFinal7-15-03.pdf>.

Environmental Costs from Integrating Wind Energy:

Expected consumption of petroleum products (§ 3.5-12) does not include consumption of natural gas and other nonrenewable (petroleum) resources for firming of power, provision of reserves, etc. (as described in the above section). Similarly, indirect impacts from use of alternative generation facilities are excluded from consideration. It is worth noting that environmental impacts from the project are not confined to the KVVWPP; rather, construction of the KVVWPP will induce such impacts from other sources.³

2

DEIS §3.7 (p. 20-21) on Property Taxes:

On p. 20 it states:

The proposed KVVWPP would increase the amount of annual property tax revenue to Kittitas County. The tax revenue analysis prepared by ECONorthwest was based on review of Kittitas County budgets and spending and assumes a value of \$750,000 per turbine and a property tax rate of 1.35 for Kittitas County. The results of the ECONorthwest study have been updated to reflect the proposed wind turbine configuration under the middle scenario.

Under this scenario, the project would generate an increase of \$1,249,600 in annual property tax revenue to Kittitas County.

But then on p. 21 it states:

Washington State Initiative I-747 limited property tax levy increases to 1% per year. Assuming that \$500,000 of the value of a wind turbine would be assessed as personal property, installing 121 wind turbines under the middle scenario would increase the total property value of Kittitas County by \$60.5 million, which is a 2.6% increase (Sagebrush Power Partners LLC 2003a, Section 8.1.3.5). Because this is greater than the one-percent increase limit imposed by I-747, it is possible that other taxes would need to decline to remain under the 1% limitation. However, the ECONorthwest study concluded that regardless of whether the new turbines would result in an increase in property tax revenue or enable a reduction in other taxes, the project would bring substantial property tax benefits to Kittitas County (Sagebrush Power Partners LLC 2003a, Section 8.1.3.5).

3

First, which value is it? Second, The ECONorthwest study nowhere “concluded that ... the project would bring substantial property tax benefits to Kittitas County.” In fact, the KVVWPP EFSEC Application, Section 8.1.3.5, written by Sagebrush Power Partners LLC, makes this claim. The ECONorthwest report itself makes no mention of this!

³ A corollary to this is that claims that “wind turbine generators produce no air emissions, consume no water for cooling, result in zero wastewater discharges, require no drilling, mining or transportation of fuel, and produce no hazardous or solid wastes,” while literally true, are not true in practice. An addendum to claims that the KVVWPP will reduce emissions from electricity generation is that the vast majority of the power generated in WA is hydroelectric – 83.5% in 1999, and thus already has zero emissions.

2

DEIS § 3.7 on Property Values:

The REPP study violates most of the fundamental assumptions of econometric/statistical analysis. I am willing to testify to the fact that the REPP analysis is statistically invalid; no conclusions can reasonably be drawn from the numbers or representations contained therein.

I will not enter into a lengthy discussion of statistical analysis here, but will endeavor to list certain respects in which the analysis is not valid.

1. The analysis is biased, due to failure of the zero conditional mean assumption for OLS. In particular, sales trends are based on a dummy variable for location and sales date alone. A number of other unobserved factors are not provided as explanatory variables that nevertheless may covary with sales date and location. To name a few:
 - a. the overall level of price appreciation is not included, nor are any other economic variables (e.g., per capita income, unemployment); there are any number of trending covariates that could lead to the observed sales figures
 - b. hedonic analysis is NOT performed – there may be factors specific to the houses that sold that affect value and are not explained by location or date of sale
 - c. the change in value may be caused by capitalization of reductions in property taxes; that is, if property taxes drop, the residence on a particular property becomes more valuable as the tax savings are passed on to the sale price
2. The sample is not i.i.d. – the attributes of the houses that sold in different years may vary (e.g., there is a general movement to sell smaller homes in favor of larger homes in other communities). The study doesn't examine change in property values, merely the trend in the values of properties that actually sold. Compositional changes would invalidate these estimates.
3. Given that hedonic analysis is not performed, there is no way of accounting for viewshed quality in the estimation. That is, effects on housing prices in Carson County, TX are not differentiated from those in Riverside, CA. To the extent that Kittitas County has a significant viewshed, one might expect prices to respond differently than they would in a predominately flat agricultural area with no appreciable scenic views, for example.
4. There is heteroskedasticity in the data. Moreover, the sales figures are not normalized, so nominal changes are incomparable. For example, suppose a \$100,000 house is sold one year later for \$102,000, after construction of a windfarm, in a year in which the overall level of price appreciation is 1%. This equates to an increase of \$1,000 in real terms, but a nominal increase of \$2,000. Another house that was purchased for \$300,000 and sold for \$302,000 would have a nominal increase of \$2,000 as well, but decrease of \$1,000 in real terms.
5. R-squared is a measure of goodness-of-fit, but doesn't measure causality. That is, the source of price changes could be other, unobserved variables that correlate with sales date and viewshed status (e.g., inflation rate). The REPP report doesn't provide standard errors, t-statistics, etc. so it cannot be ascertained whether their parameter estimates are 'correct'. Moreover, the bulk of their R² values lie below 0.7 (and 0.7 is completely arbitrary in any event; 0.7 means that 30% of the variation in observed sales prices is not explained by the data).

4

3

The REPP study is, truly, one of the worst pieces of statistical analysis I have ever seen. To the extent that viewshed impact on property values is, arguably, the most important consideration in accepting or rejecting the KVVWPP proposal, **it is irresponsible to base a conclusion on the information provided.**

4
cont.

DEIS § 3.5.3 on No Action Alternative:

The DEIS refers to Table 2-9 to make the following assertion: “anticipated land requirements for a 60-aMW combustion turbine facility would be more than two times greater than the KVVWPP (see Table 2-9).” This is a specious argument: a hypothetical 60 MW natural-gas fired facility might have an acreage requirement of 14 acres, and the literal land requirement for the KVVWPP turbines may be 7 acres, but the overall affected acreage of the latter project is considerably greater in all meaningful respects. In particular, in Table 2-1 the total permanent disturbance footprint for the middle alternative is listed as 93 acres, and the project will be spread over 7,000 acres (see §1, p. 4).

5



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Wind Power Impacts on Electric-Power-System Operating Costs Summary and Perspective on Work Done to Date November 2003

Introduction

Wind power plants generate electricity when the wind is blowing, and the plant output depends substantially on the wind speed. Wind speeds cannot be predicted with high accuracy over daily periods, and the wind often fluctuates from minute to minute and hour to hour. Consequently, electric utility system planners and operators have been concerned that variations in wind-plant output may increase the operating costs of the system as a whole. This concern arises because the system must maintain an instantaneous balance at all times between the aggregate demand for electric power and the total power generated by all power plants feeding into the system. This is a highly sophisticated task that utility operators and automatic controls perform routinely – based on well-known operating characteristics for conventional power plants and a great deal of experience accumulated over many years. In general, the costs associated with maintaining this balance are referred to as ancillary-services costs.

System operators have been concerned that variations in wind-plant output will force the conventional power plants to provide compensating variations in order to maintain system balance, thus causing the conventional power plants to deviate from operating points that are chosen to minimize the total cost of operating the entire system. The operators' concerns are compounded by the fact that conventional power plants are generally under their control and thus are dispatchable, whereas wind plants are controlled instead by nature and not by them. Although these are valid concerns, it is important to understand that the key issue is not whether a system with a significant amount of wind capacity can be operated reliably, but rather to what extent are the system operating costs increased by the variability of the wind.

Major Questions

Variability of wind-plant output has raised a number of key questions among electric power system personnel:

Utility Wind Interest Group www.uwig.org November 2003. For additional information, contact Charlie Smith jcharlessmith@comcast.net or Ed DeMeo edemeo@earthlink.net

- Do wind plants require backup with dispatchable generation, and if so to what extent?
- How are the routine costs of operating the power system affected by the inclusion of wind power in the mix of generation?
- How can these cost impacts be evaluated? Should they be based on actual cost-of-service impacts, or on market prices for ancillary services?
- How do these cost impacts vary with wind power's penetration into the entire mix of system generation; and with variations in other key system characteristics like generation mix, fuel types and costs, and access to external markets for energy purchases and sales?
- How should penetration be defined in light of changes evolving in power system operation as a result of ongoing restructuring in the electric power sector?
- How would these cost impacts be affected by improvements in wind forecasting?

Over the past two years, several investigations of these questions have been carried out by or on behalf of U.S. electric utilities. These studies have addressed utility systems with different mixes of generating resources, and have employed different analytical approaches. In aggregate, this work provides illuminating insights into the issue of wind's impacts on overall electric system operating costs.

Summary of Studies Conducted to Date

A summary of the results from the recent studies is provided below. The studies use different methodologies and approaches, but have a common element in that they seek to determine the cost of ancillary services necessary to accommodate a wind plant on a utility system. There are typically three different time scales of interest, which correspond to the operation of the utility system and the structure of the competitive electricity markets:

- **unit commitment** horizon of 1 day to 1 week with 1 hour time increments
- **intra-hour load following** horizon of 1 hour with 5-to-10 minute increments
- **regulation** horizon of 1 minute to 1 hour with 1 to 5 second increments

Each of these time frames has its own special planning and operating requirements and costs. In the unit commitment time frame, decisions must be made about which units to start and stop and when to do so, in order to maintain system reliability at minimum cost. The challenge with wind is to do this without knowing precisely the amount and timing of energy production by the wind-plant over the day(s)-ahead planning horizon. In the load following time frame, the challenge is to have adequate reserve capacity available to ramp units up and down to follow the load shape resulting from the random fluctuations in the combined load and wind-plant output. In the regulation or load-frequency-control time frame, sufficient regulating capacity must be available from the units on regulating duty to be able to hold deviations from perfect balance – quantified in terms of an area control error (ACE) – within prescribed limits.

UWIG/Xcel Energy ⁽¹⁾

The case study carried out to evaluate the operational impacts of wind generation on the XCEL-NORTH system used traditional utility simulation-based scheduling and operation tools to conduct the analysis. The study, available on the UWIG web site, determined the ancillary service costs incurred by XCEL-NORTH to accommodate their existing 280 MW wind plant in Minnesota. The XCEL-NORTH system is summer peaking, with a peak load slightly in excess of 8,000 MW. The total system generation is approximately 7,200 MW, with the difference made up by power purchases. Following is a discussion of the ancillary service cost increment for each of the time frames.

- *Unit commitment:* Simulations were performed to assess the cost incurred by XCEL-NORTH to re-schedule units because of inaccuracy associated with the wind generation forecasts used in the day-ahead scheduling. Results based on the assumptions used and the assumed range of wind-production forecast error are shown in Table 1. As demonstrated in the results, the cost impact increases as the inaccuracy of the forecast increases.

Table 1: Cost of wind forecast inaccuracy as a function of forecast error.

Distribution Range (%)	±10	±20	±30	±40	±50
Extra Cost (\$/MWh)	0.391	0.716	0.995	1.231	1.436

- *Load-following reserves:* Calculation of the intra-hour load-following reserve requirement (LFRR) of the XCEL-NORTH control area load and aggregate wind generation data indicated that the addition of 280 MW of wind capacity did not significantly increase the LFRR. Consequently, the reserve component of the load following cost was assumed to be zero at this penetration level. However, this resulted in a higher intra-hour load-following energy cost from existing conventional generating capacity.

- *Intra-hour load-following energy:* Economic dispatch simulations were performed to evaluate the cost of following the intra-hour ramping and fluctuation of wind generation. This is the cost of deploying the available load-following reserve to meet the relatively slow intra-hour variation of net customer loads. Simplifying assumptions and extrapolations were made to obtain an annualized intra-hour load following energy cost of approximately 41¢/MWh.
- *Regulation reserves.* Load frequency control (LFC) simulations produced results showing almost no change in the ACE standard deviation between the scenarios including and excluding wind generation. This suggests that XCEL-NORTH's current wind penetration of 280 MW on an 8,000 MW peak system has no significant impact on the control performance. Accordingly, the cost impact of additional regulating reserves to accommodate wind is assumed to be negligible.

Summing the cost impact results for the components assessed over the three time frames, and using the forecast error range of +/- 50%, the impact of integrating XCEL-NORTH's existing 280 MW wind plant is found to be approximately \$1.85/MWh of wind generation. The assumptions and extrapolations necessary to conduct the study were made in such a way that the effect was to produce a more conservative (more significant) impact. The results are, however, specific to the system as it currently exists.

PacifiCorp ⁽²⁾

PacifiCorp is a large utility in the northwestern region of the US, operating a system with a peak load of 8,300 MW that is expected to grow to 10,000 MW over the next decade. PacifiCorp recently completed an Integrated Resource Plan (IRP), which identified 1,400 MW (14%) of wind capacity over the next 10 years as part of the least-cost resource portfolio. A number of studies were performed to estimate the cost of wind integration on their system. The costs were categorized as incremental reserve or imbalance costs. Incremental reserves included the cost associated with installation of additional operating reserves to maintain system reliability at higher levels of wind penetration, recognizing the incremental variability in system load imposed by the variability of wind plant output. Imbalance costs captured the incremental operating costs associated with different amounts of wind energy compared to the case without any wind energy.

At wind penetration levels of 2,000 MW (20%) on the PacifiCorp system, the average integration costs were \$5.50/MWh, consisting of an incremental reserve component of \$2.50, and an imbalance cost of \$3.00. The cost of additional regulating reserve was not considered. These costs are considered by PacifiCorp to be a reasonable approximation to the costs of integrating the wind capacity.

BPA ⁽³⁾

The Bonneville Power Administration (BPA) is a federal agency that operates a large federal hydropower and transmission system in the Pacific Northwest with a peak load of 14,000 MW. Faced with interconnection requests for several thousand megawatts of wind capacity, BPA engaged Eric Hirst to conduct a preliminary study of the operating impact of wind on its system. Hirst investigated the cost of ancillary services in three time frames: day-ahead unit commitment, intra-hour balancing, and regulation. Based on wind data supplied by BPA and conservative assumptions that were unfavorable to wind, Hirst calculated the cost of ancillary services for the addition of 1,000 MW of wind. The costs of the ancillary services ranged from \$1.00-1.80/MWh in the unit commitment time frame, \$0.28/MWh for intra-hour load following, and \$0.19/MWh for regulation, for a total additional cost of \$1.47-2.27/MWh.

Hirst ⁽⁴⁾

Using wind plant output data from the Lake Benton II project in Minnesota, Hirst calculated the cost of intra-hour load following service and regulation service for a wind plant in the electricity markets of PJM for one week each in August 2000 and January 2001. The wind plant modeled was 103 MW, and the summer peak load for the PJM system was 52,000 MW. During August, a period of high market prices in PJM, the load-following and regulation services for the wind plant amounted to \$2.80/MWh and \$0.30/MWh, respectively. The same services in January amounted to \$0.70/MWh and \$0.05/MWh, respectively. While these results are necessarily of limited applicability due to the assumptions made, they are of interest because they recognize the importance of overall system balance as opposed to balancing individual wind plants, and provide plausible order of magnitude costs. These estimates are very likely conservative in that they do not represent the operation of a robust, fully functional ancillary services market.

We Energies ⁽⁵⁾

Operating in Wisconsin and the Upper Peninsula of Michigan, We Energies serves a summer peak load of 6,000 MW with installed capacity of 5,900 MW of primarily coal and nuclear units. We Energies relies on additional capacity from purchases to meet peak demands during all seasons. We Energies has set a goal of having 5% of its energy produced from renewable resources by 2005. Electrotek was retained to assist in evaluating the impact on ancillary service costs of adding up to 2,000 MW of wind capacity by 2012. Working with We Energies staff, Electrotek examined ancillary service costs in the regulation, load following, and unit-commitment time frames. For wind penetration levels varying from 250 MW to 2,000 MW for a 7,000 MW peak load in 2012, Electrotek found ancillary service costs ranging from \$2 to \$3/MWh, with load and wind variations considered together. Sensitivity studies showed that the increase in regulation reserve for wind integration was small compared to the reserve carried for normal system regulation purposes associated with load variations and load forecast uncertainty.

NREL Paper ⁽⁶⁾

Parsons et al summarized the results of recent operating impact studies in the US, including those above, in a recent NREL paper for the 2003 European Wind Energy Conference (EWEC). A summary of both the methodologies and the results is presented. This paper is available on the NREL and UWIG web sites, and is titled "Grid Impacts of Wind Power: A Summary of Recent Studies in the United States."

Summary of What We Know

There are several insights that can be gained and generalizations that can be made based upon the results to date. First, and most important, it can be seen that the incremental cost of ancillary services attributable to wind power is low at low wind penetration levels; as the wind penetration level increases, so does the cost of ancillary services. Second, the cost of ancillary services is driven by the uncertainty and variability in the wind plant output, with the greatest uncertainty in the unit commitment time frame, or day-ahead market. Whatever can be done to improve the accuracy of the wind forecast will result in lower cost of ancillary services. Third, at high penetration levels the cost of required reserves is significantly less when the combined variations in load and wind plant output are considered, as opposed to considering the variations in wind plant output alone.

The results to date also lay to rest one of the major concerns often expressed about wind power: that a wind plant would need to be backed up with an equal amount of dispatchable generation. It is now clear that, even at moderate wind penetrations, the need for additional generation to compensate for wind variations is substantially less than one-for-one and is often closer to zero.

A summary of the results of the current studies is provided in the table below. While the tools and methods are imperfect, there is sufficient information to show that the operating impacts are small at low penetration levels, and moderate at higher penetration levels.

Table 2 Summary of Results

Study	Relative Wind Penetration (%)	\$/MWh			
		Regulation	Load Following	Unit Commitment	Total
UWIG/Xcel	3.5	0	0.41	1.44	1.85
PacifiCorp	20	0	2.50	3.00	5.50
BPA	7	0.19	0.28	1.00 - 1.80	1.47 - 2.27
Hirst	0.06 - 0.12	0.05 - 0.30	0.70 - 2.80	na	na
We Energies I	4	1.12	0.09	0.69	1.90
We Energies II	29	1.02	0.15	1.75	2.92

Summary of What We Don't Yet Understand

The studies to date have examined complex systems with many interacting variables. The sensitivity of the results of the current studies to critical modeling assumptions and parameter values should be investigated in order to gain a better understanding of the critical parameters. Important factors to investigate and further explore include:

- **Varying amounts of wind generation.** It is clear that the cost of ancillary services increases with increasing wind penetration. A better understanding of this increase for different types of systems, and associated mitigation methods, should be developed. Nonlinear effects – especially at high penetration levels – should be investigated with system simulation tools.
- **Market structure and imbalance energy pricing.** Market-based ancillary service costs will differ from those provided by a utility in a vertically-integrated environment. The availability of a robust hour-ahead market or a well-functioning regional balancing energy market would likely lead to lower cost impacts.
- **Correlation of load and wind forecasting error.** A better understanding of the magnitude and correlation of the respective forecast errors is necessary to generate more accurate results and enable more simplifying assumptions to be made in future analyses.
- **Varying generation portfolio and fuel cost mix.** Sensitivity studies need to be conducted on a selected set of representative generation mix scenarios (coal, oil, gas, hydro, nuclear, wind) to enable results to be extrapolated to other utility systems without the need to undertake expensive and time-consuming utility-specific studies.
- **Simplified models and methods.** Once a sufficient base of results has been established, correlations between analytical and simulation approaches, trends in results, similarities, and insights should be sought in order to develop simplified approaches and 'rules of thumb'.
- **Wind penetration definition.** A new and more meaningful definition of wind penetration level needs to be developed. The definition needs to change to reflect the changes in the growth and geographical extent of competitive electricity markets and consolidation of control areas. Ancillary services will be drawn from larger market areas with more competition as markets mature.
- **Transmission congestion.** We do not have a clear understanding of the impact of transmission congestion on ancillary services markets as these

markets begin to mature. At some point, this is likely to become a limiting factor on the provision of ancillary services for regions with large amounts of wind capacity.

This additional analysis will provide a fuller understanding of the impacts of integrating bulk wind generation into a utility resource mix, as well as insights needed to extrapolate the results to other utility systems.

Summary and Future Expectations

Work conducted to date has shown that wind power's impacts on system operating costs are small at low wind penetrations (about 5% or less). In most cases, these incremental costs would detract from the value of wind energy on current wholesale markets by 10% or less. At higher wind penetrations, the impact will be higher, although current results suggest the impact remains moderate with penetrations approaching 20%.

The additional areas of further study identified above will provide additional important insights that will allow credible estimation of impacts of wind generation at higher penetrations, as well as for a wide range of utility systems. These insights likely will also lead to operating procedures that will mitigate operating-cost increases due to wind. In the longer term, they may also influence the future expansion of power systems so that the naturally variable behavior of wind power has less impact on overall operating costs than is the case with today's power systems.

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5. Electrotek Concepts, Inc; Systems Operations Impacts of Wind Generation Integration Study. Prepared for We Energies, June 2003.
6. Parsons, B., Milligan, M., Zavadil, R., Brooks, D., Kirby, B., Dragoon, K., Caldwell, J.; Grid Impacts of Wind Power: A Summary of Recent Studies in the United States. European Wind Energy Conference, Madrid, Spain; June 2003.

Makarow, Irina (EFSEC)

From: Woody [woody@elltel.net]
Posted At: Tuesday, January 20, 2004 4:25 PM
Conversation: Sagebrush DEIS Comments
Posted To: EFSEC
Subject: Sagebrush DEIS Comments

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JAN 20 2004
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RE: Kittitas Valley Wind Power Project DEIS

Mr. Fiksdal, Ms Makarow,

I wish there were more time to wade through a document this cumbersome, this complex. To help with a more "complete analysis" of the DRAFT Environmental Impact Statement, please consider these comments...

On page 1-4, Zilka/Sagebrush introduces 3 project scenarios while previously entertaining public comment only on the Middle Case scenario. How can they change the rules like this? This discrepancy allows for vague statements about project requirements throughout the entire DEIS.

1

Regarding Table 1-3

On page 1-42, Section 3.7 Socioeconomic, "It is estimated that Kittitas County would receive an estimated total of \$1,343,000 in added property tax revenue each year under the middle scenario." I was under the impression that the dollar amount was for year 1 only with each subsequent year's yield being a diminished amount due to project depreciation values.

2

I also take exception to the conclusion that property values would not decline based on one Renewable Energy Policy Project Study. Why are no Real Estate professional groups consulted? Why wasn't the Kittitas County Association of Realtors questioned? Where are there no property studies for a comparable situation? Maybe there aren't any comparable situations....

3

Page 1-54, Section 3:13 Public Service and Utilities – Communication Systems " once the specific location and configuration of the turbines is identified on paper...." This should be done already.

4

1/21/2004

524

The following paragraph promises if problems with Television reception exist “the Applicant would consult with affected residents to develop an appropriate solution.” This deserves a specific time frame for mitigation.

5

Likewise on page 1-57, Communication Systems. Any promoted television, cell phone mitigation should be accompanied by a specific time line.

All setbacks should be unified and not specific to residences and roads, but to property lines and roads. Proffered setbacks include page 1-34 (ice throw – 1000 feet), 3.4 Health & Safety, page 1-36 (tower collapse/blade throw – tower height) 3.4 Health and Safety, page 1-52 (noise –1 mile, 3.12 Noise.

6

All turbines should be setback from property lines at least 1 mile so as to meet all suggested setbacks. People should be allowed to sensibly site a new residence anywhere on their property (thus retaining more property value). The 1-mile setback should apply to existing roads as well. It would also satisfy the approximate 2000-foot shadow flicker zone, mentioned on page 1-17, section 1.9.4, Health & Safety

7

The fail-safe icing sensor system should be described, specifically as to its reliability. There is nothing mechanical that is 100 % fail-safe.

8

Regarding the section on Lighting, page 2-20, coupled with the fact from page 1-21, “Flashing of Lights on the tops of turbines would similarly be considered a significant unavoidable adverse impact”: The exact lighting scheme should be accurately described in this document.

9

A word search should be done on this DEIS Document to find such vague words as: regularly (as in regularly patrolled) continually (as in continually monitored) and promptly (as in promptly mitigated) so that words which require a specific time line might be inserted.

10

Page 1-8, Alternative Wind Turbine Locations mentions that other locations were rejected because of lack of sufficient wind resource, yet Zilka has submitted another proposal roughly 24 miles from this one, both in Kittitas County. In fact, if you were to review public statements from last spring’s EFSEC in Ellensburg meetings, I recall at last once when a Zilka official stated there were no other worthy sites in Kittitas County. (Or something to that effect.) Mr. Poshusta spoke passionately about that in his testimony at your meeting on 1/13/04 when he stated that Zilka was not being a “good neighbor.” I must agree with Mr. Poshusta and ask that you factor the tone of that meeting into something else which should be addressed in your process, perhaps even in this DEIS. That something else is DISCORD: Neighbors against Neighbors. This proposal has created a dichotomy of two camps- those fighting for their homes and way of life versus those somehow linked to Zilka’s money trail. Ironically many of those fighting for their homes are not opposed to wind energy – but to this siting.

11

EFSEC, Governor Locke, and Kittitas County have a wonderful opportunity now that the Wildhorse Project Proposal has reared up. Some sort of Wind Farm, could be pursued in the less populated area of the county so that the people of the county could get a good look at these Turbines to see if they would fit amidst residential properties. The socioeconomic benefits would be realized and all parties could maintain a degree of integrity. In light of the heated resistance to the Sagebrush siting, it would be gross negligence for EFSEC to not declare a moratorium on Zilka’s Sagebrush siting and shift its focus to the Wildhorse Project.

12

1/21/2004

County residents could get a close look at the 'real thing' and be done with all the ambiguous reports and speculations. There are far better locations in the county to pilot a wind farm .

12
cont.

Zilka has not started off being a good neighbor. They submitted a vague initial application. They then pulled away from working with the county. There have been repeated extension requests and accusations that the County has been dragging its feet. Now Zilka is talking about preempting from county input. Looking at their integrity to this point, and wondering how they will behave once they are established, EFSEC (as the lead siting agency) should be held responsible to enforce situations if Zilka doesn't play by the rules. EFSEC should retain some vehicle to leverage compliance with such things as operations, maintenance, mitigation and decommissioning timelines, as well as any unforeseen resident complaints which might arise.

13

Thank you for considering these comments.

Sincerely,

Woody Woodcock.

1/21/2004

20 Jan 04

Kittitas Valley Wind PP
DEIS Comment - Indiv. 56

Mr. Allen Fiskdal Mgr.
Energy Facility Site Evaluation Council

I attended the public comment meeting on 13 Jan for the 1st hr and had to leave due to chores.

In the studies and in some public commentary it was stated that property value will increase and even have in proximity to this wind farm. Some of the property owners in this area may have been able to sell for more than they paid for the properties, however this may not be a true indicator of the situation.

Property in much of the proximity of the wind farm is Rocky sage steppe and unsuitable for sustained crop type agriculture. Thus much of this property was bought at a cheaper price ^{per acre} than other property in the valley. Much of this property has been owned by large land owners for many yrs. and due to natural population growth and high prices for land elsewhere on the state they have gained equity wind farm or no.

My wife and I moved to the valley 3 yrs ago (Fall 2001). We bought land south of I-90 for 2 reasons. 1. Beautiful views and 2. long distance from power lines and possible wind mills. The Powerline issue affected greatly the sale of our property on 2.

the west side of the state. 4 Bonneville Power towers with multiple lines carrying over 100 mw at the back of our property caused us to reduce the asking price for our small horse farm. Prospective buyers fell in love with the house, barns and arena, until they went through the woods and saw the pasture area 200 yds behind the house; it took us 10 yrs to sell.

2
cont.

Please deny the application for this wind Power project on this site.

This company has already applied for a permit to the east (wild horse) where the wind blows and few property owners will be affected.

3

Wind farms along the Columbia gorge would be appropriate however they would probably be denied due to ruining the natural beauty of the area and on that thought I rest my case.

4

Sincerely,

Neal D. Houser

[Signature]

Kittitas Valley Landowners

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ENERGY FACILITY SITE
EVALUATION COUNCIL

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement



Name: Dail Farrar

Address: 1650 Game Farm Rd. Ellensburg, WA
(Please include your Zip!) 98926

Please write any comments you have with respect to the
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 below and leave this sheet in the Comment Box.

- ① - need to study how many days the wind blows in the Kittitas Valley in the location where the wind farms are located.
- ② - What do the wind farms do with the turbines when the wind does not blow?
- ③ - What is the environmental impact when the wind does not blow?

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Use the back of this form if you need more room for your comments.

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EVALUATION COUNCIL**

To be considered, comments on the DEIS must be e-mailed or postmarked no later than January 20, 2004.

For more information about EFSEC's review of this application, please contact:
 Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
 call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

Kittitas Valley Wind PP
DEIS Comment - Indiv. 58

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA

Public Comment Meeting on the Draft Environmental Impact Statement



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Name: _____

**ENERGY FACILITY SITE
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Address: _____

(Please include your Zip!)

**Please write any comments you have with respect to the
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below and leave this sheet in the Comment Box.**

It is becoming quite clear, as the permit process proceeds that the area first proposed for the industrial wind generated power plant located on both sides of hwy 97 is not a suitable location. The land to be consumed by the wind generators is zoned & established. To impose an industrial complex on top of existing land use is unfair to the land owners in the area that oppose its establishment.

The environmental impact on the proposed hwy. 97 is quite substantial. Imposing an industrial wind generator power plant on an area that is populated

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call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

with homes & families that also has a great potential for further growth with the zoning that is now in place is wrong. Rezoning to allow wind generators to impose their ill effects on those citizens of the area that appose them is wrong.

2
cont.

The two alternative purposed sites, Whiskey Dick mountain & Beylston mountains are absent of significant environment constraints & has property availability. It is an area that is best suited for an industrial wind generator power plant.

3

Zilka project manager, Chris Taylor, has said that the whiskey Dick mountain area has even better coind conditions then hwy 97

Let us do the right thing & turn down Zilkas request for the wind generator power plant to be located on Hwy 97. It is clear that Whiskey Dick mountain area is the best area suited for an industrial wind generator power plant.

4

Sincerely

F

Ray & Cookies (Redmond)

|||||

11/10

|||||

11

Kittitas Valley Wind PP
DEIS Comment - Indiv. 59

Makarow, Irina (EFSEC)

From: Martin Kaatz [marcar@elltel.net]
Posted At: Tuesday, January 20, 2004 4:34 PM
Conversation: wind farm comment
Posted To: EFSEC
Subject: wind farm comment

To the Washington State Energy Facility Site Evaluation Council

I have examined the Draft Environmental Impact Statement, and feel that it was thorough in looking at all the problem areas in the Wind Power Project. Where damage may occur, as in the building of roads, the report indicates the use of the best cut and fill techniques for mitigating the erosion problems.

Though I am concerned that impacts on Historical Tribal Resources is likely to be negative, I still believe that we should go ahead with this project. Deriving energy from the clean, renewable resource of wind power should be utilized, so as to minimize the nation's dependency on oil. I feel the visual effects of seeing the large turbines will become acceptable to most everyone, over time. Sincerely, Carla H.Kaatz

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528

[SPAM] enXco DEIS meeting & Zilkha deadline

Page 1 of 3

Kittitas Valley Wind PP
DEIS Comment - Individ. 60

Makarow, Irina (EFSEC)

From: ROKT [stoptheturbines@netos.com]
Sent: Sunday, January 18, 2004 5:19 PM
To: ROKT Supporters :
Subject: [SPAM] enXco DEIS meeting & Zilkha deadline

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JAN 20 2004

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Fellow ROKT Supporters,

The public comment period for the Draft Environmental Impact Statement for the Zilkha Kittitas Valley Wind Power Project will be ending January 20th. Basically, that means you will need to have it submitted on Monday, the 19th of January. If you have not submitted comments, please do so before close of business tomorrow. Email to Irina Makarow at: irinaM@ep.cted.wa.gov and Alan Fiksdal at : allenf@ep.cted.wa.gov .

Below is another letter written to EFSEC about the adequacy of the EFSEC DEIS.

Next, there will be the public meeting on January 20th from 6:30 PM to 09:30 PM at the Kittitas County Fairgrounds in the Home Arts Building. Please be aware that, due to the amount of documentation, written comments will be accepted up to 5PM on January 30th, 2004. Please address comments to: Clay White, Planner II, 411 Ruby Street, Suite 2, Ellensburg 98926 or email to: clayw@co.kittitas.wa.us .

The public meeting on Tuesday will be to present your comments on the adequacy of the Draft Environmental Impact Statement (DEIS) for the Desert Claim Wind Power Project (enXco) in the area of Reecer Creek. Written and or oral statements will be accepted.

The Kittitas Planning department mailed out copies of this DEIS in the form of a CD data disk to interested parties. They are still available at the Planning Department at no charge. Written hard copies are also available at the Planning Department for a charge of \$60.00 for the 2 volume set.

Hope to see you at the Fairgrounds on Tuesday,

Best Regards,

Ed Garrett

Turbine Environmental Study Fails to Accurately Assess Impact

Most of the EIS makes us, literally, ill. To say that the impact is "palatable," is nauseating.

When we talked with some of the folks doing the study for the statement, they said they could not come to our homes since it was private property. A simple phone call requesting permission would have let them up here in an instant to see just what we will be facing.

In addition, we were told that no other completed projects or studies could be used as reference for these proposed local sites. Nor could historical information be used regarding prior construction background statistics by the requesting companies.

1/20/2004

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We find this rather odd but perhaps it is tangled up with legalities which, if true, do a tragic disservice to this community.

We live north of Smithson Road and will have these overpowering structures in full view, mostly at eye level with the tops, no matter which direction we look. The spectacular view we now have will be destroyed. That is no small thing because it is one reason many live here. We came back home here because of that pristine view and the atmosphere that makes this valley so unique and beautiful.

And, NO, we would not have purchased this home and property, let alone done so much renovation, had these turbines already been in place. Thus, the former owner would probably still be trying to sell.

Our county officials had better take a long, hard look at the moratorium placed on any new turbine construction by the Township of Lincoln in Kewaunee County, Wisconsin.

Their document is demoralizing, downright scary and summarizes existing problems based on a survey of direct impacts to residents. Inability to get away from the noise, shadow flicker, blinking lights, and the reduction in assessed value and sales of homes (decreased to 78% from 104%) are only a few items -stated in the survey of what has already taken place.

Quoting one family's response: "Our whole family has been affected. My husband just went to the doctor because of his stomach. He hates [the wind turbines]. We have fights all the time about them. It's terrible. Why did you put them so close to our new home and expect us to live a normal life? If it isn't the shadows it's the damn noise. The only people that think they are so great and wonderful are those who really don't know [what it's like to live near them]."

Another resident stated, "Anyone that thinks there aren't going to be problems resulting from the turbines has got another guess coming." She said that she and other residents felt like the bad guys for opposing the turbine project and warning other residents that the project would spell disaster. She said she hates now that what they feared has come true. She relates that there isn't any self-satisfaction in being able to say, "I told you so."

The report of the study is overwhelming, and the negative effects residents are experiencing should be taken as an extreme warning.

We are all creatures of this Earth, whether human or otherwise, and to say that the expendable life of other species such as our birds and wildlife is o.k. because the added impact is negligible is callous. The EIS can describe all it wants as to how minimal the impacts might be. The existing sites around the globe show otherwise when you hear from folks who now must live in their shadow, within hearing distance, and feel the impact on themselves, their animals and local wildlife.

Don't foist this irreparable damage on this valley and its inhabitants, human or otherwise. We really don't want the sadness or self-satisfaction in saying "We told you so."

Chris Cole
Ellensburg, WA.

1/20/2004

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cont.

Kittitas Valley Wind PP
DEIS Comment - Indiv. 61

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Washington State Energy Facility Site Evaluation Council
 COMMENT FORM
 Kittitas Valley Wind Power Project – January 13, 2004, Ellensburg, WA
 Public Comment Meeting on the Draft Environmental Impact Statement



JAN 27 2004

ENERGY FACILITY SITE
EVALUATION COUNCIL

Name: Eloise Kirchmeyer
 Address: 16281 Reece Creek Rd, Ellensburg WA 98926
 (Please include your Zip!)

Please write any comments you have with respect to the
 Kittitas Valley Wind Power Project DEIS
 below and leave this sheet in the Comment Box.

I am a "newcomer" to Kittitas County, having moved here in April '03. I'm a transplant from King County and do you know what would have ^{happened} if this project was suggested in that County? It would have been laughed out of the office. My husband and I proposed a project of two acres and were told it was not appropriate for area. If any project is inappropriate for an area - this is. This is a for profit industrial business. I didn't buy into my neighborhood thinking it

Use the back of this form if you need more room for your comments.

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 Irina Makarow, Siting Manager, PO Box 43172, Olympia, WA 98504-3172,
 call (360) 956-2047, or e-mail efsec@ep.cted.wa.gov.

would be turned into an industrial zone
What is next - a landfill, a regional prison
Hasn't the windmill therapy tried before
in the valley. There is a large windmill
near the freeway that was a part of a study
which is now sitting idle. Is this an
omen of things to come - idle + abandoned
and still eyesores.

1
cont.

2

As far as environmental impact on the
area, I'm going to step out my back door
and see several windmills towering over
my house - it from my back deck. I didn't
see this portrayed in the simulated photos.
Am I a NIMBY (not in my backyard) U Betcha
and not in my front yard) either.

3