

Responses to Comments in Draft Supplemental EIS Letter 1 from Ed Garrett

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. EFSEC has met and exceeded the relevant State Environmental Policy Act (SEPA) and Washington Administrative Code (WAC) provisions for providing opportunity for public input and participation in the EIS process and adjudicative proceedings, respectively. SEPA calls for a public scoping process (WAC 197-11-408) and for public review of the Draft EIS. In addition, as part of the adjudicative proceeding for the Application for Site Certification, a specially designated session will be scheduled to receive evidence and testimony from the public. A hearing to receive public evidence and oral and/or written testimony on the proposed project will be held after the evidentiary hearing has closed but before any recommendation to the governor is prepared. At this hearing, any person will be entitled to express support or opposition to the project (RCW 80.50.090). Public meetings were held in Ellensburg to facilitate public participation. The information and evidence gathered through these various processes will be used to establish a record of information that EFSEC will use to make a recommendation to the governor whether to approve or deny siting of the facility.
2. Your comment is noted. The six issues identified as unresolved in the Draft EIS and Supplemental EIS have been clarified. Please refer to revisions to Section 1.7 of the Final EIS. All other EIS topics are fully evaluated and address the concerns raised in the project Scoping Summary. Please refer to Key Issue A in Section 2 of this volume for information on additional analyses included in Chapter 3 of the Final EIS.
3. Please refer to State Agency Letter 3, Response 5 regarding a redefined No Action Alternative.
4. Please refer to Organization Letter 4, Response 9 regarding the need for back-up sources of conventional energy when the wind is not blowing.
5. Please refer to Organization Letter 4, Response 5 regarding reasons why EFSEC has limited its analysis of alternative sites to those within Kittitas County.
6. Your comment is noted.
7. Your comment is noted. Please refer to State Agency Letter 2, Response 16 regarding the habitat conservation plan being developed for potential impacts on bald eagles from the project.
8. Impacts on landowners would occur regardless of whether they have signed agreements with the Applicant (i.e., participating landowners). Please refer to Individual Letter 11, Response 2 regarding future development of nearby property.

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9. There are no documented human or animal health impacts associated with shadow-flicker from wind turbines (Nielsen, Prefiled Testimony, Exhibit 40).

You do not identify the specific articles documenting that shadow-flicker effects overall human health. Please refer to Individual Letter 3, Response 5 regarding the reliability of the Lincoln Township Wind Turbine Survey.

10. Your comment is noted. Information on recent rural residential subdivisions in the project area, including the Horse Canyon Estates project, has been included in revisions to Section 3.6.1 of the Final EIS.
11. Your comment is noted. The Draft EIS acknowledges that land use in the project area consists of cattle grazing interspersed with some rural residential development. Also, please refer to Response 10 of this letter.
12. Your preference for the Wild Horse project alternative is noted.
13. Please refer to Key Issue B in Section 2 of this volume regarding property values.
14. Please refer to Individual Letter 10, Response 1 regarding financial compensation as mitigation for local property owners.
15. Your preference for the Wild Horse project alternative is noted.
16. Prior to publication of the Draft EIS, the Yakama Nation had been offered opportunities for meetings and site visits to discuss the project but declined to participate. However, in January 2004 the Yakama Nation requested a meeting with EFSEC and the Applicant to discuss and plan for the cumulative effect of wind power on a regional basis. Consultation with the Yakama Nation is ongoing. Please refer to responses to Tribal Letter 1 .
17. Thank you for your comment. Please refer to Response 10 of this letter. Viewpoints 2 and 5 most represent potential project views from the proposed Horse Canyon Estates subdivision on Bettas Road (see Section 3.9 of the Draft and Final EIS).
18. Your preference for the Wild Horse project alternative is noted.
19. Your comment is noted.
20. Your comment is noted. Please refer to Response 10 of this letter.
21. According to the noise impact analysis, the closest turbine to your property line (turbine J11) would be located 316 feet away. The approximate noise level at this property line is estimated to be between 50 and 55 decibels, which is within the maximum permissible noise level of 70 decibels (per WAC 173-60) at a Class C receptor. The regulatory noise

limits applied to a wind power project do not mean that the turbines will not be heard by its neighbors at all times and under all conditions. They do, however, protect the amenity of neighbors and ensure that the development would not disturb them to a reasonable degree.

22. Your preference for the Wild Horse project alternative is noted.
23. Your comment is noted. Please note that fires are extremely rare on modern wind turbines. For more information regarding fire safeguards on wind turbines, please refer to State Agency Letter 3, Response 24. Your preference for the Wild Horse project alternative is noted.
24. While the unimproved condition of the southern portion of Hayward Road could hinder emergency response efforts, there are other access roads to the project site. Furthermore, the Applicant would be responsible for providing keys to a master lock system that would allow emergency personnel responding to a fire or other emergency to unlock gates that would otherwise limit access to the project (see Section 3.13.4 of the Draft EIS). Your preference for the Wild Horse project alternative is noted.
25. Your comment is noted. The purpose of an EIS is to provide impartial discussion of significant environmental impacts (WAC 1970110400[2]). The issue of support for or opposition to the project is not germane to an EIS. However, expressions of project support and opposition are part of the project record upon which EFSEC will make a recommendation to the governor whether to approve or deny the siting of the facility (also, please refer to Response 1 of this letter).
26. Although willing participation of the landowner would be an essential precondition to proposing wind facility development on a particular site, it was not considered in the Draft Supplemental EIS as one of the five criteria generally necessary for a site to be amenable for wind farm development. Furthermore, the inability to meet any one of these criteria (e.g., project size and corresponding power output) does not necessarily render a potential alternative site unreasonable for further analysis in comparison to other more practical sites.
27. Thank you for your comment. Your preference for the Wild Horse project alternative is noted.
28. Your preference for the Wild Horse project alternative is noted.

Responses to Comments in Draft Supplemental EIS Letter 2 from Jeffrey S. Howard

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. The SEPA rules (WAC 197-11-448) do not require agencies to address concerns such as tax treatment and profits of the wind energy industry in an EIS. The statute and rules envision general economic considerations such as these as factors decision-makers would evaluate apart from the environmental impacts addressed in an EIS.

Please refer to Key Issue B in Section 2 of this volume regarding property values. Please refer to Individual Letter 1, Response 9 regarding treatment of quality of life issues in a SEPA EIS. Your opposition to the project is noted.

2. Thank you for your comment. Your preference for siting the project in the Whiskey Dick Mountain area is noted.

Responses to Comments in Draft Supplemental EIS Letter 3 from David and Janet Lee

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment. Your preference for siting the project in the Whiskey Dick Mountain area is noted.

Responses to Comments in Draft Supplemental EIS Letter 4 from Mike Robertson

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Please refer to Individual Letter 23, Response 7 regarding the project's need to have ready access to sufficient available capacity on an electric transmission system.
2. Please refer to Organization Letter 4, Response 5 regarding reasons why EFSEC has limited its analysis of alternative sites to those within Kittitas County.
3. Thank you for your comment. The environmental impacts of the Wild Horse Wind Power Project were considered in depth in the project's Draft and Final EIS (EFSEC 2004a, 2005a).

Responses to Comments in Draft Supplemental EIS Letter 5 from David Forster

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment. Your preference for siting the project in the Whiskey Dick Mountain area is noted.

Please refer to Organization Letter 4, Response 5 regarding reasons why EFSEC has limited its analysis of alternative sites to those within Kittitas County.

Responses to Draft Supplemental EIS Comments in Letter 6 from Tim Henebry

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment. Your opposition to the project at the KVVPP site and your preference for development at Wild Horse is noted.

**Responses to Comments in Draft Supplemental EIS Letter 7 from
Darlene and Robert Young**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment. Your preference for siting the project at the Wild Horse site is noted. Please refer to Individual Letter 1, Response 9 regarding treatment of quality of life issues in a SEPA EIS.

**Responses to Comments in Draft Supplemental EIS Letter 8 from
Suzanne and Leonard Scheele**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment.
2. Thank you for your comment.
3. Thank you for your comment. Your opposition to the project at the KVVPP site is noted.

Responses to Comments in Draft Supplemental EIS Letter 9 from Dwight Lee Bates

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment.
2. Thank you for your comment.
3. The Draft Supplemental EIS provides extensive documentation of the expected impacts of the proposed project and two offsite alternatives and thorough, objective analysis of their significance. A description of mitigation measures for the offsite alternatives has also been included in the Final EIS.
4. Please refer to Individual Letter 30, Response 15 regarding project impacts on cultural resources.
5. Please refer to Local Agency Letter 2, Response 18 regarding consultation with the Yakama Nation.
6. The Draft Supplemental EIS does not conclude that 60 residents would experience elevated noise levels from the proposed project. Noise modeling demonstrates that projected noise levels would be below 50 decibels at all receptors (i.e., houses). Please refer to Individual Letter 3, Response 5 regarding the reliability of the Lincoln Township Wind Turbine Survey.

**Responses to Comments in Draft Supplemental EIS Letter 10 from Jeff Slothower,
Lathrop, Winbauer, Harrel, Slothower & Denison L.L.P.**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. As indicated in Chapter 7 of the Draft Supplemental EIS, EFSEC staff prepared the document. It was not an existing document, and therefore could not be “adopted” pursuant to WAC 197-11-965. An adoption notice pursuant to WAC 197-11-965 would therefore have been inappropriate.
2. The Draft Supplemental EIS was not issued pursuant to WAC 197-11-630. As indicated in Response 1 of this letter, the document was not an “existing document” but a new document prepared by EFSEC staff. The Draft Supplemental EIS was issued pursuant to WAC 197-11-405. At the time the Draft EIS was issued for the proposal (December 2003), EFSEC had not received a request for preemption. The Applicant’s first request for preemption was filed on February 7, 2004. The Draft Supplemental EIS meets the requirements of WAC 197-11-405 in that it addresses the analysis of alternative sites required by EFSEC (WAC 463-28-040[3]) after a request for preemption has been filed. The Draft Supplemental EIS analyzed alternative sites not addressed in the December 2003 Draft EIS. The alternatives analysis presented in the Draft Supplemental EIS was incorporated into the Final EIS.

**Responses to Comments in Draft Supplemental EIS Letter 11 from
John and Barbara Foster**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. EFSEC is responsible for evaluating the sufficiency of applications for energy facilities and does not control the proposed siting of such facilities.
2. Thank you for your comment. Your preference for siting the project in the Wild Horse area is noted.
3. WAC 197-11-620 requires that a Supplemental EIS be prepared in the same way as a Draft and Final EIS (WAC 197-11-400 to 600), except that scoping is optional. WAC 197-11-500 through 535 establishes the notice and comment procedures required. The Draft Supplemental EIS was issued pursuant to the requirements of WAC 197-11-460. Notice of the public comment hearing on the Draft Supplemental EIS met the requirements of WAC 197-11-502(6) and WAC 197-11-535 (3). An additional comment hearing on the Draft Supplemental EIS was duly noticed and conducted on February 2, 2006, in Ellensburg, Washington.
4. Thank you for your comment. Your opposition to the project at the KVVPP site is noted.

**Responses to Comments in Draft Supplemental EIS Letter 12 from Chris Taylor
Zilkha Renewable Energy**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment.
2. Your comment is noted. The Final EIS has been revised to indicate that the Applicant would construct approximately 13 miles of new road and approximately 8 miles of existing road would be improved. With the exception of some roads being shorter, this revision does not change the proposed roadway layout. The Final EIS presents updated data for the amount of temporary and permanent roadway disturbance.
3. Your comment is noted. The Final EIS has been revised to indicate that the project area acreage is 6,000 acres. This correction does not change the boundaries of the project area.
4. Unresolved wetland impacts and mitigation issues raised in Section 1.7.1 of the Draft EIS have been clarified. Please refer to State Agency Letter 3, Response 29 and revisions to Section 3.2.4 of the Final EIS.
5. Sections 1.7.2 and 3.7.2 of the Final EIS have been updated to reflect the revised project layout with up to 65 turbines being constructed.
6. Please refer to updates to Sections 1.7.3, 3.7.2, and 3.10.2 of the Final EIS and to Local Agency Letter 2, Response 17 regarding the economic and environmental effects of tourism.
7. Please refer to updates to Sections 1.7.4 and 3.8.2 of the Final EIS and to Local Agency Letter 2, Response 18 regarding impacts on historic tribal resources.
8. Section 1.7.5 of the Final EIS has been revised to clarify that the project's potential effect on television reception in the Swauk Prairie area is unknown. Because this area is sparsely populated and television reception is currently poor, the project is not expected to generate complaints of degraded television reception from local residents.
9. Based on the new information submitted by the Applicant (refer to Organization Letter 5), Sections 1.7.6 and 3.13.2 of the Final EIS have been revised accordingly to clarify the project's effects on radio interference.
10. Please refer to Response 3 of this letter.
11. Please refer to Response 2 of this letter.
12. Sections 2.2.3 and 3.2.4 of the Final EIS have been revised to reflect that the Applicant is willing to commit to using up to 5 freestanding meteorological towers at the project site.

Responses – Draft Supplemental EIS Letter 12

13. The referenced paragraph has been revised for clarity.
14. Your comment is noted. Although willing participation of the landowner would be an essential precondition to proposing wind facility development on a particular site, it was not considered in the Draft Supplemental EIS as one of the five criteria generally necessary for a site to be amenable for wind farm development.
15. Thank you for your comment. The Wild Horse project area acreage has been corrected in the Final EIS.
16. The description of the Desert Claim project area in the Final EIS has been revised to indicate that the 4,783-acre project area is owned by eight private landowners. No project facilities are planned for public lands in the project area.
17. The referenced sentence has been revised in Section 3.2.2 of the Final EIS to clarify that surveys conducted in 2003 at the Wild Horse project site did not confirm any active leks.
18. Your comment is noted. The affected environment and impacts of the KVVWPP are summarized in the Supplemental Draft EIS to add context to the discussion of the four offsite alternatives considered at that time. Mitigation measures are not identified in the Draft Supplemental EIS. KVVWPP impacts and mitigation measures, including the Applicant's proposal to purchase and protect more than 500 acres of onsite habitat, are fully disclosed in the Draft and Final EISs.
19. Please refer to Response 18 of this letter.
20. Section 3.2.3 of the Draft EIS clearly identifies turbine shading and dust as negligible impacts on vegetation during KVVWPP operations.
21. Mitigation measures for the four offsite alternatives are not identified in the Draft Supplemental EIS but are included in the Final EIS. Please refer to revisions to Section 3.2.4 of the Final EIS addressing the Applicant's plans to develop and implement a detailed Stormwater Pollution Prevention Plan to minimize pollutant discharge from the Wild Horse site during construction.
22. The Draft EIS acknowledges that the offsite alternatives are located in an area of relatively low lightning flash density. The referenced statements are intended to provide a context for understanding the relative risk of lightning strikes among the different sites and are not included in the Final EIS. As stated in Response 21 of this letter, mitigation measures for the four offsite alternatives are not identified in the Draft Supplemental EIS but are included in the Final EIS.
23. Section 3.7.2 of the Final EIS has been revised to clarify the number of employees at the Swauk Valley site. Given that only 42 turbines would be at the Swauk Valley site,

- between 6 and 10 full-time employees would be a more realistic estimate of operations personnel.
24. Section 3.8.2 of the Final EIS has been revised to clarify that although the Kittitas Indians are now a part of the Yakama Nation, the project area is not located on the Yakama Nation Indian Reservation.
 25. Section 3.8.2 of the Final EIS has been revised to indicate that no Traditional Cultural Properties have been documented within either the Wild Horse or KVVWPP boundaries.
 26. Section 3.8.3 of the Final EIS has been revised to indicate that the Applicant has agreed to avoid ground-disturbing activity within 100 feet of all documented cultural resource sites. Please refer to Response 21 of this letter regarding mitigation measures in the Draft Supplemental EIS.
 27. The statement regarding straying beyond the perimeters of the preexisting disturbance zones during project decommissioning is not included in the description of KVVWPP decommissioning impacts in Section 3.8.3 of the Final EIS.
 28. Based on the updated KVVWPP visual impact analysis, which includes additional photosimulations of the 410-turbine scenario as well as one new viewpoint, Section 3.9.3 of the Final EIS has been revised to clarify that the KVVWPP has the potential to create high levels of visual impact at three different locations (Viewpoints 4, 11, and 12).
 29. The Draft Supplemental EIS presents objective and accurate evaluations of potential impacts attributable to the proposed KVVWPP and four offsite alternatives. Differences in analytical methodologies among the alternatives are identified where applicable (e.g., Section 3.9, Visual Impacts, Desert Claim Wind Power Project, second paragraph). Section 1.1 identifies that different authors prepared the primary sources of information used in the document.
 30. Your comment is noted. Because both the Desert Claim and Wild Horse projects resulted in complete environmental analysis documents, the discussion of these two projects as “alternatives” was deleted from the KVVWPP EIS. The EIS documents for the Desert Claim and Wild Horse Projects have been incorporated by reference, and have been considered by EFSEC in other proceedings.
 31. Please refer to revisions to Section 3.2.4 of the Final EIS, which includes project-specific mitigation measures for each offsite alternative.
 32. Please refer to Response 30 above.
 33. Please refer to Response 30.

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- 34. Please refer to Response 30.
- 35. Please refer to Response 30.
- 36. Please refer to Response 30.
- 37. Please refer to Response 30.

Responses to Comments in Draft Supplemental EIS Letter 13 from Emilia Burdyslaw

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Your comment is noted. Your opposition to the project at the KVVWPP site and preference for development at the Wild Horse site are noted.
2. Your comment is noted. Less than 0.1 acre of riparian tree habitat would be permanently affected at the proposed KVVWPP site. Furthermore, projected levels of avian mortality at the KVVWPP and Wild Horse sites are expected to be similar. For example, annual raptor mortality is projected to range from two to three at the KVVWPP site and between one and ten at the Wild Horse site. However, it is recognized that bald eagle activity is higher at the KVVWPP site than the Wild Horse site.
3. Your comment is noted.
4. Expressions of project support and opposition are part of the project record upon which EFSEC will make a recommendation to the governor whether to approve or deny the siting of the proposed KVVWPP.

Section 3.6.1 of the Draft EIS acknowledges that the project area includes rural residential development. Information on recent rural residential subdivisions in the project area, including the Horse Canyon Estates project, has been included in revisions to Section 3.6.1 of the Final EIS.

5. As stated in Section 1.4.1 of the Draft Supplemental EIS, the Applicant has obtained wind option agreements with landowners for all private lands within the project site boundary necessary for project installation. Please refer to Individual Letter 10, Response 1 regarding financial compensation as mitigation for other local property owners in the project area.
6. EFSEC is responsible for evaluating the sufficiency of applications for energy facilities and does not control the proposed siting of such facilities. Also, please refer to Responses 1 through 5 of this letter.

**Responses to Comments in Draft Supplemental EIS Letter 14¹ from
Randy and Joanna Fischer**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Your preference for siting the project in the Wild Horse area is noted.

As noted in Section 2.5.2 of the Draft Supplemental EIS, wind farm development is unsuitable at the Yakima Training Center. The Yakima Training Center is a federal military reservation administered by the U.S. Department of Defense and is actively used for military training purposes—a use that is incompatible with operation of a wind farm.

2. Your comment is noted.
3. Thank you for your comment.

By establishing the Energy Facility Site Evaluation Council in 1970, the Washington State Legislature centralized the evaluation and oversight of large energy facilities in a single location within state government. The Legislature called for “balancing” the demand for new energy facilities with the broad interests of the public. As part of the balancing process, protection of environmental quality; enhancement of the public’s opportunity to enjoy the aesthetic and recreational benefits of air, water, and land resources; safety of energy facilities; and concern for energy availability are all to be taken into account by EFSEC (RCW 80.50.010). The Kittitas County appointee has equivalent standing to all other voting members of EFSEC on matters pertaining to the project. Please refer to Individual Letter 1, Response 9 regarding treatment of quality of life issues in a SEPA EIS.

¹ Due to a numbering error there is no Draft Supplemental EIS comment Letter No. 15.

**Responses to Comments in Draft Supplemental EIS Letter 16² from Ted A. Clausing,
Regional Habitat Program Manager, Washington Department of Fish and Wildlife**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Site-specific habitat information for the Swauk Valley and Springwood Ranch sites is not available. Because both the Desert Claim and Wild Horse projects resulted in complete environmental analysis documents, the discussion of these two projects as “alternatives” was deleted from the KVVPP EIS. The EIS documents for the Desert Claim and Wild Horse Projects have been incorporated by reference, and have been considered by EFSEC in other proceedings.

Similar to the proposed KVVPP, wind farm development at the two alternative project sites remaining under consideration would permanently disturb a small portion of shrub-steppe habitat relative to the overall size of the larger project sites. While they are diminishing, habitat types within these alternative sites, including shrub-steppe, are not regionally unique and would not result in a significant loss of habitat at a “landscape scale” relative to the amount of similar or higher quality habitat in other parts of Kittitas County and Eastern Washington. As such, development at these alternative sites would not substantially alter ecosystem connectivity for shrub-steppe habitat and associated wildlife species.

2. EFSEC carefully reviewed potential alternative sites for wind farm development throughout Kittitas County. The initial screening criteria used to select alternative sites in the Draft Supplemental EIS generally need to be met for consideration as a potential offsite location. While there are probably cultivated lands in Kittitas County that appear to have wind potential and are within 10 miles of transmission lines, they may not have the appropriate amount of available lands and/or compatible zoning classifications. This, in turn, could affect a proponent’s ability to feasibly attain or approximate their objective to construct and operate a viable wind facility.

² Due to a numbering error there is no Draft Supplemental EIS comment Letter No. 15.

**Responses to Comments in Draft Supplemental EIS Letter 17 from Salah Al-Tamimi, P.E.
Regional Planning Engineer, Washington State Department of Transportation**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Thank you for your comment.

Responses to Comments in Draft Supplemental EIS Letter 18 from Keith Johnson

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. The Draft EIS did not deny that impacts to avian species would occur. Based on up-to-date analysis methods employed by the Applicant, impacts on avian species associated with the Kittitas Valley Wind Farm are however not expected to be significant and adverse.

Please refer to Organization Letter 8, Response 4 regarding the analysis of cumulative impacts of multiple wind project in Kittitas County. The Final EIS has been updated to reflect the most up-to-date information about the impacts of the KVVWPP and the Desert Claim project based and revisions to these two projects.

2. The approach to quantifying habitat loss proposed by the commentor is not a method commonly accepted by WDFW or the US Fish and Wildlife Service, and has not been used for the analysis of potential impacts. While the wind turbines and other project facilities would occupy air space, the rotor-sweep area is not necessarily “lost” as birds and bats can occupy the space when the rotors are not turning and can navigate the space when rotors are turning without colliding into them. The actual footprint of the turbines is a small fraction of the entire project area. The primary impact to birds and bats is the increased risk of mortality from collisions with project components, as described in Section 3.2 of the Draft and Final EIS. In general, impacts to species or populations from habitat loss occur as a result of the loss of habitat that is available in limited quantity, such as nesting or feeding habitat for species with specialized needs.
3. The statement refers to the impacts of the Desert Claim Wind power project, and can not be directly applied to the KVVWPP as the location and viewsheds for the KVVWPP are different for those of the Desert Claim Project. Visual impacts of the KVVWPP were addressed in Section 3.9 of the Draft EIS, and have been updated in Section 3.9 of the Final EIS.
4. Section 3.2 of the Draft EIS assessed the potential impacts to most sensitive bird species, i.e. those that are threatened or endangered. No significant adverse impacts to federal or state listed species were identified.
5. Please refer to Individual Letter 11, Response 47, and Key Issue B in Section 2 of this volume regarding the topic of wind power projects and property values. Section 3.7.2 of the Final EIS has been updated with information about site specific and other studies that have been conducted to evaluate the relationship of visual impacts on property values.
6. Changes to the Wild Horse Project configuration are beyond the scope of analysis in the Final EIS for the KVVWPP project. Re-location of the transmission line on the Wild Horse Site would not be cumulatively noticeable with respect to the viewshed impacts of the KVVWPP.

**Responses to Comments in Draft Supplemental EIS Letter 19 from
Gloria Baldi and Janet Nelson, Kittitas Audubon Society**

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the comment letter.

1. Section 3.2.3 of the Final EIS has been updated to include discussion of the most recent studies coordinated through the Bats and Wind Energy Cooperative. Please refer to Organization Letter 8, Response 16 regarding bat deaths at the referenced West Virginia wind plant. Please also refer to Response 13 below.
2. Please refer to Organization Letter 8, Response 11 regarding nighttime wildlife surveys, and Response 19 regarding use of radar technology for studying bats.
3. Please refer to Tribal Letter 1, Response 4 regarding the adequacy of the baseline wildlife study. Please refer to Organization Letter 8, Response 11 regarding nighttime wildlife surveys. Please refer to State Agency Letter 3, Response 14 regarding the adequacy of the bat surveys.
4. Please refer to individual letter 38, Response 3, regarding the presence of bats in the Project Area. With the project layout revisions brought forward by the Applicant in late 2005/early 2006 (see the revised project description in Chapter 2 of the Final EIS), turbines closest to the forested Elk Springs area have been removed.
5. Section 3.2.2 of the Draft EIS acknowledged that the Project Area is generally located in the Pacific Flyway, and that narrower migration corridors with well-defined paths may exist. The Draft EIS also discussed the migratory routes used by raptors in and around the Project Area, and how direct raptor observations conducted during the baseline studies reflect migratory movements.
6. Please refer to Response 5 above. Through long term banding and monitoring studies such as those quoted in your comment, Hawk Watch International has begun to analyze trends in raptor numbers migrating through the region. Hawk Watch International is now working on methods that will allow more information to be collected about whether certain pathways are being used by birds consistently, and to understand the relationship between migration counts and population trends (Hawk Watch International 2006).
7. Please refer to Tribal Letter 1, Response 4 regarding the adequacy of the baseline wildlife study. The extensive baseline (preconstruction) wildlife and habitat studies conducted for the proposed Kittitas Valley Wind Power Project and the proposed mitigation, as described in the Application for Site Certification and Draft EIS, are based on the best available science and are consistent with Washington Department of Fish and Wildlife guidelines.

8. Please refer to Organization letter 8, Response 4 for a discussion of how cumulative impacts to birds from all wind farms considered in Kittitas County at this time has been included in the Draft EIS.
9. The Government Accounting Office (GAO) GAO-05-906 Report on Wind Power Impacts on Wildlife and Government Responsibilities for Regulating Development and Protecting Wildlife has been referenced in the Final EIS.
10. As described in Section 3.2 of the Draft and Final EIS, and as required by EFSEC through application of the requirements of the Washington State Department of Fish and Wildlife Wind Power Guidelines, the Applicant has conducted a thorough study of the potential impacts of the KVVPP on wildlife, and avian species in particular.
11. Please refer to Response 5 above regarding the consideration of migratory routes in the Draft and Final EIS.
12. Please refer to Response 6 above regarding current efforts being conducted to quantify bird populations. As described in Section 3.2 of the EIS, based on studies conducted in accordance with the Washington State Department of Fish and Wildlife Wind power Guidelines, adverse impacts to local bird and bat populations are not expected for the KVVPP.
13. As described in section 3.2 of the Draft EIS, the Applicant used most up-to-date data to estimate potential bird mortality resulting from operation of the KVVPP. Studies used to establish mortality factors focused on wind projects that have been constructed and operated within the western region, and in habitats similar to those at the KVVPP Project Area, including projects in Oregon and Wyoming.
14. Please refer to Organization letter 8, Response 4 for a discussion of how cumulative impacts to birds from all wind farms considered in Kittitas County at this time has been included in the Draft EIS.
15. Please refer to Draft Supplemental EIS letter 18, Response 3.