

BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2003-1:  
Sagebrush Power Partners, LLC;  
Kittitas Valley Wind Power Project

**APPLICANT'S SUPPLEMENTAL OPENING STATEMENT**

**INTRODUCTION**

The purpose of this document is to supplement and update the Opening Statement originally filed regarding this project in 2004. This document reflects the relevant changes in both the project layout and relevant environmental parameters that might be affected.

Sagebrush Power Partners, LLC (the Applicant) proposes to construct and operate a wind powered electrical generation facility in Kittitas County, Washington. As presently proposed the Kittitas Valley Wind Power Project would consist of up to 65 wind turbine generators.

The Applicant filed a request for preemption with EFSEC pursuant to WAC 463-28-04 on February 9, 2004 and, withdrew the first County application. The Applicant continued to work with the County to seek a determination of consistency with local land use plans and regulations. In the summer of 2005 the Applicant decided to significantly reduce the project size revise the configuration and to file a new application with the County, in hope of obtaining land use consistency. The Applicant approached both the County and EFSEC on this matter and it was agreed to suspend the EFSEC process pending the new application with the County. Both the County and EFSEC requested the Applicant to withdraw its request for preemption pending the outcome of the new County application. The Applicant withdrew its request for preemption on October 19, 2005.

The Applicant made a second attempt to achieve local land use consistency, and filed a Development Activities Application pursuant to KCC 17.61A with the County on September 30, 2005 and submitted a revised Development Activities Application on County-required application forms, dated October 14, 2005. The County deemed the application complete on October 17, 2005.

In an effort to make the Project more acceptable to the County, the Applicant significantly reduced the number of proposed to a maximum of 80 within defined turbine corridors, an approach that is standard in the industry and utilized in Kittitas County. This reduction in the number of proposed turbines represents a very real and substantial

economic cost to the Applicant, the project landowners, and to the local taxing districts. From the Applicant's perspective, the financial impact of the reduction in number of turbines is also significant, as there are many fixed costs in a project such as this which do not decline as the size of the project is reduced.

Once the decision was made to reduce the number of proposed turbines, the Applicant went back to the record and reviewed the comments received from the public and the County. The proposed layout was then reviewed in light of the visual impact analysis in the ASC and DEIS. The Applicant identified those areas where the visual impact analysis and/or public comments suggested a particular visual sensitivity. The Applicant then proposed the elimination of turbines in those areas. During the County hearing process, in response to input from the BOCC, and at the suggestion of County staff the Applicant proposed a further reduction to a maximum of 65 turbines, a further potential economic loss to both the Applicant and the landowners, in yet another demonstration of the Applicant's genuine interest in reaching an agreement with the County

### **PURPOSE OF THE PROJECT**

The purpose of the Kittitas Valley Wind Power Project is to construct and operate a new electrical generation resource using wind energy that will meet a portion of the projected growing regional demands for electricity produced from renewable resources. Recent national and regional forecasts predict that increasing consumption of electrical energy will continue into the foreseeable future. Demand for wind generated resources has continued to increase due to concerns regarding green house gas emissions and the price volatility of conventional fossil fuel generation, particularly natural gas. These trends have even more dramatically increased in the last year.

### **PROJECT DESCRIPTION**

As a result of the process described above, refinements were made to the Project configuration. Therefore the Applicant is requesting approval of the siting of up to 65 turbines within the turbine corridors, subject to the appropriate setbacks. The setback limits from adjacent non-participating residences have also been increased.

The changes to the project proposed by the Applicant were described in the EFSEC Addendum to the DEIS.

In the ASC the Applicant originally requested certification of a range of wind generation turbine sizes, within a specific turbine layout footprint. The three scenarios as described in the ASC and DEIS were used to capture the full range of potential impacts to the environment and areas set out below:

- Lower End Scenario: The lower end scenario represents the project configuration with the lowest number of turbines erected. For turbines with a nameplate capacity of 3 MW each, up to 82 turbines would be used for a total nameplate capacity of 246 MW.

- Middle Scenario: For turbines with a nameplate capacity of 1.5 MW each, 121 turbines would be used for a total nameplate capacity of 181.5 MW.
- Upper End Scenario: The upper end scenario represents the project configuration with the highest number of turbines erected. For turbines with a nameplate capacity of 1.3 MW each, up to 150 turbines would be used for a total nameplate capacity of 195 MW.

The scenarios were modified to a certain extent when we reapplied to the County in October of 2005. The Middle to Lower End Scenario was designated as that most probable to be constructed. It is unlikely that the Upper End Scenario (1.3 MW turbines) would be constructed. The Applicant further committed to limit the project to not exceed 80 turbines. The Applicant contemplated a project between 65 and 80 turbines, depending on the size of the turbines we might ultimately utilize.

The Applicant also moved or removed portions of the strings from the turbine corridors originally proposed. The revised KVVWPP layout we proposed to the County in October 2005 is attached as Attachment 1. A comparison of these changes to the layout originally proposed in the ASC was set out in Figure 2-1 of the EFSEC Addendum to the DEIS and in the supplemental testimony of Chris Taylor.

Further modifications to this layout were made during the County hearing process as a result of the reduction of turbine numbers to a maximum of 65 at the request of County staff and the Applicant's offer to the County to increase the setback from existing residences from 1,000 feet to 1,320 feet. The site layout resulting from these proposals is the present layout showing a most likely scenario. It is attached to this as Attachment 2 and incorporated by reference herein. The differences between this layout and what was submitted to the County and contained in Attachment 1 and the EFSEC ADEIS are minor adjustments in turbine locations resulting from the Applicant's proposal to increase the setback from non-participating residences from 1,000 to 1320 feet.

Up to 65 turbines would be arranged in numerous "strings" shown in Attachment 2 labeled A through J throughout the project site, for a maximum of approximately 23 total miles of turbine strings. (Addendum Figure 2-1). The length of the 9 turbine strings would remain constant under the three project scenarios; only the density of turbines sited within each string would change. The height of the turbines (referred to as the "tip height") would range from about 260 feet to 410 feet from the ground to the blade tip in its highest position, depending on the turbine size selected (see Addendum Figure 2-2). In any scenario chosen by the Applicant only a single size of turbines would be used; different sizes of turbines would not be mixed. As noted elsewhere throughout the record in this case, the Applicant requires substantial flexibility in final wind turbine selection for a variety of reasons, including:

- Wind turbine design and technology are evolving very rapidly and advances are being made every year. Requiring an applicant to specify a particular turbine model, years in advance would be as impractical and unreasonable as requiring the selection of a particular model of personal computer years in advance.

- The unusually long timeline for gaining final approval for this Project. The Applicant began developing this site in 2001. Wind turbines now under consideration for this project were not even available for sale in the US at that time.
- The Applicant, like most major wind development firms in the US, is still negotiating potential turbine supply agreements for the period beyond 2007. The final type and numbers of turbines available to the Applicant after 2007 are not yet known.

Wind turbines would be installed along roadways as shown in Attachment 1. The present layout design is based on wind turbines with a rotor diameter of approximately 295 feet. Because of possible variances that may be discovered during the final site survey, some flexibility in determining the exact facility locations is required. Generally, it will not be necessary to relocate roads significantly from their proposed locations; however, the exact location of the turbines along the planned roadways is shown conceptually in the plan depicted in Attachment 1, and will be micro-sited based on a number of factors including:

- The results of geotechnical analysis.
- The final onsite field survey with the meteorologists may dictate that turbines be spaced slightly closer together in some areas and farther apart in other areas.
- Turbine spacing may be adjusted based on the final rotor diameter selected to maximize wind energy production.
- The final field measurement test surveys of microwave communication paths may require that some turbine locations be adjusted slightly to avoid line-of-sight interference.

This was the same process used for the Wild Horse Wind Power Project. Horizon submitted a most likely layout showing the corridors proposed for consideration, indicating approximate turbine locations. Kittitas County never objected to this method during the Wild Horse process. This approach is consistent with industry standards, regional permitting practices and it allows an appropriate level of latitude, both for analysis of environmental impact information, as well as enabling appropriate “micro-siting” to account for unanticipated conditions during the construction process, and to provide the optimum wind resource. In the final layout, turbines will not be located closer to any nonparticipating landowner residence or property lines than the minimum set back distances.

The following table summarizes the present parameters being requested for the layout of the Kittitas Valley Wind Power Project:

Description	
Maximum Number of Turbines	65

Non-Participating Structure Setback	1,320'
Non-Participating Property Line Setback	541'
Participating Residential Setback	Minimum blade tip height
Participating Property Line Setback	None
Transmission Line Setback	Minimum blade tip height
Public Roads	Minimum blade tip height

## **IMPACTS OF THE PROJECT**

The EFSEC DEIS Addendum found no significant changes in the impact regarding the reconfigured layout of the project. If there are changes any impacts previously analyzed would be minimized as a result in the reduction of project size. As a result the impact areas previously described in the original Opening Statement will not be repeated. For the purposes of this Supplemental Opening Statement subject areas that received additional studies specific to the new layout will be addressed.

### **Visual and Aesthetic**

The Applicant engaged Dr. Tom Priestley to carry out an additional visual and aesthetic impact analysis of the reconfigured project using the same method of analysis and techniques described in the original Opening Statement. The analysis of the revised project layout included most of the viewpoints evaluated in the original project DEIS. The analysis concluded that the project's reconfigured layout reduced the impacts at many of these view points from "substantial" to "moderate". When given an opportunity to provide comments to the DEIS Addendum, Kittitas County's "SEPA official" did not provide written or verbal comments taking issue with EFSEC methodology of analysis or determination. (See transcript of the EFSEC February 2, 2006 Supplemental DEIS Public Meeting, at pages 4 and 5.)

In early June 2006, Kittitas County made its final decision regarding County approval of the Kittitas Valley Wind Power Project. Generally the County has concurred with the analysis and conclusions that the project will not have significant adverse visual impacts. However the one area in which the County disagreed related to aesthetic impacts in the area of nonparticipating residences within 2,500 feet of turbines. This issue was only raised at the end of the County's land use consistency process, never during the environmental review process.

The County's analysis as shown in the County record was not based on the use of accepted visual assessment protocols that are commonly used by state and federal agencies as addressed in the supplemental testimony of Tom Priestley. The County misconstrues the treatment of the issue of visual sensitivity as it was presented by Tom Priestley in the original visual assessment in the ASC, and as it was repeated in the DEIS and Addendum thereto. As a part of the process of assessing the aesthetic impacts of

potential change to the landscape, the standard professional approach is to document the existing visual character and quality of the landscape and its sensitivity to potential visual change. Sensitivity to visual change is usually evaluated in terms of the numbers and types of viewers in the area. Residential and certain kinds of recreational viewers are usually assumed to be the most potentially sensitive to visual alterations of the landscape. In the case of this project, a high degree of sensitivity was assigned to residences located within the foreground zone (up to ½ mile) of the proposed turbines. It is important to note that visual sensitivity is not the same as visual impact, but instead is only one of the considerations that go into the final determination of impact. In determining potential impacts of proposed projects, account is taken of a range of factors, including the degree of visibility of the new feature, the degree and nature of the visual change created, the effects on the visual character and quality of the view, and the sensitivity of the viewers. As this explanation suggests, it is incorrect to assume that the level of viewer sensitivity translates directly to the level of visual impact.

Because of its confusion between level of viewer sensitivity and level of visual impact, the County moved very quickly to the conclusion that all turbines must be set back 2,500 feet from residences. As a consequence, the County's record related to project aesthetic impacts focused almost exclusively on the 2,500 foot setback issue to the detriment of a wider and better informed consideration of the factors determining the degree of impact. The County mischaracterized aesthetic analyses in the EIS process. The County took the findings that those analyses described as "moderate to high" and has misrepresented those findings as findings of "high" impacts. From there, the County asserts that a "high impact is a significant adverse environmental impact." This assertion was made without detailed analysis or any reference to the criteria used to establish the significance of impacts under SEPA. That assertion is not based on the analysis of the EFSEC DEIS and the Addendum thereto. Building on this questionable chain of assertions, the County argues that because the places where "significant" impacts were found were places in close proximity to turbines, the only solution is to increase viewer distance from turbines through the use of 2,500 foot setbacks from all non-participating residences.

The Applicant believed its prior analysis and that of the DEIS and Addendum thereto, about which the County made no comment, were adequate. This was primarily because of the rural nature of the area and the small numbers of residences in proximity to the project, especially in light of the terrain, which restricts the views of the proposed turbines from many locations. However in response to the County's 2,500 foot setback from non-participating residences raised at the end of their process and used to deny the project, the Applicant made a thorough investigation of the residences located within 2,500 feet of proposed turbines. This investigation included a close review of maps created using a geographic information system (GIS), and both on-the-ground and helicopter-based field reconnaissance. The results of this investigation are contained in the supplemental testimony of Dr. Tom Priestley. This study assumed a worst case scenario for the turbines with a tip height of 410 feet.

By insisting that all turbines be set back 2,500 feet from houses to mitigate for a perceived "looming" visual impact, the County would place unnecessary restrictions on

turbines sited in areas where they would have relatively little impact on residential views. The effect on the views to houses with turbines within 2,500 feet is not as stated by the County. Instead of the 27 houses assumed to be affected there are actually only eleven that would have other than an insignificant view at the most, due topography and screening. Of these eleven houses, the primary viewshed of all but one is not towards the turbines within 2,500 feet. Further, the view of the turbines ceases to dominate (“loom”) at about 1,640 feet. The degree to which visual impacts are adverse significantly depend on the viewer’s location and sensitivity and the impact on view quality. Because of the fact that the primary viewsheds of houses that can actually see the turbines within 2,500 feet are overwhelmingly away from or not directly towards the turbines and because most of the turbines are located in “Zone 3”, as described in Dr. Priestley’s supplemental testimony, the visual impacts are less than significant. For projects like the Kittitas Valley Wind Power Project, whose siting and design have shaped its overall visual impacts, any visual impact that might be identified as affecting small numbers of viewers must be evaluated in the context of the fact, that on the whole, the projects visual impacts are relatively low.

The Applicant’s analysis and the DEIS and Addendum thereto concluded that the visual impact of the project would not constitute significant impacts because of the low to moderate levels of sensitivity of the affected views. Moreover as the SEPA lead agency it is appropriate and necessary for EFSEC to balance the moderate impact to a handful of residences against the overwhelming public benefit of the Kittitas Valley Wind Power Project.

### **Shadow Flicker**

Due to the significant reductions in the number of wind turbines as well as the increase in setbacks from neighboring residences, the potential for shadow flicker impacts to neighbors has been dramatically reduced. A detailed report prepared by Arne Nielsen of Wind Engineers was prepared to analyze shadow flicker and was submitted to EFSEC and the County in October 2005. This analysis was a worst case analysis of all structures in the area. Because of the extreme assumptions the actual impact will be considerably less. Further as shown in the testimony of Dr. Tom Priestley many of the houses within 2,500 feet of a turbine are significantly screened from its view and many of the houses that are not screened are oriented away from the turbine. Therefore any actual affect will be much less than as modeled. Based on this detailed analysis, the Applicant does not expect the nonparticipating residences to be significantly adversely impacted by shadow flicker. However in the unlikely event that the modeling results are shown later to be inaccurate, and some residences are significantly adversely impacted by shadow flicker, the Applicant has stated that it is willing and able to mitigate by programming the turbines to shutdown during those specific times that significant shadow flicker occurs.

### **Noise**

The Applicant reanalyzed noise in relation to the reconfigured layout. The study showed that the maximum predicted project noise level at any of the receptors was within the limits of

the Washington Department of Ecology pursuant to Washington Administrative Code (WAC) 173-60-040.

### Socioeconomics

Steve Grover has carried out a new economic analysis based on present data and assumptions and the experience gained from the construction of the Wild Horse Wind Power Project. His new estimates are shown in the following tables. These tables are taken from Exhibit 80 (SG-4) attached to the supplemental testimony of Steve Grover, show the economic impacts for the construction period.

#### Construction Phase Economic Impacts for Kittitas County

Impact Type	Output	Wages	Business Income	Personal Income	Other Income	Jobs
Direct	\$5,814,500	\$2,712,500	\$0	\$2,712,500	\$0	52.0
Indirect	2,752,800	906,500	154,800	1,061,300	366,100	49.9
Induced	1,582,800	492,100	118,800	610,900	220,900	24.1
<b>Total</b>	<b>\$10,150,100</b>	<b>\$4,111,100</b>	<b>\$273,600</b>	<b>\$4,384,700</b>	<b>\$587,000</b>	<b>126.0</b>

As shown above, the construction phase of the project is expected to result in an increase in the economic output of the county of \$10,150,100 during the construction phase. During this time approximately 52 local full and part time jobs are expected to be created. This is an addition to the approximately 103 non-local workers that are expected to be hired during the construction phase. Spending from this project on local labor and materials is expected to result in an additional 74 jobs for a total of approximately 126 full and part time jobs during the construction period. Wages during this period will be expected to be approximately \$4,111,100 due to the hiring of local construction workers and the increases in services needed to support the construction work. Similarly, business incomes will be expected to increase by \$273,600 due to spending on local materials and other items such as food and lodging for non-local labor hired for the project. Taken together, personal income is estimated to increase by \$4,384,700 in Kittitas County due to spending during the construction phase. When the income of \$587,000 expected from other sources is considered, the increase in income to the county totals \$4,971,700 during the construction phase.

Spending will continue in the local economy during the operation of the wind turbines once the construction phase has ended. During the operations phase, spending will consist of primarily:

- 10 employees hired to operate and manage the wind power plant
- Spending on equipment, maintenance and materials to operate the wind turbines
- Income to property owners that rent land for the wind turbines (an estimated \$10,371 annually per turbine for the first year.)

The impact to the local economy due to the wind plant operations was modeled based on these factors. As during the construction phase, there is a direct effect from these factors

as well as an indirect effect that results from the spending due to the increases in income from the new jobs and from the rental income. These expected impacts are summarized in the following table taken from Exhibit 80 (SG-4) attached to the supplemental testimony of Steve Grover.

**Wind Plant Operations Annual Economic Impacts for Kittitas County**

<b>Impact Type</b>	<b>Output</b>	<b>Wages</b>	<b>Business Income</b>	<b>Total Personal Income</b>	<b>Other Income</b>	<b>Jobs</b>
Direct	\$3,491,800	\$939,500	\$0	\$939,500	\$508,200	10.0
Indirect	22,000	6,700	1,800	8,500	3,300	0.2
Induced	526,300	162,900	39,500	202,400	74,000	7.9
<b>Total</b>	<b>\$4,040,100</b>	<b>\$1,109,100</b>	<b>\$41,300</b>	<b>\$1,150,400</b>	<b>\$585,500</b>	<b>18.1</b>

The above shows the expected effect on incomes due to continued operations of the wind turbines. The operations will require approximately 10 full and part time jobs, and the spending on these jobs and plant equipment will create approximately 8 additional jobs in businesses that support the wind plants. The combined effect of direct and indirect spending will result in approximately 18 additional new and part time jobs in Kittitas County. The combined effect on the economic output for Kittitas County is expected to be \$4,040,100 annually. Similarly, spending on these jobs is expected to increase annual wages by \$1,109,100 and yearly business income by \$41,300. Income from other sources is estimated at \$585,500 annually and will consist primarily of rental fees paid to land owners where the wind turbines are situated. Taken together, the wind turbines operations are expected to increase income to the county by \$1,735,900 annually.

The overall increase in economic activity from the wind power plant will increase tax revenues for Kittitas County.

Based on the evaluation of the proposed wind power facility and a review of the levy rates in the 2005-2006 Kittitas County Assessor’s Report, it has been estimated that new property tax revenues will equal approximately \$1,508,325 in the first year of operation (this amount will gradually decrease as the turbines depreciate over time). For this calculation the complete wind farm project was valued at \$190,000,000. For comparison, property tax revenues from all sources in Kittitas County totaled \$33,198,898 for the 2005-2006 budget year. The expected increase in property tax revenues due to the wind farm amounts to an increase of 5 percent over these levels.

The following table taken from Exhibit 80 (SG-4) attached to the supplemental testimony of Steve Grover, shows how the new tax revenues would be allocated based on the taxing districts where the turbines would be located.

### Allocation of Property Tax Revenues

Spending Category	Amount
State schools	\$560,823
Local schools	\$333,880
County roads	\$269,211
County services	\$226,607
Hospitals	\$73,694
Fire districts	\$44,109
<b>Total</b>	<b>\$1,508,325</b>

In addition, 16 turbines are expected to be built on land managed by the Washington Department of Natural Resources (DNR) rather than on private land. For these turbines, a rental fee for land will be paid to the State, which then returns these funds to schools throughout the state based on district need. For the first 10 years of the project, the annual rental rate is estimated to be \$9,429 per turbine, amounting to an additional \$150,864 annually for the DNR. These payments then increase and eventually reach an estimated \$20,744 per turbine after 25 years, resulting in \$331,904 in revenue to the DNR.

### ALTERNATIVES

As stated in the Applicant's prior opening statement EFSEC conducted an independent analysis of alternative sites in conjunction with the DEIS prepared for the Wild Horse Wind Power Project (EFSEC, 2004). The County adopted the same analysis in its EIS regarding the Desert Claim Wind Power Project. The content of those studies and SDEIS are still current and accurate.

It would appear that the County through Mr. Piercy's testimony is alleging that there are alternative sites to this project. The County appears to allege that the Desert Claim Project (previously denied by Kittitas County), a potential small project utilizing the infrastructure of the Wild Horse Wind Power Project (essentially an expansion of Wild Horse) and some general discussion with the County of a potential project by a company called Invenergy are alternatives to the Kittitas Valley Wind Power Project.

The zoning ordinance for Kittitas County, KCC Chapter 17.61A does not allow wind farms as a permitted use anywhere in the County. The County chose, after considerable debate on the issue, to not go through a zoning process that would designate areas in which a wind farm would be permitted. The BOCC instead adopted a project-specific siting/permit process to consider proposed wind power projects on a case-by-case. This wind farm siting process is more complex and contains more regulatory hurdles than are required for siting a fossil-fuel fired power plant, pipelines, or any other type of energy-related facility in the County, without policy rationale for treating renewable energy more strictly than conventional greenhouse gas-producing energy facilities. The Applicant pointed this out to the County in comments submitted to the BOCC in

December 2002. As discussed in Roger Wagoner's supplemental testimony and as applied to the Kittitas Valley Wind Power Project, the County process was deeply flawed.

Pursuant to the ordinance, a wind farm may be authorized by the BOCC Wind Farm Resource Development Permit only in conjunction with approval of a legislative comprehensive plan amendment and rezone, approved in tandem with a quasi-judicial development agreement. In effect, under the County's ordinance, there are no alternative areas of the County that are "zoned" for wind energy facilities. There is no site or area in the County that an Applicant can identify that allows a wind farm as a permitted use. In other words, without going through the entire County siting/permit process for each individual proposed site, there is no zoning district or area where a wind farm can be sited. In essence, an Applicant is unable to find any place in the County in which a wind farm is permitted without submitting multiple applications through the County siting/permit process – a process that vests the BOCC with unfettered discretion, with no meaningful criteria for an applicant to utilize in judging specific sites or the economic viability of a project undergoing review through the County's process.

Further, an analysis of alternative sites in the County for the Kittitas Valley Wind Power Project was included in the in Chapter 2.7 of EFSEC DEIS, the EFSEC Supplemental DEIS, Chapter 2.4.1 of the Kittitas County DEIS for the enXco Desert Claim Wind Power Project and Chapter 3.16 of the Wild Horse Wind Power Project DEIS.

The analysis in the EFSEC DEIS was the same used by Kittitas County for its DEIS for the enXco Desert Claim wind farm site and the Wild Horse DEIS. The County denied the enXco Desert Claim project, while approving the Wild Horse project. These DEIS's established criteria for the analysis of alternatives, and then reviewed potential sites in Kittitas County. The criteria are as follows: 1) sufficient wind resource (the most important); 2) proximate/adequate transmission facilities; 3) large land area; 4) absence of significant environmental constraints; and 5) property owner interest/property availability/control of property. The DEIS's concluded that although other sites for wind power generation may exist in Kittitas County, none would satisfy the test for availability or practicability for the KVVPP proposal.

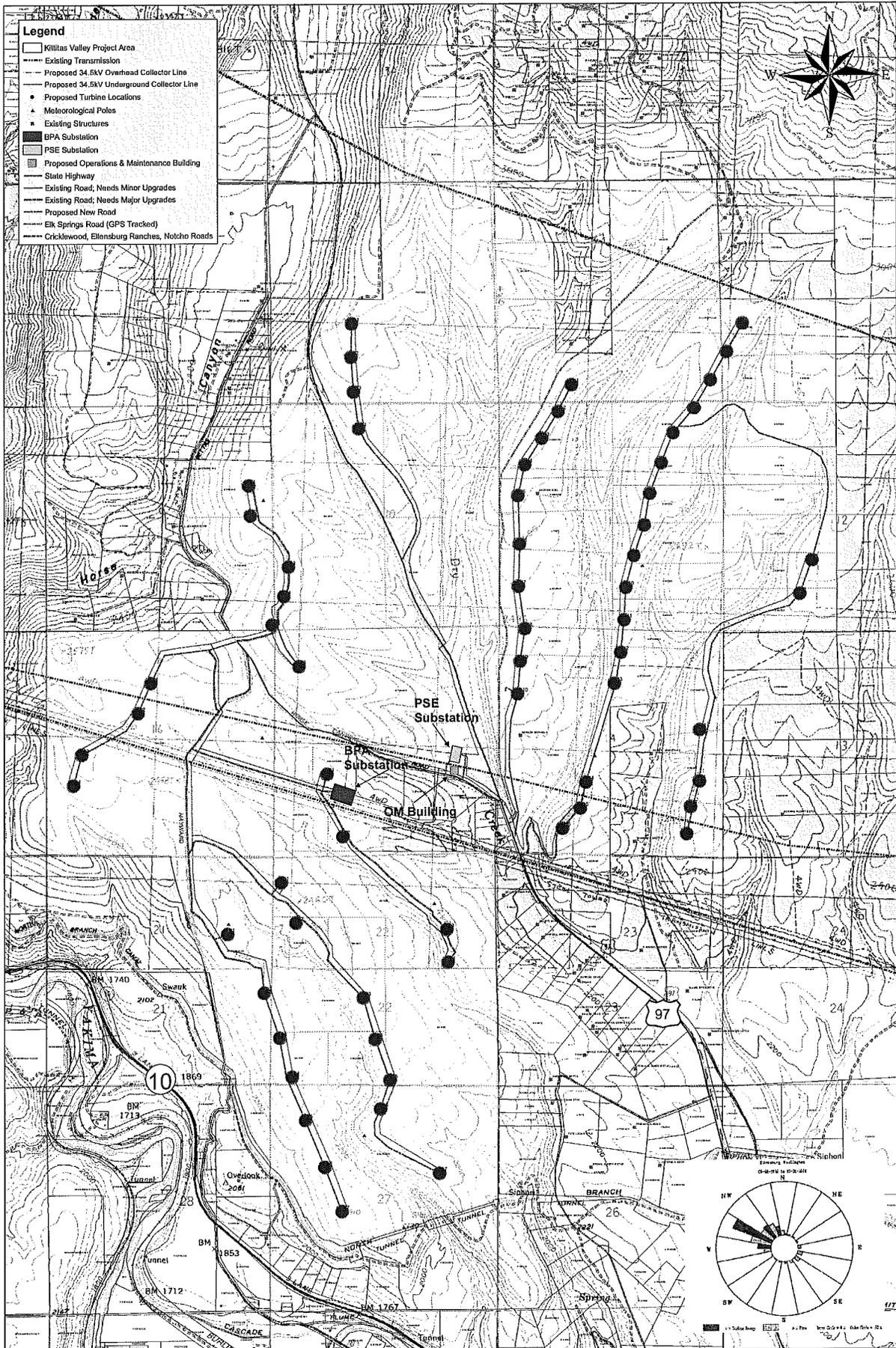
In addition, the supplemental testimony of Chris Taylor specifically addressed these three alleged alternative sites. The preliminary assessment of the property adjacent to Wild Horse is that it could accommodate perhaps 20 wind turbines. This site is in no way comparable or an alternative to the Kittitas Valley site in terms of the magnitude of wind energy potential. Further, without the presence of existing infrastructure (roads, step-up substation, feeder lines, etc.) at the adjacent Wild Horse project site, a project of this size would not be economically viable under current market conditions. Such a project would require the support and participation with PSE, and would be best characterized as an expansion of Wild Horse, not a new project. There has been no application made for the alleged Invenergy alternative which may lack adequate transmission access. Regarding the alleged Desert Claim alternative, it has already been analyzed in the EFSEC SEPA process which concluded

it was not an alternative to this project. Desert Claim has been denied by the County and it is our understanding that its sponsors intend to file with EFSEC sometime this fall.

Further the purpose and need of the Kittitas Wind Power Project is to construct and operate a new electrical generation resource using wind energy that will meet a portion of the projected growing regional demands for electricity. Therefore one project may not just be substituted for another.

### **CONCLUSION**

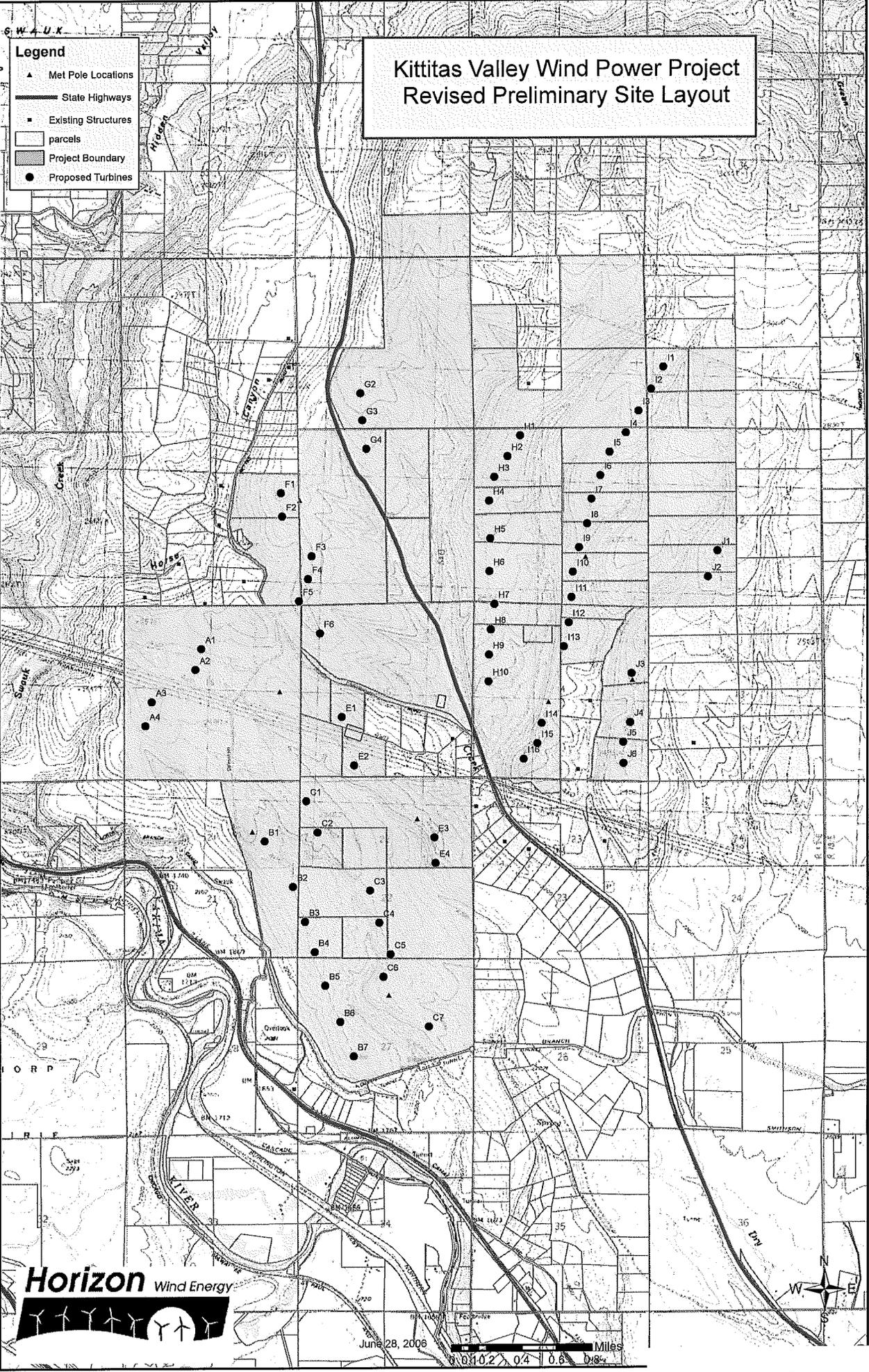
As shown by the Applicant and confirmed by EFSEC's DEIS and Addendum thereto and Supplemental DEIS, this project as originally designed and as reconfigured, will provide much needed renewable electricity for the growing regional demand without creating significant unavoidable adverse impacts on the environment. The Applicant has demonstrated that the project meets all criteria for approval set forth in RCW 80.50, and will help provide abundant renewable energy at reasonable cost, serving the broad interest of the public.



Kittitas Valley Wind Power Project  
 Preliminary Site Layout  
 Map Revised December 28, 2005



NOT FOR CONSTRUCTION



6: W A U K

- Legend**
- ▲ Met Pole Locations
  - State Highways
  - Existing Structures
  - ▭ parcels
  - Project Boundary
  - Proposed Turbines

**Kittitas Valley Wind Power Project  
Revised Preliminary Site Layout**



June 28, 2006

0 0.1 0.2 0.4 0.6 0.8 Miles