Kittitas Valley Wind PP
DEIS Comment – Tribal 1

Confederated Tribes and Bands
of the Yakama Nation
Post Office Box 151, Fort Road, Toppenish, WA 98948 (509) 865-5121

Established by the
Treaty of June 9, 1855

January 5, 2004

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ENERGY FACILITY SITE
EVALUATION COUNCIL

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

Subject: Kittitas Valley Wind Power Project Draft EIS

Mr. Fiksdal,

The Yakama Nation has received the Kittitas Valley Wind Power Project Draft EIS. This project is within the ceded lands of the Yakama Nation and has a high potential to contain cultural resources significant to the Yakama Nation. The Yakama Nation is a sovereign nation and has reserved rights to this land by the Treaty of 1855 with the United States government.

The Yakama Nation has an interest in the identification and preservation of cultural resources in the ceded and traditional use lands across Washington State. Archaeological resources are only one type of cultural resource and we would like all resources of cultural value preserved and protected for future generations.

On page 3.2-4 of the draft EIS it is stated that "Lithosols are of a concern at the project site because they are a specialized subdominant habitat with unique characteristics and are both sensitive to disturbance and difficult to replace. The projects site's lithosol areas are typically in good condition". Found in this lithosol environments are a number of important medicinal and subsistence plants important to the Yakama Nation. These important cultural resources will be lost if this project is implemented. In the planned turbine strings (A-J) native species have a dominate role in strings A-D and F-G. String E contains patches of non-native species but the overall habitat is in fair to good condition. Construction impacts of the project would destroy this unique and fragile environment along with the native plant resources.

The riparian areas have already been impacted and likely destroyed by the economic exploitations of overgrazing. On page 3.2-4 it is stated that these riparian areas have been "typically degraded" and common native species of chokecherry (*Prunus virginiana*) and yellow monkeyflower (*Mimulus guttatus*). Both of these plant species have medicinal and subsistence uses (Reference Eugene Hunn. *Nch'I Wana "The Big River" Mid Columbia Indians and Their Land.*). 1

The sensitive lithosol environment likely contains native plants important to the Yakama Nation. The degraded riparian areas have the at one time contained plants important to the Yakama Nation and have the potential to contain these plants again. The area has demonstrated that it was used by our Native Ancestors by the two archaeological properties identified in the project area. Taking into account all of these factors we oppose this project and do not want to see any construction or further development of this area.

One final point of concern is the qualification of visual impact. It appears that no quantitative system is in place to evaluate visual impacts. The system seems haphazard at best. 2

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On page 3.9-21 it is stated that from the view from the I-90 National Scenic Byway "the visual quality of the views toward the project site is high, reflecting the high vividness attributable to the presence of the peaks of the Stuart Range in the far background of the view, and the view's relatively high levels of unity and intactness". Although these views were warranted to designate this route as a National Scenic Byway in 1998 it seems that the severe impact that the turbines will have is repeatedly lessened because "the views toward the project area from I-90 are at a right angle and not in the primary view of the driver" (3.9-21). It is absurd to think that drivers do not turn their head to see the views of a National Scenic Byway and this statement makes no considerations to passengers who are enjoying views from the vehicle. This oversight is again highlighted in 3.9-19 in which an area of high visual quality only has a moderate visual impact by the placement of turbines. This process of undervaluing visual impacts is repeated in Figure 3.9-14, 3.9-15, 3.9-21, 3.9-22, 3.9-24, 3.9-25, 3.9-26, 3.9-27. Figures 3.9.23 is interesting because it contains a high degree of visual quality but low visual sensitivity. Natural aesthetic quality is sensitive to the impacts of non-natural intrusions (such a wind turbines) and placement of these intrusions should be valued as a high visual impact. I am sure that the local residences and tourists of this area would agree. 3

Finally, we feel that the data gathered for the avian portion of the report is insufficient. A number of survey strategies were designed to identify local birds and nesting grounds no plans are in place to deal with migratory birds, such as the Canadian Goose (*branta canadensis*). It is known, traditionally, the route through the project area is a migration route for the Canadian Goose. 4 5

Thank you for your time and interest with the Yakama Nation concerns. Please contact myself at 509-865-5121 ext. 4737 if you have any questions.

Respectfully,

Johnson Meninick, Program Manager
Cultural Resources Program

Cc: Allysion Brooks P.H.D., State Historic Preservation Office
LaRena Sohapppy, Chairperson, Cultural Committee