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Q Would you please identify what has been marked for identification as Exhibit 21-1(CT-1)?

A Exhibit 21-1(CT-1) is a résumé of my educational background and employment experience.

Q Are you sponsoring any portions of the “Application for Site Certification” for the Wild Horse Wind Power Project?

A Yes. I am sponsoring the following sections for which I was primarily responsible for the analysis and development:

- Section 1.5 Mitigation Measures, concerning the commitments made by the Applicant. Technical consultants are sponsoring the mitigation measures that relate to technical issues within their area(s) of expertise
- Section 1.6.5 Cumulative Impacts, Energy and Natural Resources
- Section 1.6.7 Cumulative Impacts, Socioeconomics
- Section 1.7 Public Involvement/Consultation/Coordination
- Section 1.8 Issues to Be Resolved
- Section 2.4 Benefits or Disadvantages of Reserving Project Approval for a Later, Date Proposed Project and Alternatives
- Section 2.5 Regulations and Permits
- Section 2.6 Coordination and Consultation With Agencies, Indian Tribes, the Public and Non-Government Organizations
- Section 3.8 Energy and Natural Resources

1 Section 3.12 Population, Housing and Economics
2 Section 3.17.9 Cumulative Impacts, Energy and Natural resources
3 Section 3.17.11 Cumulative Impacts, Socio-Economics
4 Section 3.17.12 Cumulative Impacts, Employment Income and County Revenues
5 Section 3.18 Relationship Between Short Term Uses of the Environment and the
6 Maintenances of Long Productivity
7 Section 3.19 Irreversible Or Irretrievable Commitments of Resources
8 Section 4.2 Required EFSEC Information, Sources of Information
9 Section 4.8 Required EFSEC Information, Initial Site Restoration Plan
10 Section 4.9 Required EFSEC Information, Study Schedules
11 Section 4.10 Required EFSEC Information, List of Preparers

12
13 Q What exhibits that are part of the Application that you are sponsoring?

14
15 A I am sponsoring the following Exhibit to the Application:

16
17 Exhibit 25 Tribal Correspondence
18

19 Q Are you familiar with these sections of the Application and exhibit?

20
21 A Yes.
22

23 Q Did you prepare these sections and exhibit, or, if not, did you direct and/or supervise its
24 preparation?

25 EXHIBIT 21 (CT-T) - 3
CHRIS TAYLOR
PREFILED TESTIMONY

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A Yes.

Q Is the information in these sections and exhibit within your area of authority?

A Yes

Q Are the contents of these sections and exhibit of the Application either based upon your own knowledge, or upon evidence, such as studies and reports as a reasonably prudent persons in your field are accustomed to rely in the conduct of their affairs?

A Yes.

Q To the best of your knowledge, are the contents of these sections and exhibit of the Application true?

A Yes.

Q Do you incorporate the facts and content of these sections and exhibit as part of your testimony?

A Yes.

1 Q Are you able to answer questions under cross examination regarding these sections and
2 exhibit?

3
4 A Yes

5
6 Q Do you sponsor the admission into evidence of these sections and exhibit of the
7 Application?

8
9 A Yes

10
11 Q Are there any modifications or corrections to be made to those portions of the Application
12 that you are sponsoring?

13
14 A Yes. The overall cost to construct the Project is expected to increase prior to construction, as
15 discussed in greater detail later in my testimony.

16
17 Q. Would you please summarize and briefly describe the information related to “Energy and
18 Natural Resources”.

19
20 A. Section 3.8 summarizes the energy and other natural resources, which will be consumed
21 during construction and operation. Section 3.5 includes information regarding diesel and
22 gasoline use, steel utilized for project components, aggregate, concrete, and water used
23 for road compaction, dust control, and other construction-related purposes. Fuel for
24 construction equipment and vehicles will be purchased from existing licensed fuel

1 distributors or gas stations. Water will be obtained from a local source with a valid water
2 right, potentially a municipal water utility. Concrete will be produced by a temporary
3 batch plant to be installed on the Project site. Electricity for construction will be
4 generated using portable generators.

5
6 During operation of the facilities, the types of energy and natural resources anticipated
7 will be fuel for operation and maintenance vehicles, lubricating oils, a minor amount of
8 electricity for Project operations, and minimal water for domestic use at the operation and
9 maintenance facility.

10
11 Q. Would you please summarize and briefly describe information related to “Initial Site
12 Restoration Plan”.

13
14 A. Section 4.8 documents the Applicant’s plans for site restoration. As provided in Section
15 4.8, the design life of all major equipment such as turbines, transformers, substation and
16 supporting plant infrastructure is anticipated to be at least 20 years. However, it is
17 expected that the proposed turbine technology will continue to perform well into the third
18 decade of operation. However, the trend in the wind industry is to replace or “repower”
19 older wind energy projects by upgrading older equipment with more efficient turbines. It
20 is likely that the Project would be upgraded with more efficient equipment and, therefore,
21 will endure beyond the design life of 20 years.

22
23 Prior to commencement of construction, the Applicant will submit and obtain approval
24 from EFSEC of a detailed “Initial Site Restoration Plan”. As described in Section 4.8,

1 industry experience shows that the scrap value of materials and equipment contained in
2 the Project infrastructure (steel towers, electric generators, copper cables, etc.) may
3 exceed the cost of dismantling the Project, based on historic scrap prices. The Applicant
4 will provide financial assurance mechanisms acceptable to EFSEC to cover all
5 anticipated costs associated with decommissioning. Final financial responsibility for
6 decommissioning will rest with the Applicant. Section 4.8 contains additional
7 information regarding site restoration plans and the Applicant's agreements with Project
8 landowners, which include additional provisions that require the Applicant to pay for
9 prompt decommissioning of all Project infrastructure in the event the Project is no longer
10 operational.

11
12 Applicant shall provide to the County and to EFSEC, as required under WAC 463-42-
13 655, a Project decommissioning and site restoration plan prepared in sufficient detail to
14 identify, evaluate, and resolve all major environmental, and public health and safety
15 issues presently anticipated. It shall describe the process used to evaluate the options and
16 select the measures that will be taken to restore or preserve the site or otherwise protect
17 all segments of the public against risks or danger resulting from the site. The plan shall
18 include a discussion of economic factors regarding the costs and benefits of various
19 restoration options versus the relative public risk and shall address provisions for funding
20 or bonding arrangements to meet the site restoration or management costs. The plan shall
21 be prepared in detail commensurate with the time until site restoration is to begin. The
22 scope of proposed monitoring shall be addressed in the plan.

1 Q Would you please summarize and briefly describe your evaluation of socioeconomic
2 impacts resulting from construction and operation of the project.

3
4 A No impacts are expected to population, housing, property values, community cohesion, or
5 environmental justice. There appears to be an adequate supply of temporary housing
6 available to accommodate non-local workers.

7
8 Based on a set of reasonable assumptions outlined in Section 3.12 of the Application, the
9 construction phase of the Project is projected to result in approximately \$4.8 million in
10 total income and 71 jobs in Kittitas County. Based on a series of reasonable and
11 conservative assumptions outlined in Section 3.12 of the Application, the operations
12 phase of the Project is projected to result in an estimated \$1.4 million per year in added
13 income and 26-30 additional jobs in Kittitas County.

14
15 Washington DNR would receive an annual lease income of approximately \$200,000,
16 which contributes to statewide school funding.

17
18 Based on the findings of research cited in Section 3.12 of the Application, the Project is
19 not likely to result in a negative impact to property values. I understand that other
20 witnesses will address the property value issue in more detail.

21
22 The exact final project cost is not known at this time. It is anticipated that costs will
23 increase prior to construction to perhaps \$235 million. This is due primarily to
24 anticipated increases in the cost of steel, fuel and other key materials for construction and

1 the declining value of the U.S. dollar against the Euro (most major wind turbine
2 manufacturers are based in Europe.) Based on a conservative estimated total Project cost
3 of \$235 million, the Applicant estimates that the Project will increase the total valuation
4 of real property in Kittitas County by approximately 8%, from \$2.5 billion to \$2.7 billion.
5 To put this figure in perspective, the 2003 total assessed value of the ten largest taxpayers
6 in Kittitas County combined is approximately \$140 million and the largest single
7 taxpayer in Kittitas County is Puget Sound Energy, with an assessed value in 2003 of
8 \$32,343,143 (Kittitas County Assessor, Feb. 2003). Therefore, it is anticipated that the
9 Project would be the largest single taxpayer in Kittitas County by a factor of six and
10 would have an assessed value greater than that of all ten of the current largest taxpayers
11 in the County combined. It is expected that the Project will result in both increased
12 revenues for state schools and local public services in the area as well as reduced
13 property tax levy rates for local taxpayers. Benefits to taxpayers in Kittitas County are
14 derived from the additional services provided by tax dollars generated by the Project, as
15 well as by the reduction in levy rates that might be required by Initiative I-747. The
16 largest beneficiaries of the added revenue from the Project would be local and state
17 schools, county government, county roads, and other local services.

18
19 Q Would you please describe the cumulative socioeconomic impacts, considering the
20 Desert Claim Wind Power Project and the Kittitas Valley Wind Power Project?
21

22 A The cumulative impacts of constructing the Project and other potential nearby wind
23 turbine developments, such as Zilkha's Kittitas Valley Wind Power Project and the wind
24 power project proposed by enXco in Kittitas County, would be to increase the demand
25

1 for construction workers in the study area. The proposed Projects could contribute to
2 increases in temporary and permanent job opportunities and populations in the region.
3 We originally estimated that peak construction of each Project could employ about 165
4 workers, for a combined peak total of approximately 500 workers. However in the
5 course of the enXco county permitting process, enXco estimated their peak construction
6 work force to be 100 workers. Base on this figure, the combined peak construction could
7 be adjusted accordingly to 435 workers. Using the new figure of approximately 435
8 workers, if conservatively 30% of wind facility construction workers are assumed to be
9 local, non-local workers would be employed by each Project, or a cumulative total of
10 305. The actual mix of local and non-local workers would depend on the availability and
11 residence of construction workers with the particular skills needed for wind facilities, and
12 competition from other concurrent construction projects in the region.

13
14 It is possible for some large projects to temporarily increase the demand for labor
15 sufficiently to place temporary upward pressure on wages in certain sectors of the
16 construction industry. However, it is expected that contractors will have access to a large
17 construction labor pool from a broad geographic area which includes Seattle and Yakima,
18 and thus the effect on construction wages will likely be temporary and insignificant

19
20 The majority of cumulative population and housing impacts would be temporary and
21 would occur during construction. It is likely that some non-local construction workers
22 would choose to live in housing located Kittitas County or Yakima, both located within a
23 reasonable commuting distance of the Project sites. It appears that the area has an
24

1 adequate supply of temporary housing to accommodate the potential cumulative increase
2 in construction workers from outside the area

3
4 The workforce analysis conducted for the Wild Horse Project suggests that there is a
5 sufficient labor supply available to complete both the Kittitas Valley and Wild Horse
6 Wind Power Projects within the same time frame. If the Desert Claim Project were also
7 to be constructed simultaneously, the local workforce supply might be strained. The
8 result may be to draw more workers from outside of the Project area, thus potentially
9 affecting local population and housing. However it should be noted that it is highly
10 unlikely that all these projects will be built at one time due to permitting schedules and
11 other factors.

12
13 Construction and operation of the wind energy developments will increase retail sales and
14 overall economic activity in the area, as well as create additional employment
15 opportunities for residents of Kittitas County.

16
17
18 The proposed wind turbine projects in Kittitas County will have a substantial impact on
19 the property tax base of the County. Cumulative fiscal impacts, as summarized here, are
20 considered to be the simple addition of the direct costs and revenues of each Project.
21 There is no synergistic effect assumed from multiple Projects in terms of direct revenues;
22 such an effect could occur, however, in terms of indirect or induced economic effects
23 (e.g., additional jobs, income, spending, etc.). For purposes of estimating cumulative
24 impacts, each Project is assumed to be approximately the same size (+/- 120

1 turbines). Presently the estimated assessed values of the projects is as follows: 1)
2 Wildhorse - \$235 million; 2) Desert Claim - \$150 million; and 3) Kittitas Valley - \$150
3 million. The combined assessed value for all three projects would be estimated to be
4 over \$500 million. The combined value of the three projects would represent an increase
5 of approximately 20% over the current assessed valuation for all real and personal
6 property in Kittitas County of approximately \$2.5 billion (Kittitas County 2003).

7
8 Because, with the passage of Initiative 747, county property tax collections are limited,
9 with some exceptions, to an annual one percent increase, it is possible that property tax
10 levies in the county would decrease in order for the County to comply with the
11 requirements of the law. Even with the tax increase limitations, the County could expect
12 to collect a sizeable amount of additional revenue. On balance, the actual effect of the
13 Projects on property taxes would likely be some combination of increased revenues and
14 decreased levy rates (Kittitas County 2003.) Expected cumulative revenues are projected
15 to be significantly higher than estimated costs for the Projects and would result in a
16 substantial benefit (a surplus of revenues relative to costs) for the affected local
17 jurisdictions (Kittitas County 2003). The wind power projects will not require local
18 services of the kind created by other types of uses, e.g. residential subdivisions, such as
19 public roads, water supply, wastewater treatment, increased school enrollment, law
20 enforcement etc. Area schools, local government, the state, and fire departments, and
21 county roads will all benefit from the additional funds.

1 Q. As you are aware Friends of Wildlife and Wind Power have intervened in this case.
2 Would you please describe your understanding of what they are requesting with respect
3 to the Project?
4

5 A. It is my understanding that Friends of Wildlife and Wind Power has proposed moving
6 approximately 65% of the proposed wind turbines off the Wild Horse Wind Power
7 Project site to WDFW and DNR lands in Kittitas County, Township 17 North, Range 21
8 East, Sections 12 and 13 and Township 17 North, Range 22 East Sections 7, 16, 17, and
9 18 (the 'Alternative Area').
10

11 Q. When did you first become aware of Friends of Wildlife and Wind Power's position and
12 proposed changes to the project?
13

14 A. I first became aware of the details and extent of Friends of Wildlife and Wind Power's
15 proposed alternative in reviewing their comments on the Draft Environmental Impact
16 Statement for the Wild Horse Wind Power Project which were received by EFSEC
17 September 10, 2004.
18

19 Q. Did you consider the site proposed by Friends of Wildlife and Wind Power in the process
20 of choosing the Project site and analyzing alternatives?
21

22 A. Applicant did not consider this area in depth during the siting process, for a number of
23 reasons, including the significantly lower elevation of the area which would indicate
24 lower wind resource potential given the local topography and direction of the prevailing
25

1 wind mechanism, its location in the Whiskey Dick Wildlife Recreation Area, and
2 underlying ownership by the WDFW.

3
4 Q. Did you met with representatives of Friends of Wildlife and Wind Power after their
5 intervention and discuss their proposal?

6
7 A. Yes. Applicant has met with representatives Friends of Wildlife and Wind Power on the
8 following occasions: September 17, 2004, September 29, 2004, September 30, 2004,
9 November 9, 2004, November 17, 2004, and November 30, 2004 (conference call).

10
11 Q. Are your discussions continuing?

12
13 A. Yes.

14
15 Q. Did you investigate their proposal?

16
17 A. Yes.

18
19 Q. Would you briefly describe the problems that you see related to the proposal of Friends
20 of Wildlife and Wind Power?

21
22 A. First of all we believe their proposal is made sincerely and in a good faith. However the
23 Applicant believes that the alternative layout proposed by Friends of Wildlife and Wind
24 Power is not feasible for a variety of reasons and concerns which are outlined below.

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1. The property being proposed by Friends of Wildlife and Wind Power is presently unavailable to the Applicant. It is entirely within the Whiskey Dick Wildlife Recreation Area, on lands controlled by WDFW and DNR. WDFW representatives have communicated to Applicant that WDFW is not inclined to have the bulk of a major wind power project located in a WDFW Wildlife Recreation Area. It is impossible to develop a project without the consent and participation of the underlying landowner(s). We believe that it is highly questionable and speculative whether WDFW would ever make the property available for a major wind farm development. It is my understanding that the USFWS provided funding for the acquisition of the Whiskey Dick Wildlife Area and that WDFW would be required to consult with the USFWS to enter into such an agreement. Approval by the state Fish and Wildlife Commission would also likely be required. It could take years to work through the political and legal processes to obtain permission even to commence the investigation and meteorological studies to determine if there is an adequate wind resource available to justify the additional environmental studies necessary to compare the relative environmental impacts of constructing the Project in the Whiskey Dick Wildlife Recreation Area. These additional studies would include wildlife studies, rare plant surveys and habitat evaluation, in addition to numerous other environmental, cultural, and geotechnical studies. This phase of the site investigation process could take up to two years and cost hundreds of thousands of dollars.

1 2. The proposed relocation would require approximately an additional 4 miles of
2 overhead transmission line to connect this southeastern area. Applicant does not
3 currently have transmission easement options across the Whiskey Dick Wildlife Area.
4 Again, WDFW has expressed disinterest in having extensive wind power facilities
5 developed in the Whiskey Dick Wildlife Area and it is impossible to develop a
6 project without the consent and participation of the landowner. Furthermore, the
7 additional miles of overhead transmission line would be expensive to construct and
8 create additional permanent impact footprint. This new transmission corridor would
9 also have to be surveyed for potential impacts to wildlife or cultural resources.

10
11 3. As I understand the proposal by Friends of Wildlife and Wind Power, it would entail
12 the removal of approximately 65% of the wind turbines from the present Project
13 location and relocating them on the Whiskey Dick Wildlife Recreation Area. In
14 response to the proposed project relocation to the Whiskey Dick Wildlife Recreation
15 Area, the Applicant conducted a preliminary evaluation, using rough wind speed and
16 energy estimates from a couple of miles away and assuming a “best case” scenario
17 that all of the turbines that Friends of Wildlife and Wind Power desires to be
18 removed, could successfully be relocated. This evaluation generally confirmed that it
19 is likely that there would be significant energy loss resulting from the relocation. To
20 obtain more detailed data, and make more concrete wind and energy predictions for
21 the Whiskey Dick Wildlife Recreation Area, roughly 8-10 meteorological towers
22 would need to be installed and operated for at least a year. To implement a valid
23 wind monitoring and assessment program would require a significant additional
24

1 monetary investment, and the permission of the underlying landowners (WDFW and
2 WDNR.)

3
4 4. The Applicant has conducted a full year of rigorous studies at the Project site and
5 EFSEC's Draft EIS for the Project concluded that with implementation of mitigation
6 measures, there will be no significant adverse environmental impacts. No impact
7 studies have been conducted on the proposed Whiskey Dick Wildlife Recreation
8 Area. In the absence of scientifically rigorous studies for this area, it is impossible to
9 compare the potential wildlife impacts of the Project and possible impacts of a project
10 over the Whiskey Dick Wildlife Recreational Area. At this time, we believe it is pure
11 conjecture to consider that the relocation of over half of the Wild Horse Project to the
12 Whiskey Dick Wildlife Recreation Area would substantially reduce impacts to
13 wildlife. Use of the Whiskey Dick Wildlife Recreation Area raises some obvious
14 potential environmental concerns including:

- 15 • closer proximity to the Columbia River (which would likely entail greater use by
16 eagles and other sensitive raptor species),
- 17 • closer proximity to the Ginko State Park and potentially greater visual impact
18 concerns for park users, and
- 19 • spreading the Project footprint across roughly 5 miles by 10 miles (vs. 4 miles by
20 5 miles in the current proposed layout), which could result in greater impacts to
21 habitat connectivity between adjacent public lands.

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Therefore we believe that the use the Whiskey Dick Wildlife Recreation Area for a major wind facility is highly doubtful, and any comparable environmental benefit is at best highly speculative.