

Burnett, Diane (CTED)

From: MOODY, SANDRA (DNR)
Sent: Friday, August 08, 2008 2:50 PM
To: CTED EFSEC
Subject: Wildhorse Wind Power Expansion

Attachments: wildhorsewind_08expansion_logo.doc

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AUG 08 2008
ENERGY FACILITY SITE
EVALUATION COUNCIL

I have attached a comment letter from the Washington Natural Heritage Program for the Wildhorse Wind Power Expansion. I will also mail a hard copy of the letter. Thank you for considering our comments. Please contact me if you have any questions or would like more information.

Sandy Swope Moody
Environmental and Grants Coordinator
Washington Natural Heritage Program
PO Box 47014
Olympia WA 98504-7014
phone 360-902-1697



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August 8, 2008

Allen Fiksdal, Manager
EFSEC
PO Box 43172
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SUBJECT: Wild Horse Wind Power Project Amendment to SCA for Expansion of the Site by 1280 Acres (T18N R21E S08, 09, 17)

The Washington Natural Heritage Program is responsible for maintaining information on the state's rare plant species as well as high quality native ecosystems. We have reviewed the proposed expansion to the Wild Horse Wind Power Project and have the following comments.

In most places the report correctly refers to the hedgehog cactus as *Pediocactus simpsonii* var. *robustior*, but in Appendix A, on page 8 and on Figure 4, A, *P. simpsonii* is used.

On page 8, Appendix A, Section 5.2, it states that "the Wildhorse Project successfully translocated hedgehog cactus from areas that were to be impacted by turbines or other facility features." It is our understanding that salvaging the cacti and keeping them under cultivation in irrigated locations had a high success rate, but without this care survival would be doubtful. We believe that avoidance of the cacti should be a much higher priority than relocation.

On page 8, Appendix A, Section 5.2, it also states that impacts to the cactus may occur, but we could find no information on how much impact may occur. It would be helpful to have even an approximation of the quantitative level of impact.

In Table 1, Appendix A, the list of "Rare plant surveys for which surveys were conducted", *Tauschia hooveri* (Hoover's tauschia), state threatened and a federal species of concern, should have been included for surveys in the Wildhorse project area. It is known in the general vicinity and has a good likelihood of occurring in the project area.

There are numerous plants reported in Appendix A, "List of Vascular Plant Species Encountered During the 2006 Whiskey Ridge Wind Project Rare Plant Surveys" identified only to the genus, including many that are in genera that include rare species (*Agoseris*, *Lomatium*, *Erigeron*, *Cryptantha*, *Silene*, *Astragalus*, *Phacelia*, and *Penstemon*) that are included in Table 1 (Rare plant species for which surveys were conducted). In the rare plant survey described here, plants that were encountered in these genera were not identified to the species. There is no explanation of how the surveyors knew that the plants in these genera were not the species for which they were performing the survey.

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There is a lack of evaluation of vegetation (habitat) impacts in the study. Over half of the sagebrush steppe habitat in Washington has been converted to agriculture, urban areas, and other development. Invasion by exotic plants has further diminished the quality of the remaining shrub-steppe in Washington. The loss of shrub-steppe acreage with this project adds to the cumulating conversion of shrub-steppe habitat.

The placement of wind turbines, although minimizing the impacts in linear strips, fragments a large shrub-steppe landscape. The Natural Heritage Program would prefer the placement of wind turbines and supporting facilities to be on existing converted or heavily disturbed shrub-steppe. Short of avoiding loss of shrub-steppe habitat at the project site, restoration or other mitigation should be required to offset the loss of habitat if the project is completed as proposed.

Thank you for the opportunity to provide comments on this project. Please contact me by phone at (360) 902-1697 if you would like more information, or by e-mail: sandra.moody@dnr.wa.gov.

Sincerely,

Sandy Swope Moody, Environmental Review Coordinator
Washington Natural Heritage Program