



August 5, 2008

Allen J. Fiksdal
EFSEC Manager
PO Box 43172
Olympia, WA 98504-3172

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ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Mr. Fiksdal:

The Department of Natural Resources (DNR) would like to provide comments on the Puget Sound Energy (PSE) request to amend the Wild Horse Wind Power Project Site Certification Agreement (SCA). DNR leases state lands for both wind power and grazing within this area and our comments are based upon our perspective as a land manager.

Specifically, DNR urges EFSEC to amend the existing Site Certificate Agreement (SCA) to waive the requirement for permanent fencing of the springs and mitigation parcel. The water developments do need to be protected. However, the landowners should be encouraged to develop site specific plans to protect the water developments in order to protect the resource while providing benefits to wildlife and livestock. This may or may not include fencing but should be based upon a site specific plan.

PSE is an active member of the Wild Horse Coordinated Resource Management (CRM) planning group. The CRM group is implementing a new grazing plan for the area designed to maintain and improve wildlife habitat, and resource conditions. The CRM also monitors these conditions prior to, and following each grazing season. This planned livestock grazing is significantly different than the grazing plan in place at the time the SCA was written. Participation in the CRM provides superior habitat mitigation across a larger landscape without the need for permanent fencing of the mitigation parcel.

Thank you for your consideration.

Sincerely,

Milton D. Johnston

Milton D. Johnston
Southeast Region Assistant Manager

BB:MJ:jp

c: Brent Billingsley
Files 60-075018, 10-079384