



# Washington State Energy Facility Site Evaluation Council AGENDA

**MONTHLY MEETING**  
Tuesday, May 15, 2018  
**1:30 PM**

1300 S Evergreen Park Drive SW  
Olympia, WA 98504  
Meeting Room 139

- 1. Call to Order ..... Kathleen Drew, EFSEC Chair
- 2. Roll Call ..... Tammy Mastro, EFSEC Staff
- 3. Proposed Agenda ..... Kathleen Drew, EFSEC Chair
- 4. Minutes **Meeting Minutes** ..... Kathleen Drew, EFSEC Chair
  - April 11, 2018
  - April 17, 2018
- 5. Projects
  - a. **Kittitas Valley Wind Project**
    - Operational Updates ..... Eric Melbardis, EDP Renewables
  - b. **Wild Horse Wind Power Project**
    - Operational Updates ..... Jennifer Diaz, Puget Sound Energy
  - c. **Columbia Generating Station**
    - Operational Updates ..... Debbie Knaub, Energy Northwest
  - d. **WNP – 1/4**
    - Non-Operational Updates ..... Debbie Knaub, Energy Northwest
  - e. **Chehalis Generation Facility**
    - Operational Updates ..... Mark Miller, Chehalis Generation
  - f. **Desert Claim**
    - Project Update ..... Sonia Bumpus, EFSEC Staff
  - g. **Columbia Solar Project**
    - Project Update ..... Ami Kidder, EFSEC Staff
  - h. **Grays Harbor Energy Center**
    - Operational Updates ..... Chris Sherin, Grays Harbor Energy
    - PSD Permit ..... Sonia Bumpus, EFSEC Staff

EFSEC staff will provide a summary of Amendment 4 to the Prevention of Significant Deterioration Air Permit and the Council may take FINAL ACTION on issuing the draft permit for public comment.
- 6. Adjourn ..... Kathleen Drew, EFSEC Chair

**Note: "FINAL ACTION"** means a collective positive or negative decision, or an actual vote by a majority of the members of a governing body when sitting as a body or entity, upon a motion, proposal, resolution, order, or ordinance. RCW 42.30.020

**Verbatim Transcript of Public Hearing - Desert Claim  
Wind Project**

**Washington State Energy Facility Site Evaluation Council**

**April 11, 2018**



**206.287.9066 | 800.846.6989**

1325 Fourth Avenue, Suite 1840, Seattle, Washington 98101

[www.buellrealtime.com](http://www.buellrealtime.com)

email: [info@buellrealtime.com](mailto:info@buellrealtime.com)



Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

WASHINGTON STATE  
ENERGY FACILITY SITE EVALUATION COUNCIL MEETING  
Ellensburg, Washington  
Wednesday, April 11, 2018  
6:30 p.m.

DESERT CLAIM WIND PROJECT  
PUBLIC HEARING  
Verbatim Transcript of Proceeding

\*\*\*\*\*  
Transcribed by: Jennifer A.P. Albino, CET  
Court Certified Transcription

1 -o0o-  
2 April 11, 2018  
3 6:31:18  
4

5 CHAIR DREW: -- everyone? Can you all hear me?  
6 Oh, you already -- you took care of the phone?  
7 MS. AITKEN: I did, yes.

8 CHAIR DREW: My name is Kathleen Drew. And I am the chair  
9 of the Energy Facility Site Evaluation Council. Thank you  
10 all for being here this evening. The first thing I want to  
11 say is that we do have a speaker sign-in, so if you'd like  
12 to speak, we'd like to be able to come up and have you  
13 sign-in. Of course, you can continue to do that until we  
14 close the public hearing. But I just wanted to let you know  
15 it's to my right, to your left, if you'd like to sign in to  
16 speak.

17 This is the public hearing on the Desert Claim Site  
18 Certification Agreement Proposed Amendment in accordance  
19 with Washington Administrative Code 463-66-030. I will ask  
20 the other Councilmembers who are here joining me to  
21 introduce yourselves.

22 And you have to give your mic a second to warm up. It's  
23 the mute button. Yeah. That's it. Keep pressing. There  
24 we go.

25 Is yours on? You got it?

1 APPEARANCES

2 Councilmembers:  
3 KATHLEEN DREW, Chair  
4 JAMIE ROSSMAN, Department of Commerce  
5 MIKE LIVINGSTON, Department of Fish and Wildlife

6 Attorney General's Office:  
7 ANN C. ESSKO, Assistant Attorney General

8 EFSEC Staff:  
9 JOAN AITKEN  
10 AMI KIDDER  
11 SONIA BUMPUS  
12 STEPHEN POSNER  
13 CHRISTINA POTIS

14 Applicant:  
15 RICK MILLER, Director of Wind Business Development  
16 EDF Renewable Energy

17 Community Speakers:

18 CHRISTINE COLE, Community member  
19 JAMES C. CARMODY, Attorney with Meyer, Fluegge and Tenney  
20 MARK PRITCHARD, Professor, College of Business,  
21 Central Washington University  
22 KATHI PRITCHARD, Member of Save Our Farms  
23 RICHARD CARKNER, Director of Save Our Farms  
24 PATTY KINNEY, Community member  
25 TERESA SLOAN, Community member, local pilot  
PAUL JEWELL, Kittitas County Commissioner  
GINA JEFFERSON-LINDEMOEN, Community member  
KEN SATRE, Community member  
EMILY SATRE, Community member  
JANET NELSON, Community member  
DAN MORGAN, President of Morgan & Son Earthmoving, Inc.

1 MR. ROSSMAN: Jamie Rossman with the Washington State  
2 Department of Commerce.

3 MR. LIVINGSTON: Mike Livingston, Washington Department of  
4 Fish and Wildlife.

5 CHAIR DREW: Okay. And our agenda tonight is that we will  
6 first hear from the applicant about the project overview.  
7 This is an amendment to a site certification agreement. And  
8 then our staff will talk about what that amendment process  
9 looks like.

10 So if we can begin, then, with the representatives from  
11 Desert Claim.

12 MR. MILLER: Good evening, Council. Thank you very much  
13 for this opportunity, and to the public as well for coming.  
14 My name is -- and Staff as well, thank you -- my name is  
15 Rick Miller. I'm the director of Wind Business Development  
16 for the company EDF Renewable Energy. We're here tonight to  
17 discuss the amendment we're proposing for the Desert Claim  
18 Wind Project.

19 If you could flip to the next slide.

20 I'd like to take a quick second --

21 CHAIR DREW: If you could adjust the microphone up a  
22 little bit --

23 MR. MILLER: Sure.

24 CHAIR DREW: -- more. There. You're --

25 MR. MILLER: Is that better?

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 CHAIR DREW: -- taller than average. There you go.  
 2 MR. MILLER: Okay.  
 3 CHAIR DREW: Thank you.  
 4 MR. MILLER: It doesn't help my basketball skills, though.  
 5 So for those of you that are not familiar with EDF  
 6 Renewable Energy, our name used to be enXco. That was the  
 7 name of the company. It's the same company, many of the  
 8 same people, but EDF Renewable Energy is -- and we have many  
 9 different aspects in our business all having to do with both  
 10 energy production and management. So we do things like  
 11 distributed solar and storage. We are the largest  
 12 third-party operations and maintenance provider in the  
 13 country for wind projects. You'll see later on a slide we  
 14 manage over 14 gigawatts of wind projects globally. We've  
 15 developed approximately 10 gigawatts of renewable power, and  
 16 we still own about half of that fleet, about 5 gigawatts.  
 17 There's 1,000 employees for EDF Renewable Energy. We cover  
 18 all of North America. We have a headquarters in San Diego,  
 19 California.  
 20 And then the larger owner of the company is the EDF Group.  
 21 They're basically the electricity company in France that  
 22 runs all the nuclear power plants over there. They've been  
 23 in business about 70 years, and so the company really has a  
 24 very strong expertise in engineering and research and  
 25 development. Probably enough on that.

1 been a concept for the Kittitas Valley for quite a long  
 2 time. The project originally submitted application back in  
 3 twenty -- in 2006 and then updated that in February of 2009.  
 4 And with our site certification agreement we have many  
 5 outstanding agreements that we intend to continue to follow  
 6 through with, with the Counsel for the Environment, with the  
 7 Washington Department of Fish and Wildlife, with Kittitas  
 8 County, and with the Yakima Nation. We have every intention  
 9 to both continue to follow those agreements that we have;  
 10 strengthen them, when and if they're going to be necessary,  
 11 as we do this amendment; and continue to abide by all the  
 12 original conditions as they may be updated in this process.  
 13 So we did submit a formal amendment in February just a  
 14 couple months ago, looking to update the project. And  
 15 you'll see in a couple slides how that update and  
 16 modification is being proposed.  
 17 So for those of you that aren't familiar with where the  
 18 Desert Claim Wind Project is proposed to be sited, it's on  
 19 private land. There's some Department of Natural Resources  
 20 State land involved in the project. And then there's -- the  
 21 project is generally laid out on the north side of  
 22 Smithson Road and to the east of Highway 97, as you can see  
 23 on this map.  
 24 So the project -- I think, actually, if you could just go  
 25 to the next slide. It's a little bit more telling.

1 If you could switch the slide, please.  
 2 So, again, this is just a quick summary of the pipeline.  
 3 So EDF Renewable Energy is very active in the United States  
 4 and all of North America. We've put approximately  
 5 1,000 gigawatts of projects in the ground in the last few  
 6 years. In 2015 we did one and a half gigawatts. And our  
 7 current pipeline in North America is a little over  
 8 17 gigawatts.  
 9 You can go to the next slide.  
 10 So I've already run over many of these numbers. But I  
 11 think it would just be important to emphasize that we are a  
 12 company that builds projects for the long haul. We do  
 13 the -- everything from the very beginning, from the site  
 14 selection to the resource assessment, monitoring the wind  
 15 speed at the site or -- and we do the product design, the  
 16 permitting. And then we do all the procurement engineering  
 17 ourselves, the financing, and then construction, and then,  
 18 like I said, the long-term management. You saw that we keep  
 19 approximately half of the projects that we design and build,  
 20 and then we sell some of them to just recuperate our cap  
 21 backs (phonetic).  
 22 Okay. Next slide.  
 23 Okay. So what we all came here for. Look at that. Got  
 24 that out of the way. So the Desert Claim Wind Project, as  
 25 hopefully many of the people here are familiar with, has

1 So the project boundary has been revised slightly in the  
 2 amendment. We've reduced the project boundary size in terms  
 3 of acres. Originally, the project size was approximately  
 4 5,200 acres; it's now 4,400 acres. And what you can see in  
 5 this diagram -- or map, rather, is that on the east side of  
 6 the project we're removing multiple pieces of property for  
 7 the project. We've added one small area to the northwest, a  
 8 half section up there. But on bounds, the project is  
 9 approximately 800 acres smaller. A lot of the -- originally  
 10 the project boundary, which is shown here -- this is the  
 11 full boundary, the reduced boundary is in blue. The biggest  
 12 geographical change to the project, really, is to eliminate  
 13 development of turbines and roads or facilities on the east  
 14 side of Reecer Creek, which is the water feature that runs  
 15 through, basically the east end of the project through, what  
 16 I think is shown there as Section 21.  
 17 Why don't you do me a -- okay. Yeah. That's great. I  
 18 was going to say if you go back one, it would show the  
 19 current boundary, but this one shows the current boundary as  
 20 well. So that's perfect.  
 21 So the project was originally approved for 190 megawatts.  
 22 We're reducing the request down to one hun- -- up to  
 23 100 megawatts [sic]. And we've shown two different proposed  
 24 layouts. One, to generate 80 megawatts of power using a  
 25 Siemens turbine technology. And then another proposal of

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 9

Page 11

1 100 megawatts, and that would be using the Vestas turbine  
 2 technology. So this site plan here represents the  
 3 100-megawatt layout using Vestas turbines. And it's a  
 4 conceptual layout to show, in general, where turbines would  
 5 be placed and roads and electrical would be installed to  
 6 connect the turbine strings. And then you'll see there's a  
 7 proposed operations and maintenance building on the lower  
 8 southern half of the project there, kind of right in the  
 9 middle. And then there's an on-site to-be-built project  
 10 substation that will allow us to connect directly to the  
 11 230 kV Puget Sound Energy lines that run directly through  
 12 the project.

13 If you flip to the next slide, you'll see that this is,  
 14 honestly, a very similar looking layout, but this is what it  
 15 would look like on the 80-megawatt scenario utilizing the  
 16 Siemens turbines. For what it's worth, you'll see in the  
 17 amendment application that we're using a mixture of  
 18 different turbine types. There's a couple of reasons for  
 19 that. The first reason is that the project would qualify  
 20 for the federal production tax credit if it is installed by  
 21 December of 2020 by utilizing a 5 percent safe harbor. So  
 22 the machines that are PTC eligible, which make up  
 23 approximately 5 out of, say, 25 -- there would be five  
 24 2-megawatt turbines and approximately 25 of the larger  
 25 nameplate turbines, that are approximately 4 megawatts. And

1 experts that have been doing a lot of the analysis that's  
 2 gone into the wildlife, vegetation, and habitat wetland  
 3 studies -- we also find that just having a smaller project  
 4 and a smaller footprint has also enabled us to reduce some  
 5 of the impacts to wildlife and vegetation.

6 So these are these numbers, which I hope I did okay off  
 7 the top of my head on earlier. But this is a chart to try  
 8 to make it obvious and easy to look at some of the changes  
 9 in numbers. So, yes, I accurately stated the project is  
 10 about 800 acres smaller. The turbines under the two  
 11 scenarios, which I've kind of described, we wouldn't use  
 12 more than 31 individual turbines; and before there was up to  
 13 95. And then, of course, we talked about the nameplate  
 14 capacity. The project is generally half the size in terms  
 15 of the power it will produce. We will have the need for  
 16 less roads because we'll have less turbines to connect. And  
 17 then the great -- one of the great benefits of the reduction  
 18 is the disturbance to the land will be significantly  
 19 smaller. You'll see the temporary disturbance there; we're  
 20 down to 224 acres for temporary impacts. And we were a  
 21 little over 300 before. And then the project footprint, you  
 22 can see those numbers there, a pretty large reduction in the  
 23 footprint.

24 Okay. So here's the turbine technology that I have sort  
 25 discussed previously. It's worth noting the tip height for

Page 10

Page 12

1 that's how the project would qualify for the production tax  
 2 credit. So you'll see in the application a range of  
 3 2-megawatt machines to 2- to 4.2-megawatt machines. And  
 4 that -- that is the reason why you'll see that. The  
 5 difference between the Siemens layout and the Vestas layout  
 6 is Vestas makes a machine with a larger nominal nameplate  
 7 capacity, up to 4 megawatts, whereas the Siemens are all in  
 8 the 2-megawatt variety. So utilizing the same footprint of  
 9 land, we can get up to 100 megawatts with the Vestas  
 10 machines.

11 So the key changes to the project, we've sort of touched  
 12 on them a little bit. But it is a smaller project. It is a  
 13 reduction in both the size of the land included; it's also a  
 14 reduction in the number of individual turbines. I believe  
 15 we had up to maybe 90 individual units in the original SCA.  
 16 We won't use more than 31 under any scenario in this project  
 17 revision.

18 Of course, you know, the turbine technology is not vastly  
 19 different than it was five years ago. But, you know, these  
 20 are newer, generally larger machines. And then in the  
 21 applicant's estimate, we think that the reduction or the  
 22 change in the project will also reduce impacts to county  
 23 residents by having less turbines and have them further  
 24 apart. And we also think there will be less impact on roads  
 25 to build the project. And then we also find that our

1 these machines. They're -- they're still under 500 feet  
 2 tall, but you'll see the tip height is taller. And then the  
 3 rotor diameter for the individual turbines is also much  
 4 greater. But you'll see a little bit later on that we have  
 5 calculated sort of the rotor swept area. And because  
 6 there's less turbines, that has also been reduced.

7 Okay. So as I said earlier, the applicant is of the  
 8 opinion that the reduced and revised project will result in  
 9 less impacts to the local community. The reduction in the  
 10 number of turbines and the distance between the turbines has  
 11 been -- the number of turbines has been decreased. The  
 12 distance between them has been increased. And so we think  
 13 there will be less sort of visual clutter, if you will.

14 And so why don't we go to the next slide.

15 This slide is intended to sort of highlight some of the --  
 16 well, there will be some impacts to wildlife and vegetation  
 17 from the project, but the amended project -- revised project  
 18 should result in less impact. So we've got 30 percent less  
 19 disturbance to the habitat and vegetation during  
 20 construction, so a lot less land will be touched. We have a  
 21 40 percent less permanent loss of habitat and vegetation due  
 22 to the reduced footprint. We will have some wetland  
 23 impacts, but they have been kept below a half an acre of  
 24 permanent wetland impacts and less than two acres of  
 25 temporary impacts to wetlands and streams. And as I was

3 (Pages 9 to 12)

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 stating, we have larger turbines, longer turbine blades; but  
 2 when you look at the rotor swept area, the area where the  
 3 blades spin in space, we reduced that, under the different  
 4 scenarios, as much as by a third, even up to perhaps a half.  
 5 So, you know, that reduction of rotor swept area will result  
 6 in a reduction to hazards to things that fly in the air like  
 7 birds and bats.  
 8 And that would conclude our prepared presentation. We  
 9 would be happy to take any questions.  
 10 CHAIR DREW: Are there any questions?  
 11 Go ahead.  
 12 MR. LIVINGSTON: Yeah, I have a couple questions. One,  
 13 so --  
 14 CHAIR DREW: I'm not sure if your microphone is --  
 15 MR. LIVINGSTON: Is it on?  
 16 CHAIR DREW: -- it's -- it looks like it's on, but maybe  
 17 you're not close enough.  
 18 MR. LIVINGSTON: One question I had was -- so I agree with  
 19 the reduction of the number of turbines. Your wind swept  
 20 area is less. The impacts are overall --  
 21 FEMALE SPEAKER: We can't hear back here?  
 22 MR. LIVINGSTON: Okay. How's that?  
 23 MALE SPEAKER: That (inaudible).  
 24 MR. LIVINGSTON: I'll move it up my mouth. The reduction  
 25 in the number of turbines does in- -- decrease the wind

1 what I would say is I don't think that we're going to have  
 2 vastly different results with the newer turbines than we  
 3 would with the turbines that are already in the permit. I  
 4 think it will be pretty similar.  
 5 CHAIR DREW: Thank you.  
 6 MR. LIVINGSTON: Thank you.  
 7 CHAIR DREW: Mr. Rossman?  
 8 MR. ROSSMAN: Thank you very much for the presentation.  
 9 Looking at the map -- and I don't know if we could go back  
 10 to, I think it's, Slide 9 or 10. So the turbines that are  
 11 marked A1 to A4 there, they appear to be on a steeper  
 12 topographic area than most of the rest of the site. And  
 13 I'm not hugely familiar with the site, but could you say  
 14 anything about that? And are you familiar at all with  
 15 whether the research indicates anything different about  
 16 placing turbines on steeper versus shallower slopes?  
 17 MR. MILLER: Well, yeah. There's a little bit of a bench  
 18 there. So you'll see the road kind of hooks around. You  
 19 know, we'll have maximum gradients that we won't exceed on  
 20 those roads. So that's kind of why that road does that.  
 21 But once you get up on that area there, which is, you know,  
 22 the furthest west, the northwest area -- or the portion of  
 23 the project, it's relatively flat there. So we don't --  
 24 we've only done preliminary engineering and designing. But  
 25 we've been out there. We've had engineers out there and

1 swept area, which will reduce the risk of collisions with  
 2 raptors and bats. I'm just curious with this new technology  
 3 and these larger turbines, what does -- what does the  
 4 research say about those relative to risk to flying birds  
 5 and mammals?  
 6 MR. MILLER: So, the -- so there has not been a lot of  
 7 study yet to compare some of the -- you know, the current  
 8 technology on land-based turbines is about 2-megawatt --  
 9 2- to 3-megawatt machines. We're going to see larger and  
 10 larger equipment installed in the U.S. The trend is still  
 11 heading towards much larger. We're seeing -- you know, now  
 12 we see multiple manufacturers come out with 4.2-megawatt  
 13 machines, but none of them have been installed yet, so  
 14 there's no way to really do a comparison in real time.  
 15 Having said that, we have done a tremendous amount of  
 16 pre-construction bird survey work, nest surveys, raptor  
 17 surveys, bird use counts over multiple years. And we've  
 18 seen a general -- relatively speaking the use -- the bird  
 19 use of the site is not excessive. It's not in a, quote,  
 20 "high-risk" area. So my assessment is that the new turbine  
 21 technology is no different than what you see installed in  
 22 projects today. And so we'll be doing post-construction  
 23 monitoring to see how our pre-construction estimates of  
 24 impacts fan out. We also have a proposal for a technical  
 25 advisory committee attack to be created. And so, I guess

1 surveyors out there. So we don't see any issue with getting  
 2 to that part of the -- of the project, if that's -- if  
 3 that's what your question is. I mean, it's not steep in the  
 4 sense that, like, the foundation, is going to be sort of on  
 5 a hill or anything.  
 6 The thing that's funny about these maps is the turbines  
 7 look really big.  
 8 FEMALE SPEAKER: They are. Well, they are big. What do  
 9 you mean? (Inaudible) --  
 10 MR. ROSSMAN: And this a question --  
 11 CHAIR DREW: Excuse me.  
 12 FEMALE SPEAKER: -- (inaudible).  
 13 CHAIR DREW: You all will have an opportunity to speak.  
 14 FEMALE SPEAKER: Oh.  
 15 CHAIR DREW: Can we please have the courtesy of hearing  
 16 the presentation? And then we'll get to the your comments.  
 17 FEMALE SPEAKER: I'm sorry. (Inaudible).  
 18 MR. ROSSMAN: This is a question perhaps for Staff. You  
 19 may have already answered part of it. But in terms of the  
 20 size of these larger turbines and how those compare to the  
 21 other wind farms in the valley, are those all at the  
 22 2-megawatt size, or are some of those something in between  
 23 the 2 and 4.2; do you know?  
 24 MR. POSNER: The two other projects that EFSEC has  
 25 permitted, the Kittitas Valley Wind Project and Wild Horse,

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 I believe, are 1.8 to 2 megawatts.  
 2 MR. ROSSMAN: And then a question for you, Mr. Miller.  
 3 You said that you're not aware of any other turbines of this  
 4 size being installed in the United States. Do you know if  
 5 they've been installed in other countries or installed on a  
 6 demonstration basis anywhere?  
 7 MR. MILLER: I can say with certainty that these larger  
 8 nameplate turbines have been used, certainly, offshore.  
 9 There's a lot of 4-megawatt machines. I don't know for sure  
 10 if 4-megawatt machines have been installed on land. I can  
 11 tell you that the technology, the way that the turbine  
 12 works, and the way that they generally work is no different  
 13 than the turbines that are installed here in the valley.  
 14 They're generally going to look very, very similar to what  
 15 you see. So I don't -- I mean, I wouldn't dwell on the fact  
 16 that they generate more megawatts. There is a -- you know,  
 17 a larger rotor, larger blades, but in general they look like  
 18 modern wind turbines.  
 19 MR. ROSSMAN: And just to make sure I'm understanding --  
 20 and I'm looking at Slide 13, which has the tip height and  
 21 rotor diameter comparison -- when it says "tip height," is  
 22 that the top of a rotor, you know, that's entirely vertical?  
 23 So that's the maximum height that any part of it reaches?  
 24 MR. MILLER: Yeah. Sometimes it's referred to as sort of  
 25 the 12 o'clock position. So that's correct. Yeah, one

1 MR. ROSSMAN: That would be great. Thank you.  
 2 MR. MILLER: That's no problem.  
 3 CHAIR DREW: Thank you.  
 4 MR. ROSSMAN: And that was my last question. Thank you.  
 5 MS. BUMPUS: Councilmember Rossman, I was just going to  
 6 add that in the existing SCA the applicant is required to  
 7 develop -- and EFSEC would also review and approve this -- a  
 8 post-construction avian monitoring plan to look at impacts.  
 9 This plan would basically help them to identify any impacts  
 10 that are a result of the operation of the facility.  
 11 MR. ROSSMAN: Thank you.  
 12 CHAIR DREW: Thank you very much for your presentation.  
 13 MR. MILLER: Thank you.  
 14 CHAIR DREW: Next we will have Sonia Bumpus give us an  
 15 overview or talk about our process.  
 16 Thank you.  
 17 MS. BUMPUS: Thank you. Good afternoon, Chair Drew and  
 18 Councilmembers.  
 19 So in light of the request by Desert Claim to amend their  
 20 2010 Site Certification Agreement or SCA, Staff would like  
 21 to discuss the SCA amendment process with the Council just  
 22 to give you a sense of what to expect as Staff continues to  
 23 review the amendments that are proposed. EFSEC's rules and  
 24 WAC 463-66 provide information about EFSEC's SCA amendment  
 25 process and what to consider when we receive an amendment

1 turbine blade sticking right up at a 12 o'clock position on  
 2 a clock.  
 3 MR. ROSSMAN: And so does the diameter of 136 meters  
 4 there -- that means that it -- at its height -- at its  
 5 lowest it's 14 meters off the ground?  
 6 MR. MILLER: Um --  
 7 MR. ROSSMAN: Or -- no, I guess --  
 8 CHAIR DREW: Is that the difference for the -- between the  
 9 different --  
 10 MR. MILLER: No, not necessarily. I don't think it --  
 11 MR. ROSSMAN: Okay. No, it --  
 12 MR. MILLER: -- I don't think I would draw that  
 13 conclusion.  
 14 CHAIR DREW: Are you looking at the tip height 134 to 150?  
 15 MR. ROSSMAN: No. I guess I'm just wondering if the --  
 16 CHAIR DREW: Oh.  
 17 MR. ROSSMAN: -- if the highest that -- if the highest  
 18 point it will get is 150 meters, and then I'm drawing a  
 19 diameter of 136 meters downwards, then that would seem to  
 20 only be 14 meters off the ground. But maybe I'm -- maybe  
 21 I'm not understanding something about it.  
 22 MR. MILLER: If it's okay, I'd prefer to follow up with  
 23 the Council on that or Staff. But I can certainly get some  
 24 minimum blade-tip-to-ground distances for the different  
 25 turbines.

1 request.  
 2 In terms of approving such an amendment request, the  
 3 Council may either accept it, reject it, or reject it with  
 4 conditions determined to be acceptable by the Council. In  
 5 order to make such a determination, the Council must review  
 6 the proposed changes. EFSEC rules, specifically  
 7 WAC 463-66-050, specifically note that the Council consider  
 8 whether the proposed amendment is consistent with the public  
 9 health, safety, and welfare as well as considering the  
 10 short-term and long-term environmental impacts of the  
 11 proposed changes.  
 12 So when we look at impacts of the amendments, I'm  
 13 referring to rules in WAC 197-11, for the State Environment  
 14 Policy Act, which in EFSEC rules we promulgate in 463-47.  
 15 So under SEPA rules we will need to evaluate the proposal  
 16 and any new information to determine if there are any  
 17 substantial changes to the proposal that are likely to have  
 18 significant adverse environmental impacts. Existing SEPA  
 19 documents, such as the Supplemental Final EIS that was  
 20 prepared by EFSEC in 2009 could be updated with an addendum  
 21 if new analysis is done. We could also develop a SEPA  
 22 threshold determination. So there are some options once  
 23 we've identified what the impacts are.  
 24 The point is that we need to do SEPA. And once we have an  
 25 understanding of the impacts associated with the proposed

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 changes, we can decide what we need to do to document the  
 2 analysis, whether that be in a new threshold determination  
 3 or in an addendum to one -- to the existing SEPA document.  
 4 In this case, the supplemental Final EIS.  
 5 So I want to go back to the SCA amendment WAC that I was  
 6 talking about at the beginning. So once we've made a  
 7 determination on SEPA and we understand the impacts and the  
 8 extent of those impacts, we would look at the changes to the  
 9 provision in the original SCA. If the amendments do not  
 10 substantially alter the provisions of the SCA and there are  
 11 no significant detrimental effects on the environment, the  
 12 Council could approve the request for the amendment in the  
 13 form of a resolution. However, if the amendment  
 14 substantially alters any provisions of the SCA or we  
 15 identify detrimental environmental effects, the amendment  
 16 would require approval by the Governor.  
 17 So that's sort of the -- those are the highlights, you  
 18 know, as far as options -- places where we may go as we do  
 19 our review. Right now Staff is working with our consultant  
 20 and other agencies to review the SCA proposed changes.  
 21 We're also reviewing an updated SEPA environmental  
 22 checklist. And so we're going to keep you posted as that  
 23 review continues. We'll also keep you posted on how the  
 24 results of that review are going to affect our process  
 25 moving forward.

1 We live at 7430 Robbins Road. And my first inkling that  
 2 something suspicious was afoot was when two men were looking  
 3 for something at the edge of my property along the road next  
 4 to my fence. My partner Roger drove down to find out what  
 5 they were doing. And the answer was that they were seeking  
 6 markers and photographing the turbines.  
 7 On contacting the former president of the Sun East  
 8 Property Owners Association where we reside, he had also  
 9 noticed and had questions about markers and -- that were up  
 10 above on the shared road for the owners about a mile north  
 11 of my place and at a higher elevation. It appears that  
 12 these men had traversed and apparently trespassed beyond a  
 13 very visible warning sign at the Sun East entrance that  
 14 states that only property owners are allowed. I don't know  
 15 whether or not permission to enter had been granted.  
 16 We wonder again if our statements are just another effort  
 17 in futility. With the County and most of the residents  
 18 opposed to the Kittitas Valley Wind Power Project site --  
 19 the final decision that was left up to Governor Gregoire,  
 20 who is soon to leave office and not be living here -- our  
 21 fate was sealed. And we are now left with the constant  
 22 eyesores in view and now with more to come. My feeling is  
 23 that the Governor was viewing the east side of the Cascades  
 24 with the eyes of the west side overpopulated and harried  
 25 occupants, but without the view and insight of local folk

1 Are there any questions about that overview?  
 2 CHAIR DREW: Question? Okay.  
 3 Thank you very much.  
 4 At this point we will call forward anyone who would like  
 5 to speak that is here with us tonight.  
 6 And do we have a speaker sign-up? Okay.  
 7 So some more --  
 8 MS. POTIS: Okay. If --  
 9 CHAIR DREW: -- some more people are --  
 10 MS. POTIS: -- you --  
 11 CHAIR DREW: -- signing up, but, Christina --  
 12 MS. POTIS: Sure.  
 13 CHAIR DREW: -- will start with the first ones on the  
 14 list.  
 15 MS. POTIS: Can you hear me?  
 16 CHAIR DREW: Yes.  
 17 MS. POTIS: Okay. We're ready for the first five  
 18 speakers. So if you want to move forward. Speaker No. 1 is  
 19 Chris Cole.  
 20 You can come up and talk.  
 21 CHAIR DREW: And the microphone at the podium is a little  
 22 high, so you might want to bring that down a little bit.  
 23 There you go.  
 24 MS. COLE: Hi, my name is -- my name is Christine Cole.  
 25 I'm here representing myself and my partner Roger Binette.

1 that cherish the open spaces that are anything but desolate  
 2 and certainly not land to be exploited. In addition, the  
 3 site, now inundated with turbines, is above a  
 4 forever-spoiled scenic highway that once was incredibly  
 5 beautiful landscape.  
 6 One woman who wrote a letter to the editor of the Daily  
 7 Record complained that the turbines obscured her view of  
 8 Mount Stuart. Where was she during the public testimony is  
 9 unclear. But my response would be, "We told you so. Where  
 10 were you before with the years' long struggle to oppose  
 11 these towers?"  
 12 The photos that were taken from my yard with my permission  
 13 for the Kittitas Valley Wind Power Project Informational  
 14 Layout show -- showing how the turbines would appear from my  
 15 elevation were, at most, panoramic photos, deceptive as  
 16 compared to the actual perception from our eyes. A half  
 17 mile distance is nothing in this open country. But the  
 18 photos depicted the turbines are a long way away. From my  
 19 kitchen window they are enormous. That is how they appear.  
 20 And my home is several miles and a canyon away. It's all in  
 21 the perception, depending on how a photo is projected and  
 22 the reality witnessed. The folks with homes on Reecer Creek  
 23 may most likely have the worst of its impact. More larger  
 24 and powerful turbines proposed and in place and the reality  
 25 of the potential disturbance is to us overwhelming. Our



Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 25

1 prior arguments, backed up with testimony from a variety of  
 2 scientists and folks already subjected to the effects of  
 3 turbines, were sadly deemed irrelevant.  
 4 The smoke from the Taylor Bridge Fire resulted in many  
 5 forced evacuations across the northern slopes here,  
 6 including Sun East residents, along with many farm and ranch  
 7 animals trailered out with the generous help of friends and  
 8 family and anyone available in search of the (inaudible)  
 9 equipment. Information from the firefighters and pilots  
 10 operating helicopters and the retardant-dumping airplanes  
 11 should be consulted as to how -- how the smoke-shrouded  
 12 turbines affected their efforts.  
 13 The placement decisions for these towers was taken from us  
 14 and imposed by others with the same result. As we stated  
 15 many, many times there are less offensive areas to place  
 16 these turbines. Wild horse is one of them. Desert Claim  
 17 Territory is not one of them, and it isn't even desert. I  
 18 believe that it is the perspective of those not living here  
 19 subjected to the towers.  
 20 During the previous public testimony, our local county  
 21 representative on the Council asked if the Kittitas Valley  
 22 Wind Power Project bird kill had been documented. The  
 23 representative was unable to provide the answer at the time  
 24 and would look into it. How can the dead birds and bats be  
 25 counted it? They are most likely easy meals and edible

Page 26

1 treats for coyotes and other wildlife that consume them.  
 2 The count becomes uncountable, invisible, and obscure and  
 3 tossed away by the important facts of impact.  
 4 Perhaps none of us that oppose these turbines matter, but  
 5 at least our voice has been raised to hopefully be  
 6 documented, even if not heard nor taken seriously. Thank  
 7 you.  
 8 CHAIR DREW: Thank you.  
 9 FEMALE SPEAKER: Thank you.  
 10 CHAIR DREW: Go ahead. Next speaker.  
 11 MS. POTIS: Okay. Our next speaker is James Carmody.  
 12 MR. CARMODY: Good evening and thank you, Councilmembers,  
 13 Staff. My name is James Carmody. I work at the firm of  
 14 Meyer, Fluegge and Tenney in Yakima. My address is  
 15 230 South Second Street, Yakima. I'm here tonight  
 16 representing a group of local citizens and property owners  
 17 who have particular considerations in the preservation and  
 18 protection of agricultural farmlands and prime farm  
 19 properties, as well as preservation of rural character.  
 20 We're eight-plus years into this process, and the original  
 21 SCA is a ten-year authorization. So we're at the tag end,  
 22 and I think we can see why --  
 23 MS. POTIS: Can you --  
 24 MR. CARMODY: -- we're here.  
 25 MS. POTIS: -- turn it up?

Page 27

1 MR. CARMODY: I think we can see why we're at this point,  
 2 and that has to do with production tax credits, which is  
 3 what always drives these projects.  
 4 I've got some background. I was the attorney that  
 5 represented local citizens and argued in the Supreme Court  
 6 in the Residents against Kittitas Turbines litigation that  
 7 went to the Supreme Court. I've been involved in this  
 8 community, grew up in this community, and have been a  
 9 participant in these projects. I've also represented both  
 10 developers and citizen groups in wind farm projects  
 11 throughout the state.  
 12 What I think is significant in this case and significant  
 13 for your concerns, and it's even broader than this  
 14 particular application, it's issues facing this valley with  
 15 respect to alternative energy projects. You have a Columbia  
 16 Solar Project, which is being proposed in agricultural prime  
 17 farmlands, disruptive of rural character. And you have  
 18 this -- this project as well. So they offer and present  
 19 issues that are different than we've seen before.  
 20 Now, what has changed and what we believe to be  
 21 significant in this process is this county has gone through  
 22 a very difficult and long process in complying with the  
 23 Growth Management Act. In the amendment process, the Chair  
 24 mentioned the standards that you consider. There's an  
 25 additional standard, and that is compliance with applicable

Page 28

1 laws and rules as they apply. And the Growth Management Act  
 2 is very clear in the decision-making needs to bear upon and  
 3 respect the preservation and protection of prime farmlands.  
 4 And it also needs to be considerate and -- in looking at the  
 5 impact on rural character.  
 6 Kittitas County had a case that went to the Supreme Court  
 7 subsequent to the approval of this project in 2009 and '10.  
 8 And that litigation and the Supreme Court directed this  
 9 community to adopt and protect those particular resource  
 10 lands through amendments to their comprehensive plan and to  
 11 their development of regulations. They found that the  
 12 County was not compliant in not registering and providing  
 13 the appropriate level of projection for those.  
 14 I say that because I understand in the context the idea  
 15 that there's preemptive authority at the EFSEC level. But  
 16 that exercise of authority needs to be undertaken in the  
 17 context of what Growth Management is telling people: And  
 18 it's clearly preserve and protect.  
 19 This is the opportunity of the amendment where there's  
 20 changes that I think the amendment process requires that you  
 21 undertake that review in consideration with respect to  
 22 whether the amendment is appropriate or it continues to be  
 23 compliant with applicable laws with the clarity that the  
 24 Supreme Court and Growth Management has brought to this, and  
 25 the clear fact that you're going to have a transition and no

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

<p style="text-align: right;">Page 29</p> <p>1 preservation of farmland. So I think that's an important                  2 component in your review and decision-making process.                  3 I was also struck by the fact that the question posited by                  4 Mr. Livingston with respect to the impacts in study and                  5 analysis of the new turbines that are being used resulted                  6 in, really, no knowledge at all for you to assess the                  7 impacts in that regard. And that is a huge change. So you                  8 talk about a shrinking of the size of the project. That's                  9 fine. I get that. But the fundamental change in the                  10 turbine and the size going from 1.8- or a 2.0-megawatt                  11 machine to a 4, 4.2 is significant. There's absolutely no                  12 study or analysis that's available for you, and that was                  13 admitted tonight.                  14 And I think that's what SEPA is all about. There was                  15 discussions about post-construction avian studies, and                  16 that's part of what Fish and Wildlife have always required                  17 as a part of their wind power guidelines and attack                  18 committee for that that's fine. But that doesn't change the                  19 SEPA responsibility that you have, which is to analyze the                  20 impacts in advance of construction, not afterwards. So I                  21 think that the review and environmental review process needs                  22 to undertake, either through an addendum or process that you                  23 choose that has some meaningful study and analysis of the                  24 change in the equipment that's being proposed for the                  25 project.</p>	<p style="text-align: right;">Page 31</p> <p>1 All right. Let me get to the point of the matter in that                  2 we've got a code that the Council considers in evaluating                  3 these. And there are four provisions that are a part of                  4 that consideration. One of the ones that I think is                  5 particularly relevant to what I wanted to address tonight                  6 was the public health, safety, and welfare of the county in                  7 which this development is taking place. And I wanted to                  8 expressly target the idea of economic welfare.                  9 And let's, first of all, start out by saying larger                  10 turbines lead to greater impacts. And that's actually                  11 documented with some documents that I'll provide tonight.                  12 Even though the -- it wasn't particularly forthcoming                  13 relative to the height of the towers, these things are as                  14 tall as the Seattle -- as the Seattle Space Needle. And so                  15 we've got some significant impacts.                  16 But let's look at the first concern: welfare of the                  17 community. Economic data collected from 2010 to 2016                  18 designates Kittitas now as an economically distressed                  19 community. Poverty rates, housing, vacancy rates, change in                  20 establishments, median incomes, and change in employment set                  21 this county apart as actually having a little more fragile                  22 economy than some of the west side counties that you may                  23 well be more familiar with. Facility developments can                  24 produce economic impacts that undermine the public welfare                  25 of Kittitas. And Kittitas economic welfare is at risk when</p>
<p style="text-align: right;">Page 30</p> <p>1 So those are a few of the points that people that I                  2 represent would like you to consider. They're real and                  3 important in this valley. This is a farming community. The                  4 land is going away. Growth Management came about because of                  5 the Kent Valley and the loss of farmland there. And the                  6 courts and the legislature have been clear about                  7 responsibilities and land decision-making to preserve and                  8 protect those lands. And we ask you to consider those in                  9 the context of this process.                  10 CHAIR DREW: Thank you.                  11 MS. POTIS: Speaker No. 3, Mark Pritchard.                  12 MR. PRITCHARD: Thank you for traveling over. My name is                  13 Mark Pritchard. I'm a professor in the College of Business                  14 at Central Washington. I've been involved in, obviously,                  15 rural development for some years. I was down at Arizona                  16 State for a decade before coming here to Central for a                  17 decade. Including rural development, I've been involved in                  18 tourism development. And some of the amendments that are a                  19 part of this I wanted to bring before the committee for your                  20 consideration tonight. So I'll just go through a couple of                  21 points that I've listed here for you, and I've provided a                  22 sheaf of documents that I'll hand over to Tammy when I'm                  23 done. So if you could take a look at them, that would be                  24 great, and consider them in your decision-making here                  25 tonight.</p>	<p style="text-align: right;">Page 32</p> <p>1 local industry profits and jobs are threatened. And this                  2 particular amendment has that potential, that's why I wanted                  3 you to consider it.                  4 Basically, we've got a fledgling tourism industry that the                  5 Chamber of Commerce and also the Downtown Development                  6 Association have been working on for some time. It ties in                  7 nicely with the recent development that (inaudible) would                  8 know with the Governor's approval of a tourism marketing                  9 plan and also the funding of tourism for the state, which is                  10 a first for a long time.                  11 What we have with the development of these really tall                  12 towers is that we have diminished visitor appeal, diminished                  13 visitation rights, and diminished tourism dollar revenue                  14 potentials for this valley. When we have rural development,                  15 we have agriculture as a base. But tourism is this nice                  16 secondary industry that starts to be a fruit over time. And                  17 actually the Chamber has done a wonderful job with a very                  18 small budget of actually make- -- punching outside of its                  19 weight and actually having a big impact in trying to shift                  20 the dial relative to growth in this area.                  21 I think probably what we need to do is look at the profile                  22 of the county economically. And Don Meseck, who is the                  23 labor statistician, gives us a pretty good outline of that                  24 particular detail. Let me just read a little bit about what                  25 Don had to say about this.</p>

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 33

1 "If one analyzes the employment changes in Kittitas County  
 2 in the past 12 years from 2004 to 2016 using Washington  
 3 State Employment Security Department's annual average  
 4 Quarterly Census of Employment and Wage data, one observes  
 5 the total covered employment increase from 12,000 to 14,000  
 6 in 2016, 1,900 jobs and 15 percent expansion. Of that -- of  
 7 these sectors, the ones that made the most impact were in  
 8 accommodation and food services," which is an industry  
 9 related to tourism. "It provides 1,500" -- oh, sorry.  
 10 Backing up to this. "Many of these jobs are at local hotels  
 11 and restaurants. Accommodation and food services account  
 12 for 54 percent of all covered jobs added to this -- these  
 13 sectors in Kittitas. Between 2004 and 2016, looking at  
 14 these data, it's safe to say" -- and in Don's words -- "that  
 15 tourism is extremely important to the Kittitas County labor  
 16 market. Conversely, state government, which includes jobs  
 17 at Central Washington, decreased in the same period from  
 18 1,900 to 1,500, 439 jobs in total, a 22 percent reduction in  
 19 employment opportunities in what is already a distressed  
 20 county."  
 21 Now, one might be forgiven for thinking maybe the wind  
 22 turbines, there's only 31 of them, isn't going to have a  
 23 significant impact. Well, if you look at data that comes  
 24 out of Germany from an evaluation, a benchmark study of the  
 25 impact of tourism on 2,200 municipalities where they studied

Page 34

1 the number of jobs that diminished alongside of wind farm  
 2 development, you see a significant impact on the number of  
 3 tourism jobs, the number of tourism dollars coming into  
 4 those counties.  
 5 You've got the same sort of research and trends happening  
 6 in Scotland. You've got the same sort of research and  
 7 trends happening in the U.K. where they're looking at the  
 8 adverse affects of wind farms on tourism industries,  
 9 especially scenic landscapes. So the basic two -- the two  
 10 basic fundamental features of tourism attraction are the  
 11 destination image and that deals with the quality of the  
 12 landscape. And what we find is that over 55 percent of  
 13 visitors don't go to areas that have wind farms in them.  
 14 They don't want to see manmade constructed turbines on  
 15 natural landscapes. And so we're having some difficulties.  
 16 Now, the developer actually mentioned that he didn't know  
 17 too much about the towers being 460 feet or something of  
 18 that stripe. But actually what's happened is the U.K.  
 19 refuses to put those towers on their land. They now move  
 20 them into the North Atlantic. They won't have them on the  
 21 land base. So it's a very interesting shift that a European  
 22 developer, who would know that the impacts are actually  
 23 being rejected in Europe, is able to bring those here and  
 24 place them on Washington State land in prime landscape, in  
 25 prime scenic viewpoints and, yet seems to do it with

Page 35

1 impunity. So I would really ask you to look at those  
 2 documents relative to the German study. It's a landmark  
 3 study on tourism impacts as it results from turbines.  
 4 One of the interesting quirks of this is this idea of  
 5 density of turbines versus height of turbines. And what  
 6 they find is that of the two, it's not about density. It's  
 7 about the height. It's about the size. That's the thing  
 8 that actually moves the dial relative to people not going to  
 9 these areas or not being tourists in these regions. So you  
 10 need to really think about what's going in here. You really  
 11 need to the think about that these amendments are  
 12 significant changes. They're not just a little cosmetic  
 13 change. That deals with other physiological things. We've  
 14 only talked about things that are above ground, let alone  
 15 things that go on below ground. I've said nothing about  
 16 hydrology or anything else relative to these entities.  
 17 All right. Moving on. So this -- you've got your  
 18 profiles relative to the county. You've got some of the  
 19 impacts in Germany, some of the impacts in Scotland that  
 20 those are listed in. You've also got the Governor's bill  
 21 protecting tourism: the idea of identifying landscapes that  
 22 are worth protecting, that are worth conserving as part of  
 23 the State's mission. So please look at that bill again and  
 24 look at the mandate that's part of that for preserving  
 25 landscapes, preserving Washington State for both its

Page 36

1 residents and for potential visitors down the road.  
 2 In addition to that and a final piece, and I'll close  
 3 because I know I've probably spoken for way too long, and it  
 4 has to do with property values. And I know that we haven't  
 5 really spent that much time, and it sounds like a NIMBY kind  
 6 of argument to say, "Oh, it's going to affect property  
 7 values." A landmark study out of the London School of  
 8 Economics surveyed over 200,000 homes. It actually covered  
 9 the sale of homes in the U.K. and Wales for a period of ten  
 10 years. It was published in 2015. But the German article  
 11 and this one are published only three to four years ago, so  
 12 most of the data wasn't available when you made the decision  
 13 in 2010 to move forward with this project. But this one  
 14 here on valuing property values is significant. We've got  
 15 another one that I've provided on Ontario, Canada, where  
 16 they also talked about property values.  
 17 In the British study, you'll see from this survey of over  
 18 several hundred thousand sales over that ten-year period  
 19 throughout all of those different counties they looked at  
 20 the proximity of wind farms to those things and found  
 21 significant disadvantages accrued to local residents that  
 22 own those properties. So please look at the numbers. The  
 23 numbers are even more significant in Canada. They noted a  
 24 33 to 38 percent average median drop in price values to  
 25 properties that were adjacent to these things.

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 So those are documented impacts that go with these kinds  
 2 of developments. And they too, just like the tourism side  
 3 of things, are significantly impacted when you move from  
 4 small turbines to large turbines.  
 5 I think I can stop there. I've got a copy of the points  
 6 that I raised. Thank you for hearing us out tonight. We  
 7 appreciate you taking the time and coming over.  
 8 CHAIR DREW: Thank you.  
 9 MS. POTIS: Speaker No. 4, Kathi Pritchard.  
 10 MS. PRITCHARD: Good evening, Chair Drew and Council.  
 11 Thank you for visiting our area and listening to our  
 12 concerns about this amendment.  
 13 My name is Kathi Pritchard, and I am a resident of  
 14 Ellensburg. I am also a member of a grassroots community  
 15 group called Save Our Farms. But this is -- these are  
 16 comments I drafted myself. I have two -- along with my  
 17 husband, who just spoke -- years of experience in tourism  
 18 marketing. And so I agree with a lot of things he said.  
 19 But I'll be addressing you about economic interests.  
 20 RCW -- am I speaking loud enough for everyone? RCW 80.50  
 21 assigns you the task of balancing increasing energy demand  
 22 with the broad interests of the State, yet the energy supply  
 23 picture has changed dramatically since this legislation  
 24 empowered EFSEC, and more importantly, since Desert Claim  
 25 was approved in 2010. The demand for energy in the

1 exceeded the cap for new connections. Local residents are  
 2 already affected by this since Kittitas PUD is not accepting  
 3 new connections into the grid.  
 4 Into a market of oversupply of energy and flat demand, you  
 5 are being asked to consider an amendment with major changes.  
 6 Changes in location and size of turbines are beyond the  
 7 scope of a simple amendment. The effects will be  
 8 far-reaching. Thirty-one turbines the height of the  
 9 Space Needle will hinder Ellensburg's award winning tourism  
 10 program and the new State Tourism Program, which will add  
 11 natural vistas to attract visitors. Homeowners may have  
 12 rooftop solar contracts canceled if large utilities find no  
 13 room on the grid for net metering. Environmental impacts  
 14 are numerous, including harms for threatened species,  
 15 including eagles and bats. And also impacts to ground  
 16 water.  
 17 I respectfully submit several documents to you,  
 18 documenting the points I've made in this testimony.  
 19 Included in that is a monthly report documenting the effect  
 20 to birds already in this region from Wild Horse Wind  
 21 Facility. Wild Horse is being very responsible in going  
 22 forward to the U.S. Forest -- U.S. Fish and Wildlife Service  
 23 in arranging an eagle permit plan for the take of four  
 24 eagles. But these cumulative effects, along with effects  
 25 that might be occurring from Columbia Solar need to be taken

1 Northwest has been flat for the last few years and will  
 2 remain so in the future, according to the Northwest Power  
 3 and Conservation Council.  
 4 Not only is the demand for energy flat here, demand is  
 5 flat in California. The big change since 2010 is the surge  
 6 in California's energy output due to the industrial and  
 7 rooftop solar. California is giving away excess energy to  
 8 neighboring states in the west. This is documented in an  
 9 award winning article I've included for you from the  
 10 Los Angeles Times environmental reporter Ivan Penn. In part  
 11 because PSE joined California's energy imbalance market  
 12 recently, the amount of energy available in the Northwest is  
 13 abundant.  
 14 Several new additional industrial scale projects -- wind  
 15 in Thurston and Lewis Counties and new industrial solar  
 16 projects near Spokane, Centralia, and the Tri-Cities -- will  
 17 add to this supply. With so many new industrial-sized  
 18 additions our state may be -- may experience California's  
 19 current problem: congestion. But the congestion is not on  
 20 their freeways. It's in their transmission lines. What  
 21 will excess supply do to existing power companies like  
 22 Kittitas Valley Wind who already lacks customers? What will  
 23 this do to homeowners in our state who want to install solar  
 24 onto their rooftops? The State's latest energy report says  
 25 rooftop solar has increased so much that most utilities have

1 into account in the environmental impact of this project and  
 2 any other project that this Council is considering.  
 3 I appreciate your listening to my comments and concerns  
 4 and thank you for your attention.  
 5 CHAIR DREW: Thank you.  
 6 MS. POTIS: Speaker No. 5, Richard Carkner.  
 7 MR. CARKNER: Good evening, Chairman Drew and the Council.  
 8 I'd like to thank you for the opportunity to share a few  
 9 thoughts, a lot of which are quite similar to what you just  
 10 heard, but I think it's worth repeating. My name is Dick  
 11 Carkner. I'm the director of Save Our Farms organization  
 12 and a resident of Kittitas County. Save Our Farms has  
 13 concerns that this project and other proposals before the  
 14 EFSEC Council exceed the amount of peak power needed in the  
 15 State of Washington and further that the EFSEC Council has  
 16 not considered the current or future statewide demand for  
 17 wind and solar power. And the Energy Council has not  
 18 balanced the increased demands for energy in terms of  
 19 location and operation through the state.  
 20 To repeat, I'm sure you're familiar with this, RCW 80.50  
 21 provides the guidelines, the legislative guidelines for the  
 22 intent of putting together the EFSEC Organization. And,  
 23 again, balancing increased demand -- energy demand with the  
 24 broad interests of the public. And one of those, of course,  
 25 that we've talked about tonight is tourism. It's an

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 41

1 important part of the public interest. It simply hasn't  
 2 seen much light of day in the discussions up to this point.  
 3 As my call my colleague spoke about problems in  
 4 California, how excessive peak power generation affects the  
 5 distribution of power, we're concerned that in Washington  
 6 the Council is approving projects without examining the  
 7 demand for power or balancing the public interest related to  
 8 that. And, again, Steve Simmons from the Northwest Power  
 9 Council just in 2017 said, "The demand for inform is flat."  
 10 Puget Sound Energy report in 2015 said that their energy  
 11 demand, the demand for electricity is less in '15 than it  
 12 was in '13. So despite the flat demand for power, the  
 13 continued permitting of projects in Washington has caused a  
 14 decline in some electric utilities, and Kittitas PUD in  
 15 particular, to allow net metering.  
 16 This is an important opportunity for people in this  
 17 community and others to participate in the process through  
 18 personal investment, achieving a return on that investment,  
 19 rather than have this only with the -- or primarily the  
 20 opportunity for large corporations. In approving the Desert  
 21 Claim Project or any other proposals, the Council should  
 22 develop a statewide plan that shows the output of any new  
 23 proposals that's compatible with the -- well, for example,  
 24 these were mentioned as well. It seems like there's just a  
 25 haphazard process of siting projects. We've got the

Page 42

1 Chehalis coal mining site on-site. We have got a new  
 2 projects coming on near Lind.  
 3 Somehow these needs to be coordinated. We need a  
 4 big-picture look at this, rather than allowing incremental  
 5 power production with all the -- all the impacts that you've  
 6 heard about tonight. We need to allow some time for  
 7 technology to catch up. Storage technology, in particular,  
 8 is going to have a, you know, a big role in the decisions as  
 9 we look ahead in the green energy future. We should also  
 10 look at other options like community-based green energy  
 11 systems designed to benefit local residents, not  
 12 foreign-owned corporations.  
 13 This permit for Desert Claim and any other Kittitas power  
 14 production proposal should not be approved unless and until  
 15 the EFSEC Council can justify energy production in terms of  
 16 balancing the demands for energy with the broad interests of  
 17 the public, not just the interests of utility companies.  
 18 Thank you.  
 19 CHAIR DREW: Thank you.  
 20 MS. POTIS: Speaker No. 6 is Patty Kinney.  
 21 MS. KINNEY: I brought some visual aids, and so I'm just  
 22 going to -- if you'll bear with me for a second.  
 23 My name is Patty Kinney. I live at 2362 Smithson Road,  
 24 and it's on the southern border of the project. My comments  
 25 are in two parts. They're about the amendment that's

Page 43

1 proposed right now and the specific things that I think  
 2 warrant a new look at the size or whatever process you  
 3 choose to use on that. And my other comments are about the  
 4 past and when the wind farm was approved in 2010.  
 5 So I brought some pictures because I felt that our  
 6 comments about the visual impacts of turbines on the  
 7 neighborhoods in the area were not given the weight that  
 8 they deserved. So I'll read from my comments here.  
 9 The pictures I have taken over the years of the landscape  
 10 as viewed from my property, and I brought these to share  
 11 with you. These are not just my views, but people east,  
 12 west, and south of me have very similar views of this  
 13 landscape. I want to share these photos with you because I  
 14 want you to understand the sense of place that we feel here,  
 15 the rural character. Each of these photos is typical of any  
 16 given year. And I think they accurately portray the beauty  
 17 we see in this landscape.  
 18 Picture No. 1 is from early spring. Table Mountain and  
 19 Lion Rock have just received a dusting of snow. In a couple  
 20 of years this view could be full of wind turbines obscuring  
 21 these two popular landmarks from view.  
 22 Picture No. 2 -- I'm okay. Picture No. 2 is from late  
 23 spring where everything is greening up. But the pastels of  
 24 spring will soon be painted with wide strokes of white  
 25 turbines.

Page 44

1 Picture No. 3 is from a typical summer evening with the  
 2 sun low in the sky and the curvature of the canyons and the  
 3 hills is accentuated. The turbines will be much higher than  
 4 the top of the hills, and that's what will command our  
 5 attention, not the rolling curvature of these hills.  
 6 Picture No. 4 is late summer, early fall. It's rustic  
 7 flavor is what we love about this place. The BPA towers are  
 8 in this picture and every picture I've shown you so far.  
 9 They're hardly noticeable, if at all. They blend into their  
 10 surroundings because they are not white and also because  
 11 they are not taller than the top of the hills.  
 12 Picture 5. This is what it looks like when the hills are  
 13 burning. This is the Naneum Fire in 2014. And I just  
 14 want -- if you can see in the middle ground, there are two  
 15 power poles.  
 16 And in this next picture, Picture No. 6, is an airplane  
 17 dropping retardant. If you look between those power poles,  
 18 you'll see it. There's also another plane up in the corner  
 19 of the picture. And there was also that day a yellow plane  
 20 that was dropping retardant. This day was the day after the  
 21 2012 Taylor Bridge Fire. I don't think these planes could  
 22 have done what they did if turbines were in this area.  
 23 This is Picture 7. It was taken April of 2009. It  
 24 replicates one of the viewpoints from the Final SEIS. It's  
 25 two miles from the project from Hayward Hill. I used a

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 45	Page 47
<p>1 50 millimeter focal length on my camera. The BPA towers are                  2 the in the background. They're 170 feet tall. What would                  3 492-foot tall turbines look like? Between this brown --                  4 this brown house with the green roof to the north of                  5 Smithson Road there are about 26 other homes that would be                  6 looking at the white massive turbines, instead of noticing                  7 how blue these hills are.                  8 Picture 8 is typical of late winter, early spring. It's                  9 from Smithson Road. I did zoom in to about 130 millimeters                  10 and these raptors are near the berm of the north branch                  11 canal. There are about nine of them in here. Three eagles                  12 on the ground, one in flight. I believe that's a golden                  13 eagle flying in flight and maybe one on the fence post. I                  14 see more and more eagles every year up here. And they often                  15 perch in a tree on my property. If they're lucky, they'll                  16 go away when the turbines come.                  17 Picture 9 was taken in January of this year from my back                  18 deck. Those are cattle going down Smithson Road. You never                  19 know when there's going to be a cattle drive down Smithson.                  20 And even those it's a slow-moving process, it's exciting to                  21 watch. This is the essence of our place.                  22 I don't know how this message was lost on EFSEC in 2009.                  23 On page 18 of Order 843 that recommended approval of the                  24 wind farm it stated, quote, "Affected nonparticipating                  25 homeowners did not express specific concerns about the</p>	<p>1 end quote. Another part of that same law is that EFSEC,                  2 quote, "assure for all people of Washington safe, healthful,                  3 productive, and aesthetically and culturally pleasing                  4 surroundings," end quote.                  5 In 2009 the Council, in my mind, gave very little weight                  6 to this part of the law. Our voices, imploring that we love                  7 and want to protect not just our views but also our rural                  8 character, were completely lost on the people who were on                  9 the Council at that time. Placing turbines right in front                  10 of the Wenatchee mountains and right in the middle of a                  11 large number of homes should be a last resort, not a first                  12 resort.                  13 Our representative, Mr. Ian Elliot's response to Order 843                  14 stated in part, quote, "We have not adequately dealt with                  15 the visual effect of multiple turbines on relatively flat                  16 terrain as it pertains to local residences," unquote. I                  17 hope the Council will deal with the visual impacts on nearby                  18 residences adequately this time around. And what I mean by                  19 "nearby" is not just those within 2,500 feet. I mean within                  20 two to three miles of the project. These turbines are so                  21 huge there will be visual impacts on anyone within a two- to                  22 three-mile radius of the project. The National Academy of                  23 Sciences concurs with this; quote, "The most significant                  24 visual impacts are likely to occur within three miles of the                  25 projects with impacts possible from sensitive viewing areas</p>
Page 46	Page 48
<p>1 effect of nearby turbines on view or aesthetics," end quote.                  2 That interpretation of what happened is completely                  3 inaccurate. I reread the comments from the public hearing,                  4 which I attended, as well as the land use hearing, and many                  5 people spoke of the aesthetics of turbines near their homes.                  6 Perhaps words such as "monstrosity" or "industrial" were not                  7 interpreted as applying to visual impacts. Perhaps since                  8 the words "view" or "viewshed" were not used so much or at                  9 all, our concerns were not considered specific enough for                  10 the EFSEC author of Order 843. But I read many articulate                  11 informed comments that were specific.                  12 The next paragraph on page 18 of Order 843 states, quote,                  13 "Few commenters at the public hearings mentioned visual                  14 aspects of nearby turbines, and the comments were not                  15 expert," end quote. Again, there were plenty of commenters                  16 who spoke of visual concerns. That's how I interpreted what                  17 I saw and read. The idea that the comments were not expert                  18 is anathema to this whole process of public hearings. Why                  19 even involve the public if our comments have no rank because                  20 they are not considered expert.                  21 It seems that interpretation plays as important a role in                  22 this process as the rule of law. The conclusion on page 24                  23 of Order 843 states, quote, "One of the Council's principal                  24 duties is to ensure that the location of energy facilities                  25 will produce minimal adverse effects on the environment,"</p>	<p>1 up to eight miles of the project."                  2 Can I keep going?                  3 CHAIR DREW: Uh-huh.                  4 MS. KINNEY: Okay. I want to start with the current                  5 project and the visual simulations. All the visual                  6 simulations that are in the amendment use an uncommonly wide                  7 angle of view of 124 degrees. I think I copied one off. I                  8 will show you in a second here. But what we really need to                  9 comprehend the size of turbines near our homes is something                  10 quite different. When I saw the simulations from                  11 Viewpoint 6 in the amendment, I didn't trust that it was                  12 accurate because I know the area, and it didn't look right                  13 to me. So I went to Viewpoint 6, which is about a mile east                  14 of my house on Smithson Road. As soon as I got there I                  15 discovered I was right. The white house is much closer in                  16 person.                  17 So I photographed the area, taking in the same view as the                  18 simulation. I took four photos with my Nikon D7200, which                  19 has an APS-C sensor, which means it's slightly smaller than                  20 a full-frame sensor, therefore, I used 44 millimeters as my                  21 lens focal length rather than 50 millimeters, which is what                  22 I would have used if I had a full-frame sensor. Next I                  23 sized the photos so that they had the same vertical                  24 measurement as the photo simulation I retrieved from the new                  25 project description, which is 2.2 -- 6.25 inches. I lined</p>

12 (Pages 45 to 48)

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 49

1 up the photos and made one photo that I printed in two parts  
 2 due to paper size limitations. I'll show you what I did. I  
 3 know this is a -- may be a little bit hard for you to see  
 4 from where you're at, but this is just a copy of what's in  
 5 the amendment. And when I saw this picture, this  
 6 simulation, I just thought the white house was way too far  
 7 away.  
 8 CHAIR DREW: So --  
 9 MS. KINNEY: So my four pictures that I put together, you  
 10 can see the white house, probably, from where you're  
 11 sitting. It's much closer and bigger, and it's more  
 12 realistic. And I don't know how they did their simulations,  
 13 but all -- every simulation must start with a photograph.  
 14 And a photograph has to be made with a 50 millimeter lens if  
 15 you have a full-frame sensor. If you don't, objects look  
 16 smaller and farther away. And the very first time this  
 17 project was proposed, that's what they used was a camera  
 18 with a 35 millimeter lens. And they had to go do all their  
 19 simulations over using a 50 millimeter lens. And I think  
 20 these simulations need to be examined, and we need to find  
 21 out how they were done because I believe that when we look  
 22 at these simulations the towers look so much smaller and  
 23 farther away than what they really will look like.  
 24 If a wind turbine is within a half a mile it will likely  
 25 dominate a person's field of view. And peripheral vision

Page 50

1 will be just that, peripheral. We won't be interested in a  
 2 180-degree view. We'll be looking at what's right in front  
 3 of us. According to the National Academy of Sciences,  
 4 quote, "Photographs should be taken with a 50 millimeter  
 5 lens or digital equivalent that creates a 38.6 degree angle  
 6 of view, which most closely matches human visual  
 7 perception." There are a lot of people who live within a  
 8 half mile of one or more turbines. We need to see how big  
 9 they're really going to look. So I hope new simulations can  
 10 be done.  
 11 The number of viewpoints is also inadequate. There should  
 12 be more views from areas where there are the most people  
 13 nearby who will see turbines. I believe a viewpoint should  
 14 be added at Howard Road, perhaps a quarter mile west, like  
 15 the view used in the 2009 Final SEIS. It should be looking  
 16 north, as that's where most of the turbines will be located.  
 17 This will actually be the view of many people not shown on  
 18 the maps of the project. The maps cut off at Smithson Road.  
 19 If you look at those maps right back there, the bottom of  
 20 the project is right at Smithson Road, and you see nothing  
 21 below that. But you do see homes -- they have a map of the  
 22 nearby homes in the amendment, and you can see houses to the  
 23 east and to the northeast of the project that are probably a  
 24 mile or a mile and a half away. But none of the homes that  
 25 are south of the project are shown on the map. There are

Page 51

1 27 residences along Howard Road that are not shown. That's  
 2 about a third of the total residences that surround that  
 3 project. So there is going to be a significant number of  
 4 people impacted by this, even though they say there's only  
 5 21 [sic] turbines.  
 6 In addition to these visual impacts I just want to go  
 7 through some things very quickly here, if I can, that I  
 8 think might warrant either immunity or making a new SEIS.  
 9 One, there's a new section of land in the new SCA that  
 10 wasn't in the previous SCA. Of course, the turbine size has  
 11 changed. I have a letter to the editor to the Ellensburg  
 12 Daily Record that I will submit that talks more in-depth  
 13 about that. The attorney general in the draft SEIS comments  
 14 called for a scale diagram with points of reference to allow  
 15 the reader to easily comprehend the turbine size. This has  
 16 never been done. Instead a photograph in the 2018 project  
 17 description shows, quote, "a typical turbine in use." That  
 18 is not adequate. We need to see scale drawings of what  
 19 these turbines with look like and have a frame of reference  
 20 so we know how big is it really going to be.  
 21 And when I was trying to figure out the size of the rotors  
 22 and so forth, I came up with a measurement of 50 feet from  
 23 ground to the tip of the rotors when they're rotating. I  
 24 don't know if that's right or not. I just subtracted the  
 25 numbers that they put on, you know, their turb- -- on the

Page 52

1 chart. So is that right that when that turbine -- those  
 2 rotors are rotating the lowest it will be is only 50 feet  
 3 off the ground? We don't know because they don't give us  
 4 any drawings.  
 5 The configuration of turbines is very troubling to me.  
 6 Local residences will view the turbines from closest to  
 7 farthest rather than a string of turbines along a ridge top.  
 8 This will lead to visual disorder on relatively flat but  
 9 sloped terrain. The spacing is not consistent creating  
 10 visual clutter from front to back and side to side. It's  
 11 inconsistent because of the number of wetlands in the area  
 12 and the attempts to avoid crossing them. For example, there  
 13 is one road -- you can see it right back there -- it's about  
 14 1.7 miles long that services only two turbines in one  
 15 configuration and three in another. And I thought that  
 16 might be really inefficient use of the roads that they're  
 17 building.  
 18 CHAIR DREW: If I could ask you to wrap up. And perhaps  
 19 if you have additional written comments -- and we can also  
 20 have the staff talk to you more because we have about a half  
 21 hour left and --  
 22 MS. KINNEY: Okay.  
 23 CHAIR DREW: -- another six speakers. I wanted to --  
 24 MS. KINNEY: Yes.  
 25 CHAIR DREW: -- give people as much time as I could,

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 53

1 but --

2 MS. KINNEY: Okay. I will --

3 CHAIR DREW: -- that's fair.

4 MS. KINNEY: -- skip to my conclusion. Is that good?

5 CHAIR DREW: Yes.

6 MS. KINNEY: All right.

7 CHAIR DREW: And we're happy to get written documentation.

8 And --

9 MS. KINNEY: I do have that.

10 CHAIR DREW: -- I think your comments are well-taken --

11 MS. KINNEY: Okay.

12 CHAIR DREW: -- and very well-researched. So we

13 appreciate that.

14 MS. KINNEY: Okay. Let me see here.

15 MR. ROSSMAN: And copies of the photos.

16 CHAIR DREW: Oh, copies of the photos are being requested.

17 MS. KINNEY: I do have those two digital copies for you --

18 CHAIR DREW: Okay. Thank you.

19 MS. KINNEY: -- for your convenience.

20 Okay. I just want to get to my -- okay. I'll try not to

21 take too much longer.

22 CHAIR DREW: Thank you.

23 MS. KINNEY: The last thing I have, then, is Desert Claim

24 has not demonstrated the need to site this wind farm in this

25 location. EFSEC has stated in its report to the Governor

Page 54

1 recommending rejection of the Tesoro Savage Petroleum

2 Terminal on page 59, quote, "Tesoro Savage has the burden of

3 demonstrating that -- the need for the VEDT at the proposed

4 location. As discussed in Section VIII, even if one accepts

5 the premise that there is a 'pressing need for energy

6 facilities,' the Council must determine the appropriateness

7 of the proposed location and operation of the proposed

8 facility in light of the need for energy from that

9 facility." Not once in Order 843 did EFSEC require Desert

10 Claim to address the need for a wind farm in this particular

11 location over all others.

12 Does anyone remember the uproar over the Vantage Wind Farm

13 in 2010? No. Because they worked with the County in the

14 overlay zone, and the process worked. The Ellensburg Daily

15 Record quoted Invenergy director of development at the time,

16 quote, "County staff and commissioners did a good job at

17 presenting the fair and reasonable conditions in the

18 development agreement," unquote. The project manager at the

19 time construction began was also quoted as saying "We're

20 moving right along right on schedule." And Commissioner

21 Alan Crankoich said, "The County put a thorough wind farm

22 review process in place, and it worked."

23 So it's time to say that this is not an appropriate place

24 for a wind farm. Desert Claim has had over a decade to get

25 it right in siting this wind farm in this area. And now

Page 55

1 that the SCA is about to expire in 2020, they want EFSEC to

2 hurry up and approve their latest amendment. And I say it's

3 time to say, "Not in this place."

4 CHAIR DREW: Thank you.

5 MS. POTIS: Speaker No. 7, Teresa Sloan.

6 MS. SLOAN: I don't know if the mic will go low enough.

7 Hi, my name is Teresa Sloan. I am a local pilot. I'm

8 instrument rated. That means I can fly in the clouds. I

9 have an airplane at the Ellensburg airport and I work at the

10 Ellensburg airport. And my concern is I saw the words

11 "transportation considerations" on the board back there, but

12 we didn't see anything that specifically mentioned the FAA.

13 Unless there's been an additional long-term study on any

14 potential impact on the instrument approaches coming into

15 Bowers Field, I recommend that this project not move forward

16 until that's done.

17 If we look at the original wind farm and how it was

18 approved and how our minimums were raised for our instrument

19 approaches after that wind farm went in to the east of us,

20 basically, there was some input sought from the FAA --

21 didn't quite get the answer they wanted and went to a

22 retired person from the FAA, and got approval for putting in

23 the turbines that are out there. One of my colleagues,

24 while executing an instrument approach in visual conditions,

25 coming in on what's called the intermediate segment coming

Page 56

1 into Ellensburg was actually looking up at the wind towers

2 to the side of him. They were higher than the airplane.

3 And if you can imagine that being a problem when you're in

4 the clouds and you can't even see those wind farms.

5 We had just received that instrument approach, which

6 lowered the minimums that airplanes could go down to. And

7 we no sooner got those lower minimums when the FAA came and

8 said, "Oh, golly gee, those towers are taller, we need to

9 raise your minimums back up even higher." And we're afraid

10 that that might had an again.

11 As you may know, we've recently had one of our two runways

12 closed, which means we've lost one of our instrument

13 approaches to runway 25. We have a very new instrument

14 approach for runway 11 that comes in from the northwest for

15 landing towards the southeast. And you may have noticed

16 we've been having quite a bit of wind from that direction

17 lately. That particular approach -- I just pulled up the

18 approach chart and looked at it, and the proposed wind farm

19 comes pretty close to some of the segments of that

20 instrument approach.

21 I believe that there's a minimum of 2,000 feet clearance

22 between the altitude of the approach and the terrain or any

23 obstacles on it within a 4-nautical-mile radius on either

24 side. And my concern is, has anybody really researched

25 exactly where these towers are going to go in and their



Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 relation to that instrument approach, or are we going to  
2 lose another instrument approach or have our minimums jacked  
3 up so high that it's difficult for an aircraft to get down  
4 low enough to be able to get below the clouds in time to see  
5 the runway.

6 Keep in mind we do have some medevac flights coming in.  
7 That actually has been a little bit curtailed because of the  
8 short runway that we have right now, although the plan is to  
9 extend that runway in the not-too-distant future. But  
10 lowering those minimums to that instrument approach could  
11 further prevent medevac flights from being able to come into  
12 Ellensburg. So I do highly recommend that the FAA be  
13 completely researched on this subject and that it is only  
14 active FAA members that are giving the recommendations.  
15 Thank you.

16 CHAIR DREW: Thank you.

17 MS. POTIS: Speaker No. 8, Mr. Paul Jewell.

18 MR. JEWELL: Good evening.

19 CHAIR DREW: Good evening.

20 MR. JEWELL: My name is Paul Jewell. I'm a Kittitas  
21 County commissioner. I can't even work my own equipment.  
22 Sorry about that. I also apologize for my appearance this  
23 evening. I wasn't planning to speak, but as I was  
24 evaluating some of the -- listening to some of the remarks  
25 and evaluating some of the paperwork on this, I had a couple

1 to take us all on vacation and otherwise.

2 She mentioned the medevac flights and how important those  
3 are. Another really important thing to point out, though,  
4 is it also serves as a wildfire base during the summertime.  
5 DNR operates out of there with a Helitack crew as well as  
6 several other flight operations for the wildfires that tend  
7 to occur regularly in they area. So flight operations,  
8 regular operations not being affected at Bowers Field is  
9 really important for us on a regular basis.

10 The second thing I'd like to mention is what I really see  
11 as a pretty stark omission in the site certification  
12 agreement. And that is any mitigation requirements around  
13 local roads. There's a lot of discussion about project  
14 roads and a lot of discussion about internal roads within  
15 the project, construction of those, what they might look  
16 like, how wide they'll be, access, et cetera. But there's  
17 not a lot of discussion about public and state roads. The  
18 reason I bring that up is we've got some experience now with  
19 some of these wind farms. We've had three major projects  
20 here in the county, and with at least two of them we  
21 experienced major damage and other issues associated with  
22 our roadways. The most recent project in the Vantage area,  
23 I think it was the Invenergy project, we're still trying to  
24 recover Vantage Highway from some of the road damage that  
25 occurred.

1 of -- a couple of things to add. I won't take up a lot of  
2 your time, so I'm going to limit it to two main remarks.

3 First of all, before I get to those, though, certainly are  
4 appreciative of all the folks who have shown up tonight and  
5 are making some really good comments. We really appreciate  
6 how thoughtful they're being. And we hope you appreciate  
7 that as well.

8 Now, to my two main comments. First of all, I want to  
9 support the comments that were just made about the Bowers  
10 Airfield operations and the concerns about the operating  
11 minimums and how these turbines, especially with the  
12 increased height, might affect aeronautical operations at  
13 Bowers Field. You have some really strong language in the  
14 site certification agreement that requires FAA approval or  
15 certification that installation of the turbines won't affect  
16 Bowers Field in any way, shape, or form. If there's a way  
17 to strengthen that even further to make sure that the proper  
18 certification and the proper authorization is received by  
19 the FAA prior to construction of any of the turbines, we  
20 would definitely support that.

21 Bowers Field hosts a flight training program from Central  
22 Washington University. I don't know if the previous speaker  
23 mentioned that. But it's a very important flight program,  
24 not only for the University, but also regionally here for  
25 making sure we have the next crop of professionals out there

1 With the larger turbines, it sounds like larger trucks; it  
2 sounds like heavier loads. We might see some more impacts.  
3 So I would like you to include some pretty strong language  
4 around pre and post road condition, monitoring, and  
5 certification. And to work with the County to make sure  
6 that if there is damage that has been caused by these  
7 projects on our roads, that the applicant is responsible for  
8 that. If you need us to provide you some specific language  
9 for some appropriate conditions, we'd be happy to do that.

10 CHAIR DREW: Thank you.

11 MR. JEWELL: Thanks very much.

12 CHAIR DREW: Thank you.

13 MS. POTIS: Speaker No. 9, Gina Jefferson-Lindemoen.

14 MS. JEFFERSON-LINDEMOEN: Hi, I am a resident at the end  
15 of Reecer Creek. I was involved in three of the fires. It  
16 was really scary. I don't know how a plane or -- can you  
17 all hear me?

18 FEMALE SPEAKER: Can you lower the mic? There you go.

19 MS. JEFFERSON-LINDEMOEN: I don't know how a plane or a  
20 helicopter could even operate. The telephone poles that  
21 burned and fell on the horse trailers trying to get my horse  
22 out during the Taylor Bridge Fire -- it was scary. I  
23 couldn't even leave. I had to go up over the mountain  
24 through the back woods to leave my property and go to  
25 Wenatchee. I couldn't even leave and go down Reecer Creek.

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

Page 61

1 So that to me is a very big concern.  
 2 I really didn't even realize that this is an amendment. I  
 3 thought maybe this is to reject this project. And I still  
 4 haven't even seen what's going to happen here. Is this just  
 5 to amend the project?  
 6 CHAIR DREW: The proposal from the applicant is to amend  
 7 the project --  
 8 MS. JEFFERSON-LINDEMOEN: Okay.  
 9 CHAIR DREW: -- yes.  
 10 MS. JEFFERSON-LINDEMOEN: So it's actually approved to go  
 11 in.  
 12 CHAIR DREW: No. Oh, the project had been approved, yes.  
 13 MS. JEFFERSON-LINDEMOEN: Right.  
 14 CHAIR DREW: There's an existing site certification  
 15 agreement.  
 16 MS. JEFFERSON-LINDEMOEN: Right. But it -- they didn't  
 17 comply up to 2015; is that correct? They were supposed to  
 18 do all their permitting before 2015, and they did not do  
 19 that? So we all thought it was gone and done and over with.  
 20 CHAIR DREW: I'll see if our staff is prepared to answer  
 21 that question. If not, we will get back to you --  
 22 MS. JEFFERSON-LINDEMOEN: Okay.  
 23 CHAIR DREW: -- but --  
 24 MS. JEFFERSON-LINDEMOEN: That was the assumption of all  
 25 us on Reecer Creek: That it was done; it was over. So now

Page 62

1 it's all put us all back in a frenzy.  
 2 CHAIR DREW: Do you want to wait just one second? I'll --  
 3 MS. JEFFERSON-LINDEMOEN: Okay.  
 4 CHAIR DREW: -- see if we have a response for your  
 5 question on the process.  
 6 MR. POSNER: We can check on that, but I'm not aware that  
 7 their -- they had to have all of their permits in place.  
 8 They have not even submitted any plans that need to be  
 9 approved for it -- before any sort of site preparation or  
 10 construction would begin.  
 11 CHAIR DREW: So we will take that comment and then get an  
 12 answer.  
 13 MS. JEFFERSON-LINDEMOEN: Okay. Is --  
 14 MR. POSNER: So I'm not sure where you're getting that --  
 15 MS. JEFFERSON-LINDEMOEN: From the Daily --  
 16 MR. POSNER: -- information from.  
 17 MS. JEFFERSON-LINDEMOEN: -- Record. It was -- came from  
 18 the Daily Record --  
 19 CHAIR DREW: Oh. Oh. Okay. So not necessarily --  
 20 MS. JEFFERSON-LINDEMOEN: -- that they had to have all  
 21 their --  
 22 CHAIR DREW: Okay. Thank you.  
 23 MS. JEFFERSON-LINDEMOEN: -- permitting done before 2015,  
 24 and nothing was presented.  
 25 The other thing I'd like to say is has anybody noticed the

Page 63

1 cost of electric prices in Ellensburg? The cost increase  
 2 for your utilities for your electric is because of  
 3 Bonneville. Because of the fight that they've had with the  
 4 dams and the wind turbine companies. I work for the utility  
 5 companies, for one in particular. And this year alone we  
 6 had 8.1 percent increase in our utilities. Last year we had  
 7 3.7. Since 2010 we've had almost 37 percent increase. When  
 8 Bonneville went to court with the other wind tower company  
 9 that hasn't sold all their power, of course, the courts went  
 10 against Bonneville and our transmission lines had to be used  
 11 for the wind power, which affected our fish and affected our  
 12 electrical costs. So all the utility companies had to raise  
 13 their costs because Bonneville had to sell their power at a  
 14 more expensive price. So 8.1 percent this year.  
 15 Someone brought up that we don't even need this because  
 16 the utility -- the need for the utilities, we don't have it;  
 17 that it's flat. So what's that going to do to our City of  
 18 Ellensburg or the surrounding area for the cost increases?  
 19 I deal with people every day that cannot pay their utility  
 20 bills and then have to look for federal money to help them  
 21 through programs such as HopeSource. We have a median  
 22 income here of around \$12 an hour in this county. How can  
 23 we afford to force all of our citizens with these increases  
 24 in their electricity? You're all asking us to pay for more.  
 25 Because when the subsidies go away, we pay for it. No one

Page 64

1 else but us pays for it. And I have to hear all the stories  
 2 every day about how they can't pay for it. People haven't  
 3 each gotten their bill yet from the City of Ellensburg with  
 4 the 8.1 increase in their utility rate cap (phonetic).  
 5 The other thing I would like to say is no jobs will be  
 6 local. They can tell you whatever they want, but they bring  
 7 plants from Oregon and other sites for batch plants to do  
 8 their gravel and all of that. They don't ask for anybody  
 9 local. They had one person that had two trucks come in and  
 10 help, but there were no local jobs. Ellensburg Cement  
 11 Products did supply some of the gravel that was needed, but  
 12 not near the amount that they had thought that they were  
 13 going to get because they brought the batch plants from  
 14 Oregon. And the people that install them travel all the way  
 15 around the country. Nobody local it getting those jobs.  
 16 The other thing is the property values, which was brought  
 17 up. I'm going -- I live at the very end of Reecer Creek,  
 18 and my home is now valued \$400,000. Who's going to give me  
 19 that amount of money if I had to sell? Are any of you all  
 20 going to buy my house?  
 21 FEMALE SPEAKER: No.  
 22 CHAIR DREW: Please, please, if you can address the  
 23 Council in this hearing.  
 24 MS. JEFFERSON-LINDEMOEN: I am addressing --  
 25 CHAIR DREW: Okay.

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 MS. JEFFERSON-LINDEMOEN: -- the Council. But I'm  
 2 addressing my neighbors as well.  
 3 CHAIR DREW: Right. You -- the (inaudible) --  
 4 MS. JEFFERSON-LINDEMOEN: So also the thing I would like  
 5 to --  
 6 CHAIR DREW: -- Council.  
 7 MS. JEFFERSON-LINDEMOEN: -- say about this is I went  
 8 through all of it before. I had the assistant attorney  
 9 general at my home. And what he told me -- this is before  
 10 Christine Gregoire approve it. They knew before the Council  
 11 did anything. He was at my home with all my neighbors, and  
 12 he said, "Gina, it's not if; it's when."  
 13 And we told him, "Well, the County hasn't approved it."  
 14 He said, "I'm telling you. It's not if; it's when." So  
 15 what is -- what are people hiding from us? If you all are  
 16 the ones that are doing this, how come you all didn't come  
 17 out and tell us sooner when they came forth with it in 2009  
 18 or 2010? Because he was at my home and he told us it wasn't  
 19 if; it was when. That's my other thing.  
 20 The other thing I'd like to know is why aren't they  
 21 approaching North Bend? North Bend has a whole bunch of  
 22 wind. Why aren't they being built in King County? I'd like  
 23 to know that.  
 24 Well, that's about all I really have to say. It's like I  
 25 feel like we've all been storied to, but I can't imagine why

1 have a beautiful view at night, you know, when we look down  
 2 over the town of Ellensburg. And we're not looking forward  
 3 to seeing a bunch of red blinking lights like we see off to  
 4 the west, and the towers being as tall as they are.  
 5 The other thing I've noticed in the area is we have had an  
 6 increase in bald eagles, owls, and hawks in the area. Um --  
 7 yeah. I guess -- you know, the biggest thing is I would  
 8 think we could do a lot more with conservation work and --  
 9 you know, with that. We're doing good for the customers.  
 10 You know, we're helping more industries, businesses to  
 11 improve their efficiencies and things like that. And the  
 12 money just goes for a better cause. So that's all I've got  
 13 to say.  
 14 CHAIR DREW: Thank you.  
 15 MS. POTIS: Speaker No. 11, Emily Satre.  
 16 MS. SATRE: Hello, Council. My name is Emily Satre and  
 17 I'm Ken's wife. And I've lived with him a long time to know  
 18 that he knows what he's talking about. We don't need these  
 19 wind turbines. We have too much power. When we have an  
 20 excess amount of anything it creates a problem. No one is  
 21 creating a problem for me. I'm just a concerned property  
 22 owner.  
 23 I had a really hard life, even though it doesn't mean  
 24 anything to you or anybody involved with this project. But  
 25 for what I had to survive and get through in life to move to

1 anyone would allow something to go in where there are  
 2 homes -- that many of them and that tall. That's all I have  
 3 to say.  
 4 CHAIR DREW: Thank you.  
 5 MS. POTIS: Speaker No. 10. Give me a second.  
 6 CHAIR DREW: Your microphone is --  
 7 MS. POTIS: Testing?  
 8 CHAIR DREW: We'll have the speaker introduce himself.  
 9 MR. SATRE: Hello, Council. My name is Ken Satre. And I  
 10 actually retired from Snohomish County Pud. And I was a  
 11 senior energy manager there. And my position there was  
 12 working with commercial, industrial, and agricultural  
 13 customers doing conservation work. And we actually saved  
 14 quite a bit of energy. I worked with Boeing, dairy farmers,  
 15 pretty much everybody. And, you know, the biggest bang for  
 16 your buck is in conservation. Building the wind towers and  
 17 things like that.  
 18 You know, the other problem we have is the grid. You  
 19 know, there's only so many electrons you can run through the  
 20 wires. It's kind of like a hose, there's only -- you know,  
 21 a certain size hose will only take so much water. So with  
 22 the increase in gigawatts, you know, you're going to be  
 23 looking at massive expansions of the grid also.  
 24 And then I also live at the very end of Reecer Creek Road,  
 25 and, you know, we live at the north end. And right now we

1 where I live right now out on Reecer Creek Road, I feel like  
 2 I was blessed finally with a beautiful place to live. These  
 3 wind turbines are going to (inaudible). They're going to  
 4 devalue my property. They're going to devalue my life, my  
 5 quality of life, and my choice of life. I did not choose to  
 6 have this monstrosity of a wind generator come in and take  
 7 over the land. I chose to live in a place that was  
 8 peaceful, free, has wildlife. It has beautiful landscape.  
 9 It means something to me. It means something to everybody  
 10 that bought property where we live out there.  
 11 This is an intrusion in our life, and it will devalue our  
 12 quality of living. And I am asking, please, do not allow  
 13 for this to be taken away from us because it will force me  
 14 to have to move again. And I don't want to have to move. I  
 15 don't want to loose what I worked my entire life for. It  
 16 means that much to me. It means that much to everybody that  
 17 lives here. This is a beautiful community. Why let it be  
 18 destroyed by somebody who just wants to make more money?  
 19 They don't live here. We do. Thank you.  
 20 MS. POTIS: Speaker No. 12, Janet Nelson.  
 21 MS. NELSON: My name is Janet Nelson, and I live here in  
 22 town after many years up at Lake Kachess where we had a  
 23 beautiful view. I really wasn't going to speak, but I have  
 24 been trying to research online information about  
 25 supplemental environment studies that might be going to be

Verbatim Transcript of Public Hearing - Desert Claim Wind Project - 4/11/2018

1 done. And I couldn't find anything. This was on the EFSEC  
2 website. I understand there are studies going on. But I  
3 wanted to alert you to the fact that there probably have  
4 been changes in the last nine or ten years, environmentally,  
5 on this area.

6 One thing that I became aware of while I was trying to  
7 research it online is that there is an animal called the  
8 Townsend's ground squirrel, which, evidently, is or may be  
9 an endangered animal that's found in this area. It's --  
10 actually, I think he's probably found on all the wind farms  
11 here. And I think that he -- it's an animal of concern  
12 because I think it's a prey species for golden eagle. You  
13 know the bald eagles live primarily on fish, whereas the  
14 golden eagle is -- eats closer to the ground and is living  
15 on various types of rodents and whatnot. And this, I think,  
16 is a rodent.

17 But anyway, I saw it mentioned that there was going to be  
18 some kind of a special study on this wind farm of that  
19 animal, and I wasn't really aware of where that came from.  
20 But evidently this is an -- something that needs to be  
21 researched thoroughly. In fact, I really think -- well,  
22 evidently there's going to be -- there's a specialist hired  
23 who's going to compare what was done in 2010 with what's  
24 going on there now or go out in the field and examine it.  
25 So that's something that definitely needs to be researched.

1 Morgan & Son Earthmoving here in Ellensburg. I'm a  
2 third-generation owner of our company. And we have been  
3 involved with the construction, operation and maintenance,  
4 environmental compliance of all three of the existing wind  
5 farms here in Kittitas County. We employ local people. We  
6 all live here. We've lived here forever. And I'm able to  
7 keep year-round employees now, where I couldn't before.  
8 Renewable energy has been very good for us. And I'm in  
9 favor of the project. Thank you.

10 CHAIR DREW: Thank you.

11 Ma'am, you already had an opportunity to --

12 MS. JEFFERSON-LINDEMOEN: Can I say one --

13 CHAIR DREW: -- speak.

14 MS. JEFFERSON-LINDEMOEN: -- more thing?

15 CHAIR DREW: No. Thank you.

16 MS. JEFFERSON-LINDEMOEN: Can I ask about the noise level  
17 of these new ones? What will the noise level be?

18 CHAIR DREW: I will direct you to talk to Staff after the  
19 hearing here.

20 MS. JEFFERSON-LINDEMOEN: Okay.

21 CHAIR DREW: If we are now completed with our sign-up  
22 sheet, this hearing is adjourned.

23 Thank you all for participating.

24 (Meeting is adjourned.)

25 (8:22:55)

1 And then the other thing is that we now have had golden  
2 eagles killed in this valley. Four of them were killed just  
3 15 miles away on the Wild Horse Wind Farm. And they've gone  
4 through all the appropriate studies through the U.S. Fish  
5 and Wildlife Service that are required because of the laws  
6 that protect golden and bald eagles. But anyway, that has  
7 happened here. So I would like to see -- I don't know --  
8 maybe special studies. I think U.S. -- or WDFW can advise  
9 on that -- what could be done supplemental for that on --  
10 for this wind farm if it's approved.

11 And then the other thing I'm more aware of now is, hearing  
12 about the height of these towers, is that no one really  
13 knows what the impact will be to the wildlife, to the birds  
14 and bats. So I definitely feel that there needs to be  
15 two-year studies done post-construction for birds and maybe  
16 bats. If you're going to do one, you might as well do the  
17 other. So that's primarily -- my concerns are  
18 environmental, since that's what Kittitas Audubon is all  
19 about. That's it. Thank you.

20 CHAIR DREW: Thank you.

21 Is there anyone else?

22 MS. POTIS: Uh, yes. We have one final speaker, Dan  
23 Morgan.

24 CHAIR DREW: Okay.

25 MR. MORGAN: Hi. My name is Dan Morgan. I'm president of

1 CERTIFICATE

2  
3 STATE OF WASHINGTON )

4 )  
5 COUNTY OF SNOHOMISH )

6  
7 I, the undersigned, do hereby certify under penalty  
8 of perjury that the foregoing court proceedings, recorded  
9 statements, hearings and/or interviews were transcribed under my  
10 direction as a certified transcriptionist; and that the  
11 transcript is true and accurate to the best of my knowledge and  
12 ability, including any changes made by the trial judge reviewing  
13 the transcript; that I am not a relative or employee of any  
14 attorney or counsel employed by the parties hereto, nor  
15 financially interested in its outcome.  
16

17  
18 IN WITNESS WHEREOF, I have hereunto set my hand  
19 this 26th day of April, 2018.

20  
21  
22 *Jennifer A.P. Albino*  
23 Jennifer A.P. Albino, CET-661  
24  
25



<p style="text-align: center;"><b>A</b></p> <p><b>A.P</b> 1:21 72:23  <b>A1</b> 15:11  <b>A4</b> 15:11  <b>abide</b> 7:11  <b>ability</b> 72:12  <b>able</b> 3:12 34:23              57:4,11 71:6  <b>absolutely</b> 29:11  <b>abundant</b> 38:13  <b>Academy</b> 47:22              50:3  <b>accentuated</b> 44:3  <b>accept</b> 20:3  <b>acceptable</b> 20:4  <b>accepting</b> 39:2  <b>accepts</b> 54:4  <b>access</b> 59:16  <b>accommodation</b>              33:8,11  <b>account</b> 33:11 40:1  <b>accrued</b> 36:21  <b>accurate</b> 48:12              72:11  <b>accurately</b> 11:9              43:16  <b>achieving</b> 41:18  <b>acre</b> 12:23  <b>acres</b> 8:3,4,4,9              11:10,20 12:24  <b>Act</b> 20:14 27:23              28:1  <b>active</b> 6:3 57:14  <b>actual</b> 24:16  <b>add</b> 19:6 38:17              39:10 58:1  <b>added</b> 8:7 33:12              50:14  <b>addendum</b> 20:20              21:3 29:22  <b>addition</b> 24:2 36:2              51:6  <b>additional</b> 27:25              38:14 52:19 55:13  <b>additions</b> 38:18</p>	<p><b>address</b> 26:14 31:5              54:10 64:22  <b>addressing</b> 37:19              64:24 65:2  <b>adequate</b> 51:18  <b>adequately</b> 47:14              47:18  <b>adjacent</b> 36:25  <b>adjourned</b> 71:22              71:24  <b>adjust</b> 4:21  <b>Administrative</b>              3:19  <b>admitted</b> 29:13  <b>adopt</b> 28:9  <b>advance</b> 29:20  <b>adverse</b> 20:18 34:8              46:25  <b>advise</b> 70:8  <b>advisory</b> 14:25  <b>aeronautical</b> 58:12  <b>aesthetically</b> 47:3  <b>aesthetics</b> 46:1,5  <b>affect</b> 21:24 36:6              58:12,15  <b>afford</b> 63:23  <b>afoot</b> 23:2  <b>afraid</b> 56:9  <b>afternoon</b> 19:17  <b>agencies</b> 21:20  <b>agenda</b> 4:5  <b>ago</b> 7:14 10:19              36:11  <b>agree</b> 13:18 37:18  <b>agreement</b> 3:18 4:7              7:4 19:20 54:18              58:14 59:12 61:15  <b>agreements</b> 7:5,9  <b>agricultural</b> 26:18              27:16 66:12  <b>agriculture</b> 32:15  <b>ahead</b> 13:11 26:10              42:9  <b>aids</b> 42:21  <b>air</b> 13:6</p>	<p><b>aircraft</b> 57:3  <b>Airfield</b> 58:10  <b>airplane</b> 44:16 55:9              56:2  <b>airplanes</b> 25:10              56:6  <b>airport</b> 55:9,10  <b>AITKEN</b> 2:10  <b>Alan</b> 54:21  <b>Albino</b> 1:21 72:23  <b>alert</b> 69:3  <b>allow</b> 9:10 41:15              42:6 51:14 66:1              68:12  <b>allowed</b> 23:14  <b>allowing</b> 42:4  <b>alongside</b> 34:1  <b>alter</b> 21:10  <b>alternative</b> 27:15  <b>alters</b> 21:14  <b>altitude</b> 56:22  <b>amend</b> 19:19 61:5              61:6  <b>amended</b> 12:17  <b>amendment</b> 3:18              4:7,8,17 7:11,13              8:2 9:17 19:21,24              19:25 20:2,8 21:5              21:12,13,15 27:23              28:19,20,22 32:2              37:12 39:5,7              42:25 48:6,11              49:5 50:22 55:2              61:2  <b>amendments</b> 19:23              20:12 21:9 28:10              30:18 35:11  <b>America</b> 5:18 6:4,7  <b>AMI</b> 2:10  <b>amount</b> 14:15              38:12 40:14 64:12              64:19 67:20  <b>analysis</b> 11:1 20:21              21:2 29:5,12,23  <b>analyze</b> 29:19</p>	<p><b>analyzes</b> 33:1  <b>anathema</b> 46:18  <b>and/or</b> 72:9  <b>Angeles</b> 38:10  <b>angle</b> 48:7 50:5  <b>animal</b> 69:7,9,11              69:19  <b>animals</b> 25:7  <b>ANN</b> 2:7  <b>annual</b> 33:3  <b>answer</b> 23:5 25:23              55:21 61:20 62:12  <b>answered</b> 16:19  <b>anybody</b> 56:24              62:25 64:8 67:24  <b>anyway</b> 69:17 70:6  <b>apart</b> 10:24 31:21  <b>apologize</b> 57:22  <b>apparently</b> 23:12  <b>appeal</b> 32:12  <b>appear</b> 15:11 24:14              24:19  <b>appearance</b> 57:22  <b>appears</b> 23:11  <b>applicable</b> 27:25              28:23  <b>applicant</b> 2:14 4:6              12:7 19:6 60:7              61:6  <b>applicant's</b> 10:21  <b>application</b> 7:2              9:17 10:2 27:14  <b>apply</b> 28:1  <b>applying</b> 46:7  <b>appreciate</b> 37:7              40:3 53:13 58:5,6  <b>appreciative</b> 58:4  <b>approach</b> 55:24              56:5,14,17,18,20              56:22 57:1,2,10  <b>approaches</b> 55:14              55:19 56:13  <b>approaching</b> 65:21  <b>appropriate</b> 28:13              28:22 54:23 60:9</p>	<p>70:4  <b>appropriateness</b>              54:6  <b>approval</b> 21:16              28:7 32:8 45:23              55:22 58:14  <b>approve</b> 19:7 21:12              55:2 65:10  <b>approved</b> 8:21              37:25 42:14 43:4              55:18 61:10,12              62:9 65:13 70:10  <b>approving</b> 20:2              41:6,20  <b>approximately</b> 5:15              6:4,19 8:3,9 9:23              9:24,25  <b>April</b> 1:7 3:2 44:23              72:19  <b>APS-C</b> 48:19  <b>area</b> 8:7 12:5 13:2              13:2,5,20 14:1,20              15:12,21,22 32:20              37:11 43:7 44:22              48:12,17 52:11              54:25 59:7,22              63:18 67:5,6 69:5              69:9  <b>areas</b> 25:15 34:13              35:9 47:25 50:12  <b>argued</b> 27:5  <b>argument</b> 36:6  <b>arguments</b> 25:1  <b>Arizona</b> 30:15  <b>arranging</b> 39:23  <b>article</b> 36:10 38:9  <b>articulate</b> 46:10  <b>asked</b> 25:21 39:5  <b>asking</b> 63:24 68:12  <b>aspects</b> 5:9 46:14  <b>assess</b> 29:6  <b>assessment</b> 6:14              14:20  <b>assigns</b> 37:21  <b>assistant</b> 2:7 65:8</p>
---	---	---	--	---

<p><b>associated</b> 20:25 59:21 <b>Association</b> 23:8 32:6 <b>assumption</b> 61:24 <b>assure</b> 47:2 <b>Atlantic</b> 34:20 <b>attack</b> 14:25 29:17 <b>attempts</b> 52:12 <b>attended</b> 46:4 <b>attention</b> 40:4 44:5 <b>attorney</b> 2:6,7,19 27:4 51:13 65:8 72:14 <b>attract</b> 39:11 <b>attraction</b> 34:10 <b>Audubon</b> 70:18 <b>author</b> 46:10 <b>authority</b> 28:15,16 <b>authorization</b> 26:21 58:18 <b>available</b> 25:8 29:12 36:12 38:12 <b>average</b> 5:1 33:3 36:24 <b>avian</b> 19:8 29:15 <b>avoid</b> 52:12 <b>award</b> 38:9 39:9 <b>aware</b> 17:3 62:6 69:6,19 70:11</p> <hr/> <p style="text-align: center;"><b>B</b></p> <p><b>back</b> 7:2 8:18 13:21 15:9 21:5 45:17 50:19 52:10,13 55:11 56:9 60:24 61:21 62:1 <b>backed</b> 25:1 <b>background</b> 27:4 45:2 <b>Backing</b> 33:10 <b>backs</b> 6:21 <b>balanced</b> 40:18 <b>balancing</b> 37:21 40:23 41:7 42:16 <b>bald</b> 67:6 69:13</p>	<p>70:6 <b>bang</b> 66:15 <b>base</b> 32:15 34:21 59:4 <b>basic</b> 34:9,10 <b>basically</b> 5:21 8:15 19:9 32:4 55:20 <b>basis</b> 17:6 59:9 <b>basketball</b> 5:4 <b>batch</b> 64:7,13 <b>bats</b> 13:7 14:2 25:24 39:15 70:14 70:16 <b>bear</b> 28:2 42:22 <b>beautiful</b> 24:5 67:1 68:2,8,17,23 <b>beauty</b> 43:16 <b>began</b> 54:19 <b>beginning</b> 6:13 21:6 <b>believe</b> 10:14 17:1 25:18 27:20 45:12 49:21 50:13 56:21 <b>bench</b> 15:17 <b>benchmark</b> 33:24 <b>Bend</b> 65:21,21 <b>benefit</b> 42:11 <b>benefits</b> 11:17 <b>berm</b> 45:10 <b>best</b> 72:11 <b>better</b> 4:25 67:12 <b>beyond</b> 23:12 39:6 <b>big</b> 16:7,8 32:19 38:5 42:8 50:8 51:20 61:1 <b>big-picture</b> 42:4 <b>bigger</b> 49:11 <b>biggest</b> 8:11 66:15 67:7 <b>bill</b> 35:20,23 64:3 <b>bills</b> 63:20 <b>Binette</b> 22:25 <b>bird</b> 14:16,17,18 25:22 <b>birds</b> 13:7 14:4</p>	<p>25:24 39:20 70:13 70:15 <b>bit</b> 4:22 7:25 10:12 12:4 15:17 22:22 32:24 49:3 56:16 57:7 66:14 <b>blade</b> 18:1 <b>blade-tip-to-grou...</b> 18:24 <b>blades</b> 13:1,3 17:17 <b>blend</b> 44:9 <b>blessed</b> 68:2 <b>blinking</b> 67:3 <b>blue</b> 8:11 45:7 <b>board</b> 55:11 <b>Boeing</b> 66:14 <b>Bonneville</b> 63:3,8 63:10,13 <b>border</b> 42:24 <b>bottom</b> 50:19 <b>bought</b> 68:10 <b>boundary</b> 8:1,2,10 8:11,11,19,19 <b>bounds</b> 8:8 <b>Bowers</b> 55:15 58:9 58:13,16,21 59:8 <b>BPA</b> 44:7 45:1 <b>branch</b> 45:10 <b>Bridge</b> 25:4 44:21 60:22 <b>bring</b> 22:22 30:19 34:23 59:18 64:6 <b>British</b> 36:17 <b>broad</b> 37:22 40:24 42:16 <b>broader</b> 27:13 <b>brought</b> 28:24 42:21 43:5,10 63:15 64:13,16 <b>brown</b> 45:3,4 <b>buck</b> 66:16 <b>budget</b> 32:18 <b>build</b> 6:19 10:25 <b>building</b> 9:7 52:17 66:16</p>	<p><b>builds</b> 6:12 <b>built</b> 65:22 <b>Bumpus</b> 2:11 19:5 19:14,17 <b>bunch</b> 65:21 67:3 <b>burden</b> 54:2 <b>burned</b> 60:21 <b>burning</b> 44:13 <b>business</b> 2:15,19 4:15 5:9,23 30:13 <b>businesses</b> 67:10 <b>button</b> 3:23 <b>buy</b> 64:20</p> <hr/> <p style="text-align: center;"><b>C</b></p> <p><b>C</b> 2:1,7,19 72:1,1 <b>calculated</b> 12:5 <b>California</b> 5:19 38:5,7 41:4 <b>California's</b> 38:6 38:11,18 <b>call</b> 22:4 41:3 <b>called</b> 37:15 51:14 55:25 69:7 <b>camera</b> 45:1 49:17 <b>Canada</b> 36:15,23 <b>canal</b> 45:11 <b>canceled</b> 39:12 <b>canyon</b> 24:20 <b>canyons</b> 44:2 <b>cap</b> 6:20 39:1 64:4 <b>capacity</b> 10:7 11:14 <b>care</b> 3:6 <b>Carkner</b> 2:21 40:6 40:7,11 <b>Carmody</b> 2:19 26:11,12,13,24 27:1 <b>Cascades</b> 23:23 <b>case</b> 21:4 27:12 28:6 <b>catch</b> 42:7 <b>cattle</b> 45:18,19 <b>cause</b> 67:12 <b>caused</b> 41:13 60:6 <b>Cement</b> 64:10</p>	<p><b>Census</b> 33:4 <b>Central</b> 2:20 30:14 30:16 33:17 58:21 <b>Centralia</b> 38:16 <b>certain</b> 66:21 <b>certainly</b> 17:8 18:23 24:2 58:3 <b>certainty</b> 17:7 <b>certification</b> 3:18 4:7 7:4 19:20 58:14,15,18 59:11 60:5 61:14 <b>certified</b> 1:22 72:10 <b>certify</b> 72:7 <b>CET</b> 1:21 <b>CET-661</b> 72:23 <b>cetera</b> 59:16 <b>chair</b> 2:3 3:5,8,8 4:5,21,24 5:1,3 13:10,14,16 15:5 15:7 16:11,13,15 18:8,14,16 19:3 19:12,14,17 22:2 22:9,11,13,16,21 26:8,10 27:23 30:10 37:8,10 40:5 42:19 48:3 49:8 52:18,23,25 53:3,5,7,10,12,16 53:18,22 55:4 57:16,19 60:10,12 61:6,9,12,14,20 61:23 62:2,4,11 62:19,22 64:22,25 65:3,6 66:4,6,8 67:14 70:20,24 71:10,13,15,18,21 <b>Chairman</b> 40:7 <b>Chamber</b> 32:5,17 <b>change</b> 8:12 10:22 29:7,9,18,24 31:19,20 35:13 38:5 <b>changed</b> 27:20 37:23 51:11</p>
---	---	---	--	---

<p><b>changes</b> 10:11 11:8 20:6,11,17 21:1,8 21:20 28:20 33:1 35:12 39:5,6 69:4 72:12 <b>character</b> 26:19 27:17 28:5 43:15 47:8 <b>chart</b> 11:7 52:1 56:18 <b>check</b> 62:6 <b>checklist</b> 21:22 <b>Chehalis</b> 42:1 <b>cherish</b> 24:1 <b>choice</b> 68:5 <b>choose</b> 29:23 43:3 68:5 <b>chose</b> 68:7 <b>Chris</b> 22:19 <b>Christina</b> 2:12 22:11 <b>Christine</b> 2:18 22:24 65:10 <b>citizen</b> 27:10 <b>citizens</b> 26:16 27:5 63:23 <b>City</b> 63:17 64:3 <b>Claim</b> 1:12 3:17 4:11,17 6:24 7:18 19:19 25:16 37:24 41:21 42:13 53:23 54:10,24 <b>clarity</b> 28:23 <b>clear</b> 28:2,25 30:6 <b>clearance</b> 56:21 <b>clearly</b> 28:18 <b>clock</b> 18:2 <b>close</b> 3:14 13:17 36:2 56:19 <b>closed</b> 56:12 <b>closely</b> 50:6 <b>closer</b> 48:15 49:11 69:14 <b>closest</b> 52:6 <b>clouds</b> 55:8 56:4</p>	<p>57:4 <b>clutter</b> 12:13 52:10 <b>coal</b> 42:1 <b>code</b> 3:19 31:2 <b>Cole</b> 2:18 22:19,24 22:24 <b>colleague</b> 41:3 <b>colleagues</b> 55:23 <b>collected</b> 31:17 <b>College</b> 2:19 30:13 <b>collisions</b> 14:1 <b>Columbia</b> 27:15 39:25 <b>come</b> 3:12 14:12 22:20 23:22 45:16 57:11 64:9 65:16 65:16 68:6 <b>comes</b> 33:23 56:14 56:19 <b>coming</b> 4:13 30:16 34:3 37:7 42:2 55:14,25,25 57:6 <b>command</b> 44:4 <b>comment</b> 62:11 <b>commenters</b> 46:13 46:15 <b>comments</b> 16:16 37:16 40:3 42:24 43:3,6,8 46:3,11 46:14,17,19 51:13 52:19 53:10 58:5 58:8,9 <b>Commerce</b> 2:3 4:2 32:5 <b>commercial</b> 66:12 <b>commissioner</b> 2:22 54:20 57:21 <b>commissioners</b> 54:16 <b>committee</b> 14:25 29:18 30:19 <b>community</b> 2:17,18 2:21,22,23,23,24 2:24 12:9 27:8,8 28:9 30:3 31:17</p>	<p>31:19 37:14 41:17 68:17 <b>community-based</b> 42:10 <b>companies</b> 38:21 42:17 63:4,5,12 <b>company</b> 4:16 5:7 5:7,20,21,23 6:12 63:8 71:2 <b>compare</b> 14:7 16:20 69:23 <b>compared</b> 24:16 <b>comparison</b> 14:14 17:21 <b>compatible</b> 41:23 <b>complained</b> 24:7 <b>completed</b> 71:21 <b>completely</b> 46:2 47:8 57:13 <b>compliance</b> 27:25 71:4 <b>compliant</b> 28:12,23 <b>comply</b> 61:17 <b>complying</b> 27:22 <b>component</b> 29:2 <b>comprehend</b> 48:9 51:15 <b>comprehensive</b> 28:10 <b>concept</b> 7:1 <b>conceptual</b> 9:4 <b>concern</b> 31:16 55:10 56:24 61:1 69:11 <b>concerned</b> 41:5 67:21 <b>concerns</b> 27:13 37:12 40:3,13 45:25 46:9,16 58:10 70:17 <b>conclude</b> 13:8 <b>conclusion</b> 18:13 46:22 53:4 <b>concur</b> 47:23 <b>condition</b> 60:4</p>	<p><b>conditions</b> 7:12 20:4 54:17 55:24 60:9 <b>configuration</b> 52:5 52:15 <b>congestion</b> 38:19 38:19 <b>connect</b> 9:6,10 11:16 <b>connections</b> 39:1,3 <b>conservation</b> 38:3 66:13,16 67:8 <b>conserving</b> 35:22 <b>consider</b> 19:25 20:7 27:24 30:2,8,24 32:3 39:5 <b>considerate</b> 28:4 <b>consideration</b> 28:21 30:20 31:4 <b>considerations</b> 26:17 55:11 <b>considered</b> 40:16 46:9,20 <b>considering</b> 20:9 40:2 <b>considers</b> 31:2 <b>consistent</b> 20:8 52:9 <b>constant</b> 23:21 <b>constructed</b> 34:14 <b>construction</b> 6:17 12:20 29:20 54:19 58:19 59:15 62:10 71:3 <b>consultant</b> 21:19 <b>consulted</b> 25:11 <b>consume</b> 26:1 <b>contacting</b> 23:7 <b>context</b> 28:14,17 30:9 <b>continue</b> 3:13 7:5,9 7:11 <b>continued</b> 41:13 <b>continues</b> 19:22 21:23 28:22</p>	<p><b>contracts</b> 39:12 <b>convenience</b> 53:19 <b>Conversely</b> 33:16 <b>coordinated</b> 42:3 <b>copied</b> 48:7 <b>copies</b> 53:15,16,17 <b>copy</b> 37:5 49:4 <b>corner</b> 44:18 <b>corporations</b> 41:20 42:12 <b>correct</b> 17:25 61:17 <b>cosmetic</b> 35:12 <b>cost</b> 63:1,1,18 <b>costs</b> 63:12,13 <b>Council</b> 1:5 3:9 4:12 18:23 19:21 20:3,4,5,7 21:12 25:21 31:2 37:10 38:3 40:2,7,14,15 40:17 41:6,9,21 42:15 47:5,9,17 54:6 64:23 65:1,6 65:10 66:9 67:16 <b>Council's</b> 46:23 <b>Councilmember</b> 19:5 <b>Councilmembers</b> 2:2 3:20 19:18 26:12 <b>counsel</b> 7:6 72:14 <b>count</b> 26:2 <b>counted</b> 25:25 <b>counties</b> 31:22 34:4 36:19 38:15 <b>countries</b> 17:5 <b>country</b> 5:13 24:17 64:15 <b>counts</b> 14:17 <b>county</b> 2:22 7:8 10:22 23:17 25:20 27:21 28:6,12 31:6,21 32:22 33:1,15,20 35:18 40:12 54:13,16,21 57:21 59:20 60:5</p>
--	--	---	--	---

63:22 65:13,22 66:10 71:5 72:5 <b>couple</b> 7:14,15 9:18 13:12 30:20 43:19 57:25 58:1 <b>course</b> 3:13 10:18 11:13 40:24 51:10 63:9 <b>court</b> 1:22 27:5,7 28:6,8,24 63:8 72:8 <b>courtesy</b> 16:15 <b>courts</b> 30:6 63:9 <b>cover</b> 5:17 <b>covered</b> 33:5,12 36:8 <b>coyotes</b> 26:1 <b>Crankoich</b> 54:21 <b>created</b> 14:25 <b>creates</b> 50:5 67:20 <b>creating</b> 52:9 67:21 <b>credit</b> 9:20 10:2 <b>credits</b> 27:2 <b>Creek</b> 8:14 24:22 60:15,25 61:25 64:17 66:24 68:1 <b>crew</b> 59:5 <b>crop</b> 58:25 <b>crossing</b> 52:12 <b>culturally</b> 47:3 <b>cumulative</b> 39:24 <b>curious</b> 14:2 <b>current</b> 6:7 8:19,19 14:7 38:19 40:16 48:4 <b>curtailed</b> 57:7 <b>curvature</b> 44:2,5 <b>customers</b> 38:22 66:13 67:9 <b>cut</b> 50:18	<b>damage</b> 59:21,24 60:6 <b>dams</b> 63:4 <b>Dan</b> 2:25 70:22,25 <b>data</b> 31:17 33:4,14 33:23 36:12 <b>day</b> 41:2 44:19,20 44:20 63:19 64:2 72:19 <b>dead</b> 25:24 <b>deal</b> 47:17 63:19 <b>deals</b> 34:11 35:13 <b>dealt</b> 47:14 <b>decade</b> 30:16,17 54:24 <b>December</b> 9:21 <b>deceptive</b> 24:15 <b>decide</b> 21:1 <b>decision</b> 23:19 36:12 <b>decision-making</b> 28:2 29:2 30:7,24 <b>decisions</b> 25:13 42:8 <b>deck</b> 45:18 <b>decline</b> 41:14 <b>decrease</b> 13:25 <b>decreased</b> 12:11 33:17 <b>deemed</b> 25:3 <b>definitely</b> 58:20 69:25 70:14 <b>degree</b> 50:5 <b>degrees</b> 48:7 <b>demand</b> 37:21,25 38:4,4 39:4 40:16 40:23,23 41:7,9 41:11,11,12 <b>demands</b> 40:18 42:16 <b>demonstrated</b> 53:24 <b>demonstrating</b> 54:3 <b>demonstration</b>	17:6 <b>density</b> 35:5,6 <b>Department</b> 2:3,4 4:2,3 7:7,19 <b>Department's</b> 33:3 <b>depending</b> 24:21 <b>depicted</b> 24:18 <b>described</b> 11:11 <b>description</b> 48:25 51:17 <b>desert</b> 1:12 3:17 4:11,17 6:24 7:18 19:19 25:16,17 37:24 41:20 42:13 53:23 54:9,24 <b>deserved</b> 43:8 <b>design</b> 6:15,19 <b>designates</b> 31:18 <b>designed</b> 42:11 <b>designing</b> 15:24 <b>desolate</b> 24:1 <b>despite</b> 41:12 <b>destination</b> 34:11 <b>destroyed</b> 68:18 <b>detail</b> 32:24 <b>determination</b> 20:5 20:22 21:2,7 <b>determine</b> 20:16 54:6 <b>determined</b> 20:4 <b>detrimental</b> 21:11 21:15 <b>devalue</b> 68:4,4,11 <b>develop</b> 19:7 20:21 41:22 <b>developed</b> 5:15 <b>developer</b> 34:16,22 <b>developers</b> 27:10 <b>development</b> 2:15 4:15 5:25 8:13 28:11 30:15,17,18 31:7 32:5,7,11,14 34:2 54:15,18 <b>developments</b> 31:23 37:2	<b>diagram</b> 8:5 51:14 <b>dial</b> 32:20 35:8 <b>diameter</b> 12:3 17:21 18:3,19 <b>Dick</b> 40:10 <b>Diego</b> 5:18 <b>difference</b> 10:5 18:8 <b>different</b> 5:9 8:23 9:18 10:19 13:3 14:21 15:2,15 17:12 18:9,24 27:19 36:19 48:10 <b>difficult</b> 27:22 57:3 <b>difficulties</b> 34:15 <b>digital</b> 50:5 53:17 <b>diminished</b> 32:12 32:12,13 34:1 <b>direct</b> 71:18 <b>directed</b> 28:8 <b>direction</b> 56:16 72:10 <b>directly</b> 9:10,11 <b>director</b> 2:15,21 4:15 40:11 54:15 <b>disadvantages</b> 36:21 <b>discovered</b> 48:15 <b>discuss</b> 4:17 19:21 <b>discussed</b> 11:25 54:4 <b>discussion</b> 59:13,14 59:17 <b>discussions</b> 29:15 41:2 <b>disorder</b> 52:8 <b>disruptive</b> 27:17 <b>distance</b> 12:10,12 24:17 <b>distances</b> 18:24 <b>distressed</b> 31:18 33:19 <b>distributed</b> 5:11 <b>distribution</b> 41:5 <b>disturbance</b> 11:18	11:19 12:19 24:25 <b>DNR</b> 59:5 <b>document</b> 21:1,3 <b>documentation</b> 53:7 <b>documented</b> 25:22 26:6 31:11 37:1 38:8 <b>documenting</b> 39:18 39:19 <b>documents</b> 20:19 30:22 31:11 35:2 39:17 <b>doing</b> 11:1 14:22 23:5 65:16 66:13 67:9 <b>dollar</b> 32:13 <b>dollars</b> 34:3 <b>dominate</b> 49:25 <b>Don</b> 32:22,25 <b>Don's</b> 33:14 <b>Downtown</b> 32:5 <b>downwards</b> 18:19 <b>draft</b> 51:13 <b>drafted</b> 37:16 <b>dramatically</b> 37:23 <b>draw</b> 18:12 <b>drawing</b> 18:18 <b>drawings</b> 51:18 52:4 <b>Drew</b> 2:3 3:5,8,8 4:5,21,24 5:1,3 13:10,14,16 15:5 15:7 16:11,13,15 18:8,14,16 19:3 19:12,14,17 22:2 22:9,11,13,16,21 26:8,10 30:10 37:8,10 40:5,7 42:19 48:3 49:8 52:18,23,25 53:3 53:5,7,10,12,16 53:18,22 55:4 57:16,19 60:10,12 61:6,9,12,14,20
<b>D</b>				
<b>D7200</b> 48:18 <b>Daily</b> 24:6 51:12 54:14 62:15,18 <b>dairy</b> 66:14				



<p>61:23 62:2,4,11 62:19,22 64:22,25 65:3,6 66:4,6,8 67:14 70:20,24 71:10,13,15,18,21 <b>drive</b> 45:19 <b>drives</b> 27:3 <b>drop</b> 36:24 <b>dropping</b> 44:17,20 <b>drove</b> 23:4 <b>due</b> 12:21 38:6 49:2 <b>dusting</b> 43:19 <b>duties</b> 46:24 <b>dwell</b> 17:15</p> <hr/> <p style="text-align: center;"><b>E</b></p> <hr/> <p><b>E</b> 2:1,1 72:1,1 <b>eagle</b> 39:23 45:13 69:12,14 <b>eagles</b> 39:15,24 45:11,14 67:6 69:13 70:2,6 <b>earlier</b> 11:7 12:7 <b>early</b> 43:18 44:6 45:8 <b>Earthmoving</b> 2:25 71:1 <b>easily</b> 51:15 <b>east</b> 7:22 8:5,13,15 23:7,13,23 25:6 43:11 48:13 50:23 55:19 <b>easy</b> 11:8 25:25 <b>eats</b> 69:14 <b>economic</b> 31:8,17 31:24,25 37:19 <b>economically</b> 31:18 32:22 <b>Economics</b> 36:8 <b>economy</b> 31:22 <b>EDF</b> 2:15 4:16 5:5 5:8,17,20 6:3 <b>edge</b> 23:3 <b>edible</b> 25:25 <b>editor</b> 24:6 51:11 <b>effect</b> 39:19 46:1</p>	<p>47:15 <b>effects</b> 21:11,15 25:2 39:7,24,24 46:25 <b>efficiencies</b> 67:11 <b>effort</b> 23:16 <b>efforts</b> 25:12 <b>EFSEC</b> 2:9 16:24 19:7 20:6,14,20 28:15 37:24 40:14 40:15,22 42:15 45:22 46:10 47:1 53:25 54:9 55:1 69:1 <b>EFSEC's</b> 19:23,24 <b>eight</b> 48:1 <b>eight-plus</b> 26:20 <b>EIS</b> 20:19 21:4 <b>either</b> 20:3 29:22 51:8 56:23 <b>electric</b> 41:14 63:1 63:2 <b>electrical</b> 9:5 63:12 <b>electricity</b> 5:21 41:11 63:24 <b>electrons</b> 66:19 <b>elevation</b> 23:11 24:15 <b>eligible</b> 9:22 <b>eliminate</b> 8:12 <b>Ellensburg</b> 1:6 37:14 51:11 54:14 55:9,10 56:1 57:12 63:1,18 64:3,10 67:2 71:1 <b>Ellensburg's</b> 39:9 <b>Elliot's</b> 47:13 <b>Emily</b> 2:24 67:15 67:16 <b>emphasize</b> 6:11 <b>employ</b> 71:5 <b>employed</b> 72:14 <b>employee</b> 72:13 <b>employees</b> 5:17 71:7</p>	<p><b>employment</b> 31:20 33:1,3,4,5,19 <b>empowered</b> 37:24 <b>enabled</b> 11:4 <b>endangered</b> 69:9 <b>energy</b> 1:5 2:15 3:9 4:16 5:6,8,10,17 6:3 9:11 27:15 37:21,22,25 38:4 38:6,7,11,12,24 39:4 40:17,18,23 41:10,10 42:9,10 42:15,16 46:24 54:5,8 66:11,14 71:8 <b>engineering</b> 5:24 6:16 15:24 <b>engineers</b> 15:25 <b>enormous</b> 24:19 <b>ensure</b> 46:24 <b>enter</b> 23:15 <b>entire</b> 68:15 <b>entirely</b> 17:22 <b>entities</b> 35:16 <b>entrance</b> 23:13 <b>environment</b> 7:6 20:13 21:11 46:25 68:25 <b>environmental</b> 20:10,18 21:15,21 29:21 38:10 39:13 40:1 70:18 71:4 <b>environmentally</b> 69:4 <b>enXco</b> 5:6 <b>equipment</b> 14:10 25:9 29:24 57:21 <b>equivalent</b> 50:5 <b>especially</b> 34:9 58:11 <b>essence</b> 45:21 <b>ESSKO</b> 2:7 <b>establishments</b> 31:20 <b>estimate</b> 10:21</p>	<p><b>estimates</b> 14:23 <b>et</b> 59:16 <b>Europe</b> 34:23 <b>European</b> 34:21 <b>evacuations</b> 25:5 <b>evaluate</b> 20:15 <b>evaluating</b> 31:2 57:24,25 <b>evaluation</b> 1:5 3:9 33:24 <b>evening</b> 3:10 4:12 26:12 37:10 40:7 44:1 57:18,19,23 <b>everybody</b> 66:15 68:9,16 <b>evidently</b> 69:8,20 69:22 <b>exactly</b> 56:25 <b>examine</b> 69:24 <b>examined</b> 49:20 <b>examining</b> 41:6 <b>example</b> 41:23 52:12 <b>exceed</b> 15:19 40:14 <b>exceeded</b> 39:1 <b>excess</b> 38:7,21 67:20 <b>excessive</b> 14:19 41:4 <b>exciting</b> 45:20 <b>Excuse</b> 16:11 <b>executing</b> 55:24 <b>exercise</b> 28:16 <b>existing</b> 19:6 20:18 21:3 38:21 61:14 71:4 <b>expansion</b> 33:6 <b>expansions</b> 66:23 <b>expect</b> 19:22 <b>expensive</b> 63:14 <b>experience</b> 37:17 38:18 59:18 <b>experienced</b> 59:21 <b>expert</b> 46:15,17,20 <b>expertise</b> 5:24</p>	<p><b>experts</b> 11:1 <b>expire</b> 55:1 <b>exploited</b> 24:2 <b>express</b> 45:25 <b>expressly</b> 31:8 <b>extend</b> 57:9 <b>extent</b> 21:8 <b>extremely</b> 33:15 <b>eyes</b> 23:24 24:16 <b>eyesores</b> 23:22</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>F</b> 72:1 <b>FAA</b> 55:12,20,22 56:7 57:12,14 58:14,19 <b>facilities</b> 8:13 46:24 <b>facilities,'</b> 54:6 <b>facility</b> 1:5 3:9 19:10 31:23 39:21 54:8,9 <b>facing</b> 27:14 <b>fact</b> 17:15 28:25 29:3 69:3,21 <b>facts</b> 26:3 <b>fair</b> 53:3 54:17 <b>fall</b> 44:6 <b>familiar</b> 5:5 6:25 7:17 15:13,14 31:23 40:20 <b>family</b> 25:8 <b>fan</b> 14:24 <b>far</b> 21:18 44:8 49:6 <b>far-reaching</b> 39:8 <b>farm</b> 25:6 26:18 27:10 34:1 43:4 45:24 53:24 54:10 54:12,21,24,25 55:17,19 56:18 69:18 70:3,10 <b>farmers</b> 66:14 <b>farming</b> 30:3 <b>farmland</b> 29:1 30:5 <b>farmlands</b> 26:18 27:17 28:3 <b>farms</b> 2:20,21</p>
---	--	--	--	--

<p>16:21 34:8,13          36:20 37:15 40:11          40:12 56:4 59:19          69:10 71:5  <b>farther</b> 49:16,23  <b>farthest</b> 52:7  <b>fate</b> 23:21  <b>favor</b> 71:9  <b>feature</b> 8:14  <b>features</b> 34:10  <b>February</b> 7:3,13  <b>federal</b> 9:20 63:20  <b>feel</b> 43:14 65:25          68:1 70:14  <b>feeling</b> 23:22  <b>feet</b> 12:1 34:17 45:2          47:19 51:22 52:2          56:21  <b>fell</b> 60:21  <b>felt</b> 43:5  <b>FEMALE</b> 13:21          16:8,12,14,17          26:9 60:18 64:21  <b>fence</b> 23:4 45:13  <b>field</b> 49:25 55:15          58:13,16,21 59:8          69:24  <b>fight</b> 63:3  <b>figure</b> 51:21  <b>final</b> 20:19 21:4          23:19 36:2 44:24          50:15 70:22  <b>finally</b> 68:2  <b>financially</b> 72:15  <b>financing</b> 6:17  <b>find</b> 10:25 11:3          23:4 34:12 35:6          39:12 49:20 69:1  <b>fine</b> 29:9,18  <b>Fire</b> 25:4 44:13,21          60:22  <b>firefighters</b> 25:9  <b>fires</b> 60:15  <b>firm</b> 26:13  <b>first</b> 3:10 4:6 9:19</p>	<p>22:13,17 23:1          31:9,16 32:10          47:11 49:16 58:3          58:8  <b>fish</b> 2:4 4:4 7:7          29:16 39:22 63:11          69:13 70:4  <b>five</b> 9:23 10:19          22:17  <b>flat</b> 15:23 38:1,4,5          39:4 41:9,12          47:15 52:8 63:17  <b>flavor</b> 44:7  <b>fledgling</b> 32:4  <b>fleet</b> 5:16  <b>flight</b> 45:12,13          58:21,23 59:6,7  <b>flights</b> 57:6,11 59:2  <b>flip</b> 4:19 9:13  <b>Fluegge</b> 2:19 26:14  <b>fly</b> 13:6 55:8  <b>flying</b> 14:4 45:13  <b>focal</b> 45:1 48:21  <b>folk</b> 23:25  <b>folks</b> 24:22 25:2          58:4  <b>follow</b> 7:5,9 18:22  <b>food</b> 33:8,11  <b>footprint</b> 10:8 11:4          11:21,23 12:22  <b>force</b> 63:23 68:13  <b>forced</b> 25:5  <b>foregoing</b> 72:8  <b>foreign-owned</b>          42:12  <b>Forest</b> 39:22  <b>forever</b> 71:6  <b>forever-spoiled</b>          24:4  <b>forgiven</b> 33:21  <b>form</b> 21:13 58:16  <b>formal</b> 7:13  <b>former</b> 23:7  <b>forth</b> 51:22 65:17  <b>forthcoming</b> 31:12</p>	<p><b>forward</b> 21:25 22:4          22:18 36:13 39:22          55:15 67:2  <b>found</b> 28:11 36:20          69:9,10  <b>foundation</b> 16:4  <b>four</b> 31:3 36:11          39:23 48:18 49:9          70:2  <b>fragile</b> 31:21  <b>frame</b> 51:19  <b>France</b> 5:21  <b>free</b> 68:8  <b>freeways</b> 38:20  <b>frenzy</b> 62:1  <b>friends</b> 25:7  <b>front</b> 47:9 50:2          52:10  <b>fruit</b> 32:16  <b>full</b> 8:11 43:20  <b>full-frame</b> 48:20,22          49:15  <b>fundamental</b> 29:9          34:10  <b>funding</b> 32:9  <b>funny</b> 16:6  <b>further</b> 10:23 40:15          57:11 58:17  <b>furthest</b> 15:22  <b>futility</b> 23:17  <b>future</b> 38:2 40:16          42:9 57:9</p> <hr/> <p style="text-align: center;"><b>G</b></p> <hr/> <p><b>gee</b> 56:8  <b>general</b> 2:7 9:4          14:18 17:17 51:13          65:9  <b>General's</b> 2:6  <b>generally</b> 7:21          10:20 11:14 17:12          17:14  <b>generate</b> 8:24          17:16  <b>generation</b> 41:4  <b>generator</b> 68:6</p>	<p><b>generous</b> 25:7  <b>geographical</b> 8:12  <b>German</b> 35:2 36:10  <b>Germany</b> 33:24          35:19  <b>getting</b> 16:1 62:14          64:15  <b>gigawatts</b> 5:14,15          5:16 6:5,6,8 66:22  <b>Gina</b> 2:23 60:13          65:12  <b>give</b> 3:22 19:14,22          52:3,25 64:18          66:5  <b>given</b> 43:7,16  <b>gives</b> 32:23  <b>giving</b> 38:7 57:14  <b>globally</b> 5:14  <b>go</b> 3:24 5:1 6:9 7:24          8:18 12:14 13:11          15:9 21:5,18          22:23 26:10 30:20          34:13 35:15 37:1          45:16 49:18 51:6          55:6 56:6,25          60:18,23,24,25          61:10 63:25 66:1          69:24  <b>goes</b> 67:12  <b>going</b> 7:10 8:18          14:9 15:1 16:4          17:14 19:5 21:22          21:24 28:25 29:10          30:4 33:22 35:8          35:10 36:6 39:21          42:8,22 45:18,19          48:2 50:9 51:3,20          56:25 57:1 58:2          61:4 63:17 64:13          64:17,18,20 66:22          68:3,3,4,23,25          69:2,17,22,23,24          70:16  <b>golden</b> 45:12 69:12          69:14 70:1,6</p>	<p><b>golly</b> 56:8  <b>good</b> 4:12 19:17          26:12 32:23 37:10          40:7 53:4 54:16          57:18,19 58:5          67:9 71:8  <b>gotten</b> 64:3  <b>government</b> 33:16  <b>Governor</b> 21:16          23:19,23 53:25  <b>Governor's</b> 32:8          35:20  <b>gradients</b> 15:19  <b>granted</b> 23:15  <b>grassroots</b> 37:14  <b>gravel</b> 64:8,11  <b>great</b> 8:17 11:17,17          19:1 30:24  <b>greater</b> 12:4 31:10  <b>green</b> 42:9,10 45:4  <b>greening</b> 43:23  <b>Gregoire</b> 23:19          65:10  <b>grew</b> 27:8  <b>grid</b> 39:3,13 66:18          66:23  <b>ground</b> 6:5 18:5,20          35:14,15 39:15          44:14 45:12 51:23          52:3 69:8,14  <b>group</b> 5:20 26:16          37:15  <b>groups</b> 27:10  <b>growth</b> 27:23 28:1          28:17,24 30:4          32:20  <b>guess</b> 14:25 18:7,15          67:7  <b>guidelines</b> 29:17          40:21,21</p> <hr/> <p style="text-align: center;"><b>H</b></p> <hr/> <p><b>habitat</b> 11:2 12:19          12:21  <b>half</b> 5:16 6:6,19 8:8          9:8 11:14 12:23</p>
--	---	---	--	--

<p>13:4 24:16 49:24 50:8,24 52:20 <b>hand</b> 30:22 72:18 <b>haphazard</b> 41:25 <b>happen</b> 61:4 <b>happened</b> 34:18 46:2 70:7 <b>happening</b> 34:5,7 <b>happy</b> 13:9 53:7 60:9 <b>harbor</b> 9:21 <b>hard</b> 49:3 67:23 <b>harms</b> 39:14 <b>harried</b> 23:24 <b>haul</b> 6:12 <b>hawks</b> 67:6 <b>Hayward</b> 44:25 <b>hazards</b> 13:6 <b>head</b> 11:7 <b>heading</b> 14:11 <b>headquarters</b> 5:18 <b>health</b> 20:9 31:6 <b>healthful</b> 47:2 <b>hear</b> 3:5 4:6 13:21 22:15 60:17 64:1 <b>heard</b> 26:6 40:10 42:6 <b>hearing</b> 1:13 3:14 3:17 16:15 37:6 46:3,4 64:23 70:11 71:19,22 <b>hearings</b> 46:13,18 72:9 <b>heavier</b> 60:2 <b>height</b> 11:25 12:2 17:20,21,23 18:4 18:14 31:13 35:5 35:7 39:8 58:12 70:12 <b>helicopter</b> 60:20 <b>helicopters</b> 25:10 <b>Helitack</b> 59:5 <b>Hello</b> 66:9 67:16 <b>help</b> 5:4 19:9 25:7 63:20 64:10</p>	<p><b>helping</b> 67:10 <b>hereto</b> 72:14 <b>hereunto</b> 72:18 <b>Hi</b> 22:24 55:7 60:14 70:25 <b>hiding</b> 65:15 <b>high</b> 22:22 57:3 <b>high-risk</b> 14:20 <b>higher</b> 23:11 44:3 56:2,9 <b>highest</b> 18:17,17 <b>highlight</b> 12:15 <b>highlights</b> 21:17 <b>highly</b> 57:12 <b>highway</b> 7:22 24:4 59:24 <b>hill</b> 16:5 44:25 <b>hills</b> 44:3,4,5,11,12 45:7 <b>hinder</b> 39:9 <b>hired</b> 69:22 <b>home</b> 24:20 64:18 65:9,11,18 <b>homeowners</b> 38:23 39:11 45:25 <b>homes</b> 24:22 36:8,9 45:5 46:5 47:11 48:9 50:21,22,24 66:2 <b>honestly</b> 9:14 <b>hooks</b> 15:18 <b>hope</b> 11:6 47:17 50:9 58:6 <b>hopefully</b> 6:25 26:5 <b>HopeSource</b> 63:21 <b>horse</b> 16:25 25:16 39:20,21 60:21,21 70:3 <b>hose</b> 66:20,21 <b>hosts</b> 58:21 <b>hotels</b> 33:10 <b>hour</b> 52:21 63:22 <b>house</b> 45:4 48:14 48:15 49:6,10 64:20</p>	<p><b>houses</b> 50:22 <b>housing</b> 31:19 <b>How's</b> 13:22 <b>Howard</b> 50:14 51:1 <b>huge</b> 29:7 47:21 <b>hugely</b> 15:13 <b>human</b> 50:6 <b>hun-</b> 8:22 <b>hundred</b> 36:18 <b>hurry</b> 55:2 <b>husband</b> 37:17 <b>hydrology</b> 35:16</p> <hr/> <p style="text-align: center;"><b>I</b></p> <p><b>Ian</b> 47:13 <b>idea</b> 28:14 31:8 35:4,21 46:17 <b>identified</b> 20:23 <b>identify</b> 19:9 21:15 <b>identifying</b> 35:21 <b>image</b> 34:11 <b>imagine</b> 56:3 65:25 <b>imbalance</b> 38:11 <b>immunity</b> 51:8 <b>impact</b> 10:24 12:18 24:23 26:3 28:5 32:19 33:7,23,25 34:2 40:1 55:14 70:13 <b>impacted</b> 37:3 51:4 <b>impacts</b> 10:22 11:5 11:20 12:9,16,23 12:24,25 13:20 14:24 19:8,9 20:10,12,18,23,25 21:7,8 29:4,7,20 31:10,15,24 34:22 35:3,19,19 37:1 39:13,15 42:5 43:6 46:7 47:17 47:21,24,25 51:6 60:2 <b>imploring</b> 47:6 <b>important</b> 6:11 26:3 29:1 30:3 33:15 41:1,16</p>	<p>46:21 58:23 59:2 59:3,9 <b>importantly</b> 37:24 <b>imposed</b> 25:14 <b>improve</b> 67:11 <b>impunity</b> 35:1 <b>in-</b> 13:25 <b>in-depth</b> 51:12 <b>inaccurate</b> 46:3 <b>inadequate</b> 50:11 <b>inaudible</b> 13:23 16:9,12,17 25:8 32:7 65:3 68:3 <b>inches</b> 48:25 <b>include</b> 60:3 <b>included</b> 10:13 38:9 39:19 <b>includes</b> 33:16 <b>including</b> 25:6 30:17 39:14,15 72:12 <b>income</b> 63:22 <b>incomes</b> 31:20 <b>inconsistent</b> 52:11 <b>increase</b> 33:5 63:1 63:6,7 64:4 66:22 67:6 <b>increased</b> 12:12 38:25 40:18,23 58:12 <b>increases</b> 63:18,23 <b>increasing</b> 37:21 <b>incredibly</b> 24:4 <b>incremental</b> 42:4 <b>indicates</b> 15:15 <b>individual</b> 10:14,15 11:12 12:3 <b>industrial</b> 38:6,14 38:15 46:6 66:12 <b>industrial-sized</b> 38:17 <b>industries</b> 34:8 67:10 <b>industry</b> 32:1,4,16 33:8</p>	<p><b>inefficient</b> 52:16 <b>inform</b> 41:9 <b>information</b> 19:24 20:16 25:9 62:16 68:24 <b>Informational</b> 24:13 <b>informed</b> 46:11 <b>inkling</b> 23:1 <b>input</b> 55:20 <b>insight</b> 23:25 <b>install</b> 38:23 64:14 <b>installation</b> 58:15 <b>installed</b> 9:5,20 14:10,13,21 17:4 17:5,5,10,13 <b>instrument</b> 55:8,14 55:18,24 56:5,12 56:13,20 57:1,2 57:10 <b>intend</b> 7:5 <b>intended</b> 12:15 <b>intent</b> 40:22 <b>intention</b> 7:8 <b>interest</b> 41:1,7 <b>interested</b> 50:1 72:15 <b>interesting</b> 34:21 35:4 <b>interests</b> 37:19,22 40:24 42:16,17 <b>intermediate</b> 55:25 <b>internal</b> 59:14 <b>interpretation</b> 46:2 46:21 <b>interpreted</b> 46:7,16 <b>interviews</b> 72:9 <b>introduce</b> 3:21 66:8 <b>intrusion</b> 68:11 <b>inundated</b> 24:3 <b>Invenergy</b> 54:15 59:23 <b>investment</b> 41:18 41:18 <b>invisible</b> 26:2</p>
--	---	--	---	---

involve 46:19	<b>Kent</b> 30:5	<b>labor</b> 32:23 33:15	<b>legislature</b> 30:6	23:25 25:20 26:16
<b>involved</b> 7:20 27:7	<b>kept</b> 12:23	<b>lacks</b> 38:22	<b>length</b> 45:1 48:21	27:5 32:1 33:10
30:14,17 60:15	<b>key</b> 10:11	<b>laid</b> 7:21	<b>lens</b> 48:21 49:14,18	36:21 39:1 42:11
67:24 71:3	<b>KIDDER</b> 2:10	<b>Lake</b> 68:22	49:19 50:5	47:16 52:6 55:7
<b>irrelevant</b> 25:3	<b>kill</b> 25:22	<b>land</b> 7:19,20 10:9	<b>let's</b> 31:9,16	59:13 64:6,9,10
<b>issue</b> 16:1	<b>killed</b> 70:2,2	10:13 11:18 12:20	<b>letter</b> 24:6 51:11	64:15 71:5
<b>issues</b> 27:14,19	<b>kind</b> 9:8 11:11	17:10 24:2 30:4,7	<b>level</b> 28:13,15	<b>located</b> 50:16
59:21	15:18,20 36:5	34:19,21,24 46:4	71:16,17	<b>location</b> 39:6 40:19
<b>Ivan</b> 38:10	66:20 69:18	51:9 68:7	<b>Lewis</b> 38:15	46:24 53:25 54:4
	<b>kinds</b> 37:1	<b>land-based</b> 14:8	<b>life</b> 67:23,25 68:4,5	54:7,11
<b>J</b>	<b>King</b> 65:22	<b>landing</b> 56:15	68:5,11,15	<b>London</b> 36:7
<b>jack</b> 57:2	<b>Kinney</b> 2:21 42:20	<b>landmark</b> 35:2	<b>light</b> 19:19 41:2	<b>long</b> 6:12 7:1 24:10
<b>James</b> 2:19 26:11	42:21,23 48:4	36:7	54:8	24:18 27:22 32:10
26:13	49:9 52:22,24	<b>landmarks</b> 43:21	<b>lights</b> 67:3	36:3 52:14 67:17
<b>Jamie</b> 2:3 4:1	53:2,4,6,9,11,14	<b>lands</b> 28:10 30:8	<b>limit</b> 58:2	<b>long-term</b> 6:18
<b>Janet</b> 2:24 68:20,21	53:17,19,23	<b>landscape</b> 24:5	<b>limitations</b> 49:2	20:10 55:13
<b>January</b> 45:17	<b>kitchen</b> 24:19	34:12,24 43:9,13	<b>Lind</b> 42:2	<b>longer</b> 13:1 53:21
<b>Jefferson-Linde...</b>	<b>Kittitas</b> 2:22 7:1,7	43:17 68:8	<b>lined</b> 48:25	<b>look</b> 6:23 9:15 11:8
2:23 60:13,14,19	16:25 23:18 24:13	<b>landscapes</b> 34:9,15	<b>lines</b> 9:11 38:20	13:2 16:7 17:14
61:8,10,13,16,22	25:21 27:6 28:6	35:21,25	63:10	17:17 19:8 20:12
61:24 62:3,13,15	31:18,25,25 33:1	<b>language</b> 58:13	<b>Lion</b> 43:19	21:8 25:24 30:23
62:17,20,23 64:24	33:13,15 38:22	60:3,8	<b>list</b> 22:14	31:16 32:21 33:23
65:1,4,7 71:12,14	39:2 40:12 41:14	<b>large</b> 11:22 37:4	<b>listed</b> 30:21 35:20	35:1,23,24 36:22
71:16,20	42:13 57:20 70:18	39:12 41:20 47:11	<b>listening</b> 37:11 40:3	42:4,9,10 43:2
<b>Jennifer</b> 1:21 72:23	71:5	<b>larger</b> 5:20 9:24	57:24	44:17 45:3 48:12
<b>Jewell</b> 2:22 57:17	<b>knew</b> 65:10	10:6,20 13:1 14:3	<b>litigation</b> 27:6 28:8	49:15,21,22,23
57:18,20,20 60:11	<b>know</b> 3:14 10:18,19	14:9,10,11 16:20	<b>little</b> 4:22 6:7 7:25	50:9,19 51:19
<b>JOAN</b> 2:10	13:5 14:7,11 15:9	17:7,17,17 24:23	10:12 11:21 12:4	55:17 59:15 63:20
<b>job</b> 32:17 54:16	15:19,21 16:23	31:9 60:1,1	15:17 22:21,22	67:1
<b>jobs</b> 32:1 33:6,10	17:4,9,16,22	<b>largest</b> 5:11	31:21 32:24 35:12	<b>looked</b> 36:19 56:18
33:12,16,18 34:1	21:18 23:14 32:8	<b>late</b> 43:22 44:6 45:8	47:5 49:3 57:7	<b>looking</b> 7:14 9:14
34:3 64:5,10,15	34:16,22 36:3,4	<b>lately</b> 56:17	<b>live</b> 23:1 42:23 50:7	15:9 17:20 18:14
<b>joined</b> 38:11	42:8 45:19,22	<b>latest</b> 38:24 55:2	64:17 66:24,25	23:2 28:4 33:13
<b>joining</b> 3:20	48:12 49:3,12	<b>law</b> 46:22 47:1,6	68:1,2,7,10,19,21	34:7 45:6 50:2,15
<b>judge</b> 72:12	51:20,24,25 52:3	<b>laws</b> 28:1,23 70:5	69:13 71:6	56:1 66:23 67:2
<b>justify</b> 42:15	55:6 56:11 58:22	<b>layout</b> 9:3,4,14	<b>lived</b> 67:17 71:6	<b>looks</b> 4:9 13:16
	60:16,19 65:20,23	10:5,5 24:14	<b>lives</b> 68:17	44:12
<b>K</b>	66:15,18,19,20,22	<b>layouts</b> 8:24	<b>living</b> 23:20 25:18	<b>loose</b> 68:15
<b>Kachess</b> 68:22	66:25 67:1,7,9,10	<b>lead</b> 31:10 52:8	68:12 69:14	<b>Los</b> 38:10
<b>Kathi</b> 2:20 37:9,13	67:17 69:13 70:7	<b>leave</b> 23:20 60:23	<b>Livingston</b> 2:4 4:3	<b>lose</b> 57:2
<b>Kathleen</b> 2:3 3:8	<b>knowledge</b> 29:6	60:24,25	4:3 13:12,15,18	<b>loss</b> 12:21 30:5
<b>keep</b> 3:23 6:18	72:11	<b>left</b> 3:15 23:19,21	13:22,24 15:6	<b>lost</b> 45:22 47:8
21:22,23 48:2	<b>knows</b> 67:18 70:13	52:21	29:4	56:12
57:6 71:7	<b>kV</b> 9:11	<b>legislation</b> 37:23	<b>loads</b> 60:2	<b>lot</b> 8:9 11:1 12:20
<b>Ken</b> 2:23 66:9		<b>legislative</b> 40:21	<b>local</b> 2:22 12:9	14:6 17:9 37:18
<b>Ken's</b> 67:17	<b>L</b>			

<p>40:9 50:7 58:1 59:13,14,17 67:8 <b>loud</b> 37:20 <b>love</b> 44:7 47:6 <b>low</b> 44:2 55:6 57:4 <b>lower</b> 9:7 56:7 60:18 <b>lowered</b> 56:6 <b>lowering</b> 57:10 <b>lowest</b> 18:5 52:2 <b>lucky</b> 45:15</p> <hr/> <p style="text-align: center;"><b>M</b></p> <p><b>Ma'am</b> 71:11 <b>machine</b> 10:6 29:11 <b>machines</b> 9:22 10:3 10:3,10,20 12:1 14:9,13 17:9,10 <b>main</b> 58:2,8 <b>maintenance</b> 5:12 9:7 71:3 <b>major</b> 39:5 59:19 59:21 <b>make-</b> 32:18 <b>making</b> 51:8 58:5 58:25 <b>MALE</b> 13:23 <b>mammals</b> 14:5 <b>manage</b> 5:14 <b>management</b> 5:10 6:18 27:23 28:1 28:17,24 30:4 <b>manager</b> 54:18 66:11 <b>mandate</b> 35:24 <b>manmade</b> 34:14 <b>manufacturers</b> 14:12 <b>map</b> 7:23 8:5 15:9 50:21,25 <b>maps</b> 16:6 50:18,18 50:19 <b>Mark</b> 2:19 30:11 30:13 <b>marked</b> 15:11 <b>markers</b> 23:6,9</p>	<p><b>market</b> 33:16 38:11 39:4 <b>marketing</b> 32:8 37:18 <b>massive</b> 45:6 66:23 <b>matches</b> 50:6 <b>matter</b> 26:4 31:1 <b>maximum</b> 15:19 17:23 <b>meals</b> 25:25 <b>mean</b> 16:3,9 17:15 47:18,19 67:23 <b>meaningful</b> 29:23 <b>means</b> 18:4 48:19 55:8 56:12 68:9,9 68:16,16 <b>measurement</b> 48:24 51:22 <b>medevac</b> 57:6,11 59:2 <b>median</b> 31:20 36:24 63:21 <b>Meeting</b> 1:5 71:24 <b>megawatts</b> 8:21,23 8:24 9:1,25 10:7,9 17:1,16 <b>member</b> 2:18,20,21 2:22,23,23,24,24 37:14 <b>members</b> 57:14 <b>men</b> 23:2,12 <b>mention</b> 59:10 <b>mentioned</b> 27:24 34:16 41:24 46:13 55:12 58:23 59:2 69:17 <b>Meseck</b> 32:22 <b>message</b> 45:22 <b>metering</b> 39:13 41:15 <b>meters</b> 18:3,5,18,19 18:20 <b>Meyer</b> 2:19 26:14 <b>mic</b> 3:22 55:6 60:18 <b>microphone</b> 4:21</p>	<p>13:14 22:21 66:6 <b>middle</b> 9:9 44:14 47:10 <b>Mike</b> 2:4 4:3 <b>mile</b> 23:10 24:17 48:13 49:24 50:8 50:14,24,24 <b>miles</b> 24:20 44:25 47:20,24 48:1 52:14 70:3 <b>Miller</b> 2:15 4:12,15 4:23,25 5:2,4 14:6 15:17 17:2,7,24 18:6,10,12,22 19:2,13 <b>millimeter</b> 45:1 49:14,18,19 50:4 <b>millimeters</b> 45:9 48:20,21 <b>mind</b> 47:5 57:6 <b>minimal</b> 46:25 <b>minimum</b> 18:24 56:21 <b>minimums</b> 55:18 56:6,7,9 57:2,10 58:11 <b>mining</b> 42:1 <b>mission</b> 35:23 <b>mitigation</b> 59:12 <b>mixture</b> 9:17 <b>modern</b> 17:18 <b>modification</b> 7:16 <b>money</b> 63:20 64:19 67:12 68:18 <b>monitoring</b> 6:14 14:23 19:8 60:4 <b>monstrosity</b> 46:6 68:6 <b>monthly</b> 39:19 <b>months</b> 7:14 <b>Morgan</b> 2:25,25 70:23,25,25 71:1 <b>Mount</b> 24:8 <b>mountain</b> 43:18 60:23</p>	<p><b>mountains</b> 47:10 <b>mouth</b> 13:24 <b>move</b> 13:24 22:18 34:19 36:13 37:3 55:15 67:25 68:14 68:14 <b>moves</b> 35:8 <b>moving</b> 21:25 35:17 54:20 <b>multiple</b> 8:6 14:12 14:17 47:15 <b>municipalities</b> 33:25 <b>mute</b> 3:23</p> <hr/> <p style="text-align: center;"><b>N</b></p> <p><b>N</b> 2:1 <b>name</b> 3:8 4:14,14 5:6,7 22:24,24 26:13 30:12 37:13 40:10 42:23 55:7 57:20 66:9 67:16 68:21 70:25 <b>nameplate</b> 9:25 10:6 11:13 17:8 <b>Naneum</b> 44:13 <b>Nation</b> 7:8 <b>National</b> 47:22 50:3 <b>natural</b> 7:19 34:15 39:11 <b>near</b> 38:16 42:2 45:10 46:5 48:9 64:12 <b>nearby</b> 46:1,14 47:17,19 50:13,22 <b>necessarily</b> 18:10 62:19 <b>necessary</b> 7:10 <b>need</b> 11:15 20:15 20:24 21:1 32:21 35:10,11 39:25 42:3,6 48:8 49:20 49:20 50:8 51:18 53:24 54:3,5,8,10 56:8 60:8 62:8</p>	<p>63:15,16 67:18 <b>needed</b> 40:14 64:11 <b>Needle</b> 31:14 39:9 <b>needs</b> 28:2,4,16 29:21 42:3 69:20 69:25 70:14 <b>neighborhoods</b> 43:7 <b>neighboring</b> 38:8 <b>neighbors</b> 65:2,11 <b>Nelson</b> 2:24 68:20 68:21,21 <b>nest</b> 14:16 <b>net</b> 39:13 41:15 <b>never</b> 45:18 51:16 <b>new</b> 14:2,20 20:16 20:21 21:2 29:5 38:14,15,17 39:1 39:3,10 41:22 42:1 43:2 48:24 50:9 51:8,9,9 56:13 71:17 <b>newer</b> 10:20 15:2 <b>nice</b> 32:15 <b>nicely</b> 32:7 <b>night</b> 67:1 <b>Nikon</b> 48:18 <b>NIMBY</b> 36:5 <b>nine</b> 45:11 69:4 <b>noise</b> 71:16,17 <b>nominal</b> 10:6 <b>nonparticipating</b> 45:24 <b>north</b> 5:18 6:4,7 7:21 23:10 34:20 45:4,10 50:16 65:21,21 66:25 <b>northeast</b> 50:23 <b>northern</b> 25:5 <b>northwest</b> 8:7 15:22 38:1,2,12 41:8 56:14 <b>not-too-distant</b> 57:9 <b>note</b> 20:7</p>
---	---	---	--	---

<p><b>noted</b> 36:23  <b>noticeable</b> 44:9  <b>noticed</b> 23:9 56:15              62:25 67:5  <b>noticing</b> 45:6  <b>noting</b> 11:25  <b>nuclear</b> 5:22  <b>number</b> 10:14              12:10,11 13:19,25              34:1,2,3 47:11              50:11 51:3 52:11  <b>numbers</b> 6:10 11:6              11:9,22 36:22,23              51:25  <b>numerous</b> 39:14</p> <hr/> <p style="text-align: center;"><b>O</b></p> <p><b>o'clock</b> 17:25 18:1  <b>o0o-</b> 3:1  <b>objects</b> 49:15  <b>obscure</b> 26:2  <b>obscured</b> 24:7  <b>obscuring</b> 43:20  <b>observes</b> 33:4  <b>obstacles</b> 56:23  <b>obvious</b> 11:8  <b>obviously</b> 30:14  <b>occupants</b> 23:25  <b>occur</b> 47:24 59:7  <b>occurred</b> 59:25  <b>occurring</b> 39:25  <b>offensive</b> 25:15  <b>offer</b> 27:18  <b>office</b> 2:6 23:20  <b>offshore</b> 17:8  <b>oh</b> 3:6 16:14 18:16              33:9 36:6 53:16              56:8 61:12 62:19              62:19  <b>okay</b> 4:5 5:2 6:22              6:23 8:17 11:6,24              12:7 13:22 18:11              18:22 22:2,6,8,17              26:11 43:22 48:4              52:22 53:2,11,14              53:18,20,20 61:8</p>	<p>61:22 62:3,13,19          62:22 64:25 70:24          71:20  <b>omission</b> 59:11  <b>on-site</b> 9:9 42:1  <b>once</b> 15:21 20:22              20:24 21:6 24:4              54:9  <b>ones</b> 22:13 31:4              33:7 65:16 71:17  <b>online</b> 68:24 69:7  <b>Ontario</b> 36:15  <b>open</b> 24:1,17  <b>operate</b> 60:20  <b>operates</b> 59:5  <b>operating</b> 25:10              58:10  <b>operation</b> 19:10              40:19 54:7 71:3  <b>operations</b> 5:12 9:7              58:10,12 59:6,7,8  <b>opinion</b> 12:8  <b>opportunities</b>              33:19  <b>opportunity</b> 4:13              16:13 28:19 40:8              41:16,20 71:11  <b>oppose</b> 24:10 26:4  <b>opposed</b> 23:18  <b>options</b> 20:22 21:18              42:10  <b>order</b> 20:5 45:23              46:10,12,23 47:13              54:9  <b>Oregon</b> 64:7,14  <b>organization</b> 40:11              40:22  <b>original</b> 7:12 10:15              21:9 26:20 55:17  <b>originally</b> 7:2 8:3,9              8:21  <b>outcome</b> 72:15  <b>outline</b> 32:23  <b>output</b> 38:6 41:22  <b>outside</b> 32:18</p>	<p><b>outstanding</b> 7:5  <b>overall</b> 13:20  <b>overlay</b> 54:14  <b>overpopulated</b>              23:24  <b>oversupply</b> 39:4  <b>overview</b> 4:6 19:15              22:1  <b>overwhelming</b>              24:25  <b>owls</b> 67:6  <b>owner</b> 5:20 67:22              71:2  <b>owners</b> 23:8,10,14              26:16</p> <hr/> <p style="text-align: center;"><b>P</b></p> <p><b>P</b> 2:1,1  <b>p.m</b> 1:8  <b>page</b> 45:23 46:12              46:22 54:2  <b>painted</b> 43:24  <b>panoramic</b> 24:15  <b>paper</b> 49:2  <b>paperwork</b> 57:25  <b>paragraph</b> 46:12  <b>part</b> 16:2,19 17:23              29:16,17 30:19              31:3 35:22,24              38:10 41:1 47:1,6              47:14  <b>participant</b> 27:9  <b>participate</b> 41:17  <b>participating</b> 71:23  <b>particular</b> 26:17              27:14 28:9 32:2              32:24 41:15 42:7              54:10 56:17 63:5  <b>particularly</b> 31:5              31:12  <b>parties</b> 72:14  <b>partner</b> 22:25 23:4  <b>parts</b> 42:25 49:1  <b>pastels</b> 43:23  <b>Patty</b> 2:21 42:20,23  <b>Paul</b> 2:22 57:17,20</p>	<p><b>pay</b> 63:19,24,25              64:2  <b>pays</b> 64:1  <b>peaceful</b> 68:8  <b>peak</b> 40:14 41:4  <b>penalty</b> 72:7  <b>Penn</b> 38:10  <b>people</b> 5:8 6:25              22:9 28:17 30:1              35:8 41:16 43:11              46:5 47:2,8 50:7              50:12,17 51:4              52:25 63:19 64:2              64:14 65:15 71:5  <b>percent</b> 9:21 12:18              12:21 33:6,12,18              34:12 36:24 63:6              63:7,14  <b>perception</b> 24:16              24:21 50:7  <b>perch</b> 45:15  <b>perfect</b> 8:20  <b>period</b> 33:17 36:9              36:18  <b>peripheral</b> 49:25              50:1  <b>perjury</b> 72:8  <b>permanent</b> 12:21              12:24  <b>permission</b> 23:15              24:12  <b>permit</b> 15:3 39:23              42:13  <b>permits</b> 62:7  <b>permitted</b> 16:25  <b>permitting</b> 6:16              41:13 61:18 62:23  <b>person</b> 48:16 55:22              64:9  <b>person's</b> 49:25  <b>personal</b> 41:18  <b>perspective</b> 25:18  <b>pertains</b> 47:16  <b>Petroleum</b> 54:1  <b>phone</b> 3:6</p>	<p><b>phonetic</b> 6:21 64:4  <b>photo</b> 24:21 48:24              49:1  <b>photograph</b> 49:13              49:14 51:16  <b>photographed</b>              48:17  <b>photographing</b>              23:6  <b>Photographs</b> 50:4  <b>photos</b> 24:12,15,18              43:13,15 48:18,23              49:1 53:15,16  <b>physiological</b> 35:13  <b>picture</b> 37:23 43:18              43:22,22 44:1,6,8              44:8,12,16,16,19              44:23 45:8,17              49:5  <b>pictures</b> 43:5,9              49:9  <b>piece</b> 36:2  <b>pieces</b> 8:6  <b>pilot</b> 2:22 55:7  <b>pilots</b> 25:9  <b>pipeline</b> 6:2,7  <b>place</b> 23:11 24:24              25:15 31:7 34:24              43:14 44:7 45:21              54:22,23 55:3              62:7 68:2,7  <b>placed</b> 9:5  <b>placement</b> 25:13  <b>places</b> 21:18  <b>placing</b> 15:16 47:9  <b>plan</b> 9:2 19:8,9              28:10 32:9 39:23              41:22 57:8  <b>plane</b> 44:18,19              60:16,19  <b>planes</b> 44:21  <b>planning</b> 57:23  <b>plans</b> 62:8  <b>plants</b> 5:22 64:7,7              64:13</p>
--	---	--	---	--

<p><b>plays</b> 46:21  <b>please</b> 6:1 16:15          35:23 36:22 64:22          64:22 68:12  <b>pleasing</b> 47:3  <b>plenty</b> 46:15  <b>podium</b> 22:21  <b>point</b> 18:18 20:24          22:4 27:1 31:1          41:2 59:3  <b>points</b> 30:1,21 37:5          39:18 51:14  <b>poles</b> 44:15,17          60:20  <b>Policy</b> 20:14  <b>popular</b> 43:21  <b>portion</b> 15:22  <b>portray</b> 43:16  <b>posited</b> 29:3  <b>position</b> 17:25 18:1          66:11  <b>POSNER</b> 2:11          16:24 62:6,14,16  <b>possible</b> 47:25  <b>post</b> 45:13 60:4  <b>post-construction</b>          14:22 19:8 29:15          70:15  <b>posted</b> 21:22,23  <b>potential</b> 24:25          32:2 36:1 55:14  <b>potentials</b> 32:14  <b>POTIS</b> 2:12 3:7          22:8,10,12,15,17          26:11,23,25 30:11          37:9 40:6 42:20          55:5 57:17 60:13          66:5,7 67:15          68:20 70:22  <b>Poverty</b> 31:19  <b>power</b> 5:15,22 8:24          11:15 23:18 24:13          25:22 29:17 38:2          38:21 40:14,17          41:4,5,7,8,12 42:5</p>	<p>42:13 44:15,17          63:9,11,13 67:19  <b>powerful</b> 24:24  <b>pre</b> 60:4  <b>pre-construction</b>          14:16,23  <b>preemptive</b> 28:15  <b>prefer</b> 18:22  <b>preliminary</b> 15:24  <b>premise</b> 54:5  <b>preparation</b> 62:9  <b>prepared</b> 13:8          20:20 61:20  <b>present</b> 27:18  <b>presentation</b> 13:8          15:8 16:16 19:12  <b>presented</b> 62:24  <b>presenting</b> 54:17  <b>preservation</b> 26:17          26:19 28:3 29:1  <b>preserve</b> 28:18 30:7  <b>preserving</b> 35:24          35:25  <b>president</b> 2:25 23:7          70:25  <b>pressing</b> 3:23 54:5  <b>pretty</b> 11:22 15:4          32:23 56:19 59:11          60:3 66:15  <b>prevent</b> 57:11  <b>previous</b> 25:20          51:10 58:22  <b>previously</b> 11:25  <b>prey</b> 69:12  <b>price</b> 36:24 63:14  <b>prices</b> 63:1  <b>primarily</b> 41:19          69:13 70:17  <b>prime</b> 26:18 27:16          28:3 34:24,25  <b>principal</b> 46:23  <b>printed</b> 49:1  <b>prior</b> 25:1 58:19  <b>Pritchard</b> 2:19,20          30:11,12,13 37:9</p>	<p>37:10,13  <b>private</b> 7:19  <b>probably</b> 5:25          32:21 36:3 49:10          50:23 69:3,10  <b>problem</b> 19:2 38:19          56:3 66:18 67:20          67:21  <b>problems</b> 41:3  <b>Proceeding</b> 1:14  <b>proceedings</b> 72:8  <b>process</b> 4:8 7:12          19:15,21,25 21:24          26:20 27:21,22,23          28:20 29:2,21,22          30:9 41:17,25          43:2 45:20 46:18          46:22 54:14,22          62:5  <b>procurement</b> 6:16  <b>produce</b> 11:15          31:24 46:25  <b>product</b> 6:15  <b>production</b> 5:10          9:20 10:1 27:2          42:5,14,15  <b>productive</b> 47:3  <b>Products</b> 64:11  <b>professionals</b> 58:25  <b>professor</b> 2:19          30:13  <b>profile</b> 32:21  <b>profiles</b> 35:18  <b>profits</b> 32:1  <b>program</b> 39:10,10          58:21,23  <b>programs</b> 63:21  <b>project</b> 1:12 4:6,18          6:24 7:2,14,18,20          7:21,24 8:1,2,3,6          8:7,8,10,12,15,21          9:8,9,12,19 10:1          10:11,12,16,22,25          11:3,9,14,21 12:8          12:17,17,17 15:23</p>	<p>16:2,25 23:18          24:13 25:22 27:16          27:18 28:7 29:8          29:25 36:13 40:1          40:2,13 41:21          42:24 44:25 47:20          47:22 48:1,5,25          49:17 50:18,20,23          50:25 51:3,16          54:18 55:15 59:13          59:15,22,23 61:3          61:5,7,12 67:24          71:9  <b>projected</b> 24:21  <b>projection</b> 28:13  <b>projects</b> 5:13,14          6:5,12,19 14:22          16:24 27:3,9,10          27:15 38:14,16          41:6,13,25 42:2          47:25 59:19 60:7  <b>promulgate</b> 20:14  <b>proper</b> 58:17,18  <b>properties</b> 26:19          36:22,25  <b>property</b> 8:6 23:3,8          23:14 26:16 36:4          36:6,14,16 43:10          45:15 60:24 64:16          67:21 68:4,10  <b>proposal</b> 8:25          14:24 20:15,17          42:14 61:6  <b>proposals</b> 40:13          41:21,23  <b>proposed</b> 3:18 7:16          7:18 8:23 9:7          19:23 20:6,8,11          20:25 21:20 24:24          27:16 29:24 43:1          49:17 54:3,7,7          56:18  <b>proposing</b> 4:17  <b>protect</b> 28:9,18          30:8 47:7 70:6</p>	<p><b>protecting</b> 35:21,22  <b>protection</b> 26:18          28:3  <b>provide</b> 19:24          25:23 31:11 60:8  <b>provided</b> 30:21          36:15  <b>provider</b> 5:12  <b>provides</b> 33:9          40:21  <b>providing</b> 28:12  <b>provision</b> 21:9  <b>provisions</b> 21:10,14          31:3  <b>proximity</b> 36:20  <b>PSE</b> 38:11  <b>PTC</b> 9:22  <b>public</b> 1:13 3:14,17          4:13 20:8 24:8          25:20 31:6,24          40:24 41:1,7          42:17 46:3,13,18          46:19 59:17  <b>published</b> 36:10,11  <b>Pud</b> 39:2 41:14          66:10  <b>Puget</b> 9:11 41:10  <b>pulled</b> 56:17  <b>punching</b> 32:18  <b>put</b> 6:4 34:19 49:9          51:25 54:21 62:1  <b>putting</b> 40:22          55:22</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>qualify</b> 9:19 10:1  <b>quality</b> 34:11 68:5          68:12  <b>quarter</b> 50:14  <b>Quarterly</b> 33:4  <b>question</b> 13:18 16:3          16:10,18 17:2          19:4 22:2 29:3          61:21 62:5  <b>questions</b> 13:9,10          13:12 22:1 23:9</p>
---	---	--	--	--

<p><b>quick</b> 4:20 6:2  <b>quickly</b> 51:7  <b>quirks</b> 35:4  <b>quite</b> 7:1 40:9              48:10 55:21 56:16              66:14  <b>quote</b> 14:19 45:24              46:1,12,15,23              47:1,2,4,14,23              50:4 51:17 54:2              54:16  <b>quoted</b> 54:15,19</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>R</b> 2:1 72:1  <b>radius</b> 47:22 56:23  <b>raise</b> 56:9 63:12  <b>raised</b> 26:5 37:6              55:18  <b>ranch</b> 25:6  <b>range</b> 10:2  <b>rank</b> 46:19  <b>raptor</b> 14:16  <b>raptors</b> 14:2 45:10  <b>rate</b> 64:4  <b>rated</b> 55:8  <b>rates</b> 31:19,19  <b>RCW</b> 37:20,20              40:20  <b>reaches</b> 17:23  <b>read</b> 32:24 43:8              46:10,17  <b>reader</b> 51:15  <b>ready</b> 22:17  <b>real</b> 14:14 30:2  <b>realistic</b> 49:12  <b>reality</b> 24:22,24  <b>realize</b> 61:2  <b>really</b> 5:23 8:12              14:14 16:7 29:6              32:11 35:1,10,10              36:5 48:8 49:23              50:9 51:20 52:16              56:24 58:5,5,13              59:3,9,10 60:16              61:2 65:24 67:23</p>	<p>68:23 69:19,21              70:12  <b>reason</b> 9:19 10:4              59:18  <b>reasonable</b> 54:17  <b>reasons</b> 9:18  <b>receive</b> 19:25  <b>received</b> 43:19 56:5              58:18  <b>recommend</b> 55:15              57:12  <b>recommendations</b>              57:14  <b>recommended</b>              45:23  <b>recommending</b>              54:1  <b>Record</b> 24:7 51:12              54:15 62:17,18  <b>recorded</b> 72:8  <b>recover</b> 59:24  <b>recuperate</b> 6:20  <b>red</b> 67:3  <b>reduce</b> 10:22 11:4              14:1  <b>reduced</b> 8:2,11              12:6,8,22 13:3  <b>reducing</b> 8:22  <b>reduction</b> 10:13,14              10:21 11:17,22              12:9 13:5,6,19,24              33:18  <b>Reecer</b> 8:14 24:22              60:15,25 61:25              64:17 66:24 68:1  <b>reference</b> 51:14,19  <b>referred</b> 17:24  <b>referring</b> 20:13  <b>refuses</b> 34:19  <b>regard</b> 29:7  <b>region</b> 39:20  <b>regionally</b> 58:24  <b>regions</b> 35:9  <b>registering</b> 28:12  <b>regular</b> 59:8,9</p>	<p><b>regularly</b> 59:7  <b>regulations</b> 28:11  <b>reject</b> 20:3,3 61:3  <b>rejected</b> 34:23  <b>rejection</b> 54:1  <b>related</b> 33:9 41:7  <b>relation</b> 57:1  <b>relative</b> 14:4 31:13              32:20 35:2,8,16              35:18 72:13  <b>relatively</b> 14:18              15:23 47:15 52:8  <b>relevant</b> 31:5  <b>remain</b> 38:2  <b>remarks</b> 57:24 58:2  <b>remember</b> 54:12  <b>removing</b> 8:6  <b>renewable</b> 2:15              4:16 5:6,8,15,17              6:3 71:8  <b>repeat</b> 40:20  <b>repeating</b> 40:10  <b>replicates</b> 44:24  <b>report</b> 38:24 39:19              41:10 53:25  <b>reporter</b> 38:10  <b>represent</b> 30:2  <b>representative</b>              25:21,23 47:13  <b>representatives</b>              4:10  <b>represented</b> 27:5,9  <b>representing</b> 22:25              26:16  <b>represents</b> 9:2  <b>request</b> 8:22 19:19              20:1,2 21:12  <b>requested</b> 53:16  <b>require</b> 21:16 54:9  <b>required</b> 19:6              29:16 70:5  <b>requirements</b> 59:12  <b>requires</b> 28:20              58:14  <b>reread</b> 46:3</p>	<p><b>research</b> 5:24 14:4              15:15 34:5,6              68:24 69:7  <b>researched</b> 56:24              57:13 69:21,25  <b>reside</b> 23:8  <b>residences</b> 47:16,18              51:1,2 52:6  <b>resident</b> 37:13              40:12 60:14  <b>residents</b> 10:23              23:17 25:6 27:6              36:1,21 39:1              42:11  <b>resolution</b> 21:13  <b>resort</b> 47:11,12  <b>resource</b> 6:14 28:9  <b>Resources</b> 7:19  <b>respect</b> 27:15 28:3              28:21 29:4  <b>respectfully</b> 39:17  <b>response</b> 24:9              47:13 62:4  <b>responsibilities</b>              30:7  <b>responsibility</b>              29:19  <b>responsible</b> 39:21              60:7  <b>rest</b> 15:12  <b>restaurants</b> 33:11  <b>result</b> 12:8,18 13:5              19:10 25:14  <b>resulted</b> 25:4 29:5  <b>results</b> 15:2 21:24              35:3  <b>retardant</b> 44:17,20  <b>retardant-dumpi...</b>              25:10  <b>retired</b> 55:22 66:10  <b>retrieved</b> 48:24  <b>return</b> 41:18  <b>revenue</b> 32:13  <b>review</b> 19:7,23 20:5              21:19,20,23,24</p>	<p>28:21 29:2,21,21              54:22  <b>reviewing</b> 21:21              72:12  <b>revised</b> 8:1 12:8,17  <b>revision</b> 10:17  <b>Richard</b> 2:21 40:6  <b>Rick</b> 2:15 4:15  <b>ridge</b> 52:7  <b>right</b> 3:15 9:8 18:1              21:19 31:1 35:17              43:1 47:9,10              48:12,15 50:2,19              50:20 51:24 52:1              52:13 53:6 54:20              54:20,25 57:8              61:13,16 65:3              66:25 68:1  <b>rights</b> 32:13  <b>risk</b> 14:1,4 31:25  <b>road</b> 7:22 15:18,20              23:1,3,10 36:1              42:23 45:5,9,18              48:14 50:14,18,20              51:1 52:13 59:24              60:4 66:24 68:1  <b>roads</b> 8:13 9:5              10:24 11:16 15:20              52:16 59:13,14,14              59:17 60:7  <b>roadways</b> 59:22  <b>Robbins</b> 23:1  <b>Rock</b> 43:19  <b>rodent</b> 69:16  <b>rodents</b> 69:15  <b>Roger</b> 22:25 23:4  <b>role</b> 42:8 46:21  <b>rolling</b> 44:5  <b>roof</b> 45:4  <b>rooftop</b> 38:7,25              39:12  <b>rooftops</b> 38:24  <b>room</b> 39:13  <b>Rossman</b> 2:3 4:1,1              15:7,8 16:10,18</p>
---	--	--	--	--



<p>17:2,19 18:3,7,11 18:15,17 19:1,4,5 19:11 53:15 <b>rotating</b> 51:23 52:2 <b>rotor</b> 12:3,5 13:2,5 17:17,21,22 <b>rotors</b> 51:21,23 52:2 <b>rule</b> 46:22 <b>rules</b> 19:23 20:6,13 20:14,15 28:1 <b>run</b> 6:10 9:11 66:19 <b>runs</b> 5:22 8:14 <b>runway</b> 56:13,14 57:5,8,9 <b>runways</b> 56:11 <b>rural</b> 26:19 27:17 28:5 30:15,17 32:14 43:15 47:7 <b>rustic</b> 44:6</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>S</b> 2:1 <b>sadly</b> 25:3 <b>safe</b> 9:21 33:14 47:2 <b>safety</b> 20:9 31:6 <b>sale</b> 36:9 <b>sales</b> 36:18 <b>San</b> 5:18 <b>Satre</b> 2:23,24 66:9 66:9 67:15,16,16 <b>Savage</b> 54:1,2 <b>Save</b> 2:20,21 37:15 40:11,12 <b>saved</b> 66:13 <b>saw</b> 6:18 46:17 48:10 49:5 55:10 69:17 <b>saying</b> 31:9 54:19 <b>says</b> 17:21 38:24 <b>SCA</b> 10:15 19:6,20 19:21,24 21:5,9 21:10,14,20 26:21 51:9,10 55:1 <b>scale</b> 38:14 51:14</p>	<p>51:18 <b>scary</b> 60:16,22 <b>scenario</b> 9:15 10:16 <b>scenarios</b> 11:11 13:4 <b>scenic</b> 24:4 34:9,25 <b>schedule</b> 54:20 <b>School</b> 36:7 <b>Sciences</b> 47:23 50:3 <b>scientists</b> 25:2 <b>scope</b> 39:7 <b>Scotland</b> 34:6 35:19 <b>sealed</b> 23:21 <b>search</b> 25:8 <b>Seattle</b> 31:14,14 <b>second</b> 3:22 4:20 26:15 42:22 48:8 59:10 62:2 66:5 <b>secondary</b> 32:16 <b>section</b> 8:8,16 51:9 54:4 <b>sectors</b> 33:7,13 <b>Security</b> 33:3 <b>see</b> 5:13 7:15,22 8:4 9:6,13,16 10:2,4 11:19,22 12:2,4 14:9,12,21,23 15:18 16:1 17:15 26:22 27:1 34:2 34:14 36:17 43:17 44:14,18 45:14 49:3,10 50:8,13 50:20,21,22 51:18 52:13 53:14 55:12 56:4 57:4 59:10 60:2 61:20 62:4 67:3 70:7 <b>seeing</b> 14:11 67:3 <b>seeking</b> 23:5 <b>seen</b> 14:18 27:19 41:2 61:4 <b>segment</b> 55:25 <b>segments</b> 56:19 <b>SEIS</b> 44:24 50:15</p>	<p>51:8,13 <b>selection</b> 6:14 <b>sell</b> 6:20 63:13 64:19 <b>senior</b> 66:11 <b>sense</b> 16:4 19:22 43:14 <b>sensitive</b> 47:25 <b>sensor</b> 48:19,20,22 49:15 <b>SEPA</b> 20:15,18,21 20:24 21:3,7,21 29:14,19 <b>seriously</b> 26:6 <b>serves</b> 59:4 <b>Service</b> 39:22 70:5 <b>services</b> 33:8,11 52:14 <b>set</b> 31:20 72:18 <b>shallower</b> 15:16 <b>shape</b> 58:16 <b>share</b> 40:8 43:10,13 <b>shared</b> 23:10 <b>sheaf</b> 30:22 <b>sheet</b> 71:22 <b>shift</b> 32:19 34:21 <b>short</b> 57:8 <b>short-term</b> 20:10 <b>show</b> 8:18 9:4 24:14 48:8 49:2 <b>showing</b> 24:14 <b>shown</b> 8:10,16,23 44:8 50:17,25 51:1 58:4 <b>shows</b> 8:19 41:22 51:17 <b>shrinking</b> 29:8 <b>sic</b> 8:23 51:5 <b>side</b> 7:21 8:5,14 23:23,24 31:22 37:2 52:10,10 56:2,24 <b>Siemens</b> 8:25 9:16 10:5,7 <b>sign</b> 3:15 23:13</p>	<p><b>sign-in</b> 3:11,13 <b>sign-up</b> 22:6 71:21 <b>significant</b> 20:18 21:11 27:12,12,21 29:11 31:15 33:23 34:2 35:12 36:14 36:21,23 47:23 51:3 <b>significantly</b> 11:18 37:3 <b>signing</b> 22:11 <b>similar</b> 9:14 15:4 17:14 40:9 43:12 <b>Simmons</b> 41:8 <b>simple</b> 39:7 <b>simply</b> 41:1 <b>simulation</b> 48:18 48:24 49:6,13 <b>simulations</b> 48:5,6 48:10 49:12,19,20 49:22 50:9 <b>site</b> 1:5 3:9,17 4:7 6:13,15 7:4 9:2 14:19 15:12,13 19:20 23:18 24:3 42:1 53:24 58:14 59:11 61:14 62:9 <b>sited</b> 7:18 <b>sites</b> 64:7 <b>siting</b> 41:25 54:25 <b>sitting</b> 49:11 <b>six</b> 52:23 <b>size</b> 8:2,3 10:13 11:14 16:20,22 17:4 29:8,10 35:7 39:6 43:2 48:9 49:2 51:10,15,21 66:21 <b>sized</b> 48:23 <b>skills</b> 5:4 <b>skip</b> 53:4 <b>sky</b> 44:2 <b>slide</b> 4:19 5:13 6:1 6:9,22 7:25 9:13 12:14,15 15:10</p>	<p>17:20 <b>slides</b> 7:15 <b>slightly</b> 8:1 48:19 <b>Sloan</b> 2:22 55:5,6,7 <b>sloped</b> 52:9 <b>slopes</b> 15:16 25:5 <b>slow-moving</b> 45:20 <b>small</b> 8:7 32:18 37:4 <b>smaller</b> 8:9 10:12 11:3,4,10,19 48:19 49:16,22 <b>Smithson</b> 7:22 42:23 45:5,9,18 45:19 48:14 50:18 50:20 <b>smoke</b> 25:4 <b>smoke-shrouded</b> 25:11 <b>Snohomish</b> 66:10 72:5 <b>snow</b> 43:19 <b>solar</b> 5:11 27:16 38:7,15,23,25 39:12,25 40:17 <b>sold</b> 63:9 <b>somebody</b> 68:18 <b>Son</b> 2:25 71:1 <b>Sonia</b> 2:11 19:14 <b>soon</b> 23:20 43:24 48:14 <b>sooner</b> 56:7 65:17 <b>sorry</b> 16:17 33:9 57:22 <b>sort</b> 10:11 11:24 12:5,13,15 16:4 17:24 21:17 34:5 34:6 62:9 <b>sought</b> 55:20 <b>Sound</b> 9:11 41:10 <b>sounds</b> 36:5 60:1,2 <b>south</b> 26:15 43:12 50:25 <b>southeast</b> 56:15 <b>southern</b> 9:8 42:24</p>
---	--	--	--	--

<p><b>space</b> 13:3 31:14 39:9 <b>spaces</b> 24:1 <b>spacing</b> 52:9 <b>speak</b> 3:12,16 16:13 22:5 57:23 68:23 71:13 <b>speaker</b> 3:11 13:21 13:23 16:8,12,14 16:17 22:6,18 26:9,10,11 30:11 37:9 40:6 42:20 55:5 57:17 58:22 60:13,18 64:21 66:5,8 67:15 68:20 70:22 <b>speakers</b> 2:17 22:18 52:23 <b>speaking</b> 14:18 37:20 <b>special</b> 69:18 70:8 <b>specialist</b> 69:22 <b>species</b> 39:14 69:12 <b>specific</b> 43:1 45:25 46:9,11 60:8 <b>specifically</b> 20:6,7 55:12 <b>speed</b> 6:15 <b>spent</b> 36:5 <b>spin</b> 13:3 <b>Spokane</b> 38:16 <b>spoke</b> 37:17 41:3 46:5,16 <b>spoken</b> 36:3 <b>spring</b> 43:18,23,24 45:8 <b>squirrel</b> 69:8 <b>staff</b> 2:9 4:8,14 16:18 18:23 19:20 19:22 21:19 26:13 52:20 54:16 61:20 71:18 <b>standard</b> 27:25 <b>standards</b> 27:24 <b>stark</b> 59:11</p>	<p><b>start</b> 22:13 31:9 48:4 49:13 <b>starts</b> 32:16 <b>state</b> 1:4 4:1 7:20 20:13 27:11 30:16 32:9 33:3,16 34:24 35:25 37:22 38:18,23 39:10 40:15,19 59:17 72:3 <b>State's</b> 35:23 38:24 <b>stated</b> 11:9 25:14 45:24 47:14 53:25 <b>statements</b> 23:16 72:9 <b>states</b> 6:3 17:4 23:14 38:8 46:12 46:23 <b>statewide</b> 40:16 41:22 <b>stating</b> 13:1 <b>statistician</b> 32:23 <b>steep</b> 16:3 <b>steeper</b> 15:11,16 <b>STEPHEN</b> 2:11 <b>Steve</b> 41:8 <b>sticking</b> 18:1 <b>stop</b> 37:5 <b>storage</b> 5:11 42:7 <b>storied</b> 65:25 <b>stories</b> 64:1 <b>streams</b> 12:25 <b>Street</b> 26:15 <b>strengthen</b> 7:10 58:17 <b>string</b> 52:7 <b>strings</b> 9:6 <b>stripe</b> 34:18 <b>strokes</b> 43:24 <b>strong</b> 5:24 58:13 60:3 <b>struck</b> 29:3 <b>struggle</b> 24:10 <b>Stuart</b> 24:8 <b>studied</b> 33:25</p>	<p><b>studies</b> 11:3 29:15 68:25 69:2 70:4,8 70:15 <b>study</b> 14:7 29:4,12 29:23 33:24 35:2 35:3 36:7,17 55:13 69:18 <b>subject</b> 57:13 <b>subjected</b> 25:2,19 <b>submit</b> 7:13 39:17 51:12 <b>submitted</b> 7:2 62:8 <b>subsequent</b> 28:7 <b>subsidies</b> 63:25 <b>substantial</b> 20:17 <b>substantially</b> 21:10 21:14 <b>substation</b> 9:10 <b>subtracted</b> 51:24 <b>summary</b> 6:2 <b>summer</b> 44:1,6 <b>summertime</b> 59:4 <b>sun</b> 23:7,13 25:6 44:2 <b>supplemental</b> 20:19 21:4 68:25 70:9 <b>supply</b> 37:22 38:17 38:21 64:11 <b>support</b> 58:9,20 <b>supposed</b> 61:17 <b>Supreme</b> 27:5,7 28:6,8,24 <b>sure</b> 4:23 13:14 17:9,19 22:12 40:20 58:17,25 60:5 62:14 <b>surge</b> 38:5 <b>surround</b> 51:2 <b>surrounding</b> 63:18 <b>surroundings</b> 44:10 47:4 <b>survey</b> 14:16 36:17 <b>surveyed</b> 36:8 <b>surveyors</b> 16:1</p>	<p><b>surveys</b> 14:16,17 <b>survive</b> 67:25 <b>suspicious</b> 23:2 <b>swept</b> 12:5 13:2,5 13:19 14:1 <b>switch</b> 6:1 <b>systems</b> 42:11</p> <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <p><b>T</b> 72:1,1 <b>Table</b> 43:18 <b>tag</b> 26:21 <b>take</b> 4:20 13:9 30:23 39:23 53:21 58:1 59:1 62:11 66:21 68:6 <b>taken</b> 24:12 25:13 26:6 39:25 43:9 44:23 45:17 50:4 68:13 <b>talk</b> 4:8 19:15 22:20 29:8 52:20 71:18 <b>talked</b> 11:13 35:14 36:16 40:25 <b>talking</b> 21:6 67:18 <b>talks</b> 51:12 <b>tall</b> 12:2 31:14 32:11 45:2,3 66:2 67:4 <b>taller</b> 5:1 12:2 44:11 56:8 <b>Tammy</b> 30:22 <b>target</b> 31:8 <b>task</b> 37:21 <b>tax</b> 9:20 10:1 27:2 <b>Taylor</b> 25:4 44:21 60:22 <b>technical</b> 14:24 <b>technology</b> 8:25 9:2 10:18 11:24 14:2 14:8,21 17:11 42:7,7 <b>telephone</b> 60:20 <b>tell</b> 17:11 64:6 65:17</p>	<p><b>telling</b> 7:25 28:17 65:14 <b>temporary</b> 11:19 11:20 12:25 <b>ten</b> 36:9 69:4 <b>ten-year</b> 26:21 36:18 <b>tend</b> 59:6 <b>Tenney</b> 2:19 26:14 <b>Teresa</b> 2:22 55:5,7 <b>Terminal</b> 54:2 <b>terms</b> 8:2 11:14 16:19 20:2 40:18 42:15 <b>terrain</b> 47:16 52:9 56:22 <b>Territory</b> 25:17 <b>Tesoro</b> 54:1,2 <b>testimony</b> 24:8 25:1,20 39:18 <b>Testing</b> 66:7 <b>thank</b> 3:9 4:12,14 5:3 15:5,6,8 19:1 19:3,4,11,12,13 19:16,17 22:3 26:6,8,9,12 30:10 30:12 37:6,8,11 40:4,5,8 42:18,19 53:18,22 55:4 57:15,16 60:10,12 62:22 66:4 67:14 68:19 70:19,20 71:9,10,15,23 <b>Thanks</b> 60:11 <b>thing</b> 3:10 16:6 35:7 53:23 59:3 59:10 62:25 64:5 64:16 65:4,19,20 67:5,7 69:6 70:1 70:11 71:14 <b>things</b> 5:10 13:6 31:13 35:13,14,15 36:20,25 37:3,18 43:1 51:7 58:1 66:17 67:11</p>
---	---	--	--	--

<p><b>think</b> 6:11 7:24 8:16 10:21,24 12:12 15:1,4,10 18:10,12 26:22 27:1,12 28:20 29:1,14,21 31:4 32:21 35:10,11 37:5 40:10 43:1 43:16 44:21 48:7 49:19 51:8 53:10 59:23 67:8 69:10 69:11,12,15,21 70:8 <b>thinking</b> 33:21 <b>third</b> 13:4 51:2 <b>third-generation</b> 71:2 <b>third-party</b> 5:12 <b>Thirty-one</b> 39:8 <b>thorough</b> 54:21 <b>thoroughly</b> 69:21 <b>thought</b> 49:6 52:15 61:3,19 64:12 <b>thoughtful</b> 58:6 <b>thoughts</b> 40:9 <b>thousand</b> 36:18 <b>threatened</b> 32:1 39:14 <b>three</b> 36:11 45:11 47:20,24 52:15 59:19 60:15 71:4 <b>three-mile</b> 47:22 <b>threshold</b> 20:22 21:2 <b>Thurston</b> 38:15 <b>ties</b> 32:6 <b>time</b> 7:2 14:14 25:23 32:6,10,16 36:5 37:7 42:6 47:9,18 49:16 52:25 54:15,19,23 55:3 57:4 58:2 67:17 <b>times</b> 25:15 38:10 <b>tip</b> 11:25 12:2</p>	<p>17:20,21 18:14 51:23 <b>to-be-built</b> 9:9 <b>today</b> 14:22 <b>told</b> 24:9 65:9,13 65:18 <b>tonight</b> 4:5,16 22:5 26:15 29:13 30:20 30:25 31:5,11 37:6 40:25 42:6 58:4 <b>top</b> 11:7 17:22 44:4 44:11 52:7 <b>topographic</b> 15:12 <b>tossed</b> 26:3 <b>total</b> 33:5,18 51:2 <b>touched</b> 10:11 12:20 <b>tourism</b> 30:18 32:4 32:8,9,13,15 33:9 33:15,25 34:3,3,8 34:10 35:3,21 37:2,17 39:9,10 40:25 <b>tourists</b> 35:9 <b>tower</b> 63:8 <b>towers</b> 24:11 25:13 25:19 31:13 32:12 34:17,19 44:7 45:1 49:22 56:1,8 56:25 66:16 67:4 70:12 <b>town</b> 67:2 68:22 <b>Townsend's</b> 69:8 <b>trailed</b> 25:7 <b>trailers</b> 60:21 <b>training</b> 58:21 <b>transcribed</b> 1:21 72:9 <b>transcript</b> 1:14 72:11,13 <b>Transcription</b> 1:22 <b>transcriptionist</b> 72:10 <b>transition</b> 28:25</p>	<p><b>transmission</b> 38:20 63:10 <b>transportation</b> 55:11 <b>travel</b> 64:14 <b>traveling</b> 30:12 <b>traversed</b> 23:12 <b>treats</b> 26:1 <b>tree</b> 45:15 <b>tremendous</b> 14:15 <b>trend</b> 14:10 <b>trends</b> 34:5,7 <b>trespassed</b> 23:12 <b>Tri-Cities</b> 38:16 <b>trial</b> 72:12 <b>troubling</b> 52:5 <b>trucks</b> 60:1 64:9 <b>true</b> 72:11 <b>trust</b> 48:11 <b>try</b> 11:7 53:20 <b>trying</b> 32:19 51:21 59:23 60:21 68:24 69:6 <b>turb-</b> 51:25 <b>turbine</b> 8:25 9:1,6 9:18 10:18 11:24 13:1 14:20 17:11 18:1 29:10 49:24 51:10,15,17 52:1 63:4 <b>turbines</b> 8:13 9:3,4 9:16,24,25 10:14 10:23 11:10,12,16 12:3,6,10,10,11 13:1,19,25 14:3,8 15:2,3,10,16 16:6 16:20 17:3,8,13 17:18 18:25 23:6 24:3,7,14,18,24 25:3,12,16 26:4 27:6 29:5 31:10 33:22 34:14 35:3 35:5,5 37:4,4 39:6 39:8 43:6,20,25 44:3,22 45:3,6,16</p>	<p>46:1,5,14 47:9,15 47:20 48:9 50:8 50:13,16 51:5,19 52:5,6,7,14 55:23 58:11,15,19 60:1 67:19 68:3 <b>turn</b> 26:25 <b>twenty</b> 7:3 <b>two</b> 8:23 11:10 12:24 16:24 23:2 34:9,9 35:6 37:16 42:25 43:21 44:14 44:25 47:20 49:1 52:14 53:17 56:11 58:2,8 59:20 64:9 <b>two-</b> 47:21 <b>two-year</b> 70:15 <b>types</b> 9:18 69:15 <b>typical</b> 43:15 44:1 45:8 51:17</p>	<p>54:18 <b>update</b> 7:14,15 <b>updated</b> 7:3,12 20:20 21:21 <b>uproar</b> 54:12 <b>use</b> 10:16 11:11 14:17,18,19 43:3 46:4 48:6 51:17 52:16 <b>utilities</b> 38:25 39:12 41:14 63:2 63:6,16 <b>utility</b> 42:17 63:4 63:12,16,19 64:4 <b>utilizing</b> 9:15,21 10:8</p>
<b>V</b>				
				<p><b>vacancy</b> 31:19 <b>vacation</b> 59:1 <b>valley</b> 7:1 16:21,25 17:13 23:18 24:13 25:21 27:14 30:3 30:5 32:14 38:22 70:2 <b>valued</b> 64:18 <b>values</b> 36:4,7,14,16 36:24 64:16 <b>valuing</b> 36:14 <b>Vantage</b> 54:12 59:22,24 <b>variety</b> 10:8 25:1 <b>various</b> 69:15 <b>vastly</b> 10:18 15:2 <b>VEDT</b> 54:3 <b>vegetation</b> 11:2,5 12:16,19,21 <b>Verbatim</b> 1:14 <b>versus</b> 15:16 35:5 <b>vertical</b> 17:22 48:23 <b>Vestas</b> 9:1,3 10:5,6 10:9 <b>view</b> 23:22,25 24:7 43:20,21 46:1,8 48:7,17 49:25</p>
<b>U</b>				
				<p><b>U.K</b> 34:7,18 36:9 <b>U.S</b> 14:10 39:22,22 70:4,8 <b>Uh</b> 70:22 <b>Uh-huh</b> 48:3 <b>Um</b> 18:6 67:6 <b>unable</b> 25:23 <b>unclear</b> 24:9 <b>uncommonly</b> 48:6 <b>uncountable</b> 26:2 <b>undermine</b> 31:24 <b>undersigned</b> 72:7 <b>understand</b> 21:7 28:14 43:14 69:2 <b>understanding</b> 17:19 18:21 20:25 <b>undertake</b> 28:21 29:22 <b>undertaken</b> 28:16 <b>United</b> 6:3 17:4 <b>units</b> 10:15 <b>University</b> 2:20 58:22,24 <b>unquote</b> 47:16</p>

50:2,6,15,17 52:6 67:1 68:23 <b>viewed</b> 43:10 <b>viewing</b> 23:23 47:25 <b>viewpoint</b> 48:11,13 50:13 <b>viewpoints</b> 34:25 44:24 50:11 <b>views</b> 43:11,12 47:7 50:12 <b>viewshed</b> 46:8 <b>VIII</b> 54:4 <b>visible</b> 23:13 <b>vision</b> 49:25 <b>visitation</b> 32:13 <b>visiting</b> 37:11 <b>visitor</b> 32:12 <b>visitors</b> 34:13 36:1 39:11 <b>vistas</b> 39:11 <b>visual</b> 12:13 42:21 43:6 46:7,13,16 47:15,17,21,24 48:5,5 50:6 51:6 52:8,10 55:24 <b>voice</b> 26:5 <b>voices</b> 47:6	<b>warm</b> 3:22 <b>warning</b> 23:13 <b>warrant</b> 43:2 51:8 <b>Washington</b> 1:4,6 2:20 3:19 4:1,3 7:7 30:14 33:2,17 34:24 35:25 40:15 41:5,13 47:2 58:22 72:3 <b>wasn't</b> 31:12 36:12 51:10 57:23 65:18 68:23 69:19 <b>watch</b> 45:21 <b>water</b> 8:14 39:16 66:21 <b>way</b> 6:24 14:14 17:11,12 24:18 36:3 49:6 58:16 58:16 64:14 <b>WDFW</b> 70:8 <b>we'll</b> 11:16 14:22 15:19 16:16 21:23 50:2 66:8 <b>we're</b> 4:16,17 8:6 8:22 9:17 11:19 14:9,11 15:1 21:21,22 22:17 26:20,21,24 27:1 34:15 41:5 53:7 54:19 56:9 59:23 67:2,9,10 <b>we've</b> 5:14 6:4 8:2 8:7,23 10:11 12:18 14:17 15:24 15:25,25 20:23 21:6 27:19 31:2 31:15 32:4 35:13 36:14 40:25 41:25 56:11,12,16 59:18 59:19 63:7 65:25 71:6 <b>website</b> 69:2 <b>Wednesday</b> 1:7 <b>weight</b> 32:19 43:7 47:5	<b>welfare</b> 20:9 31:6,8 31:16,24,25 <b>well-researched</b> 53:12 <b>well-taken</b> 53:10 <b>Wenatchee</b> 47:10 60:25 <b>went</b> 27:7 28:6 48:13 55:19,21 63:8,9 65:7 <b>west</b> 15:22 23:24 31:22 38:8 43:12 50:14 67:4 <b>wetland</b> 11:2 12:22 12:24 <b>wetlands</b> 12:25 52:11 <b>whatnot</b> 69:15 <b>WHEREOF</b> 72:18 <b>white</b> 43:24 44:10 45:6 48:15 49:6 49:10 <b>wide</b> 43:24 48:6 59:16 <b>wife</b> 67:17 <b>Wild</b> 16:25 25:16 39:20,21 70:3 <b>wildfire</b> 59:4 <b>wildfires</b> 59:6 <b>wildlife</b> 2:4 4:4 7:7 11:2,5 12:16 26:1 29:16 39:22 68:8 70:5,13 <b>wind</b> 1:12 2:15 4:15,18 5:13,14 6:14,24 7:18 13:19,25 16:21,25 17:18 23:18 24:13 25:22 27:10 29:17 33:21 34:1,8,13 36:20 38:14,22 39:20 40:17 43:4 43:20 45:24 49:24 53:24 54:10,12,21 54:24,25 55:17,19	56:1,4,16,18 59:19 63:4,8,11 65:22 66:16 67:19 68:3,6 69:10,18 70:3,10 71:4 <b>window</b> 24:19 <b>winning</b> 38:9 39:9 <b>winter</b> 45:8 <b>wires</b> 66:20 <b>WITNESS</b> 72:18 <b>witnessed</b> 24:22 <b>woman</b> 24:6 <b>wonder</b> 23:16 <b>wonderful</b> 32:17 <b>wondering</b> 18:15 <b>woods</b> 60:24 <b>words</b> 33:14 46:6,8 55:10 <b>work</b> 14:16 17:12 26:13 55:9 57:21 60:5 63:4 66:13 67:8 <b>worked</b> 54:13,14 54:22 66:14 68:15 <b>working</b> 21:19 32:6 66:12 <b>works</b> 17:12 <b>worst</b> 24:23 <b>worth</b> 9:16 11:25 35:22,22 40:10 <b>wouldn't</b> 11:11 17:15 <b>wrap</b> 52:18 <b>written</b> 52:19 53:7 <b>wrote</b> 24:6	63:5,6,14 <b>year-round</b> 71:7 <b>years</b> 5:23 6:6 10:19 14:17 26:20 30:15 33:2 36:10 36:11 37:17 38:1 43:9,20 68:22 69:4 <b>years'</b> 24:10 <b>yellow</b> 44:19
<hr/> <b>W</b> <hr/>		<hr/> <b>Z</b> <hr/>		
<b>WAC</b> 19:24 20:7 20:13,21:5 <b>Wage</b> 33:4 <b>wait</b> 62:2 <b>Wales</b> 36:9 <b>want</b> 3:10 21:5 22:18,22 34:14 38:23 43:13,14 44:14 47:7 48:4 51:6 53:20 55:1 58:8 62:2 64:6 68:14,15 <b>wanted</b> 3:14 30:19 31:5,7 32:2 52:23 55:21 69:3 <b>wants</b> 68:18		<b>zone</b> 54:14 <b>zoom</b> 45:9		
<hr/> <b>0</b> <hr/>		<hr/> <b>1</b> <hr/>		
<b>1</b> 22:18 43:18 <b>1,000</b> 5:17 6:5 <b>1,500</b> 33:9,18 <b>1,900</b> 33:6,18 <b>1.7</b> 52:14 <b>1.8</b> 17:1 <b>1.8-</b> 29:10 <b>10</b> 5:15 15:10 28:7 66:5 <b>100</b> 8:23 9:1 10:9 <b>100-megawatt</b> 9:3 <b>11</b> 1:7 3:2 56:14 67:15 <b>12</b> 17:25 18:1 33:2 63:22 68:20 <b>12,000</b> 33:5 <b>124</b> 48:7 <b>13</b> 17:20 41:12 <b>130</b> 45:9 <b>134</b> 18:14 <b>136</b> 18:3,19 <b>14</b> 5:14 18:5,20 <b>14,000</b> 33:5 <b>15</b> 33:6 41:11 70:3 <b>150</b> 18:14,18 <b>17</b> 6:8 <b>170</b> 45:2 <b>18</b> 45:23 46:12				
<hr/> <b>X</b> <hr/>		<hr/> <b>Y</b> <hr/>		
<b>Yakima</b> 7:8 26:14 26:15 <b>yard</b> 24:12 <b>yeah</b> 3:23 8:17 13:12 15:17 17:24 17:25 67:7 <b>year</b> 43:16 45:14,17				

<p><b>180-degree</b> 50:2  <b>190</b> 8:21  <b>197-11</b> 20:13</p> <hr/> <p><b>2</b></p> <p><b>2</b> 16:23 17:1 43:22  43:22  <b>2-</b> 10:3 14:9  <b>2-megawatt</b> 9:24  10:3,8 14:8 16:22  <b>2,000</b> 56:21  <b>2,200</b> 33:25  <b>2,500</b> 47:19  <b>2.0-megawatt</b>  29:10  <b>2.2</b> 48:25  <b>200,000</b> 36:8  <b>2004</b> 33:2,13  <b>2006</b> 7:3  <b>2009</b> 7:3 20:20 28:7  44:23 45:22 47:5  50:15 65:17  <b>2010</b> 19:20 31:17  36:13 37:25 38:5  43:4 54:13 63:7  65:18 69:23  <b>2012</b> 44:21  <b>2014</b> 44:13  <b>2015</b> 6:6 36:10  41:10 61:17,18  62:23  <b>2016</b> 31:17 33:2,6  33:13  <b>2017</b> 41:9  <b>2018</b> 1:7 3:2 51:16  72:19  <b>2020</b> 9:21 55:1  <b>21</b> 8:16 51:5  <b>22</b> 33:18  <b>224</b> 11:20  <b>230</b> 9:11 26:15  <b>2362</b> 42:23  <b>24</b> 46:22  <b>25</b> 9:23,24 56:13  <b>26</b> 45:5  <b>26th</b> 72:19</p>	<p><b>27</b> 51:1</p> <hr/> <p><b>3</b></p> <p><b>3</b> 30:11 44:1  <b>3-megawatt</b> 14:9  <b>3.7</b> 63:7  <b>30</b> 12:18  <b>300</b> 11:21  <b>31</b> 10:16 11:12  33:22  <b>33</b> 36:24  <b>35</b> 49:18  <b>37</b> 63:7  <b>38</b> 36:24  <b>38.6</b> 50:5</p> <hr/> <p><b>4</b></p> <p><b>4</b> 9:25 10:7 29:11  37:9 44:6  <b>4-megawatt</b> 17:9  17:10  <b>4-nautical-mile</b>  56:23  <b>4,400</b> 8:4  <b>4.2</b> 16:23 29:11  <b>4.2-megawatt</b> 10:3  14:12  <b>40</b> 12:21  <b>400,000</b> 64:18  <b>439</b> 33:18  <b>44</b> 48:20  <b>460</b> 34:17  <b>463-47</b> 20:14  <b>463-66</b> 19:24  <b>463-66-030</b> 3:19  <b>463-66-050</b> 20:7  <b>492-foot</b> 45:3</p> <hr/> <p><b>5</b></p> <p><b>5</b> 5:16 9:21,23 40:6  44:12  <b>5,200</b> 8:4  <b>50</b> 45:1 48:21 49:14  49:19 50:4 51:22  52:2  <b>500</b> 12:1</p>	<p><b>54</b> 33:12  <b>55</b> 34:12  <b>59</b> 54:2</p> <hr/> <p><b>6</b></p> <p><b>6</b> 42:20 44:16 48:11  48:13  <b>6.25</b> 48:25  <b>6:30</b> 1:8  <b>6:31:18</b> 3:3</p> <hr/> <p><b>7</b></p> <p><b>7</b> 44:23 55:5  <b>70</b> 5:23  <b>7430</b> 23:1</p> <hr/> <p><b>8</b></p> <p><b>8</b> 45:8 57:17  <b>8.1</b> 63:6,14 64:4  <b>8:22:55</b> 71:25  <b>80</b> 8:24  <b>80-megawatt</b> 9:15  <b>80.50</b> 37:20 40:20  <b>800</b> 8:9 11:10  <b>843</b> 45:23 46:10,12  46:23 47:13 54:9</p> <hr/> <p><b>9</b></p> <p><b>9</b> 15:10 45:17 60:13  <b>90</b> 10:15  <b>95</b> 11:13  <b>97</b> 7:22</p>		
---	---	---	--	--

# Verbatim Transcript of Monthly Council Meeting

## Washington State Energy Facility Site Evaluation Council

April 17, 2018



**206.287.9066 | 800.846.6989**

1325 Fourth Avenue, Suite 1840, Seattle, Washington 98101

[www.buellrealtime.com](http://www.buellrealtime.com)

email: [info@buellrealtime.com](mailto:info@buellrealtime.com)



Verbatim Transcript of Monthly Council Meeting - 4/17/2018

Page 1

---

WASHINGTON STATE  
ENERGY FACILITY SITE EVALUATION COUNCIL

Olympia, Washington  
Tuesday, April 17, 2018  
1:30 p.m.

---

MONTHLY COUNCIL MEETING  
Verbatim Transcript of Proceeding

REPORTED BY: TAYLER GARLINGHOUSE, CCR 3358  
Buell Realtime Reporting, LLC  
1325 Fourth Avenue  
Suite 1840  
Seattle, Washington 98101  
(206) 287-9066 | Seattle  
(360) 534-9066 | Olympia  
(800) 846-6989 | National  
www.buellrealtime.com

Page 2

1 APPEARANCES  
2 Councilmembers:  
3 KATHLEEN DREW, Chair  
4 JAMIE ROSSMAN, Department of Commerce  
5 CULLEN STEPHENSON, Department of Ecology (via phone)  
6 MIKE LIVINGSTON, Department of Fish and Wildlife  
7 DAN SIEMANN, Department of Natural Resources (via phone)  
8 DENNIS MOSS, Utilities and Transportation Commission  
9  
10 Local Government and Optional State Agency for the  
11 Columbia Solar Project:  
12  
13 KELLY COOPER, Department of Health  
14 IAN ELLIOT, Kittitas County (via phone)  
15  
16 Attorney General's Office:  
17  
18 ANN ESSKO, Assistant Attorney General  
19 JON THOMPSON, Assistant Attorney General  
20  
21 EFSEC Staff:  
22  
23 STEPHEN POSNER  
24 SONIA BUMPUS  
25 TAMMY MASTRO  
AMI KIDDER  
JOAN AITKEN  
PATTY BETTS  
CHRISTINA POTIS  
LAURA CHARTOFF  
Guests:  
MARK MILLER, Chehalis Generating Facility (via phone)  
JENNIFER DIAZ, Wild Horse Wind Power Project (via phone)  
KAREN MCGAFFEY, Perkins Coie (via phone)  
DEBBIE KNAUB, Columbia Generating Station (via phone)  
CHRIS SHERIN, Grays Harbor Energy Center (via phone)  
ERIC MELBARDIS, Kittitas Valley Wind Power Project (via phone)  
BILL SHERMAN, Counsel for the Environment

Page 3

1 OLYMPIA, WASHINGTON; APRIL 17, 2018  
2 1:30 P.M.  
3 --oOo--  
4 PROCEEDINGS  
5  
6 CHAIR DREW: Good afternoon. This is  
7 Kathleen Drew. I'm the Chair of the EFSEC Council, and  
8 it is 1:30, and I'm calling our meeting to order.  
9 Will the -- will Ms. Mastro please call the  
10 roll?  
11 MS. MASTRO: Department of Commerce?  
12 MR. ROSSMAN: Jaime Rossman is here.  
13 MS. MASTRO: Department of Ecology?  
14 Department of Fish & Wildlife?  
15 MR. LIVINGSTON: Mike Livingston, here.  
16 MS. MASTRO: Department of Natural  
17 Resources?  
18 MR. SIEMANN: Dan Siemann is on the phone.  
19 MS. MASTRO: Utilities and Transportation  
20 Commission?  
21 MR. MOSS: Dennis Moss is here.  
22 MS. MASTRO: Local Government and Optional  
23 State Agency for the Columbia Solar Project, Department  
24 of Health?  
25 MS. COOPER: Kelly Cooper is here.

Page 4

1 MS. MASTRO: Kittitas County?  
2 MR. ELLIOT: Ian Elliot, here.  
3 MS. MASTRO: Chair, there is the quorum for  
4 the regular Council as well as the Columbia Solar  
5 Council.  
6 CHAIR DREW: I believe we may have our  
7 representative for the Department of Ecology on the  
8 phone?  
9 MR. STEPHENSON: Yes, thank you. Cullen  
10 Stephenson from Ecology, here, on the phone.  
11 CHAIR DREW: Thank you.  
12 If there's anyone else who has called in who  
13 would like to introduce themselves at this point in  
14 time, please do so.  
15 MR. MILLER: This is Mark Miller from the  
16 Chehalis Generation Facility.  
17 MS. DIAZ: Jennifer Diaz --  
18 (Multiple speakers speaking.)  
19 MS. DIAZ: Go ahead, Karen.  
20 MS. MCGAFFEY: Karen McGaffey from Perkins  
21 Coie representing Desert Claim.  
22 MS. DIAZ: Jennifer Diaz, Puget Sound Energy  
23 Wild Horse Wind Facility.  
24 MS. KNAUB: Debbie Knaub, Energy Northwest  
25 Columbia Generating Station.

Verbatim Transcript of Monthly Council Meeting - 4/17/2018

Page 5

1 MR. SHERIN: Chris Sherin from Grays Harbor  
 2 Energy Center.  
 3 MR. MELBARDIS: Eric Melbardis, Kittitas  
 4 Valley Wind Power Project.  
 5 CHAIR DREW: And I believe we also have  
 6 counsel for The Environment, Bill Sherman, with us.  
 7 MR. SHERMAN: Thank you, Chair. Bill  
 8 Sherman for -- counsel for The Environment.  
 9 CHAIR DREW: Okay, councilmembers. We have  
 10 before us the proposed agenda. Is there a motion to  
 11 approve that agenda?  
 12 MR. MOSS: Chair Drew, I'll move that we  
 13 approve the agenda as published.  
 14 MR. POSNER: Chair Drew?  
 15 CHAIR DREW: Yes?  
 16 MR. POSNER: Sorry, there is one correction  
 17 on the agenda. It's minor, but just for the record,  
 18 under "Other, EFSEC Council," that should read, "Fourth  
 19 Quarter Cost Allocation."  
 20 CHAIR DREW: Thank you, Mr. Posner.  
 21 Okay. With that one correction, all in  
 22 favor?  
 23 COUNCILMEMBERS: Aye.  
 24 CHAIR DREW: Opposed? The agenda is  
 25 approved.

Page 6

1 Moving on to the meeting minutes from  
 2 March 20th, 2018.  
 3 MR. MOSS: I have one correction, Chair  
 4 Drew.  
 5 CHAIR DREW: Okay.  
 6 MR. MOSS: On page 19 at line 19, the last  
 7 word on that line is "main," it should be "name,"  
 8 n-a-m-e, name plate capacity.  
 9 CHAIR DREW: Okay. That's page 19, line 19?  
 10 MR. MOSS: Yes.  
 11 CHAIR DREW: Oh, okay. I see that. Any  
 12 other corrections? If not, is there a motion to approve  
 13 the minutes with that change?  
 14 MR. ROSSMAN: Chair Drew, I move that we  
 15 approve the March 20, 2018 minutes as amended.  
 16 MR. LIVINGSTON: I second that.  
 17 CHAIR DREW: All those this favor?  
 18 COUNCILMEMBERS: Aye.  
 19 CHAIR DREW: The minutes -- all those  
 20 opposed? Minutes are approved.  
 21 Okay. Let's move on, then, to our  
 22 operational updates. Kittitas Valley Wind Project.  
 23 Eric Melbardis, which I believe you are on  
 24 the phone?  
 25 MR. MELBARDIS: That's correct. Thank you,

Page 7

1 Chair Drew, EFSEC Council. This is Eric Melbardis with  
 2 EDP Renewables for the Kittitas Valley Wind Power  
 3 Project. All March operations at the plant were  
 4 routine, and I have nothing further to report.  
 5 CHAIR DREW: Okay. Any questions?  
 6 Thank you.  
 7 Wild Horse Wind Power Project, Jennifer  
 8 Diaz?  
 9 MS. DIAZ: Yes. Thank you, Chair Drew and  
 10 councilmembers. For the record, Jennifer Diaz with  
 11 Puget Sound Energy at the Wild Horse Wind and Solar  
 12 Facility. I only have one nonroutine update for the  
 13 month of March. In accordance with the Operations  
 14 Stormwater Pollution Prevention Plan, a semiannual  
 15 stormwater inspection was completed on March 14th, and  
 16 overall the site responded very well to spring snow  
 17 melt, and the installed BMTs functioned properly.  
 18 That's all I have.  
 19 CHAIR DREW: Thank you.  
 20 Columbia Generating Station, Debbie Knaub?  
 21 MS. KNAUB: Yes, Chair Drew and  
 22 councilmembers, this is Debbie Knaub from Energy  
 23 Northwest for the Columbia Generating Station. The only  
 24 update I have is that on March 21st, we had a dangerous  
 25 waste inspection with the Department of Ecology, and

Page 8

1 that was an unannounced inspection at the Columbia  
 2 Generating Station. And that included a walkthrough of  
 3 laboratories, chemical product and waste storage areas,  
 4 document review, and employee interview.  
 5 We also -- Energy Northwest also received  
 6 first place in group G at the American Public Power  
 7 Association 2017 Safety Awards of Excellence. And that  
 8 is the only update I have.  
 9 CHAIR DREW: Well, congratulations on that  
 10 award, and thank you for your report.  
 11 MS. KNAUB: Thank you, Chair Drew.  
 12 CHAIR DREW: Yes, Mr. Rossman?  
 13 MR. ROSSMAN: Yeah, just a question on the  
 14 Ecology inspection. Do you have a sense of when there  
 15 will be a report from that and is that going to be  
 16 shared with the Council?  
 17 MS. KNAUB: We anticipate that we will -- we  
 18 will be responding to the request for additional  
 19 documents this week, and we anticipate that there may be  
 20 another request for documents, and then their report  
 21 would be prepared after that. They haven't given us a  
 22 date yet, but they've assured us that they want to  
 23 prepare the report as quickly as they can after we  
 24 respond to the document request.  
 25 MR. ROSSMAN: Okay. Thank you.



Verbatim Transcript of Monthly Council Meeting - 4/17/2018

Page 9

1 MS. KNAUB: You're welcome.  
 2 CHAIR DREW: Then moving on to WNP 1/4.  
 3 Also Ms. Knaub?  
 4 MS. KNAUB: Yes, yes. There are no updates  
 5 for WNP 1/4.  
 6 CHAIR DREW: Okay. Moving on to the  
 7 Chehalis Generation Facility, Mark Miller?  
 8 MR. MILLER: Good afternoon, Chair Drew,  
 9 councilmembers, and Staff. I'm Mark Miller, the plant  
 10 manager at the PacifiCorp Chehalis Generation Facility.  
 11 I'd like to highlight three nonroutine comments. During  
 12 the month of March, the plant conducted the regular  
 13 annual relative accuracy test audit on the continuous  
 14 emission monitors for each of the combustion turbine  
 15 units. The draft report indicates that all monitors are  
 16 operating within required performance parameters.  
 17 Two, the EFSEC contractor from the Southwest  
 18 Clean Area Agency, Mr. Clint Lamoreaux, conducted the  
 19 2018 annual Title V site inspection. The inspection was  
 20 conducted on March 15th. At the time of the inspection,  
 21 the Clean Air staff stated there were no compliance  
 22 issues observed and that a final written report would be  
 23 forthcoming.  
 24 And also, the company recently received  
 25 verifiable emission reduction greenhouse gas credits

Page 10

1 from The Climate Trust. These were contracted purchases  
 2 that were part of the carbon offset requirement per  
 3 Order No. 836, which were conditions for the Site  
 4 Certificate transfer from SUEZ to PacifiCorp. These  
 5 are -- there are 2017 Vintage credits from the Lyden  
 6 Farm project, which PacifiCorp has now received 52,162  
 7 tons of the contracted 70,000 tons for about 75 percent.  
 8 And on a final note, the plan to -- that's  
 9 requested by EFSEC Staff is drafting an update on the  
 10 project to date the completion of all the required  
 11 acquisition commitments including the -- conducting the  
 12 review of the initial site restoration plan. And that's  
 13 all I have to say. Are there any questions?  
 14 CHAIR DREW: Thank you.  
 15 Are there any questions from councilmembers?  
 16 Okay. Thank you.  
 17 Grays Harbor Energy Center?  
 18 MR. SHERIN: Good afternoon, Chair Drew and  
 19 councilmembers. This is Chris Sherin, plant manager at  
 20 Grays Harbor Energy Center. The only nonroutine item  
 21 that I'll point out is that DOE conducted their annual  
 22 site inspection for NPDES compliance on March 28th.  
 23 They -- there weren't any significant -- there weren't  
 24 any findings on that date, and they weren't able to do  
 25 an alcohol sample because we weren't running and weren't

Page 11

1 able to do a stormwater sample that day, but they  
 2 actually came back on Monday and finished that site  
 3 inspection, got the samples. Other than that,  
 4 everything else has been routine this past month.  
 5 CHAIR DREW: Okay. Thank you.  
 6 Ms. Bumpus?  
 7 MS. BUMPUS: Thank you, Chair Drew. I  
 8 wanted to add that -- and this is just to give  
 9 councilmembers a heads-up that I intend to send a draft  
 10 PSD permit to councilmembers for your review. This is a  
 11 permit for prevention of significant deterioration for  
 12 the Grays Harbor Energy Project. Staff had been working  
 13 with Grays Harbor Energy on requested modifications to  
 14 their PSD permit. This would be amendment four.  
 15 Staff has coordinated reviews with our  
 16 contractors at the Department of Ecology, the Olympic --  
 17 Olympic Region Clean Air Agency, and our AGs. If all  
 18 goes well with the Council's review, Staff may ask the  
 19 Council to take action on the permit, make a preliminary  
 20 determination to approve it for public comment at the  
 21 May Council meeting.  
 22 CHAIR DREW: So as I understand it, the  
 23 process would be that the councilmembers would receive  
 24 that information ahead of time, and the action at the  
 25 Council meeting would be proposed that the Council would

Page 12

1 approve it for public comment. We then would have a  
 2 public comment period and a public hearing before that -  
 3 permit is finalized; is that correct?  
 4 MS. BUMPUS: Correct.  
 5 CHAIR DREW: Okay. Are there questions from  
 6 councilmembers?  
 7 MR. MOSS: Yes, I have one small point, and  
 8 it's really in the interest of maintaining continuity in  
 9 the information that we have in these reports. I see  
 10 under the "Operations and Maintenance" section, there's  
 11 a report that the plant generated --  
 12 (Brief interruption on phone.)  
 13 MR. MOSS: -- 312,857 megawatt hours.  
 14 Normally we have the capacity factor stated in  
 15 association with that report. And I'm wondering if, for  
 16 the sake of completeness, it should be indicated here  
 17 what the capacity factor was?  
 18 CHAIR DREW: Okay.  
 19 MR. MOSS: If you know.  
 20 CHAIR DREW: And that would be --  
 21 MR. SHERIN: I'll add --  
 22 CHAIR DREW: Yes, okay. Go ahead,  
 23 Mr. Sherin.  
 24 MR. SHERIN: I'll add the capacity factor in  
 25 the future. We haven't been reporting that in recent

Verbatim Transcript of Monthly Council Meeting - 4/17/2018

Page 13

1 past.

2 MR. MOSS: Okay. I was actually comparing

3 to the PacifiCorp that we just heard. So I wrongly

4 apparently assumed it was in all the reports. Well, if

5 Staff needs that, I'm sure they'll be able to get that

6 information. I'm getting nods to the affirmative.

7 MS. BUMPUS: Yes, we will.

8 MR. MOSS: Okay. Thank you.

9 MS. BUMPUS: Thank you.

10 CHAIR DREW: Desert Claim. We have a

11 project update from our Staff, Ms. Sonia Bumpus.

12 MS. BUMPUS: Thank you. So for Desert

13 Claim, last week on April 11th, 2018, in Ellensburg,

14 Washington, EFSEC conducted a public hearing for the

15 Desert Claim's request to amend their Site Certification

16 Agreement. During the hearing, the Applicant presented

17 information about the proposed changes to the SCA, and

18 we also heard public testimony from the public. We

19 received ten written comments and heard from 13

20 speakers.

21 In the coming weeks, EFSEC will be reviewing

22 those comments to identify issues of concern. We heard

23 concerns about visual impacts and many others, so we'll

24 be looking at those. EFSEC had also requested

25 additional information and clarification from the

Page 14

1 Applicant in Data Request 1. This was in March of 2018,

2 and we recently had a response from the Applicant on

3 April 16th. So we're reviewing that information now.

4 So as I discussed in the hearing on April

5 11th, once the SEPA responsible official has reviewed

6 the response materials from the Applicant, the public

7 comments that we received at the hearing, we will be

8 determining if we need more information and gathering

9 all the information we need to make a determination for

10 SEPA. So we will keep you updated as we review that

11 material.

12 CHAIR DREW: I would like to thank the

13 councilmembers who were able to attend the hearing last

14 week. It was very well attended by the speakers plus a

15 number of other community members. And I think that was

16 a very good hearing for the concerns for the community

17 as well as a proposal from the Applicant. And the

18 transcripts will be available to councilmembers for

19 review in the next couple of weeks. So those of you who

20 were unable to make the hearing, I'm sure you will take

21 a close look at those as well, and then we will approve

22 them in our next monthly meeting, and then they would be

23 online for the public to see as well.

24 The other thing I would like to ask, if the

25 Council would be interested in a tour of the site and

Page 15

1 the changes so that we can get an understanding by being

2 on site of the changes between the original agreement

3 and the proposed changes.

4 Mr. Rossman?

5 MR. ROSSMAN: Thank you, Chair Drew. I do

6 think a site visit would be helpful if possible. The

7 other thing I wanted to ask about is I know a number of

8 documents were -- or pictures were provided during the

9 hearing and just wondering if there's a sense of when

10 those might be available to us on our shared website.

11 MS. BUMPUS: I believe we're posting those

12 to the SharePoint site, so they should be up. If

13 they're not already, they should be up in the next day

14 or so. We do have those and our plan is to post those.

15 CHAIR DREW: And we also have a copy of the

16 prints that were made, which are larger than what you

17 will see on the SharePoint site. So if you ever want to

18 take a closer look, we'll have them there at the office.

19 MR. ROSSMAN: Great. Thank you very much.

20 CHAIR DREW: So I will ask the Staff, then,

21 to work with dates and see when councilmembers are

22 available for that tour.

23 MS. BUMPUS: Okay.

24 CHAIR DREW: Any other questions or

25 comments?

Page 16

1 Okay. Thank you. Moving on to the Columbia

2 Solar Project.

3 MS. KIDDER: Good afternoon, Chair Drew and

4 councilmembers. I have a brief SEPA update for you this

5 afternoon.

6 CHAIR DREW: Ms. Kidder, if you would just

7 introduce yourself.

8 MS. KIDDER: Oh, my apologies. I'm Ami

9 Kidder, EFSEC Staff. Since the last meeting in March,

10 EFSEC has reviewed public comments received on the Draft

11 MDNS for the proposed Columbia Solar Facility and

12 incorporated information received into the MDNS and SEPA

13 memo.

14 To recap, the public comment period was open

15 from February 27th through March 13th and 18 comments

16 were received from public and state agencies. In review

17 of these comments, Staff coordinated further with some

18 of its consulting agencies to clearly understand the

19 issues presented.

20 As a result of the comments received, two

21 mitigation measures were modified. Mitigation Measure

22 No. 6, addressing the availability of water was modified

23 to more accurately reflect the available mechanisms for

24 assuring water availability at the end of the life of

25 the proposed facilities. The method for preserving

Verbatim Transcript of Monthly Council Meeting - 4/17/2018

1 water availability in the initial mitigation measure was  
2 not available for the proposed sites, so it's been  
3 updated to reflect information received by local area  
4 water companies.

5 Additionally, Mitigation Measure No. 10 was  
6 modified based on information received from the  
7 Department of Archaeology and Historic Preservation,  
8 DAHP, to reflect the approval of preconstruction  
9 cultural resource survey work. Staff will continue to  
10 coordinate with DAHP in these efforts.

11 And additionally, on April 11th, Staff and  
12 available councilmembers went on a driving tour of the  
13 proposed locations. All five proposed locations were  
14 visited, and members of the public and media attended as  
15 well. Are there any questions on the SEPA update?

16 CHAIR DREW: Thank you.

17 Ms. Bumpus?

18 MS. BUMPUS: Okay. Thank you, Chair Drew.  
19 So, councilmembers, as you know, TUUSSO requested  
20 expedited processing in their application for site  
21 certification to EFSEC. If you look in your packets,  
22 you will see the final draft of the order for expedited  
23 processing. I believe councilmembers were provided some  
24 time to review the document as it was developed, and we  
25 also have received input from Staff who have been

1 6 and 10 that Ms. Kidder already talked about. And also  
2 that the criteria for expedited processing has been  
3 satisfied per RCW 80.50.075 and WAC 463-43-050.

4 If there aren't any questions, I'll proceed  
5 with Staff's recommendation.

6 CHAIR DREW: Are there any questions?

7 MS. BUMPUS: So in light of all the --

8 CHAIR DREW: We have a question. Someone on  
9 the phone.

10 MR. ELLIOT: On your question earlier, is  
11 this only questions or statements --

12 CHAIR DREW: Well --

13 MR. ELLIOT: -- that we will have

14 [inaudible] after the motion to approve?

15 CHAIR DREW: Mr. Elliot, let's take  
16 questions for Staff, and then as we proceed, we'll have  
17 discussion on the motion itself.

18 MR. ELLIOT: Thank you.

19 CHAIR DREW: Okay. Go ahead.

20 MS. BUMPUS: So in light of the -- of the  
21 conclusions in the revised MDNS, the identification of  
22 mitigation measures to mitigate identified impacts and  
23 the conclusions in the order, it's Staff's  
24 recommendation to the Council to take action to approve  
25 the order granting expedited processing per TUUSSO's

1 working on the SEPA issues as well as our AGs.

2 I'm just going to summarize some of the key  
3 points from the order. The order describes the nature  
4 of the proceeding such as a request for the expedited  
5 process, SEPA and land use consistency processes. It  
6 also provides a description of the proposed facility.  
7 It describes Council's test for consistency and  
8 compliance. It considers whether the pertinent local  
9 land use provisions prohibit sites expressly or by  
10 operation. It determines that the county moratorium is  
11 not a land use plan or zoning ordinance for purposes of  
12 EFSEC's land use consistency determination.

13 It also includes that the Applicant has met  
14 its burden of proof of demonstrating the site to be  
15 consistent and compliant with Kittitas County  
16 comprehensive plans and applicable zoning ordinances.  
17 It contains findings of fact and conclusions of law,  
18 that the project is consistent and in compliance with  
19 land use plans, environmental impacts are not  
20 significant or can be mitigated to nonsignificant  
21 levels.

22 This is also documented in the MDNS, and I  
23 did want to note that as we finalize the revised MDNS,  
24 we made sure that the mitigation measures in the order  
25 were also updated. So this would be Mitigation Measure

1 request.

2 CHAIR DREW: Okay. You've heard the Staff  
3 recommendation. Thank you for the project status and  
4 the synopsis of the draft order. I also want to thank  
5 the councilmembers and members of the public who were  
6 able to participate on the tour of the proposed site  
7 last week. And you have had that chance to review the  
8 draft order granting expedited processing, so I'd like  
9 to ask if there is a motion to put that in front of us  
10 right now.

11 MR. MOSS: And that would be for discussion?

12 CHAIR DREW: For discussion.

13 MR. MOSS: All right. Okay. I would --

14 Chair Drew, I would move that the Council approve the  
15 expedited processing of the application by TUUSSO and  
16 direct that the order be signed by the Chair and entered  
17 in due course and served on all interested parties.

18 CHAIR DREW: Okay. Thank you, Mr. Moss.

19 Is there a second?

20 MR. ROSSMAN: I'll second.

21 CHAIR DREW: Mr. Rossman.

22 Discussion? Mr. Elliot?

23 MR. ELLIOT: Yeah, I just wanted to be on  
24 record to say I am not in agreement with the conclusion  
25 of the land use consistency, which it's the lesser issue

Verbatim Transcript of Monthly Council Meeting - 4/17/2018

Page 21

1 than with respect to the point I brought up with respect  
 2 to the bundling of the project. But I feel strongly  
 3 that the -- that the EFSEC was not in the best interest  
 4 of the people of Kittitas County by bundling those  
 5 projects. They were in the best interest of the  
 6 Applicant in that it saved them money and was able to  
 7 make the spare projects all one. And I find that an  
 8 inconsistency, which I think that EFSEC should eliminate  
 9 as a possibility in the future.

10 CHAIR DREW: Okay. Thank you.  
 11 Are there further comments? Mr. Rossman?  
 12 MR. ROSSMAN: Yes, thank you. And,  
 13 Mr. Elliot, I hear the point there, and I think it has  
 14 made it more difficult to look at this as an application  
 15 to be looking at five sites. But for our purpose today,  
 16 I think that I'm -- I'm in support of this order. The  
 17 type of facility that this would be is defined in the  
 18 county code as a major energy -- major alternative  
 19 energy facility, and that's a conditionally allowed use  
 20 in the -- all of the zones that these parcels happen to  
 21 be within.

22 And so in keeping with the Council's past  
 23 sort of level of scrutiny at that land use consistency  
 24 decision point, I think it makes sense that for our  
 25 purposes, we can move forward viewing it as consistent.

Page 22

1 And I appreciate that the order also reflects something  
 2 that the Council said earlier about request of Staff,  
 3 which is to put together a plan for gathering future  
 4 input akin to what a county would receive in a  
 5 conditional use hearing so that we can be sure that if  
 6 approval is ultimately recommended, that the site --  
 7 each of the five sites is treated uniquely and  
 8 appropriately.

9 So I think that it does make sense to move  
 10 forward with this. The environmental impact can be  
 11 mitigated to a nonsignificant level. And broadly  
 12 speaking, it's consistent with the local land use plans  
 13 so long as the site-specific conditions are able to  
 14 preserve real character and do those other things that  
 15 are needed that would be considered in a conditional use  
 16 process.

17 So I just wanted to speak to emphasize that  
 18 I think it's a limited decision we're making today, and  
 19 there will be further time in the process to develop  
 20 site-specific criteria to help us make sure that the use  
 21 on each individual site is appropriate.

22 CHAIR DREW: Thank you, Mr. Rossman.  
 23 Additional comments?  
 24 MR. MOSS: Chair Drew, I would just ascribe  
 25 to and support the comments made by my colleague,

Page 23

1 Mr. Rossman, just now. I think he is directly on point,  
 2 that this is nothing more than a decision to proceed  
 3 with the expedited process. And the order is specific  
 4 in its ordering paragraph, that Staff will develop a  
 5 means to receive information akin to what the County  
 6 would receive during a conditional use hearing as to  
 7 site-specific conditions and criteria.

8 So I don't think we've gotten ahead of  
 9 ourselves here. I also have had an opportunity to  
 10 review the entire order twice, and I think it's well  
 11 reasoned and well supported in terms of its findings and  
 12 conclusions.

13 CHAIR DREW: Thank you, Mr. Moss.  
 14 Any additional comments? Mr. Livingston?  
 15 MR. LIVINGSTON: Yeah. Chair Drew, for me  
 16 also one of the clarifying points that helped me was on  
 17 page 9, No. 27, "...the Applicant retains the burden of  
 18 proving the Sites are consistent." And I'm just  
 19 curious, maybe just for clarification purposes, if we  
 20 could just briefly hear from Staff on how we would go  
 21 forward with the Applicant doing that as well as any  
 22 other hearings that we might have going forward.

23 MS. BUMPUS: Well, one of the things that we  
 24 are working on is to develop a plan that would allow us  
 25 to get some additional input about these types of

Page 24

1 issues. And so one of the things that we're working on  
 2 right now is a meeting with the County. One of the  
 3 questions that we sent them in preparation for that  
 4 discussion is to ask them about their conditional use  
 5 permitting process. We're also including our AG in that  
 6 discussion.

7 We also are going to seek public input on  
 8 the five draft site certification agreements. So these  
 9 are some things that we're working on now to try to get  
 10 additional information about this. And then, of course,  
 11 we're going to be -- as we learn more about the  
 12 conditional use permitting process from the local  
 13 government, we'll be thinking about other ways that we  
 14 can get more input.

15 CHAIR DREW: Thank you.  
 16 Other questions or comments? I would like  
 17 to also say that I think that the point that Mr. Elliot  
 18 raised is one that we all considered very seriously as  
 19 we look at this, and the decision that we are going to  
 20 vote on right now is actually a threshold decision.  
 21 It's a gatepost. It's not approval or denial. And so  
 22 as we move forward, we will look at whether or not to  
 23 approve or deny each of those sites as they are  
 24 conditioned further in our further public comment that  
 25 we will receive.

Verbatim Transcript of Monthly Council Meeting - 4/17/2018

1 So I think it is one of the critical issues  
2 that we've looked at, and I believe we have a strong  
3 method for moving forward to attain more information on  
4 the unique characteristics and needs of each of the  
5 sites.

6 Thank you. There is a motion on the floor.  
7 I would ask at this point for -- oh, is there another  
8 comment? Okay. I was hearing some voices on the line  
9 there. If Ms. Mastro can come forward and call roll.  
10 And to restate, the motion is to -- that the Council is  
11 determined that the criteria for expedited processing  
12 has been satisfied and by approval of this order is  
13 granting expedited processing for the proposed TUUSSO  
14 Energy Project.

15 MS. MASTRO: Department of Commerce?

16 MR. ROSSMAN: Aye.

17 MS. MASTRO: Department of Ecology?

18 MR. STEPHENSON: Aye.

19 MS. MASTRO: Department of Fish and  
20 Wildlife?

21 MR. LIVINGSTON: Aye.

22 MS. MASTRO: Department of Natural  
23 Resources?

24 MR. SIEMANN: Aye.

25 MS. MASTRO: Utilities and Transportation

1 holders get charged each quarter. So the list of  
2 projects is there. For the benefit of those who are on  
3 the -- who have called in, I will go ahead and read off  
4 the numbers.

5 For the Kittitas Valley Wind Power Project  
6 is 8 percent; the Wild Horse Wind Project, 8 percent;  
7 Columbia Generating Station, 20 percent; the Columbia  
8 Solar Project is 18 percent; WNP 1/4 is 4 percent;  
9 Whistling Ridge Energy Project, 3 percent; Grays Harbor  
10 Energy 1 & 2, 12 percent; Chehalis Generation Project, 9  
11 percent; Desert Claim Wind Power Project, 15 percent;  
12 and Grays Harbor Energy 3 & 4, 3 percent. And that  
13 concludes my presentation. I would be happy to answer  
14 any questions.

15 CHAIR DREW: Are there any questions from  
16 councilmembers?

17 Okay. Thank you. With that, I believe we  
18 have no further business to come before the Council, and  
19 we look forward to continuing on -- work on the two  
20 projects in front of us, and we will be in touch about  
21 the site tour of Desert Claim as we mentioned and also  
22 further information on Columbia Solar. Thank you. With  
23 that, the meeting is adjourned.

24 (Adjourned at 2:03 p.m.)  
25

1 Commission?

2 MR. MOSS: Aye.

3 MS. MASTRO: Department of Health?

4 MS. COOPER: Aye.

5 MS. MASTRO: Kittitas County?

6 MR. ELLIOTT: Nay.

7 MS. MASTRO: Chair?

8 CHAIR DREW: Aye. Motion is adopted.

9 Again, thank you all very much for the time  
10 and effort of both members of the Council, the Staff,  
11 and all of the people who have participated so far in  
12 this process. We will continue moving forward to look  
13 at the needs of each specific site and develop draft  
14 proposed site certification agreements, and we plan to  
15 actually put those out to the public for comment before  
16 the Council votes on them. So thank you very much.

17 Moving on to Item 6 under "Other." We have  
18 the EFSEC Council and then Fourth Quarter Cost  
19 Allocation.

20 MR. POSNER: Good afternoon, Chair Drew,  
21 councilmembers. Stephen Posner, EFSEC manger. So in  
22 your packets is a green sheet which outlines, describes  
23 the fourth quarter cost allocation plan. And as we do  
24 at the beginning of each quarter, we recalculate the  
25 indirect rates that our applicants and certificate

1 CERTIFICATE

2  
3 STATE OF WASHINGTON  
4 COUNTY OF THURSTON  
5

6 I, Tayler Garlinghouse, a Certified Shorthand  
7 Reporter in and for the State of Washington, do hereby  
8 certify that the foregoing transcript is true and  
9 accurate to the best of my knowledge, skill and ability.  
10



11  
12 Tayler Garlinghouse  
13 Tayler Garlinghouse, CCR 3358  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

<p style="text-align: center;"><b>A</b></p> <p><b>ability</b> 28:9</p> <p><b>able</b> 10:24 11:1 13:5 14:13 20:6 21:6 22:13</p> <p><b>accuracy</b> 9:13</p> <p><b>accurate</b> 28:9</p> <p><b>accurately</b> 16:23</p> <p><b>acquisition</b> 10:11</p> <p><b>action</b> 11:19,24 19:24</p> <p><b>add</b> 11:8 12:21,24</p> <p><b>additional</b> 8:18 13:25 22:23 23:14 23:25 24:10</p> <p><b>additionally</b> 17:5 17:11</p> <p><b>addressing</b> 16:22</p> <p><b>adjourned</b> 27:23 27:24</p> <p><b>adopted</b> 26:8</p> <p><b>affirmative</b> 13:6</p> <p><b>afternoon</b> 3:6 9:8 10:18 16:3,5 26:20</p> <p><b>AG</b> 24:5</p> <p><b>agencies</b> 16:16,18</p> <p><b>Agency</b> 2:7 3:23 9:18 11:17</p> <p><b>agenda</b> 5:10,11,13 5:17,24</p> <p><b>agreement</b> 13:16 15:2 20:24</p> <p><b>agreements</b> 24:8 26:14</p> <p><b>AGs</b> 11:17 18:1</p> <p><b>ahead</b> 4:19 11:24 12:22 19:19 23:8 27:3</p> <p><b>Air</b> 9:21 11:17</p> <p><b>AITKEN</b> 2:16</p> <p><b>akin</b> 22:4 23:5</p> <p><b>alcohol</b> 10:25</p> <p><b>allocation</b> 5:19 26:19,23</p>	<p><b>allow</b> 23:24</p> <p><b>allowed</b> 21:19</p> <p><b>alternative</b> 21:18</p> <p><b>amend</b> 13:15</p> <p><b>amended</b> 6:15</p> <p><b>amendment</b> 11:14</p> <p><b>American</b> 8:6</p> <p><b>Ami</b> 2:16 16:8</p> <p><b>ANN</b> 2:11</p> <p><b>annual</b> 9:13,19 10:21</p> <p><b>answer</b> 27:13</p> <p><b>anticipate</b> 8:17,19</p> <p><b>apologies</b> 16:8</p> <p><b>apparently</b> 13:4</p> <p><b>applicable</b> 18:16</p> <p><b>Applicant</b> 13:16 14:1,2,6,17 18:13 21:6 23:17,21</p> <p><b>applicants</b> 26:25</p> <p><b>application</b> 17:20 20:15 21:14</p> <p><b>appreciate</b> 22:1</p> <p><b>appropriate</b> 22:21</p> <p><b>appropriately</b> 22:8</p> <p><b>approval</b> 17:8 22:6 24:21 25:12</p> <p><b>approve</b> 5:11,13 6:12,15 11:20 12:1 14:21 19:14 19:24 20:14 24:23</p> <p><b>approved</b> 5:25 6:20</p> <p><b>April</b> 1:7 3:1 13:13 14:3,4 17:11</p> <p><b>Archaeology</b> 17:7</p> <p><b>area</b> 9:18 17:3</p> <p><b>areas</b> 8:3</p> <p><b>ascribe</b> 22:24</p> <p><b>Assistant</b> 2:11,12</p> <p><b>association</b> 8:7 12:15</p> <p><b>assumed</b> 13:4</p> <p><b>assured</b> 8:22</p> <p><b>assuring</b> 16:24</p> <p><b>attain</b> 25:3</p>	<p><b>attend</b> 14:13</p> <p><b>attended</b> 14:14 17:14</p> <p><b>Attorney</b> 2:10,11 2:12</p> <p><b>audit</b> 9:13</p> <p><b>availability</b> 16:22 16:24 17:1</p> <p><b>available</b> 14:18 15:10,22 16:23 17:2,12</p> <p><b>Avenue</b> 1:21</p> <p><b>award</b> 8:10</p> <p><b>Awards</b> 8:7</p> <p><b>Aye</b> 5:23 6:18 25:16,18,21,24 26:2,4,8</p> <hr/> <p style="text-align: center;"><b>B</b></p> <hr/> <p><b>back</b> 11:2</p> <p><b>based</b> 17:6</p> <p><b>beginning</b> 26:24</p> <p><b>believe</b> 4:6 5:5 6:23 15:11 17:23 25:2 27:17</p> <p><b>benefit</b> 27:2</p> <p><b>best</b> 21:3,5 28:9</p> <p><b>BETTS</b> 2:17</p> <p><b>Bill</b> 2:24 5:6,7</p> <p><b>BMTs</b> 7:17</p> <p><b>brief</b> 12:12 16:4</p> <p><b>briefly</b> 23:20</p> <p><b>broadly</b> 22:11</p> <p><b>brought</b> 21:1</p> <p><b>Buell</b> 1:21</p> <p><b>Bumpus</b> 2:15 11:6 11:7 12:4 13:7,9 13:11,12 15:11,23 17:17,18 19:7,20 23:23</p> <p><b>bundling</b> 21:2,4</p> <p><b>burden</b> 18:14 23:17</p> <p><b>business</b> 27:18</p> <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <p><b>C</b> 2:1 3:4 28:1,1</p>	<p><b>call</b> 3:9 25:9</p> <p><b>called</b> 4:12 27:3</p> <p><b>calling</b> 3:8</p> <p><b>capacity</b> 6:8 12:14 12:17,24</p> <p><b>carbon</b> 10:2</p> <p><b>CCR</b> 1:20 28:13</p> <p><b>Center</b> 2:22 5:2 10:17,20</p> <p><b>certificate</b> 10:4 26:25</p> <p><b>certification</b> 13:15 17:21 24:8 26:14</p> <p><b>Certified</b> 28:6</p> <p><b>certify</b> 28:8</p> <p><b>Chair</b> 2:3 3:6,7 4:3 4:6,11 5:5,7,9,12 5:14,15,20,24 6:3 6:5,9,11,14,17,19 7:1,5,9,19,21 8:9 8:11,12 9:2,6,8 10:14,18 11:5,7 11:22 12:5,18,20 12:22 13:10 14:12 15:5,15,20,24 16:3,6 17:16,18 19:6,8,12,15,19 20:2,12,14,16,18 20:21 21:10 22:22 22:24 23:13,15 24:15 26:7,8,20 27:15</p> <p><b>chance</b> 20:7</p> <p><b>change</b> 6:13</p> <p><b>changes</b> 13:17 15:1 15:2,3</p> <p><b>character</b> 22:14</p> <p><b>characteristics</b> 25:4</p> <p><b>charged</b> 27:1</p> <p><b>CHARTOFF</b> 2:18</p> <p><b>Chehalis</b> 2:20 4:16 9:7,10 27:10</p> <p><b>chemical</b> 8:3</p> <p><b>Chris</b> 2:22 5:1 10:19</p>	<p><b>CHRISTINA</b> 2:17</p> <p><b>Claim</b> 4:21 13:10 13:13 27:11,21</p> <p><b>Claim's</b> 13:15</p> <p><b>clarification</b> 13:25 23:19</p> <p><b>clarifying</b> 23:16</p> <p><b>Clean</b> 9:18,21 11:17</p> <p><b>clearly</b> 16:18</p> <p><b>Climate</b> 10:1</p> <p><b>Clint</b> 9:18</p> <p><b>close</b> 14:21</p> <p><b>closer</b> 15:18</p> <p><b>code</b> 21:18</p> <p><b>Coie</b> 2:21 4:21</p> <p><b>colleague</b> 22:25</p> <p><b>Columbia</b> 2:7,22 3:23 4:4,25 7:20 7:23 8:1 16:1,11 27:7,7,22</p> <p><b>combustion</b> 9:14</p> <p><b>come</b> 25:9 27:18</p> <p><b>coming</b> 13:21</p> <p><b>comment</b> 11:20 12:1,2 16:14 24:24 25:8 26:15</p> <p><b>comments</b> 9:11 13:19,22 14:7 15:25 16:10,15,17 16:20 21:11 22:23 22:25 23:14 24:16</p> <p><b>Commerce</b> 2:3 3:11 25:15</p> <p><b>Commission</b> 2:5 3:20 26:1</p> <p><b>commitments</b> 10:11</p> <p><b>community</b> 14:15 14:16</p> <p><b>companies</b> 17:4</p> <p><b>company</b> 9:24</p> <p><b>comparing</b> 13:2</p> <p><b>completed</b> 7:15</p> <p><b>completeness</b> 12:16</p>
---	--	--	---	---

<p><b>completion</b> 10:10  <b>compliance</b> 9:21  10:22 18:8,18  <b>compliant</b> 18:15  <b>comprehensive</b>  18:16  <b>concern</b> 13:22  <b>concerns</b> 13:23  14:16  <b>concludes</b> 27:13  <b>conclusion</b> 20:24  <b>conclusions</b> 18:17  19:21,23 23:12  <b>conditional</b> 22:5,15  23:6 24:4,12  <b>conditionally</b> 21:19  <b>conditioned</b> 24:24  <b>conditions</b> 10:3  22:13 23:7  <b>conducted</b> 9:12,18  9:20 10:21 13:14  <b>conducting</b> 10:11  <b>congratulations</b> 8:9  <b>considered</b> 22:15  24:18  <b>considers</b> 18:8  <b>consistency</b> 18:5,7  18:12 20:25 21:23  <b>consistent</b> 18:15,18  21:25 22:12 23:18  <b>consulting</b> 16:18  <b>contains</b> 18:17  <b>continue</b> 17:9  26:12  <b>continuing</b> 27:19  <b>continuity</b> 12:8  <b>continuous</b> 9:13  <b>contracted</b> 10:1,7  <b>contractor</b> 9:17  <b>contractors</b> 11:16  <b>Cooper</b> 2:8 3:25,25  26:4  <b>coordinate</b> 17:10  <b>coordinated</b> 11:15  16:17</p>	<p><b>copy</b> 15:15  <b>correct</b> 6:25 12:3,4  <b>correction</b> 5:16,21  6:3  <b>corrections</b> 6:12  <b>cost</b> 5:19 26:18,23  <b>Council</b> 1:5,11 3:7  4:4,5 5:18 7:1  8:16 11:19,21,25  11:25 14:25 19:24  20:14 22:2 25:10  26:10,16,18 27:18  <b>Council's</b> 11:18  18:7 21:22  <b>councilmembers</b>  2:2 5:9,23 6:18  7:10,22 9:9 10:15  10:19 11:9,10,23  12:6 14:13,18  15:21 16:4 17:12  17:19,23 20:5  26:21 27:16  <b>counsel</b> 5:6,8  <b>county</b> 2:9 4:1  18:10,15 21:4,18  22:4 23:5 24:2  26:5 28:4  <b>couple</b> 14:19  <b>course</b> 20:17 24:10  <b>credits</b> 9:25 10:5  <b>criteria</b> 19:2 22:20  23:7 25:11  <b>critical</b> 25:1  <b>Cullen</b> 2:4 4:9  <b>cultural</b> 17:9  <b>curious</b> 23:19</p> <hr/> <p style="text-align: center;"><b>D</b></p> <hr/> <p><b>D</b> 3:4  <b>DAHP</b> 17:8,10  <b>Dan</b> 2:5 3:18  <b>dangerous</b> 7:24  <b>Data</b> 14:1  <b>date</b> 8:22 10:10,24  <b>dates</b> 15:21  <b>day</b> 11:1 15:13</p>	<p><b>Debbie</b> 2:22 4:24  7:20,22  <b>decision</b> 21:24  22:18 23:2 24:19  24:20  <b>defined</b> 21:17  <b>demonstrating</b>  18:14  <b>denial</b> 24:21  <b>Dennis</b> 2:5 3:21  <b>deny</b> 24:23  <b>Department</b> 2:3,4,4  2:5,8 3:11,13,14  3:16,23 4:7 7:25  11:16 17:7 25:15  25:17,19,22 26:3  <b>describes</b> 18:3,7  26:22  <b>description</b> 18:6  <b>Desert</b> 4:21 13:10  13:12,15 27:11,21  <b>deterioration</b> 11:11  <b>determination</b>  11:20 14:9 18:12  <b>determined</b> 25:11  <b>determines</b> 18:10  <b>determining</b> 14:8  <b>develop</b> 22:19 23:4  23:24 26:13  <b>developed</b> 17:24  <b>Diaz</b> 2:21 4:17,17  4:19,22,22 7:8,9  7:10  <b>difficult</b> 21:14  <b>direct</b> 20:16  <b>directly</b> 23:1  <b>discussed</b> 14:4  <b>discussion</b> 19:17  20:11,12,22 24:4  24:6  <b>document</b> 8:4,24  17:24  <b>documented</b> 18:22  <b>documents</b> 8:19,20  15:8</p>	<p><b>DOE</b> 10:21  <b>doing</b> 23:21  <b>draft</b> 9:15 11:9  16:10 17:22 20:4  20:8 24:8 26:13  <b>drafting</b> 10:9  <b>Drew</b> 2:3 3:6,7 4:6  4:11 5:5,9,12,14  5:15,20,24 6:4,5,9  6:11,14,17,19 7:1  7:5,9,19,21 8:9,11  8:12 9:2,6,8 10:14  10:18 11:5,7,22  12:5,18,20,22  13:10 14:12 15:5  15:15,20,24 16:3  16:6 17:16,18  19:6,8,12,15,19  20:2,12,14,18,21  21:10 22:22,24  23:13,15 24:15  26:8,20 27:15  <b>driving</b> 17:12  <b>due</b> 20:17</p> <hr/> <p style="text-align: center;"><b>E</b></p> <hr/> <p><b>E</b> 2:1,1 3:4,4 28:1,1  <b>earlier</b> 19:10 22:2  <b>Ecology</b> 2:4 3:13  4:7,10 7:25 8:14  11:16 25:17  <b>EDP</b> 7:2  <b>effort</b> 26:10  <b>efforts</b> 17:10  <b>EFSEC</b> 2:13 3:7  5:18 7:1 9:17  10:9 13:14,21,24  16:9,10 17:21  21:3,8 26:18,21  <b>EFSEC's</b> 18:12  <b>eliminate</b> 21:8  <b>Ellensburg</b> 13:13  <b>Elliot</b> 2:9 4:2,2  19:10,13,15,18  20:22,23 21:13  24:17</p>	<p><b>ELLIOTT</b> 26:6  <b>emission</b> 9:14,25  <b>emphasize</b> 22:17  <b>employee</b> 8:4  <b>energy</b> 1:5 2:22  4:22,24 5:2 7:11  7:22 8:5 10:17,20  11:12,13 21:18,19  25:14 27:9,10,12  <b>entered</b> 20:16  <b>entire</b> 23:10  <b>Environment</b> 2:24  5:6,8  <b>environmental</b>  18:19 22:10  <b>Eric</b> 2:23 5:3 6:23  7:1  <b>ESSKO</b> 2:11  <b>EVALUATION</b>  1:5  <b>Excellence</b> 8:7  <b>expedited</b> 17:20,22  18:4 19:2,25 20:8  20:15 23:3 25:11  25:13  <b>expressly</b> 18:9</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>F</b> 28:1  <b>facilities</b> 16:25  <b>facility</b> 1:5 2:20  4:16,23 7:12 9:7  9:10 16:11 18:6  21:17,19  <b>fact</b> 18:17  <b>factor</b> 12:14,17,24  <b>far</b> 26:11  <b>Farm</b> 10:6  <b>favor</b> 5:22 6:17  <b>February</b> 16:15  <b>feel</b> 21:2  <b>final</b> 9:22 10:8  17:22  <b>finalize</b> 18:23  <b>finalized</b> 12:3  <b>find</b> 21:7</p>
---	---	---	--	---

<p><b>findings</b> 10:24 18:17 23:11 <b>finished</b> 11:2 <b>first</b> 8:6 <b>Fish</b> 2:4 3:14 25:19 <b>five</b> 17:13 21:15 22:7 24:8 <b>floor</b> 25:6 <b>foregoing</b> 28:8 <b>forthcoming</b> 9:23 <b>forward</b> 21:25 22:10 23:21,22 24:22 25:3,9 26:12 27:19 <b>four</b> 11:14 <b>fourth</b> 1:21 5:18 26:18,23 <b>front</b> 20:9 27:20 <b>functioned</b> 7:17 <b>further</b> 7:4 16:17 21:11 22:19 24:24 24:24 27:18,22 <b>future</b> 12:25 21:9 22:3</p> <hr/> <p style="text-align: center;"><b>G</b></p> <hr/> <p><b>G</b> 3:4 8:6 <b>Garlinghouse</b> 1:20 28:6,13 <b>gas</b> 9:25 <b>gatepost</b> 24:21 <b>gathering</b> 14:8 22:3 <b>General</b> 2:11,12 <b>General's</b> 2:10 <b>generated</b> 12:11 <b>Generating</b> 2:20,22 4:25 7:20,23 8:2 27:7 <b>Generation</b> 4:16 9:7,10 27:10 <b>getting</b> 13:6 <b>give</b> 11:8 <b>given</b> 8:21 <b>go</b> 4:19 12:22 19:19 23:20 27:3 <b>goes</b> 11:18</p>	<p><b>going</b> 8:15 18:2 23:22 24:7,11,19 <b>good</b> 3:6 9:8 10:18 14:16 16:3 26:20 <b>gotten</b> 23:8 <b>government</b> 2:7 3:22 24:13 <b>granting</b> 19:25 20:8 25:13 <b>Grays</b> 2:22 5:1 10:17,20 11:12,13 27:9,12 <b>Great</b> 15:19 <b>green</b> 26:22 <b>greenhouse</b> 9:25 <b>group</b> 8:6 <b>Guests</b> 2:19</p> <hr/> <p style="text-align: center;"><b>H</b></p> <hr/> <p><b>happen</b> 21:20 <b>happy</b> 27:13 <b>Harbor</b> 2:22 5:1 10:17,20 11:12,13 27:9,12 <b>heads-up</b> 11:9 <b>Health</b> 2:8 3:24 26:3 <b>hear</b> 21:13 23:20 <b>heard</b> 13:3,18,19 13:22 20:2 <b>hearing</b> 12:2 13:14 13:16 14:4,7,13 14:16,20 15:9 22:5 23:6 25:8 <b>hearings</b> 23:22 <b>help</b> 22:20 <b>helped</b> 23:16 <b>helpful</b> 15:6 <b>highlight</b> 9:11 <b>Historic</b> 17:7 <b>holders</b> 27:1 <b>Horse</b> 2:21 4:23 7:7 7:11 27:6 <b>hours</b> 12:13</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/>	<p><b>Ian</b> 2:9 4:2 <b>identification</b> 19:21 <b>identified</b> 19:22 <b>identify</b> 13:22 <b>impact</b> 22:10 <b>impacts</b> 13:23 18:19 19:22 <b>inaudible</b> 19:14 <b>included</b> 8:2 <b>includes</b> 18:13 <b>including</b> 10:11 24:5 <b>inconsistency</b> 21:8 <b>incorporated</b> 16:12 <b>indicated</b> 12:16 <b>indicates</b> 9:15 <b>indirect</b> 26:25 <b>individual</b> 22:21 <b>information</b> 11:24 12:9 13:6,17,25 14:3,8,9 16:12 17:3,6 23:5 24:10 25:3 27:22 <b>initial</b> 10:12 17:1 <b>input</b> 17:25 22:4 23:25 24:7,14 <b>inspection</b> 7:15,25 8:1,14 9:19,19,20 10:22 11:3 <b>installed</b> 7:17 <b>intend</b> 11:9 <b>interest</b> 12:8 21:3,5 <b>interested</b> 14:25 20:17 <b>interruption</b> 12:12 <b>interview</b> 8:4 <b>introduce</b> 4:13 16:7 <b>issue</b> 20:25 <b>issues</b> 9:22 13:22 16:19 18:1 24:1 25:1 <b>item</b> 10:20 26:17</p> <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <p><b>Jaime</b> 3:12</p>	<p><b>JAMIE</b> 2:3 <b>Jennifer</b> 2:21 4:17 4:22 7:7,10 <b>JOAN</b> 2:16 <b>JON</b> 2:12</p> <hr/> <p style="text-align: center;"><b>K</b></p> <hr/> <p><b>Karen</b> 2:21 4:19,20 <b>Kathleen</b> 2:3 3:7 <b>keep</b> 14:10 <b>keeping</b> 21:22 <b>Kelly</b> 2:8 3:25 <b>key</b> 18:2 <b>Kidder</b> 2:16 16:3,6 16:8,9 19:1 <b>Kittitas</b> 2:9,23 4:1 5:3 6:22 7:2 18:15 21:4 26:5 27:5 <b>Knaub</b> 2:22 4:24 4:24 7:20,21,22 8:11,17 9:1,3,4 <b>know</b> 12:19 15:7 17:19 <b>knowledge</b> 28:9</p> <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <p><b>laboratories</b> 8:3 <b>Lamoreaux</b> 9:18 <b>land</b> 18:5,9,11,12 18:19 20:25 21:23 22:12 <b>larger</b> 15:16 <b>LAURA</b> 2:18 <b>law</b> 18:17 <b>learn</b> 24:11 <b>lesser</b> 20:25 <b>let's</b> 6:21 19:15 <b>level</b> 21:23 22:11 <b>levels</b> 18:21 <b>life</b> 16:24 <b>light</b> 19:7,20 <b>limited</b> 22:18 <b>line</b> 6:6,7,9 25:8 <b>list</b> 27:1 <b>Livingston</b> 2:4 3:15</p>	<p>3:15 6:16 23:14 23:15 25:21 <b>LLC</b> 1:21 <b>local</b> 2:7 3:22 17:3 18:8 22:12 24:12 <b>locations</b> 17:13,13 <b>long</b> 22:13 <b>look</b> 14:21 15:18 17:21 21:14 24:19 24:22 26:12 27:19 <b>looked</b> 25:2 <b>looking</b> 13:24 21:15 <b>Lyden</b> 10:5</p> <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <p><b>main</b> 6:7 <b>maintaining</b> 12:8 <b>Maintenance</b> 12:10 <b>major</b> 21:18,18 <b>making</b> 22:18 <b>manager</b> 9:10 10:19 <b>manger</b> 26:21 <b>March</b> 6:2,15 7:3 7:13,15,24 9:12 9:20 10:22 14:1 16:9,15 <b>Mark</b> 2:20 4:15 9:7 9:9 <b>Mastro</b> 2:15 3:9,11 3:13,16,19,22 4:1 4:3 25:9,15,17,19 25:22,25 26:3,5,7 <b>material</b> 14:11 <b>materials</b> 14:6 <b>McGaffey</b> 2:21 4:20,20 <b>MDNS</b> 16:11,12 18:22,23 19:21 <b>means</b> 23:5 <b>measure</b> 16:21 17:1 17:5 18:25 <b>measures</b> 16:21 18:24 19:22 <b>mechanisms</b> 16:23</p>
---	--	---	---	--



<p><b>media</b> 17:14  <b>meeting</b> 1:11 3:8          6:1 11:21,25          14:22 16:9 24:2          27:23  <b>megawatt</b> 12:13  <b>Melbardis</b> 2:23 5:3          5:3 6:23,25 7:1  <b>melt</b> 7:17  <b>members</b> 14:15          17:14 20:5 26:10  <b>memo</b> 16:13  <b>mentioned</b> 27:21  <b>met</b> 18:13  <b>method</b> 16:25 25:3  <b>Mike</b> 2:4 3:15  <b>Miller</b> 2:20 4:15,15          9:7,8,9  <b>minor</b> 5:17  <b>minutes</b> 6:1,13,15          6:19,20  <b>mitigate</b> 19:22  <b>mitigated</b> 18:20          22:11  <b>mitigation</b> 16:21,21          17:1,5 18:24,25          19:22  <b>modifications</b>          11:13  <b>modified</b> 16:21,22          17:6  <b>Monday</b> 11:2  <b>money</b> 21:6  <b>monitors</b> 9:14,15  <b>month</b> 7:13 9:12          11:4  <b>monthly</b> 1:11 14:22  <b>moratorium</b> 18:10  <b>Moss</b> 2:5 3:21,21          5:12 6:3,6,10 12:7          12:13,19 13:2,8          20:11,13,18 22:24          23:13 26:2  <b>motion</b> 5:10 6:12          19:14,17 20:9</p>	<p>25:6,10 26:8  <b>move</b> 5:12 6:14,21          20:14 21:25 22:9          24:22  <b>moving</b> 6:1 9:2,6          16:1 25:3 26:12          26:17  <b>Multiple</b> 4:18</p> <hr/> <p style="text-align: center;"><b>N</b></p> <hr/> <p><b>N</b> 2:1 3:4  <b>n-a-m-e</b> 6:8  <b>name</b> 6:7,8  <b>National</b> 1:24  <b>Natural</b> 2:5 3:16          25:22  <b>nature</b> 18:3  <b>Nay</b> 26:6  <b>need</b> 14:8,9  <b>needed</b> 22:15  <b>needs</b> 13:5 25:4          26:13  <b>nods</b> 13:6  <b>nonroutine</b> 7:12          9:11 10:20  <b>nonsignificant</b>          18:20 22:11  <b>Normally</b> 12:14  <b>Northwest</b> 4:24          7:23 8:5  <b>note</b> 10:8 18:23  <b>NPDES</b> 10:22  <b>number</b> 14:15 15:7  <b>numbers</b> 27:4</p> <hr/> <p style="text-align: center;"><b>O</b></p> <hr/> <p><b>O</b> 3:4  <b>o0o--</b> 3:3  <b>observed</b> 9:22  <b>office</b> 2:10 15:18  <b>official</b> 14:5  <b>offset</b> 10:2  <b>oh</b> 6:11 16:8 25:7  <b>okay</b> 5:9,21 6:5,9          6:11,21 7:5 8:25          9:6 10:16 11:5</p>	<p>12:5,18,22 13:2,8          15:23 16:1 17:18          19:19 20:2,13,18          21:10 25:8 27:17  <b>Olympia</b> 1:6,23 3:1  <b>Olympic</b> 11:16,17  <b>once</b> 14:5  <b>online</b> 14:23  <b>open</b> 16:14  <b>operating</b> 9:16  <b>operation</b> 18:10  <b>operational</b> 6:22  <b>operations</b> 7:3,13          12:10  <b>opportunity</b> 23:9  <b>opposed</b> 5:24 6:20  <b>Optional</b> 2:7 3:22  <b>order</b> 3:8 10:3          17:22 18:3,3,24          19:23,25 20:4,8          20:16 21:16 22:1          23:3,10 25:12  <b>ordering</b> 23:4  <b>ordinance</b> 18:11  <b>ordinances</b> 18:16  <b>original</b> 15:2  <b>outlines</b> 26:22  <b>overall</b> 7:16</p> <hr/> <p style="text-align: center;"><b>P</b></p> <hr/> <p><b>P</b> 2:1,1 3:4  <b>p.m</b> 1:8 3:2 27:24  <b>PacifiCorp</b> 9:10          10:4,6 13:3  <b>packets</b> 17:21          26:22  <b>page</b> 6:6,9 23:17  <b>paragraph</b> 23:4  <b>parameters</b> 9:16  <b>parcels</b> 21:20  <b>part</b> 10:2  <b>participate</b> 20:6  <b>participated</b> 26:11  <b>parties</b> 20:17  <b>PATTY</b> 2:17  <b>people</b> 21:4 26:11</p>	<p><b>percent</b> 10:7 27:6,6          27:7,8,8,9,10,11          27:11,12  <b>performance</b> 9:16  <b>period</b> 12:2 16:14  <b>Perkins</b> 2:21 4:20  <b>permit</b> 11:10,11,14          11:19 12:3  <b>permitting</b> 24:5,12  <b>pertinent</b> 18:8  <b>phone</b> 2:4,5,9,20,21          2:21,22,22,23          3:18 4:8,10 6:24          12:12 19:9  <b>pictures</b> 15:8  <b>place</b> 8:6  <b>plan</b> 7:14 10:8,12          15:14 18:11 22:3          23:24 26:14,23  <b>plans</b> 18:16,19          22:12  <b>plant</b> 7:3 9:9,12          10:19 12:11  <b>plate</b> 6:8  <b>please</b> 3:9 4:14  <b>plus</b> 14:14  <b>point</b> 4:13 10:21          12:7 21:1,13,24          23:1 24:17 25:7  <b>points</b> 18:3 23:16  <b>Pollution</b> 7:14  <b>Posner</b> 2:14 5:14          5:16,20 26:20,21  <b>possibility</b> 21:9  <b>possible</b> 15:6  <b>post</b> 15:14  <b>posting</b> 15:11  <b>POTIS</b> 2:17  <b>Power</b> 2:21,23 5:4          7:2,7 8:6 27:5,11  <b>preconstruction</b>          17:8  <b>preliminary</b> 11:19  <b>preparation</b> 24:3  <b>prepare</b> 8:23</p>	<p><b>prepared</b> 8:21  <b>presentation</b> 27:13  <b>presented</b> 13:16          16:19  <b>Preservation</b> 17:7  <b>preserve</b> 22:14  <b>preserving</b> 16:25  <b>prevention</b> 7:14          11:11  <b>prints</b> 15:16  <b>proceed</b> 19:4,16          23:2  <b>proceeding</b> 1:12          18:4  <b>process</b> 11:23 18:5          22:16,19 23:3          24:5,12 26:12  <b>processes</b> 18:5  <b>processing</b> 17:20          17:23 19:2,25          20:8,15 25:11,13  <b>product</b> 8:3  <b>prohibit</b> 18:9  <b>project</b> 2:7,21,23          3:23 5:4 6:22 7:3          7:7 10:6,10 11:12          13:11 16:2 18:18          20:3 21:2 25:14          27:5,6,8,9,10,11  <b>projects</b> 21:5,7          27:2,20  <b>proof</b> 18:14  <b>properly</b> 7:17  <b>proposal</b> 14:17  <b>proposed</b> 5:10          11:25 13:17 15:3          16:11,25 17:2,13          17:13 18:6 20:6          25:13 26:14  <b>provided</b> 15:8          17:23  <b>provides</b> 18:6  <b>proving</b> 23:18  <b>provisions</b> 18:9  <b>PSD</b> 11:10,14</p>
---	--	--	--	--

**public** 8:6 11:20  
 12:1,2,2 13:14,18  
 13:18 14:6,23  
 16:10,14,16 17:14  
 20:5 24:7,24  
 26:15  
**published** 5:13  
**Puget** 4:22 7:11  
**purchases** 10:1  
**purpose** 21:15  
**purposes** 18:11  
 21:25 23:19  
**put** 20:9 22:3 26:15

**Q**

**quarter** 5:19 26:18  
 26:23,24 27:1  
**question** 8:13 19:8  
 19:10  
**questions** 7:5 10:13  
 10:15 12:5 15:24  
 17:15 19:4,6,11  
 19:16 24:3,16  
 27:14,15  
**quickly** 8:23  
**quorum** 4:3

**R**

**R** 2:1 3:4 28:1  
**raised** 24:18  
**rates** 26:25  
**RCW** 19:3  
**read** 5:18 27:3  
**real** 22:14  
**really** 12:8  
**Realtime** 1:21  
**reasoned** 23:11  
**recalculate** 26:24  
**recap** 16:14  
**receive** 11:23 22:4  
 23:5,6 24:25  
**received** 8:5 9:24  
 10:6 13:19 14:7  
 16:10,12,16,20  
 17:3,6,25  
**recommendation**

19:5,24 20:3  
**recommended** 22:6  
**record** 5:17 7:10  
 20:24  
**reduction** 9:25  
**reflect** 16:23 17:3,8  
**reflects** 22:1  
**Region** 11:17  
**regular** 4:4 9:12  
**relative** 9:13  
**Renewables** 7:2  
**report** 7:4 8:10,15  
 8:20,23 9:15,22  
 12:11,15  
**REPORTED** 1:20  
**Reporter** 28:7  
**reporting** 1:21  
 12:25  
**reports** 12:9 13:4  
**representative** 4:7  
**representing** 4:21  
**request** 8:18,20,24  
 13:15 14:1 18:4  
 20:1 22:2  
**requested** 10:9  
 11:13 13:24 17:19  
**required** 9:16  
 10:10  
**requirement** 10:2  
**resource** 17:9  
**Resources** 2:5 3:17  
 25:23  
**respect** 21:1,1  
**respond** 8:24  
**responded** 7:16  
**responding** 8:18  
**response** 14:2,6  
**responsible** 14:5  
**restate** 25:10  
**restoration** 10:12  
**result** 16:20  
**retains** 23:17  
**review** 8:4 10:12  
 11:10,18 14:10,19  
 16:16 17:24 20:7

23:10  
**reviewed** 14:5  
 16:10  
**reviewing** 13:21  
 14:3  
**reviews** 11:15  
**revised** 18:23 19:21  
**Ridge** 27:9  
**right** 20:10,13 24:2  
 24:20  
**roll** 3:10 25:9  
**Rossmann** 2:3 3:12  
 3:12 6:14 8:12,13  
 8:25 15:4,5,19  
 20:20,21 21:11,12  
 22:22 23:1 25:16  
**routine** 7:4 11:4  
**running** 10:25

**S**

**S** 2:1 3:4  
**Safety** 8:7  
**sake** 12:16  
**sample** 10:25 11:1  
**samples** 11:3  
**satisfied** 19:3 25:12  
**saved** 21:6  
**SCA** 13:17  
**scrutiny** 21:23  
**Seattle** 1:22,23  
**second** 6:16 20:19  
 20:20  
**section** 12:10  
**see** 6:11 12:9 14:23  
 15:17,21 17:22  
**seek** 24:7  
**semiannual** 7:14  
**send** 11:9  
**sense** 8:14 15:9  
 21:24 22:9  
**sent** 24:3  
**SEPA** 14:5,10 16:4  
 16:12 17:15 18:1  
 18:5  
**seriously** 24:18  
**served** 20:17

**shared** 8:16 15:10  
**SharePoint** 15:12  
 15:17  
**sheet** 26:22  
**Sherin** 2:22 5:1,1  
 10:18,19 12:21,23  
 12:24  
**Sherman** 2:24 5:6,7  
 5:8  
**Shorthand** 28:6  
**Siemann** 2:5 3:18  
 3:18 25:24  
**signed** 20:16  
**significant** 10:23  
 11:11 18:20  
**site** 1:5 7:16 9:19  
 10:3,12,22 11:2  
 13:15 14:25 15:2  
 15:6,12,17 17:20  
 18:14 20:6 22:6  
 22:21 24:8 26:13  
 26:14 27:21  
**site-specific** 22:13  
 22:20 23:7  
**sites** 17:2 18:9  
 21:15 22:7 23:18  
 24:23 25:5  
**skill** 28:9  
**small** 12:7  
**snow** 7:16  
**Solar** 2:7 3:23 4:4  
 7:11 16:2,11 27:8  
 27:22  
**Sonia** 2:15 13:11  
**Sorry** 5:16  
**sort** 21:23  
**Sound** 4:22 7:11  
**Southwest** 9:17  
**spare** 21:7  
**speak** 22:17  
**speakers** 4:18  
 13:20 14:14  
**speaking** 4:18  
 22:12  
**specific** 23:3 26:13

**spring** 7:16  
**staff** 2:13 9:9,21  
 10:9 11:12,15,18  
 13:5,11 15:20  
 16:9,17 17:9,11  
 17:25 19:16 20:2  
 22:2 23:4,20  
 26:10  
**Staff's** 19:5,23  
**state** 1:4 2:7 3:23  
 16:16 28:3,7  
**stated** 9:21 12:14  
**statements** 19:11  
**Station** 2:22 4:25  
 7:20,23 8:2 27:7  
**status** 20:3  
**Stephen** 2:14 26:21  
**Stephenson** 2:4 4:9  
 4:10 25:18  
**storage** 8:3  
**stormwater** 7:14,15  
 11:1  
**strong** 25:2  
**strongly** 21:2  
**SUEZ** 10:4  
**Suite** 1:22  
**summarize** 18:2  
**support** 21:16  
 22:25  
**supported** 23:11  
**sure** 13:5 14:20  
 18:24 22:5,20  
**survey** 17:9  
**synopsis** 20:4

**T**

**T** 28:1,1  
**take** 11:19 14:20  
 15:18 19:15,24  
**talked** 19:1  
**TAMMY** 2:15  
**Taylor** 1:20 28:6,13  
**ten** 13:19  
**terms** 23:11  
**test** 9:13 18:7  
**testimony** 13:18

<p><b>thank</b> 4:9,11 5:7,20 6:25 7:6,9,19 8:10 8:11,25 10:14,16 11:5,7 13:8,9,12 14:12 15:5,19 16:1 17:16,18 19:18 20:3,4,18 21:10,12 22:22 23:13 24:15 25:6 26:9,16 27:17,22</p> <p><b>thing</b> 14:24 15:7</p> <p><b>things</b> 22:14 23:23 24:1,9</p> <p><b>think</b> 14:15 15:6 21:8,13,16,24 22:9,18 23:1,8,10 24:17 25:1</p> <p><b>thinking</b> 24:13</p> <p><b>THOMPSON</b> 2:12</p> <p><b>three</b> 9:11</p> <p><b>threshold</b> 24:20</p> <p><b>THURSTON</b> 28:4</p> <p><b>time</b> 4:14 9:20 11:24 17:24 22:19 26:9</p> <p><b>Title</b> 9:19</p> <p><b>today</b> 21:15 22:18</p> <p><b>tons</b> 10:7,7</p> <p><b>touch</b> 27:20</p> <p><b>tour</b> 14:25 15:22 17:12 20:6 27:21</p> <p><b>transcript</b> 1:12 28:8</p> <p><b>transcripts</b> 14:18</p> <p><b>transfer</b> 10:4</p> <p><b>Transportation</b> 2:5 3:19 25:25</p> <p><b>treated</b> 22:7</p> <p><b>true</b> 28:8</p> <p><b>Trust</b> 10:1</p> <p><b>try</b> 24:9</p> <p><b>Tuesday</b> 1:7</p> <p><b>turbine</b> 9:14</p> <p><b>TUUSSO</b> 17:19 20:15 25:13</p>	<p><b>TUUSSO's</b> 19:25</p> <p><b>twice</b> 23:10</p> <p><b>two</b> 9:17 16:20 27:19</p> <p><b>type</b> 21:17</p> <p><b>types</b> 23:25</p> <hr/> <p style="text-align: center;"><b>U</b></p> <hr/> <p><b>ultimately</b> 22:6</p> <p><b>unable</b> 14:20</p> <p><b>unannounced</b> 8:1</p> <p><b>understand</b> 11:22 16:18</p> <p><b>understanding</b> 15:1</p> <p><b>unique</b> 25:4</p> <p><b>uniquely</b> 22:7</p> <p><b>units</b> 9:15</p> <p><b>update</b> 7:12,24 8:8 10:9 13:11 16:4 17:15</p> <p><b>updated</b> 14:10 17:3 18:25</p> <p><b>updates</b> 6:22 9:4</p> <p><b>use</b> 18:5,9,11,12,19 20:25 21:19,23 22:5,12,15,20 23:6 24:4,12</p> <p><b>Utilities</b> 2:5 3:19 25:25</p> <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <p><b>V</b> 9:19</p> <p><b>Valley</b> 2:23 5:4 6:22 7:2 27:5</p> <p><b>Verbatim</b> 1:12</p> <p><b>verifiable</b> 9:25</p> <p><b>viewing</b> 21:25</p> <p><b>Vintage</b> 10:5</p> <p><b>visit</b> 15:6</p> <p><b>visited</b> 17:14</p> <p><b>visual</b> 13:23</p> <p><b>voices</b> 25:8</p> <p><b>vote</b> 24:20</p> <p><b>votes</b> 26:16</p>	<hr/> <p style="text-align: center;"><b>W</b></p> <hr/> <p><b>WAC</b> 19:3</p> <p><b>walkthrough</b> 8:2</p> <p><b>want</b> 8:22 15:17 18:23 20:4</p> <p><b>wanted</b> 11:8 15:7 20:23 22:17</p> <p><b>Washington</b> 1:4,6 1:22 3:1 13:14 28:3,7</p> <p><b>waste</b> 7:25 8:3</p> <p><b>water</b> 16:22,24 17:1,4</p> <p><b>ways</b> 24:13</p> <p><b>we'll</b> 13:23 15:18 19:16 24:13</p> <p><b>we're</b> 14:3 15:11 22:18 24:1,5,9,11</p> <p><b>we've</b> 23:8 25:2</p> <p><b>website</b> 15:10</p> <p><b>week</b> 8:19 13:13 14:14 20:7</p> <p><b>weeks</b> 13:21 14:19</p> <p><b>welcome</b> 9:1</p> <p><b>went</b> 17:12</p> <p><b>weren't</b> 10:23,23 10:24,25,25</p> <p><b>Whistling</b> 27:9</p> <p><b>Wild</b> 2:21 4:23 7:7 7:11 27:6</p> <p><b>Wildlife</b> 2:4 3:14 25:20</p> <p><b>Wind</b> 2:21,23 4:23 5:4 6:22 7:2,7,11 27:5,6,11</p> <p><b>WNP</b> 9:2,5 27:8</p> <p><b>wondering</b> 12:15 15:9</p> <p><b>word</b> 6:7</p> <p><b>work</b> 15:21 17:9 27:19</p> <p><b>working</b> 11:12 18:1 23:24 24:1,9</p> <p><b>written</b> 9:22 13:19</p> <p><b>wrongly</b> 13:3</p>	<p><b>www.buellrealti...</b> 1:25</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>Yeah</b> 8:13 20:23 23:15</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>zones</b> 21:20</p> <p><b>zoning</b> 18:11,16</p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>1</b> 14:1 27:10</p> <p><b>1/4</b> 9:2,5 27:8</p> <p><b>1:30</b> 1:8 3:2,8</p> <p><b>10</b> 17:5 19:1</p> <p><b>11th</b> 13:13 14:5 17:11</p> <p><b>12</b> 27:10</p> <p><b>13</b> 13:19</p> <p><b>1325</b> 1:21</p> <p><b>13th</b> 16:15</p> <p><b>14th</b> 7:15</p> <p><b>15</b> 27:11</p> <p><b>15th</b> 9:20</p> <p><b>16th</b> 14:3</p> <p><b>17</b> 1:7 3:1</p> <p><b>18</b> 16:15 27:8</p> <p><b>1840</b> 1:22</p> <p><b>19</b> 6:6,6,9,9</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>2</b> 27:10</p> <p><b>2:03</b> 27:24</p> <p><b>20</b> 6:15 27:7</p> <p><b>2017</b> 8:7 10:5</p> <p><b>2018</b> 1:7 3:1 6:2,15 9:19 13:13 14:1</p> <p><b>206</b> 1:23</p> <p><b>20th</b> 6:2</p> <p><b>21st</b> 7:24</p> <p><b>27</b> 23:17</p> <p><b>27th</b> 16:15</p>	<p><b>287-9066</b> 1:23</p> <p><b>28th</b> 10:22</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p><b>3</b> 27:9,12,12</p> <p><b>312,857</b> 12:13</p> <p><b>3358</b> 1:20 28:13</p> <p><b>360</b> 1:23</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>4</b> 27:8,12</p> <p><b>463-43-050</b> 19:3</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p><b>52,162</b> 10:6</p> <p><b>534-9066</b> 1:23</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p><b>6</b> 16:22 19:1 26:17</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/> <p><b>70,000</b> 10:7</p> <p><b>75</b> 10:7</p> <hr/> <p style="text-align: center;"><b>8</b></p> <hr/> <p><b>8</b> 27:6,6</p> <p><b>80.50.075</b> 19:3</p> <p><b>800</b> 1:24</p> <p><b>836</b> 10:3</p> <p><b>846-6989</b> 1:24</p> <hr/> <p style="text-align: center;"><b>9</b></p> <hr/> <p><b>9</b> 23:17 27:10</p> <p><b>98101</b> 1:22</p>
---	---	--	---	--

# Kittitas Valley Wind Power Project

## Monthly Operations Report

April 2018

### Project Status Update

#### **Production Summary:**

Power generated: 19,564 MWh  
Wind speed: 6.5 m/s  
Capacity Factor: 27%

#### **Safety:**

No incidents

#### **Compliance:**

Project is in compliance

#### **Sound:**

No complaints

#### **Shadow Flicker:**

Request from Realtor to curtail turbine B6 from casting shadow flicker on an empty lot. The lot in question has no structure (receptor) and Google maps tells me it's >2,500ft away from this turbine (3,324ft).

#### **Environmental:**

No incidents

## Wild Horse Wind Facility

April 2018

### Safety

No lost-time accidents or safety injuries/illnesses.

### Compliance/Environmental

Nothing to report

### Operations/Maintenance

Nothing to report.

### Wind Production

April generation totaled 70,478 MWh for an average capacity factor of 35.91%.

### Eagle Update

Nothing new to report

**Energy Northwest  
EFSEC Council Meeting  
April 2018 Operations Report  
Debbie Knaub**

**Columbia Generating Station Operational Status**

Columbia is online at 100% power and producing 1159 MWs.

Executive Team Changes: Columbia has selected a successor to CEO, Mark Reddemann. Brad Sawatzke, who has most recently served as Columbia's Chief Nuclear Officer, has been selected as CEO, effective immediately. Grover Hettel will be assuming the Chief Nuclear Officer position, also effective immediately.

**WNP 1/4 Building Transfer/Water Rights**

No change from March 2018 Operations Report

NEPA/Leasing:

Energy Northwest's new lease with the Department of Energy for WNP 1/4 went into effect on July 1, 2017. We have started the planning and some field work on the water distribution system project, which will eventually utilize the Water Rights permit granted by the Department of Ecology.

## **Chehalis Generation Facility----Monthly Plant Report – April 2018**

### **Washington Energy Facility Site Evaluation Council**

05.05.2017

---

#### **Safety:**

- There were no recordable incidents this reporting period and the plant staff has achieved 997 days without a Lost Time Accident.

#### **Environment:**

- There were no air emissions or stormwater deviations or spills during the month of April 2018.
- Wastewater and Stormwater monitoring results were in compliance with the permit limits for the month of April.

#### **Operations and Maintenance Activities:**

- The Plant generated 43,788 MW-hours in April for a 2018 YTD generation total of 425,511 MW-hours and a capacity factor of 29.27%.
- The Plant began a planned 24 day Outage to conduct a borescope inspection of both combustion turbines, upgrade the combustion turbine controls to GE Mark 6e, install new inlet air filters and replace expended nitrogen oxide control catalyst in both heat recovery steam generators. All projects are on schedule to be completed by May 10, 2018.

#### **Regulatory/Compliance:**

- The Washington State Department of Labor and Industries conducted the annual inspection of the Chehalis plants pressure vessels. No issues were noted by the inspector.

#### **Sound monitoring:**

- Nothing to report this period.



**Carbon Offset Mitigation:**

- Nothing to report this period.

Respectfully,

A handwritten signature in black ink, appearing to read "M. Miller".

Mark A. Miller  
Manager, Gas Plant  
Chehalis Generation Facility



## EFSEC Monthly Operational Report

April 2018

1. Safety and Training

- 1.1. There were no accidents or injuries during the month of March.
- 1.2. Conducted scheduled and required monthly training.
- 1.3. Conducted the scheduled Safety Committee meeting.
- 1.4. Method 9 visible emissions training was completed by Grays Harbor O&M staff in March/April.

2. Environmental

- 2.1. The annual greenhouse gas report for 2017 was submitted to EPA and DOE. A 3rd party review is required by August for this submittal.
- 2.2. The discharge monitoring report quality assurance process for 2018 was initiated for ALS and site labs.

3. Operations & Maintenance

- 3.1. Grays Harbor Energy Center (GHEC) operated 24 days and generated 208,901MWh during the month of April. The plants capacity factor was 47%.
- 3.2. DOE finished conducting their annual site inspection on April 16. Outfall and storm water runoff samples were collected. No exceedances were noted in either set of results.
- 3.3. The discharge monitoring report quality assurance (DMR-QA 38) for Grays Harbor's site lab was submitted to ERA for review on April 26.
- 3.4. Tentatively scheduled RATAs and stack testing with Montrose for week of August 13 and confirmed the scope of work with them.
- 3.5. GHEC started our annual maintenance outage April 28.
- 3.6. Waiting on our PSD Amendment 4 to go to public comment.

4. Noise and/or Odor

- 4.1. None.

5. Site Visits

- 5.1. April 16, DOE staff member Liem Nguyen visited the site to finish DOE's annual site inspection.

6. Other

- 6.1. Grays Harbor Energy Center is staffed with 21 personnel.

## **Proposed FACT SHEET**

### **Grays Harbor Energy Center Grays Harbor Energy, LLC**

#### **No. EFSEC/2001-01, Amendment 4**

#### **Background**

EFSEC has the authority to issue both PSD and minor air permits. During development of the Air Operating Permit for this facility, EFSEC's contractor, the Olympic Region Clean Air Agency (ORCAA), identified a number of inconsistencies and questions on implementation of various terms of the PSD permit, Amendment 3 for the Grays Harbor Energy Center (GHE). These were communicated to EFSEC in October 2008 and subsequently shared with Grays Harbor Energy.

On August 7, 2009, GHE submitted a request to modify various provisions of the PSD approval. These permit modifications included modification of numerical emission limits on the combustion turbines during start-up and shutdown periods based on the requirements of PSD regulations. Along with their proposed revisions to Amendment 3, Grays Harbor Energy provided explanations for their requests. EFSEC reviewed their requests and carried forward the majority in Amendment 4 to the PSD approval (Amendment 4).

Additionally, ORCAA identified additional editorial and clarifying changes to the PSD approval that were not included in the request from GHE. These changes have been incorporated into Amendment 4 and include the following:

1. Correcting misalignments and errors in required testing and monitoring methods.
2. Clarifying which methods from 40 CFR Part 75, Appendix D apply for SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> compliance determinations and monitoring.
3. Aligning testing schedules to be uniform throughout the permit.
4. Removing cumulative annual emissions limits for emergency and fire pump engines.
5. Clarifying start-up and shutdown operations.
6. Correctly incorporating federal standards for engines from 40 CFR 63 Subpart ZZZZ.

For the fourth amendment, EFSEC concludes that:

- a. The request was deemed administratively complete on April 1, 2010.
  - i. No requested change would result in an increase in an allowable emission rate. Therefore, the Best Available Control Technology (BACT) review was not modified.

- ii. The sulfur monitoring has been adjusted to match actual operating conditions and availability of fuel supplier information. The ability to determine compliance is not affected by these changes.
- iii. The allowable time for combustion turbine cold start-up has been lengthened from four hours per turbine to 300 minutes per turbine in response to actual meteorological conditions at the Grays Harbor Energy Center site compared to the design meteorological conditions used by the prior owner/permittee, and in response to a review of the start-up procedures provided by the turbine manufacturer in its operation and maintenance manual. The climate for the site is colder than anticipated by the design conditions, so the turbines require more time to start up the gas and steam turbines compared to the design temperature. Both the actual start-up conditions and actual site design characteristics that affect start-up were unavailable during initial permitting.
- iv. A carbon monoxide BACT limit of 3.0 ppmdv @15% O<sub>2</sub>, on a 1-hour average was established in the original PSD permit based on the application of good combustion practice. The CO limit applicable to the combined cycle gas turbines (CGTs) was revised to 2.0 ppmdv @15% O<sub>2</sub>, on a 1-hour average to comply with EPA Region 10 Administrative Order on Consent, No. CAA-10-2001-0097, dated March 2001. This has resulted in a permitted reduction in sitewide carbon monoxide (CO) emissions from 477 tpy to 146 tpy or a reduction of more than 300 tpy of CO.
- v. EFSEC and GHE agreed that the CGTs are subject to emission limitation, monitoring, and reporting requirements in 40 CFR 60 Subpart GG.
- vi. The requirement to comply with normal operation emissions limits during start-up and shutdown for nitrogen oxides (NO<sub>x</sub>), CO, and volatile organic compounds (VOCs) has been replaced with added start-up and shutdown emissions limits. Cold, warm, and hot start-ups and shutdown have been defined.
- vii. The applicant has requested that: once per year, each CGT may need to be tested to confirm that the over-speed protection is functioning properly (less than 90 minutes). The permit will have this test account for one start-up/shutdown.

These changes have been explained in detail below.

Ecology, on behalf of EFSEC, drafted a response to the Grays Harbor request. This response was issued the end of September 2009 and included a draft revision to the permit and additional questions related to the request. Grays Harbor's consultant provided additional information on December 28, 2009. The company supplied additional information on March 25, 2010 (in a letter dated March 10, 2010). Based on these additional submittals, the request to revise the permit was determined to be administratively complete on April 1, 2010. At that time, EFSEC worked on the proposed permit amendment, and then, EPA region X took the lead as a coauthor. EPA Region X modified the proposed permit based on multiple reviews of federal requirements from EPA headquarters. EFSEC then finalized the proposed amendment with input from Ecology, EPA, ORCAA, and the applicant regarding start-up/shutdown requirements.

Most recently, the company provided their BACT analysis and underlying data of the start-up and shutdown periods associated with the combustion turbines on September 23, 2014. Additional meetings were held on June 28, July 19, and October 5, 2017, with EFSEC, ORCAA, the applicant, and Ecology to clarify various issues.

### **What changes to the permit conditions were requested?**

Grays Harbor Energy requested a number of minor editorial and clarifying changes be made to a number of approval conditions. ORCAA identified many of the same changes plus a number of additional clarifying changes. Many changes are simple deletions of any unnecessary words, addition of an averaging period, or clarification of a reference to a federal requirement. As such, these are considered by EFSEC to be administrative changes to the PSD approval.

Other changes requested are not considered administrative and are discussed in more detail below. However, none of the changes incorporated into Amendment 4 could lead to an increase in emissions or reduction in the ability of GHE or EFSEC to determine compliance with any emission limitation, or reduce the stringency of those limitations. Each non-administrative change is discussed below along with the rationale for EFSEC to include or deny the request in the amended approval.

#### **1. Overall Units of Measurement**

Current air regulatory orders contain only English units and the metric units have been dropped from this order.

#### **2. Conditions 3 & 4 – Fuel Sulfur Content**

A numerical limit (500 ppm sulfur) was established in the permit based on regulation at the time the GHE application was considered complete in April 2010. After 2015, the law limited the sulfur content of diesel oil available in Washington to 15 ppm sulfur. Therefore, although the 500 ppm limit remains in the permit, actual sulfur emissions will be lower. Because so little diesel oil is used at the plant, the change in the sulfur content of diesel oil will result in less than 1.0 tpy reduction in SO<sub>2</sub> emissions from diesel oil combustion at the plant.

### **3. Condition 5 – Added Exemption for Start-up and Shutdown**

In the past, emissions occurring during start-up and shutdown were excluded from penalties per WAC 173-400-107. The current permit adds enforceable emission limits that must be met during start-up and shutdown (Condition 11). The permit also clarifies that the emission limits in Condition 5 apply, “except during start-up and shutdown as provided in Condition 11.” The emissions limits added to Condition 11 are discussed below.

### **4. Condition 5 – Stack Testing Schedules Aligned**

Stack testing schedules for all the limits in Condition 5 were aligned to a 5-year schedule for consistency and to harmonize with the 5-year permit renewal schedule required under Title V.

To achieve a uniform 5-year mandatory testing schedule, the requirement that testing revert to annual when any test indicates noncompliance, was deleted from all conditions containing it. EFSEC and its contractors felt the ratcheting schedule was overly prescriptive, and complicated because it was not applied uniformly to all required testing. Additionally, EFSEC has the authority to require testing at any time. Therefore, more frequent testing is not precluded by simplifying and aligning the testing schedules to once every five years.

### **5. Condition 5 – Ongoing Compliance with Hourly Emission Limits**

The requirements of Approval Condition 18.6 were added to the Section 5 language regarding ongoing compliance with the hourly emissions limit when pollutant concentration is determined continuously ( $\text{NO}_x$ , CO, and  $\text{NH}_3$ ). Those requirements state how the exhaust rate is to be calculated based on EPA method 19.

### **6. Condition 5.1.1 – $\text{NO}_x$ Mass Rate Limit Applies to each CGT**

Changes were made to consistently refer to each GE 7FA combustion turbine and its associated duct burner and HRSG as a Combined Cycle Gas Turbine (CGT). Also, the phrase, “For CGTs 1 and 2, emissions from each exhaust stack,” was added to the beginning of Condition 5. These changes help clarify that the emissions limits in Condition 5 apply to all emissions from each CGT regardless of operating scenario, except for start-up and shutdown as explained above. Therefore, the limits apply to duct firing, combustion turbine firing alone, or operating the CGTs in a combined cycle mode. The applicant indicated that the unit cannot operate during duct firing alone.

The phrase “when duct firing” was eliminated from Condition 5.1.1. The phrase, “when duct firing” in Condition 5.1.1 restricted the hourly  $\text{NO}_x$  rate limit to only operating scenarios when the duct burners were firing, resulting in a void or no  $\text{NO}_x$  limit when just the combustion turbine was operating. The phrase “when duct firing” in Condition 5.1.1 also resulted in a less stringent hourly  $\text{NO}_x$  rate limit, and a more complex compliance monitoring situation because different modes of operation needed to be distinguished.

Applying the Condition 5 limits to emissions in each CGT stack allows the phrase, “when duct firing” in Condition 5.1.1 to be deleted, resulting in more stringent application of the hourly  $\text{NO}_x$

rate limit and enabling more straightforward compliance monitoring because the limits apply regardless of the operating scenario, except start-up and shutdown as explained above.

#### **7. Condition 5.1.5 – NO<sub>x</sub> Emission Testing**

This section was added to clarify how the initial compliance test was determined per 40 CFR Subpart GG and EPA Reference Method 20. EFSEC may choose to use this method in the future.

#### **8. Conditions 5.3, 5.4, and 6.3<sup>1</sup> – Natural Gas Fuel Sulfur Determination**

The company initially requested that the permit reference the natural gas sulfur monitoring methods in 40 CFR 60 Subpart GG generically rather than referencing specific paragraphs in the subpart. Upon further discussion and demonstration to the company of the measured concentrations of sulfur in the natural gas coming from Canada carried by the Northwest Pipeline, the company agreed to modify the request to ask that the permit reference the methods in 40 CFR Part 75 used for Acid Rain Program reporting.

The text has been changed to reference the Part 75 methods, or use of monthly grab samples analyzed by methods identified in Part 75, Appendix D. Condition 5.3 was also revised to require monthly sampling and analysis of the gas burned and mass balance calculations for determining ongoing compliance with both long- and short-term average SO<sub>2</sub> rate limits. In addition, the more specific sections from Appendix D to 40 CFR Part 75 are referenced to clarify what sampling and analysis methods should be used for ongoing compliance determination and monitoring.

Changes were also made in Condition 5.3 to clarify that EPA Reference Method 8 stack testing is a compliance determination method that can be used only for the hourly average SO<sub>2</sub> rate limit, and not for both the short- and long-term SO<sub>2</sub> limits as worded in Amendment 3. These changes were made because stack test results alone cannot be used for determining compliance with long-term average limits.

To apply stack test results for determining compliance with a long-term average limit, the stack test results must either be assumed as constant over the averaging period, or must be converted to an emissions factor and then applied over the averaging period using fuel use data. Assuming the measured stack test rate of SO<sub>2</sub> is constant over the averaging period is erroneous because this assumption evaluates a long-term limit as if it were a short-term limit. Using the stack test to derive an emissions factor and then applying it to fuel use data to calculate a long-term average is possible, but not accurate considering the variability of sulfur in the gas delivered to GHE.

Conditions 5.4 and 6.3 were amended similarly to Condition 5.3.

---

<sup>1</sup> All references to permit approval conditions refer to their numbering in Amendment 3.

### **9. Condition 5.5, 5.6 & 6 – Emission Testing (Pounds per Hour Limits)**

Method 19 was added to the emissions testing to clarify how exhaust flow shall be determined during the emission test. This is consistent with the method used for the hourly emissions with the CEMS.

### **10. Condition 5.6 – Particulate Matter Daily Limit Changed to Hourly**

A 24-hour mass rate PM limit in Condition 5.6.1 has no value because a particulate CEMS was not required and, therefore, the 24-hour PM rate cannot be monitored. Also, it is highly impractical to test for because testing would need to last a full 24 hours for a single run. Therefore, the 24-hour limit was converted to an equivalent hourly limit in this condition.

Also, Condition 5.6.6 was deleted because applying a source test derived emission factor to evaluate an hourly emissions rate limit would not result in any more insight beyond simply comparing the stack test results directly with the limit, provided the testing was conducted at or near the maximum heat rate. Condition 5.6.6 does not add any value to compliance assurance monitoring and was deleted.

### **11. Condition 6.2 – Delete Reference to 100 Percent Load**

Reference to 100% load in Condition 6.2 was deleted because it has the unintended consequence of restricting the limit to just 100% load operating scenarios and because it is not needed. Also, worst-case emissions scenarios might not coincide with 100% load and it is implied that testing be conducted at worst-case scenarios.

### **12. Condition 6.6.1 – Opacity Determination**

The language was clarified to “observations are to be performed daily for a month.” If readings are less than the standard for a month, then monitoring frequency is reduced to weekly. We do not expect this source to have visible emissions. Therefore, reduced monitoring is consistent with current approvals of boilers and heaters.

### **13. Conditions 7 & 8 – Limits Replaced with Reference to Federal Engine Requirements**

The emissions limits in Conditions 7 and 8 were removed and replaced with a general reference to the requirements in 40 CFR 63 Subpart ZZZZ. For ongoing compliance, owners and operators are required to maintain engines per the manufacturer’s recommended maintenance plans and to combust low-sulfur diesel. Emergency service engines are additionally required to limit engine testing hours to less than 50 hours per year. Emissions testing is required only if an engine is rebuilt. These engines were installed prior to the NSPS triggering date. (Fire water pump/engine 300 BHP – 2001, Emergency generator/engine 400 KW - 2002)

### **14. Condition 9.1.3 and 9.1.4 – Cooling Tower PM/PM<sub>10</sub> Emissions**

The company requested an increase in the allowable PM emissions to allow them to increase the total dissolved solids content of the tower and its blowdown to reduce the quantity of water

discharged. Based on subsequent discussions with the company, they dropped this initial request. The company also expressed some concern over clarity of the compliance provisions.

### **Discussion and Response**

The company withdrew its request to modify the allowable PM emissions from the cooling tower. Based on discussions with the company, EFSEC has clarified this condition and added the formula from the application and the Fact Sheet to the approval conditions. The formula is used to calculate the cooling tower emissions limitation.

### **15. Condition 10 – Annual Limits Diesel Emergency Generator Deleted**

The annual emissions limits for the diesel emergency generator engine were removed from Condition 10. Annual emissions from the engine are limited by limiting the generator to operating only during power outages and limiting testing of the engine to less than 50 hours per year. These provide ample assurance that annual emissions from the engine will not cause or contribute to violations of any ambient standards.

### **16. Conditions 5 and 19 (Annual Tests and RATA Testing)**

The company asked EFSEC to harmonize all combustion turbine testing frequency and CEM relative accuracy test audit (RATA) testing frequency with actual operating conditions of the facility. The company also wished to make the emission testing requirements consistent with the testing requirements in other combustion turbine projects permitted by EFSEC.

### **Discussion and Response**

EFSEC discussed the requests with the facility officials, and through clarification of the references to federal criteria, agreed to establish RATA conditions that will avoid requiring the company starting the facility solely for the purposes of performing a RATA test.

A new Condition 19 is proposed to clarify the frequency of RATA testing. The referenced requirements in 40 CFR Part 75, Appendix B allow for a RATA test once every four operating quarters with a frequency of no less often than once every eight calendar quarters. The term “operating quarter” is defined in 40 CFR 72.2 to be a quarter with at least 168 hours of operation.

### **17. Condition 11 Regarding Emission Limits During Turbine Start-up and Shutdown**

The existing permit does not provide relief from short-term emission limits during turbine start-up and shutdown events, and does not clarify what “short-term” means. Grays Harbor requested clarification of what “short-term” emission limits refer to. Also, under the PSD program, BACT emission limits must be met on a continual basis at all levels of operation. Grays Harbor could not meet the normal operating BACT limits during start-up and shutdown periods. Therefore the new permit establishes separate BACT limits for NO<sub>x</sub>, CO, and VOC that apply during start up and shutdown.



Grays Harbor Energy also requested changes in the duration allowed for cold start-ups contained in Condition 11.5 from the current four hours to 300 minutes to address cold start-up in the winter. The company also requested provisional emission factors for start-up and shutdown to be removed and CEM information used instead for NO<sub>x</sub> and CO.

### **Discussion and Response**

We have attempted to clarify the term “short-term” emission limitations as they apply to the combustion turbines. The term “short-term emission limitation” is modified to clarify that it applies to those limits with 1-hour, 3-hour, and 24-hour averages. Only NO<sub>x</sub>, CO, and VOC have 1-hour average emission limitations, while NO<sub>x</sub> also has a 24-hour average limitation. These are the only pollutants for which a different set of emission standards has been developed to cover start-up conditions. The text of the start-up condition has been modified to identify the specific emission limitations that are not applicable during CGT start-up and shutdown.

The company has requested the start-up period to be extended. The start-up period ends based on one of three operating conditions, originally intended to prevent a turbine from being in “start-up” mode for extended periods during the initial years of plant operation when discontinuous plant operation was anticipated. The least restrictive of the conditions is the maximum hours allowed to be in start-up mode.

The company presented new information that demonstrates why the original 4-hour start-up mode cannot be consistently met, especially during winter conditions. The steam and combustion turbines are not enclosed in buildings, which is typical of other combined cycle combustion turbines in Washington. As a result, the equipment is open to the weather within its weatherproof acoustic shielding. The limited amount of insulation provided is primarily for soundproofing rather than thermal protection. During the winter, the turbines are exposed to ambient daytime high temperatures averaging below 50°F along with rain and wind conditions. The design by Duke Energy for this facility was a stock design that anticipated locating the turbine in an area where ambient temperatures did not average below 50°F.

The issued permit provides a set of default emission factors to use for start-up emissions until CEM or stack test information is available for use. Information is now available from the company to reset these provisional limitations with actual limits. These actual limits are based on the information provided by the company in December 2009, May 2010, and July 2010, supplemented by information acquired from the company’s reports to the EPA Clean Air Markets Division. This information indicates that there is reason to adjust the default start-up emission values and make them cold start-up limits. This is one of two approaches to establishing cold start-up emissions limits that have been used by other states and EPA in PSD permits to account for start-up and shutdown periods of operation.

The evaluation of the 12 start-up periods available in the CAMD records (plus the information supplied by the company and its consultant) indicates that the NO<sub>x</sub> and CO emission limitations contained in Approval Condition 5 cannot be reliably achieved during unit start-up.

The NO<sub>x</sub> BACT start-up emission limitation is based on the third highest NO<sub>x</sub> emissions rate (175 lb/hr) converted to the 5-hour start-up period. The first turbine will take up to five hours,

but the second turbine starts operation in about two hours, starting about two hours after the first unit has begun operation. This is documented in the “GHE start-up history version 1” spreadsheet submitted by the company and their submittals of September 23, 2014, and January 22, 2015. The limit proposed is based on actual emissions as measured by the CEMs installed on the turbines. The CO BACT start-up limitation is based on a similar analysis using the third highest actual emissions value. These limits only apply to the CGTs as the duct burners are prohibited from operating during start-up or shutdown periods per Condition 11.9.

A review of the data indicated the highest NO<sub>x</sub> emissions during start-up were 884 lb on April 27, 2011. Therefore, the proposed start-up emission limit was set at 900 lb per turbine start-up. Yearly emissions were estimated for all three modes of start-up up to the maximum NO<sub>x</sub> limits for the turbine. The limiting case was 105 hot mode start-ups, resulting in limiting yearly CO emissions from each turbine to 71.6 tpy. This is a reduction in allowable emissions of over 330 tpy. Grays Harbor Energy supplied emissions test data for carbon monoxide and VOC’s that indicated a 1.2 factor for VOCs/carbon monoxide emissions. Therefore the 600 lbs/startup/shutdown was developed based on 500 lbs/startup/shutdown event for carbon monoxide time the 1.2 factor.

<b>Pollutant</b>	<b>Emission Limit per Turbine per Start-up/shutdown</b>
NO <sub>x</sub>	900 lbs/start-up/shutdown
CO	500 lbs/start-up/shutdown
VOC	600 lbs/start-up/shutdown

On November 4, 2013, in a letter to EFSEC, Grays Harbor Energy established the operating temperatures of the oxidation and SCR catalysts along with the dry-low-NO<sub>x</sub> burners associated with the combustion turbine as required by PSD permit Amendment 3, Approval Condition 11.8. This information has been included in Amendment 4, Condition 11.5 to make these operating limits enforceable as a practical manner as these conditions are part of how the beginning and end of the start-up and shutdown periods are defined.

### **18. Conditions 5.8 and 6.6, Visible Emission Monitoring**

Grays Harbor expresses concern about use of daily EPA Method 9 readings or use of a COM on the combustion turbines and auxiliary boiler. The company proposes instead a version of EPA Method 22 that has been utilized by ORCAA in their permits as a replacement for daily Method 9 observations. The proposal is to reduce visible emissions monitoring from once per day to once per “operating month.”

### **Discussion and Response**

For opacity monitoring of the auxiliary boiler, we have changed the requirement to use a once per day survey method when operating. If the survey method detects visible emissions, then the company must investigate the cause of the emissions and repair the problem or take EPA Method 9 observations for determining compliance. For the combustion turbines, the text has been clarified that a continuous opacity monitor may be used as a direct substitute for visible

emissions reading. Method 9 may also be used for opacity monitoring of the combustion turbine exhaust.

### **19. Conditions 7.1.3 and 7.2.3, Operating Records**

The conditions of the existing permit require records of some operating parameters used to establish compliance with emission requirements. One in particular is hours of operation, which is not a component of the calculation of hourly emissions.

#### **Response**

The determination of hourly emissions from the diesel engines is based on an emission factor based in part on the engine speed and the duration each hour that the engine is operated. In Conditions 3.2, 7.1 and 8.2, the permit also contains an hourly limit on the annual use of each diesel engine of 500 hours (Maintenance and testing of 50 hour per year).

The engine operating time is to determine compliance with the annual operating hours' limitation and for determination of compliance with the annual emission limitation in Condition 10.

We propose to modify the pertinent paragraphs of Conditions 7 and 8 to clarify that the record of hours of operation is for compliance with Conditions 3.2 and 10.

### **20. Condition 15**

The company wishes to delete the requirement to install sampling ports and platforms on the diesel engines. In addition, the engine compliance method specified refers to EPA's "in-use" requirements, not emission testing.

#### **Discussion and Response**

The condition is modified to require installation of ports and safe access if emission testing of a diesel engine is requested in writing by EFSEC.

### **21. Throughout permit: Request to delete redundant emission limitations, ppm, and kg/hr (tpy)**

The company sees having mass and concentration limits as duplicative and increasing complexity. They note other recently permitted combustion turbine projects do not have both mass and concentration limits. They also note that if compliance with ambient impacts has been determined based on worst-case emission estimates, a mass limitation is not required and a concentration limit is sufficient.

#### **Discussion and Response**

The concentration and mass emission limitations are not duplicative or redundant. Each serves a different purpose. Concentration limits in general assure proper operation of the control equipment. Mass limitations assure that the ambient air quality is protected, and that short-term and seasonal variations that affect operation are accounted for. For example, the CO and NO<sub>x</sub>

mass limitations (1- and 24-hr averaging periods) were intended to cover emissions during warm and cold start-up conditions without having to establish a specific concentration limitation that applies during start-up. The hourly emission limit in Condition 5.1.1 considers the additional NO<sub>x</sub> emitted during duct firing (while still complying with the concentration limit) and assumes that duct firing does not occur during start-up.

We propose to leave the emission limitations unchanged.

### **Other Changes Made to the Approval Order**

**22. Condition 5.7.3 regarding ammonia limitation during start-up and shutdown operations** is deleted. The condition is unnecessary since during start-up, there will be no ammonia applied to the flue gas until the catalyst has reached operating temperature (one of the defined points ending start-up). Additionally, shutdown is a rapid process taking relatively little time, again with ammonia injection ending when the catalyst is too cool to operate or there is no fuel being fired in the CGT. The 24-hour averaging period for the emission limitation also eliminates the need for the ammonia limitation during start-up and shutdown events.

**23. Condition 15** has been modified to clarify that sampling ports and platforms on the diesel generators are required only when requested. The CGTs and auxiliary boiler have stack testing requirements and will need test ports installed as part of initial construction.

**24. Condition 22 (now 23)** requiring the company to have an Operation and Maintenance manual and to have a Start-Up, Shutdown, and Malfunction Procedures manual has been simplified by removal of extraneous text.

### **EPA Comments on the Draft Revision 4**

EPA reviewed the proposed revisions and requested additional support for specific monitoring requirements contained in the approval.

**25.** EPA commented that Finding 20 needs to be revised to reflect that the CO BACT limit applicable to the combustion turbines should be 2.0 ppmvd based on a 1-hour average, and that 40 CFR Subpart Da for an affected facility that commenced construction, reconstruction, or modification after February 28, 2005, but before May 4, 2011, is applicable to both Heat Recovery Generators systems used with duct burners.

### **Response**

Ecology/EFSEC proposes to add these findings to Finding 20. In addition, Approval Condition 5.2.1 was revised to reflect the 2.0 ppmvd CO limit.

The CO limit was revised from 3.0 to 2.0 ppm to comply with the Region 10 Administrative Order on Consent, CAA-10-2001-0097, dated March 2001 (see page 8, paragraphs 11 and 13 as excerpted below). The Order requires that this facility comply with a CO limit of 2.0 ppm, 1-

hour average prior to commencing commercial operation. Existing emissions data (performance tests and CEMS data) from this facility appears to show that the existing turbines and duct burners operating with an oxidation catalyst are achieving emission levels of 0.1 to 0.3 ppm on an hourly basis. Paragraph 11 of the proposed permit: *"In its PSD permit application, Duke Energy and Energy Northwest shall request that the carbon monoxide emission from each CTG/HRSG of the Satsop CT Project not exceed 2.0 ppm<sub>dv</sub> corrected to 15% O<sub>2</sub> calculated on an hourly average."*; and Paragraph 13 of the proposed permit: *"Duke Energy and Energy Northwest shall not commence commercial operation of the Satsop CT Project until it receives a new PSD permit at least as protective as the conditions in paragraphs 7-12."* The BACT cost analysis was not updated.

40 CFR Subpart GG applies to the turbine engine (compressor, combustor, and turbine sections). The duct burners are subject to 40 CFR Subpart Da for an affected facility that commenced construction, reconstruction, or modification after February 28, 2005, but before May 4, 2011, because Grays Harbor Energy (owner) did not undertake and complete a continuous program of construction of the HRSGs and duct burners until on or about February 2007.

**26. EPA commented that Approval Condition 6, Monitoring Requirements** for the auxiliary boiler do not seem to provide a means to assure continuous compliance with the daily emission limitation and BACT.

### Response

Ecology/EFSEC proposes to use periodic stack testing using EPA reference method testing to determine and assure compliance with these emission limitations. This level of monitoring is commensurate with the scale of the emissions from the unit. In the permit writer's experience, small boilers of this size do not exhibit a great deal of variability in operating characteristics or emissions. As limited in Condition 10, the emissions from the auxiliary boiler are small. On its own, this boiler would not be subject to state NSR because the emissions are below the de minimis emission rates in state rule.

The various periodic stack testing conditions for the auxiliary boiler are amended to add "every five years or as requested by EFSEC."

**27. EPA commented on Approval Condition 9.1.3.2**, relating to determining compliance with the cooling tower emission limitation.

### Response

There is no Condition 9.1.3.2 in the proposed revision to the permit. This condition in Amendment 3 was replaced by amended Condition 9.1.4, which requires a monthly calculation of emissions based on the formula contained in the condition. Cooling tower total dissolved solids concentration and recirculating water flow rate are the primary factors affecting PM emissions from the cooling tower.

**28. EPA commented on Approval Condition 23.1 (22.1 in Revision 3) concerning the requirement for an Operation and Maintenance manual and a Start-up, Shutdown, and Malfunction Procedures manual.**

**Response**

The permit continues to require Grays Harbor Energy to have these documents. The revision deletes a listing of example considerations to include in the manuals. The revision continues to require manuals to be maintained at the plant site and be subject to EFSEC review on request. If excess emissions occur (as required to be reported by Approval Condition 22 in the proposed revised permit), a determination of whether the procedures in these manuals was followed is part of the process to determine whether a violation subject to enforcement occurred.

**29. EPA provided a letter from Donald Dossett dated June 28, 2016, regarding NSPS applicability.**

**Response**

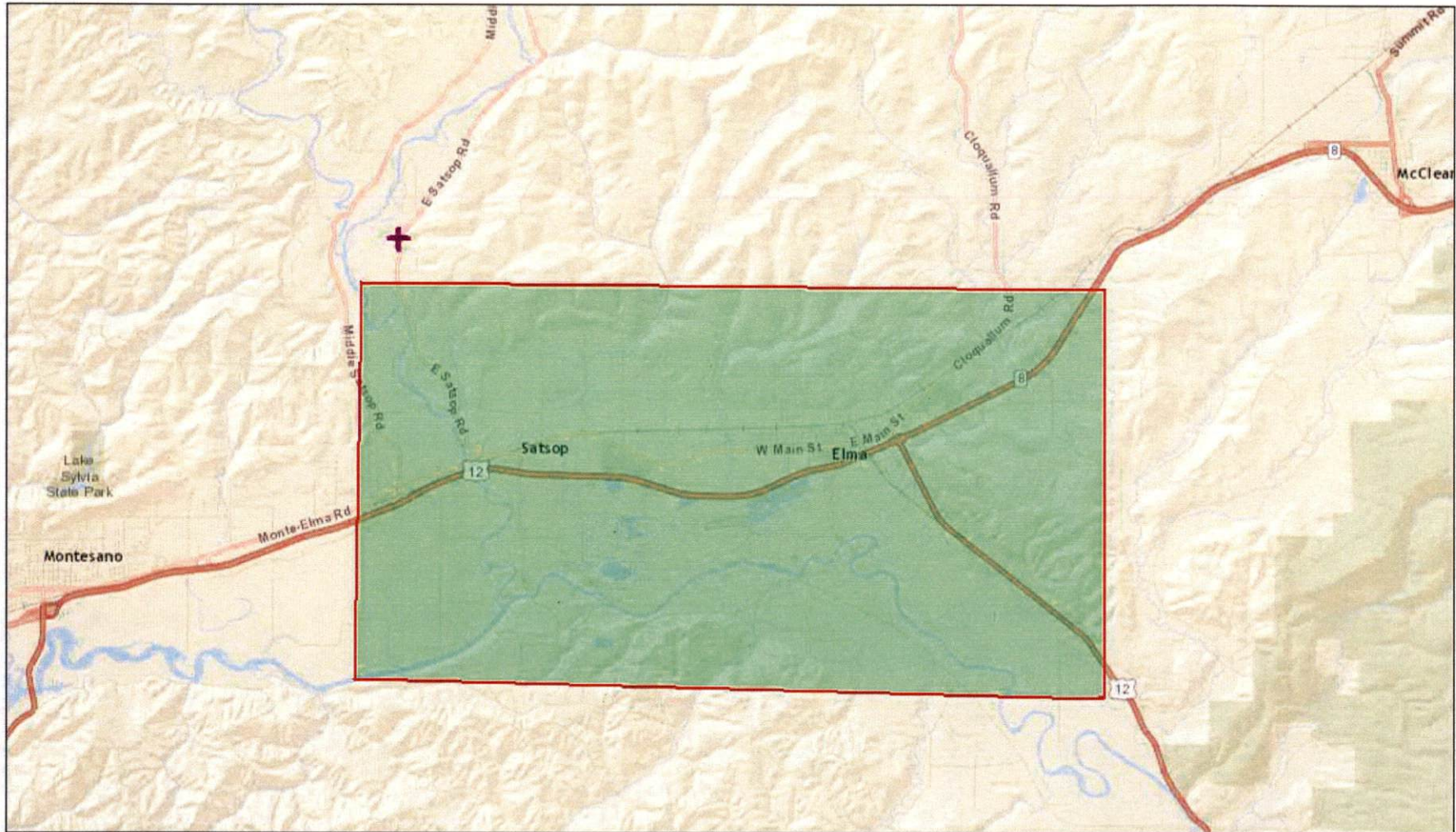
Section 13 of the Finding section includes the NSPS applicability for the various equipment.

**Changes from Permit Writer (Ecology)**

**30. Environmental Justice**

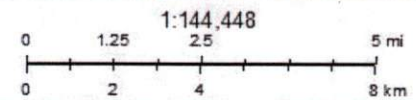
Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EFSEC conducts EJ review to ensure no group of people bears a disproportionate share of the negative environmental consequences as the result of the permitting action.

The initial step in this review is to identify any affected populations or communities of concern. EFSEC used EPA's environmental justice screening and mapping tool EJSCREEN. The area of the map shown below, which includes a total of 42 square miles (Elma/Satsop Area) was selected for the analysis.



July 27, 2017

- Digitized Polygon
- Digitized Point



Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community

The EJSCREEN American Community Survey (ACS) report estimates that approximately 12 percent of the population in the area consists of minorities, with approximately two percent of the total population speaking English “less than well.” A copy of the ACS report with more detailed information will be filed as part of the supporting documentation for the project.

The NAAQS analysis indicates that the project is protective of the community as a whole and no other review is needed. It also appears that a majority of the population in the selected area can understand and speak English proficiently. EFSEC is not expecting any communication barrier to posting notice on the legal page of the predominant newspaper in the Elma area. EFSEC also determines that an enhanced outreach effort is not needed due to the nature and scope of this project.

31. This permit amendment modifies a PSD permit originally issued before various newer NAAQS were established and appropriate Significance Impact Levels (SIL). This permit amendment does not increase emissions, therefore, a new BACT and ambient analysis is not required. The NAAQS that apply are the NAAQS that were in effect on original permit date of November 2, 2001.
32. On June 29, 2017, EFSEC was given full delegation of the PSD program by EPA. Therefore, at this time, EPA is not required to cosign the PSD permit. The language in the draft permit was modified to address this change.

### **33. STATE ENVIRONMENTAL POLICY ACT**

Under Washington State rules, a final PSD permit shall not be issued for a project until the applicant has demonstrated that State Environmental Policy Act (SEPA) review has been completed for the project. Energy Facility Site Evaluation Council (EFSEC) is the lead agency for SEPA for this project. EFSEC issued a SEPA Determination on April 6, 2001, to amend the existing National Environmental Policy Act (NEPA) Environmental impact statement (EIS) for this project. The scope of the project is the same as in April of 2001, and this amendment does not increase emissions. Therefore, no additional action is required. EFSEC concludes that the applicant has adequately demonstrated compliance with SEPA requirements.

34. **Americans with Disabilities Act (ADA)** – To request ADA accommodation or materials in a format for the visually impaired, call Mike Mills at (360) 407-6800 (Voice), or (TTD) (360) 956-2218.

### **35. PUBLIC INVOLVEMENT**

This PSD permitting action is subject to a minimum 30-day public comment period under WAC 173-400-740. A newspaper public notice announcing the public comment period was published in the Montesano Vidette on (TBD). In accordance with WAC 173-400-740(2)(a), application materials, and other related information were made available for public inspection at two locations:



EFSEC

1300 S. Evergreen Park Dr. S.W.  
P.O. Box 43172  
Olympia, WA 98504-3172

W.H. Able Memorial Library  
125 S. Main St.  
Montesano, WA 98563

The permit documents were posted on EFSEC's website: [www.efsec.wa.gov](http://www.efsec.wa.gov)

A public meeting and hearing on the proposed PSD permit is yet to be determined. The public comment period is May 15, 2018 to June 13, 2018..

### **36. AGENCY CONTACT**

Sonia E. Bumpus  
Energy Facility Siting Specialist  
Energy Facility Site Evaluation Council  
Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250  
sonia.bumpus@utc.wa.gov  
360-664-1363

**ENERGY FACILITY SITE EVALUATION COUNCIL  
P.O. BOX 43172  
OLYMPIA, WASHINGTON 98504-3172**

<b>IN THE MATTER OF:</b>		<b>NO. EFSEC/2001-01, AMENDMENT 4</b>
<b>Grays Harbor Energy Center</b>		<b>PROPOSED</b>
<b>Grays Harbor Energy, LLC</b>		<b>APPROVAL OF THE PREVENTION</b>
<b>Electrical Generating Facility</b>		<b>OF SIGNIFICANT DETERIORATION</b>
<b>Elma, Washington</b>		<b>(PSD) AND NOTICE OF CONSTRUCTION</b>

This amendment supersedes air quality PSD and NOC approval EFSEC 2001-01, Amendment 3 dated April 3, 2006. Pursuant to the Energy Facility Site Evaluation Council (EFSEC) Permit Regulations for Air Pollution Sources, Chapter 463-78 Washington Administrative Code (WAC), regulation for air permit applications WAC 463-60-536, the Washington Department of Ecology (Ecology) regulations for new source review WAC 173-400-110 and Chapter 173-460 WAC; and based upon the Notices of Construction Application (NOC), submitted by Duke Energy Grays Harbor, LLC., and Energy Northwest; the Administrative Order on Consent, Docket No. CAA-10-2001-0097, between the Satsop Combustion Turbine (Satsop CT) Project and the U.S. Environmental Protection Agency, Region 10, dated March 30, 2001; the request for second extension submitted by Grays Harbor Energy LLC, dated August 31, 2005; the request for modifications to Amendment 3 from Grays Harbor Energy LLC, dated August 7, 2009, amended Dec. 30 2010, and March 25, 2010, and the technical analysis performed by Ecology for EFSEC, EFSEC now finds the following:

**FINDINGS**

1. Duke Energy Grays Harbor, LLC, and Energy Northwest (jointly "Duke Energy") applied to construct the Satsop Combustion Turbine Project located near Elma, Washington. EFSEC previously approved the construction of this project (a.k.a. Satsop Phase I), which is designed to produce a maximum of 650 megawatt (MW) of electrical power. This project received final approval on November 2, 2001 (No. EFSEC/2001-01).
2. Amendment 1 was approved on January 2, 2003. Amendment 1 modified the operating requirements and emission limitations in the original approval, added equipment as part of the project, and removed certain operational restrictions.
3. Amendment 2 was approved on October 19, 2004. Amendment 2 authorized a delay in continuous construction to not later than January 20, 2006, and modified the monitoring requirements and BACT emission limitations based on recently available information. Amendment 2 did not change or add any emission units that were either proposed for installation or already installed at the facility. In approving Amendment 2, EFSEC concluded that:

- 3.1. The request for the second amendment was timely and complete (April 10, 2004).
- 3.2. Best Available Control Technologies (BACT) for all anticipated pollutants had not changed from the amendment 1 permit determination.
- 3.3. Interim source growth did not affect conclusions from the original permit analysis regarding air quality impact of this project.
4. On February 23, 2005, EFSEC approved transfer of ownership of the Satsop CT Project from Duke Energy and Energy Northwest to Grays Harbor Energy, LLC.
5. On August 31, 2005, Grays Harbor Energy, LLC requested a third amendment. Amendment 3 authorized a second delay in continuous construction to not later than July 20, 2007, and makes several administrative corrections to errors in Amendment 2. After January 20, 2006, the sum of all delays in continuous construction may not exceed 18 months.
6. On August 7, 2009, Grays Harbor Energy, LLC requested a fourth amendment to the approval. Amendment 4 established emissions limits during start-up and shutdown and rectifies issues with the approval identified in both the development of the Air Operating Permit for the facility and as a result of the first year of operation of the facility.
7. The total project is proposed to consist of the following major components which is consistent with the original permit and amendments 1 through 3 unless noted:
  - Two General Electric combustion gas turbines (GE 7FA); each turbine having a maximum rating of 1,671 million British thermal units per hour (MMBtu/hr), and each turbine will have a supplementary duct burner with a maximum rating of 505 MMBtu/hr.
  - Two heat recovery steam generators (HRSG).
  - One steam turbine generator (STG) rated at 300 MW.
  - One auxiliary boiler rated at 29.3 MMBtu/hr.
  - One cooling tower system.
  - One emergency backup diesel generator (Manufactured in 2002, 400 KW).
  - One diesel engine-driven fire water pump (Manufactured on 10/25/2001, 300 BHP).

Each gas turbine/duct burner/HRSG unit is defined as a combined cycle gas turbine (CGT). Each CGT has its own exhaust stack. These components are configured in a "power island" comprised of CGT 1 and CGT 2 and sharing one common steam turbine. Each CGT can operate independently with the steam turbine.

8. The project is subject to permitting requirements under WAC 173-400-700 as a fossil fuel fired steam electric generator, one of 28 listed industries that becomes a "major source," when

emitting more than 100 tons per year (tpy) of any regulated pollutant. The Grays Harbor Energy Center CT Project has the potential to emit PSD significant quantities of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>), particulate matter (PM), particulate matter less than 10 micrometers (PM<sub>10</sub>), and volatile organic compounds (VOCs).

9. The project is subject to permitting under the requirements of WAC 463-78-005(1) and 005(4) (adopting by reference Chapters 173-400 and 173-460 WAC, respectively) for ammonia (NH<sub>3</sub>). Emissions of NO<sub>x</sub> are reduced by the addition of NH<sub>3</sub>. NH<sub>3</sub> emissions are limited in the permit to protect the NO<sub>x</sub> catalyst and minimize NH<sub>3</sub> emissions (air toxic and visibility regulations).
10. The combustion turbines, duct burners, and auxiliary boilers will only use natural gas. The fuel for the diesel engines powering the emergency generator and emergency fire water pump is to be on-road specification diesel fuel.
11. The site is within an area that is in attainment with all National Ambient Air Quality Standards (NAAQS) and state air quality standards. The site is approximately 60 kilometers from the nearest Class I area, Olympic National Park.
12. The project is subject to new source review requirements under Chapter 463-78 WAC, which adopts by reference Chapter 173-400 WAC and Chapter 173-460 WAC. The facility is also subject to emission limitation, monitoring and reporting requirements in 40 CFR 60 Subpart Da (applicable to the duct burners), Dc (applicable to the auxiliary boiler), and Gg (applicable to the combustion turbines). Chapter 173-400 WAC, 40 CFR 60 Appendices A, B, and F, 40 CFR 75; and gas fuel monitoring requirements under 40 CFR Part 75 Appendix D are applicable to both the turbines and associated HRSGs.
13. BACT as required under WAC 173-400-113(2), and toxic best available control technology (T-BACT) as required under WAC 173-460-040(4), will be used for the control of all air pollutants which will be emitted by the proposed project. The following table lists the plant-wide allowable emissions and BACT control technologies based on Amendment 4 requirements.

Pollutant	Plant-Wide Potential to Emit, tpy	Best Available Control Technology			
		CGTs	Auxiliary Boiler	Diesel-Fired Emergency Equipment	Cooling Tower
NO <sub>x</sub>	246.5	Selective Catalytic Reduction plus low NO <sub>x</sub> burners (Turbine & HSRG)	Flue gas recirculation and low NO <sub>x</sub> burners	Limited to emergency uses as defined by 40 CFR 63 Subpart ZZZZ	Not applicable
CO	146.1	Good combustion practice	Good combustion practice		Not applicable
SO <sub>2</sub>	29.2*	Natural gas fuel		Use only on-road specification diesel oil	Not applicable
H <sub>2</sub> SO <sub>4</sub>	19.0	Natural gas fuel			Not applicable

Pollutant	Plant-Wide Potential to Emit, tpy	Best Available Control Technology			
		CGTs	Auxiliary Boiler	Diesel-Fired Emergency Equipment	Cooling Tower
VOCs	74.6	Natural gas fuel and good combustion practice		Limited to emergency uses as defined by 40 CFR 63 Subpart ZZZZ	Not applicable
PM and PM <sub>10</sub>	203	Natural gas fuel and good combustion practice			Drift eliminator with less than 0.001% loss of the recirculating water
NH <sub>3</sub>	141	5 ppm ammonia slip limitation	Not applicable		

\* Based on an annual average natural gas total sulfur content of 0.5 grains/100 scf.

14. Allowable emissions, from the new emissions units, will not cause or contribute to air pollution in violation of:

- 14.1. Any state or national ambient air quality standard.
- 14.2. Any applicable PSD increment.

The following table indicates the maximum Class I and Class II increment consumed by this project:

Pollutant		Maximum Ambient Class II Area Impact Concentration (µg/m <sup>3</sup> )	Class II Area Allowable Increment (µg/m <sup>3</sup> )	Maximum Ambient Class I Area Impact Concentration (µg/m <sup>3</sup> )	Class I Area Allowable Increment (µg/m <sup>3</sup> )
PM <sub>10</sub> *	24-hr	4.86	17	0.23	8
	Annual	0.91	30	0.01	4
Nitrogen dioxide (NO <sub>2</sub> )*	Annual	0.898	25	0.008	2.5
SO <sub>2</sub>	3-hr	13.54	20	0.26	25
	24-hr	3.5	91	0.032	5
	Annual	0.29	512	0.001	2

\* Evaluated at a higher emission rate than proposed to be permitted. See attached Fact Sheet for the Nov. 2001 approval and application materials for details.

- 14.3. Ammonia is the significant toxic air pollutant emitted by this facility. The emissions of ammonia and all other toxic air pollutants from this facility will not exceed an acceptable source impact level established under WAC 173-460-150 and 160 (effective Feb. 14, 1994).
15. Ambient Impact Analysis indicates that there will be no significant impacts resulting from pollutant deposition on soils and vegetation in either of the closest Class I areas, Olympic and Mt. Rainier National Parks. The permitted turbine project will have deposition levels significantly below the National Park Service's level of concern.
16. Ambient air quality analysis indicates that there will be no adverse impacts resulting from pollutant deposition in the Class II areas surrounding the project site.
17. Ambient Impact Analysis indicates that degradation of regional visibility or vistas from Olympic National Park due to the Grays Harbor Energy Center project is acceptable to the National Park Service based on an emission limitation of 2.0 ppm NO<sub>x</sub>, 24-hr average on the CGTs.
18. No significant effect on industrial, commercial, or residential growth in the Elma area is anticipated due to the project.
19. As reflected in the Third Amendment Order, for the third amendment, EFSEC concluded that:
  - 19.1. The request for the third amendment was timely and complete (September 30, 2005).
  - 19.2. BACT:
    - 19.2.1. Based on comparable permit actions since 2002, EFSEC concluded that BACT for VOC emissions from the auxiliary boiler using good combustion practice was 0.0055 lb/MMBtu (one-hour average). This determination is not changed in Amendment 4.
    - 19.2.2. For all other anticipated pollutants from the gas combustion turbines, heat recovery steam generators, auxiliary boiler, and cooling tower system BACT was the same as determined in Amendment 2. This determination is not changed in Amendment 4.
  - 19.3. Interim source growth did not affect conclusions from the original permit analysis regarding air quality impact of this project.
20. For the fourth amendment, EFSEC concludes that:
  - 20.1. The request was deemed administratively complete on April 1, 2010.

- 20.2. No requested change results in an increase in an annual emission rate.
  - 20.3. The sulfur monitoring is adjusted to match actual operating conditions and availability of fuel supplier information. The ability to determine compliance is not affected by the changes.
  - 20.4. The allowable time for combustion turbine cold start-up is lengthened from four hours per turbine to 300 minutes per turbine in response to actual meteorological conditions at the Grays Harbor Energy Center site compared to the design meteorological conditions used by the prior owner/permittee, and in response to a review of the start-up procedures provided by the turbine manufacturer in its operation and maintenance manual. The climate for the site is colder than anticipated by the design conditions, so the turbines require a longer time to start up the gas and steam turbines compared to the design temperature. Both the actual start-up conditions and actual site design characteristics that affect start-up were unavailable during initial permitting.
  - 20.5. For the CGTs, a Carbon monoxide BACT limit of 3.0 ppmdv @15% O<sub>2</sub>, on a 1-hour average was established in the original PSD permit based on the application of good combustion practice. The CO limit applicable to the CGTs was revised to 2.0 ppmdv @15% O<sub>2</sub>, on a 1-hour average to comply with EPA Region 10 Administrative Order on Consent, No.-CAA-10-2001-0097, dated March 2001.
  - 20.6. EFSEC and Grays Harbor Energy agree that the CGTs are subject to emission limitation, monitoring and reporting requirements in 40 CFR 60 Subpart GG.
  - 20.7. The requirement to comply with normal operation emissions limits during start-up and shutdown for NO<sub>x</sub> CO and VOC is replaced with added start-up and shutdown emissions limits. Cold, warm, and hot start-ups and shutdown are defined.
  - 20.8. For the emergency backup diesel generator and diesel engine-driven fire water pump, BACT constitutes the use of on-road diesel as 500 ppm sulfur defined in the Federal Code of Regulations (2007 to 2014) and limitation contained in 40 CFR 63, subpart ZZZZ.
21. EFSEC finds that all requirements for new source review (NSR) and PSD are satisfied and that as approved below, the emissions units comply with all applicable federal new source performance standards. Approval of the PSD and NOC application is granted subject to the following conditions:

## APPROVAL CONDITIONS

1. This amendment supersedes air quality PSD approval EFSEC 2001-01, Amendment 3 dated April 3, 2006.
2. The CGTs (each consisting of a GE 7FA combustion turbine and its associated duct burner and HRSG) and auxiliary boiler are limited to the use of natural gas.
3. The diesel emergency generator shall:
  - 3.1. Use only on-road specification diesel oil with 500 ppm or less sulfur content.
  - 3.2. Not exceed 500 hours per any 12 consecutive months of operating time.
4. The emergency fire water pump engine shall use only on-road specification diesel oil with 500 ppm or less sulfur content.
5. Emissions from CGT1 or CGT2 exhaust stack shall not exceed the following, except during start-up and shutdown (CGT over-speed protection testing), when they must meet the requirements in Condition 11:
  - 5.1. Nitrogen oxide (NO<sub>x</sub>) emissions:
    - 5.1.1. 21.7 pounds/hour (lb/hr), 1-hour (1-hr) average.
    - 5.1.2. 17.4 lb/hr, 24-hr rolling average.
    - 5.1.3. 2.5 parts per million by volume, dry (ppm), 1-hr average, corrected to 15% oxygen (O<sub>2</sub>).
    - 5.1.4. 2.0 ppm, 24-hr rolling average, corrected to 15% O<sub>2</sub>.
    - 5.1.5. Initial compliance with the limits in Conditions 5.1.1 and 5.1.3 shall be determined in accordance with 40 CFR Subpart GG and EPA Reference Method 20, except that the instrument span shall be set between zero and 25 ppm.
    - 5.1.6. Ongoing compliance with all limits in Condition 5.1 shall be indicated by continuous emission monitors for NO<sub>x</sub> and O<sub>2</sub>. The continuous emission monitoring system (CEMS) and flow measurement to determine lb/hr emissions shall meet the requirements of Approval Conditions 18.1 and 18.6.
  - 5.2. Carbon monoxide (CO) emissions:
    - 5.2.1. 2.0 ppm, corrected to 15% O<sub>2</sub>, 1-hr average.



5.2.2. 10.6 lb/hr, 1-hr average.

5.2.3. EPA Reference Method 10 shall determine initial compliance for each CGT, or an equivalent method agreed to in advance by EFSEC. The span and linearity calibration gas concentrations in Method 10 are to be modified as appropriate to the CO concentration limits specified in this condition.

5.2.4. Ongoing compliance shall be indicated through use of a continuous emission monitor meeting the requirements of Approval and flow measurement to determine lb/hr emissions shall meet the requirements of Approval Conditions 18.3 and 18.6.

5.3. Sulfur dioxide emissions:

5.3.1. 19.8 lb/hr, 1-hr average.

5.3.2. 3.3 lb/hr, rolling annual-average of emissions determined monthly when the CGTs operate.

5.3.3. Compliance with the limit in Condition 5.3.1 shall be determined based on stack testing using EPA Reference Method 6c, or an equivalent method approved in advance by EFSEC.

5.3.4. Compliance shall be determined for each CGT through stack testing once per calendar quarter for the first year of commercial operation, and thereafter at 5-year intervals.

5.3.5. Ongoing compliance with both limits in Condition 5.3 shall be determined monthly by calculating the hourly average SO<sub>2</sub> emission rates from each CGT in pounds per hour for all hours of operation during the previous month, and the average emission rate in lb/hr over the previous 12-consecutive month period.

5.3.6. The following emission rates shall be calculated based on the actual quantity of natural gas used by each CGT and sulfur content of natural gas consumed by each CGT:

5.3.6.1. SO<sub>2</sub> rates shall be determined per protocols and test methods described in Appendix D to 40 CFR Part 75, Optional SO<sub>2</sub> Emissions Data Protocol for Gas-Fired and Oil-Fired Units.

5.3.6.2. The quantity of SO<sub>2</sub> converted to H<sub>2</sub>SO<sub>4</sub> shall be subtracted from SO<sub>2</sub> emissions rates for compliance determination purposes. The quantity of SO<sub>2</sub> converted to H<sub>2</sub>SO<sub>4</sub> shall be based on the unit specific conversion rate of potential SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub> determined per Condition 5.4.2 below.

- 5.3.6.3. The hourly rate of natural gas burned shall be continuously monitored per the methods in 40 CFR Part 75, Appendix D, Section 2.1.
  - 5.3.6.4. Sulfur content of natural gas shall be determined at least once per calendar month by sampling the natural gas burned and analyzing samples for total sulfur content per the method specified in 40 CFR Part 75, Appendix D for high variability, non-pipeline quality natural gas. Any other analysis method listed in 40 CFR Part 75, Appendix D may be used after the use is approved by EFSEC. Valid sulfur test results from the previous month, or an average of valid sulfur data approved by EFSEC may be used when monthly sampling and analysis of the natural gas is inconclusive or results in invalid data.
  - 5.3.7. Grays Harbor Energy, LLC shall record monthly and report to EFSEC on a quarterly basis the quantity and average sulfur content of the natural gas burned at the facility, and purchase records and vendor's reports of total sulfur content in the natural gas delivered.
- 5.4. Sulfuric acid mist emissions:
- 5.4.1. 2.17 lb H<sub>2</sub>SO<sub>4</sub>/hr, rolling annual average calculated monthly.
  - 5.4.2. Hourly H<sub>2</sub>SO<sub>4</sub> rates and the unit-specific ratios of H<sub>2</sub>SO<sub>4</sub> to SO<sub>2</sub> shall be determined for each CGT based on stack testing using EPA Reference Method 8, or an equivalent method approved by EFSEC. Stack testing shall be performed once per calendar quarter for the first year of commercial operation at each exhaust stack, and thereafter at 5-year intervals.
  - 5.4.3. Unit-specific ratios of H<sub>2</sub>SO<sub>4</sub> to SO<sub>2</sub> shall be used as conversion factors to apportion the calculated potential SO<sub>2</sub> emissions into sulfuric acid mist emissions and SO<sub>2</sub> emissions.
  - 5.4.4. Compliance with the limit in Condition 5.4.1 shall be determined monthly by calculating the average H<sub>2</sub>SO<sub>4</sub> emission rate over all hours of operation during the previous month and 12 consecutive month periods based on the quantity and sulfur content of natural gas used by each CGT per Condition 5.3.6 above.
- 5.5. Volatile organic compound (VOC) emissions:
- 5.5.1. 6.3 lb/hr, 1-hr average, reported as carbon equivalent.
  - 5.5.2. 2.8 ppm, 1-hr average, reported as carbon equivalent at 15% O<sub>2</sub>.
  - 5.5.3. Use of EPA Reference Method 19 and EPA Reference Method 25A, 25B, or South Coast Air Quality Management District Method 25.3, shall determine initial

compliance for each CGT or an equivalent method agreed to in advance by EFSEC. After the initial three years of tests on each CGT stack have been completed, each CGT stack shall be tested at 5-year intervals.

5.5.4. Ongoing compliance shall be monitored by calculating hourly VOC emissions rates using:

5.5.4.1. Hours of operation.

5.5.4.2. Fuel flow to each CGT.

5.5.4.3. Application of an emission factor for VOCs derived from the most recent stack testing of the installed CGT.

5.5.4.4. Emission testing of each CGT using one of the methods listed in Approval Condition 5.5.3 is required.

5.6. Particulate matter and particulate matter less than or equal to 10 micrometers (aerodynamic diameter) ( $PM_{10}$ ) emissions:

5.6.1. 22.6 lb/hr of filterable plus condensable  $PM_{10}$ .

5.6.2. Use of EPA Reference Method 19 and Methods 5, 201, or 201A, plus Reference Method 202, or an equivalent  $PM_{10}$  test method approved by EFSEC shall be used to determine initial compliance for each CGT exhaust stack with the limit in Condition 5.6.1. Use of EPA Reference Method 5 assumes all filterable particulate is  $PM_{10}$ . Use of EPA Reference Method 201 or 201A assumes that the mass of filterable PM is equal to the mass of filterable  $PM_{10}$ . If Method 201 or 201A is used, the mass of particulate retained in the cyclone shall be determined and reported.

5.6.3. The results of the filterable and condensable particulate analyses shall be reported as total particulate, filterable particulate, and condensable particulate.

5.6.4. After the initial three years of tests on each CGT stack have been completed, each CGT stack shall be tested at 5-year intervals.

5.7. Ammonia (free  $NH_3$  and combined measured as  $NH_3$ ) emissions:

5.7.1. 5.0 ppm, 24-hr average corrected to 15%  $O_2$ .

5.7.2. 16.1 lb/hr, 24-hr average.

5.7.3. Initial compliance for each CGT shall be indicated by Bay Area Air Quality Management District Source Test Procedure ST-1B, "Ammonia, Integrated

Sampling;" EPA Conditional Test Method 027; or an equivalent method approved in advance by EFSEC.

- 5.7.4. Compliance shall be determined through use of a CEMS, which meets the requirements of Approval Condition 18.2 or Grays Harbor Energy, LLC may propose alternative means for continuous assessment and reporting of NH<sub>3</sub> emissions for approval by EFSEC. Any proposed alternative NH<sub>3</sub> reporting shall be, at a minimum, equivalent to a CEMS meeting the requirements of Approval Condition 18.2 and 18.6.
- 5.7.5. The SCR catalyst system treating the exhaust from one CGT shall be repaired, replaced, or have additional catalyst bed installed at the next scheduled outage, following a calendar month when the average ammonia slip cannot be maintained at or below 4.5 ppm, corrected to 15% oxygen, based on the actual operating hours of the CGT. No month with less than 200 hours of actual operation (excluding start-up and shutdown hours) shall be used for this evaluation. The outage to repair, replace, or install additional catalyst to the SCR system shall be no later than 12 months after the month the ammonia slip exceeds the 4.5 ppm criteria given above in this condition.

5.8. Opacity at each CGT exhaust stack:

- 5.8.1. Is not allowed to exceed a 6-minute average opacity of five percent.
- 5.8.2. Shall be determined by use of EPA Reference Method 9 or an equivalent method approved in advanced by EFSEC.
- 5.8.3. Ongoing compliance with the opacity limit in Condition 5.8.1 shall be monitored once per day (or weekly if Condition 5.8.3.3 is satisfied) as follows:
  - 5.8.3.1. A certified opacity reader shall read and record the opacity of each operating unit during daylight hours per 5.8.3 frequency, or
  - 5.8.3.2. Opacity shall be monitored using a Continuous Opacity Monitoring system on each CGT as an alternative to EPA Reference Method 9 readings. If installed, the continuous opacity monitor must be installed in the exhaust stack at a location meeting the requirements of Approval Condition 18.4.
  - 5.8.3.3. If readings from daily monitoring are less than the opacity limit in Condition 5.8.1 for the last calendar month, the manual opacity monitoring frequency is reduced to weekly. Readings above the opacity limit in Condition 5.8.1 will require daily manual opacity readings for at least 30 days.

6. The auxiliary boiler exhaust stack emissions are not to exceed the following:

6.1. NO<sub>x</sub> emissions:

6.1.1. 1.03 lb/hr, 1-hr average.

6.1.2. 30 ppm at 3% O<sub>2</sub>, 1-hr average

6.1.3. Initial compliance shall be determined in accordance with 40 CFR 60, Appendix A, Reference Method 7E and Method 19.

6.1.4. Compliance shall be determined through periodic stack tests performed at 5-year intervals after the initial compliance test. Upon written request by EFSEC, GHE shall perform emissions testing using the method in Condition 6.1.3.

6.2. CO emissions:

6.2.1. 50.0 ppm, corrected to 3% O<sub>2</sub>, 1-hr average.

6.2.2. 1.07 lb/hr, 1-hr average.

6.2.3. EPA Reference Method 10 and Method 19 or an equivalent method agreed to in advance by the EFSEC shall determine initial compliance. The span and linearity calibration gas concentrations in Method 10 shall be appropriate to the CO concentration limits specified in this condition.

6.2.4. Compliance shall be determined through periodic stack tests performed at 5-year intervals after the initial compliance test. Upon written request by EFSEC, GHE shall perform emissions testing using the method in Condition 6.2.3.

6.3. SO<sub>2</sub> emissions:

6.3.1. 0.07 lb/hr annual average, calculated monthly.

6.3.2. One ppm at 3% O<sub>2</sub>, 1-hr average.

6.3.3. EPA Reference Method 8 shall determine initial compliance with the limit in Condition 6.3.2 for the auxiliary boiler, or an equivalent method approved in advance by EFSEC.

6.3.4. Ongoing compliance with the limit in Condition 6.3.1 shall be determined by mass-balance calculations utilizing the:

6.3.4.1. Monthly Fuel consumption records for the auxiliary boiler, and

6.3.4.2. Sulfur content of the natural gas per Condition 5.3.6.4.

6.4. VOC emissions:

6.4.1. 0.16 lb/hr, 1-hr average, reported as carbon equivalent.

6.4.2. EPA Reference Method 19 and Method 25A or 25B or an equivalent method agreed to in advance by EFSEC shall determine initial compliance for the auxiliary boiler.

6.4.3. Ongoing compliance shall be determined through periodic stack tests, using one of the above referenced methods, at 5-year intervals after the initial compliance test. Upon written request by EFSEC, GHE shall perform emissions testing using methods in Condition 6.4.2.

6.5. PM<sub>10</sub> emissions:

6.5.1. 0.292 lb/hr, hourly average.

6.5.2. 0.005 gr/dscf, 1-hr average, at 3% O<sub>2</sub>.

6.5.3. Initial compliance with the limits in Condition 6.5 for the auxiliary boiler exhaust stack shall be determined by EPA Reference Method 19, Method 202 and either Reference Method 5, 201, or 201A, or an equivalent method agreed to in advance by EFSEC. Use of EPA Reference Method 5 assumes all particulate has an aerodynamic diameter less than 10 microns. Use of EPA Reference Method 201 or 201A assumes that the mass of filterable PM is equal to the mass of filterable PM<sub>10</sub>.

6.5.4. The results of the filterable and condensable particulate analyses shall be reported as total particulate, filterable particulate, and condensable particulate.

6.5.5. Compliance shall be determined through periodic stack tests, using the above specified methods, taken at 5-year intervals after the initial compliance test. Upon written request by EFSEC, GHE shall perform emissions testing using the methods in Condition 6.5.3.

6.6. Opacity at the auxiliary boiler exhaust stack:

6.6.1. Is not allowed to exceed a 6-minute average opacity of five percent.

6.6.2. Shall be determined using EPA Reference Method 9 or an equivalent method approved in advance by EFSEC.

6.6.3. Ongoing compliance with the opacity limit in Condition 6.6.1 shall be monitored as follows:

6.6.3.1. An opacity reader shall survey the boiler stack daily to determine if any opacity is present. If opacity is not observed over the course of a week, the frequency for surveying the boiler stack may change to monthly. If the survey detects visible emissions, then the company must investigate the cause of the emissions and repair the problem or take EPA Method 9 observations for determining compliance.

7. The diesel generator engine shall meet the following requirements:

7.1. The engine shall comply with the requirements in 40 CFR Part 63, Subpart ZZZZ.

7.1.1. The facility shall maintain engine operation and maintenance records verifying the engine has been operated, maintained, and repaired in a manner consistent with the manufacturer's emission-related specifications. A copy of the manufacturer's recommendations for maintaining the engine shall be kept on-site and made available upon request.

7.2. The engine shall be operated only during routine maintenance, testing, and periods when electricity is not available from the power grid. Maintenance and testing shall not exceed 50 hours per any 12 consecutive month period.

7.3. The engine shall burn only diesel fuel, biodiesel, or a mixture of both. In any case, the fuel used shall have a maximum sulfur content that does not exceed 500 ppm by weight. A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.

7.4. The engine shall be equipped with an operable, non-resetting hour meter.

7.5. Visible emissions from the engine shall not exceed an average of ten percent (10%) opacity during any 6-minute period except cold start-up, as determined in accordance with EPA Method 9 (Title 40 CFR, Part 60, Appendix A Method 9). Unless defined by the engine manufacturer, "cold start" as used in this condition shall be defined as the period beginning when the engine is started and ending when the temperature of the engine coolant reaches 150°F.

7.5.1. Initial compliance with the limit in Condition 7.5 shall be determined based on EPA Method 9 readings.

7.5.2. Weekly a qualified opacity reader shall survey and record if opacity is present from the engine whenever the engine is operated for testing and after the engine achieves normal operating temperature. If opacity is observed then Method 9 readings shall be performed during the next time the engine is started. The Survey frequency can be reduced to monthly once four readings without opacity are observed.

- 7.6. Visible emissions of ten percent (10%) opacity or more shall trigger prompt (within a week) action to initiate maintenance and/or repair the engine and eliminate opacity exceeding this standard. Maintenance and repair actions shall be documented and available for inspection.
8. The emergency fire water pump engine:
  - 8.1. The engine must comply with requirements in 40 CFR 63 Subpart ZZZZ.
    - 8.1.1. The facility shall maintain engine operation and maintenance records verifying the engine has been operated, maintained, and repaired in a manner consistent with the manufacturer's emission-related specifications. A copy of the manufacturer's recommendations for maintaining the engine shall be kept on-site and made available upon request.
  - 8.2. The engine shall be operated only during routine maintenance, testing, and periods when electricity is not available from the power grid. Maintenance and testing shall not exceed 50 hours per any 12 consecutive month period.
  - 8.3. The engine shall burn only diesel fuel, biodiesel, or a mixture of both. In any case, the fuel used shall have a maximum sulfur content that does not exceed 500 ppm by weight. A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.
  - 8.4. The engine shall be equipped with an operable, non-resetting hour meter.
9. The emissions from the cooling tower are not to exceed:
  - 9.1. 24.5 lb/day PM<sub>10</sub>, annual average.
  - 9.2. 4.5 tpy PM<sub>10</sub>, rolling total, calculated monthly.
  - 9.3. Initial compliance shall be determined by:
    - 9.3.1. An affirmative report by the cooling tower drift eliminator manufacturer, based on an on-site inspection of the completed installation, that its product has been installed in accordance with its specifications accompanied by the results of a test or analysis of the cooling tower drift eliminator material indicating that the material has a drift loss of less than 0.001% of the recirculating water flow rate. The required test could be performed on a full size mist eliminator module under laboratory conditions that match the worst case operations scenario of the actual cooling tower.
  - 9.4. Compliance is determined by using the following formula:

$$Q \times C \times DL \times 60 \times 8.34 / 1000000 = D$$



Where: Q = Monthly average recirculation rate in gallons per minute  
 C = Monthly average total dissolved solids concentration in parts per million by weight (ppmw)  
 D = PM<sub>10</sub> emission rate in lb/hr.  
 DL = the drift loss rate in gallon lost/gallon of recirculating cooling water

- 9.5. Calculate the PM<sub>10</sub> emissions from the cooling tower once each month. The monthly calculations shall use the formula in Condition 9.4 above. The monthly average recirculating water flow rate for each month shall be used for “Q” in the formula. The monthly average recirculating water flow rate should be at or below the design recirculating water flow rate of 175,000 gpm. The monthly average total dissolved solids content measured or calculated during the month shall be used for “C” in the formula.
- 9.6. Prior to operation of the cooling tower, Grays Harbor Energy, LLC shall submit to EFSEC, a report describing the manufacturer’s recommendations for installing, operating, and testing the drift eliminators.

10. Annual Emissions.

- 10.1. Annual emissions, calculated as a rolling 12-month average, shall not exceed the limits in the following table. These limits apply to total emissions over each 12 consecutive month period and include emissions from all units during start-up, shutdown and periods of malfunction.

Pollutant	CGT 1 and 2 Individually tpy	Auxiliary Boiler tpy	Cooling Tower tpy
NO <sub>x</sub>	121.7*	1.3	---
CO	71.6*	1.3	---
SO <sub>2</sub>	14.5	0.088	---
H <sub>2</sub> SO <sub>4</sub>	9.5	---	---
PM/PM <sub>10</sub>	99.0†	0.4	4.5
VOC	37.5*	0.6	---
NH <sub>3</sub>	70.5	---	---
* Includes the emissions from start-up and shutdown events of the CGTs and diesel generators. CGT start-up emissions are equally apportioned between the two turbines. † PM and PM <sub>10</sub> conservatively assumed to be equal.			

- 10.2. Rolling 12-month total emissions shall be calculated monthly based on the total monthly emissions from each permitted unit summed for the preceding 12 months. The actual emissions shall be based on CEMS, where installed, mass balance and

emission factor calculations for SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub>, and emission factors for other pollutants and emission units where CEMs are not installed.

11. Start-up and shutdown of CGTs 1 and 2 (including CGT over-speed protection testing).

11.1. Each CGT is limited to two start-ups per calendar day. This limitation does not apply during the period between initial firing of a combustion turbine for testing purposes and the start-up condition specified in Approval Condition 13.

11.2. A start-up begins when fuel is first fired in the combustion turbine, and ends when the earlier of one of these events occurs:

11.2.1. The operating temperatures of the oxidation and SCR catalysts serving an operating CGT reach 500°F and 525°F, respectively and when the associated combustion turbine achieves operational Mode 6, or

11.2.2. One of the following time limits has been reached, as applicable:

11.2.2.1. Three hundred minutes have elapsed since fuel was first introduced to the applicable turbine on a cold start-up. A cold start-up is any start-up occurring after the applicable turbine has not operated for 48 hours or more.

11.2.2.2. One hundred eighty minutes have elapsed since fuel was first introduced to the applicable turbine on a warm start-up. A warm start-up is any start-up occurring after the applicable turbine has not operated between 8 and 48 hours.

11.2.2.3. One hundred twenty minutes have elapsed since fuel was first introduced to the applicable turbine on a hot start-up. A hot start-up is any start-up occurring after the applicable turbine has not operated for 8 hours or less.

11.2.2.4. Once per year it is estimated that each CGT will need to be tested to confirm that the over-speed protection is functioning properly (less than 90 minutes). Each test will account for one start-up.

11.3. The Shutdown is defined as the period beginning when the combustion turbine leaves operational Mode 6 and ends when fuel is no longer being introduced to any burner. The turbine manufacturer defines operational Mode 6 as the low emission mode during which all six of the burner nozzles are burning a lean premixed gas steady-state operation. Duration of a planned shutdown period shall not exceed 30 minutes per occurrence.

11.4. During start-up, ammonia injection shall begin no later than when the SCR reaches an operating temperature of 525°F.

- 11.5. During a start-up and associated shutdown of a CGT, the combined emissions shall not exceed the following:

<b>Pollutant</b>	<b>Emission Limit Per Turbine Per Start-Up/Shutdown</b>
NO <sub>x</sub>	900 lb
CO	500 lb
VOCs	600 lb

- 11.5.1. Ongoing compliance with the NO<sub>x</sub> limits in Condition 11.5 shall be indicated by continuous emission monitors for NO<sub>x</sub> and O<sub>2</sub>. The continuous emission monitoring system (CEMS) and flow measurement to determine NO<sub>x</sub> lb/hr emissions shall meet the requirements of Approval Conditions 18.1 and 18.6.
- 11.5.2. Ongoing compliance with the CO limits in condition 11.5 shall be indicated by continuous emission monitor for CO and O<sub>2</sub>. The CEMS and flow measurement to determine CO lb/hr emissions shall meet the requirements of Approval Conditions 18.3 and 18.6.
- 11.6. To account for VOC emissions during start-up and shutdown when determining monthly or annual emissions, VOC emissions shall be calculated using a VOC emission factor of 177 lb/startup/shutdown/CGT. The emission factor accounts for combined VOC emissions during start-up and shutdown.
12. Within 180 days after formal, initial start-up of each combustion turbine, auxiliary boiler, and installation of the diesel generators, Grays Harbor Energy, LLC shall conduct the initial performance tests for NO<sub>x</sub>, ammonia, SO<sub>2</sub>, opacity, VOC, CO, PM<sub>10</sub>, and H<sub>2</sub>SO<sub>4</sub> noted above. An independent testing firm shall perform the initial performance testing. A test plan shall be submitted to EFSEC for approval at least 30 days prior to the testing.
13. The initial compliance testing, CEM system performance testing, and testing for other, non-acid rain program purposes must occur by the earlier of the following dates:
- 13.1. The earliest date that electrical power is offered for sale (not test generation) from a CGT and its associated steam turbine, or
- 13.2. One hundred eighty days after the first CGT in the power island has been synchronized to the electrical distribution grid.
14. Grays Harbor Energy, LLC shall notify EFSEC in writing at least 30 days prior to:
- 14.1. Initial start-up of any permitted emissions unit for operational testing and manufacturers certification purposes.

- 14.2. Formal, initial start-up defined in Approval Condition 13.
  - 14.3. The date any emissions testing required by this permit shall be performed when the time between tests is specified to be longer than 30 days.
  - 14.4. The date(s) CEMS performance testing or Relative Accuracy Test Audits will be performed.
15. Sampling ports and platforms shall be provided on each CGT stack, after the final pollution control device. The ports shall meet the requirements of 40 CFR, Part 60, Appendix A, Method 20. Upon request by EFSEC for emissions testing, sampling ports and platforms shall be installed on diesel engines as appropriate. Sampling ports and platforms shall meet the requirements of 40 CFR Part 60, Appendix A, Method 1.
16. Adequate permanent and safe access to the test ports shall be provided. Other arrangements may be acceptable if approved by EFSEC prior to installation.
17. Operating Records for Emissions Units:
- 17.1. Unless otherwise specified above, operating records shall contain information necessary to determine the operational status of the equipment.
  - 17.2. Specific parameters and acceptable ranges of those parameters shall be specified in the Operation and Maintenance Manual.
    - 17.2.1. Example operating record information includes, but is not limited to:
      - 17.2.1.1. Fuel heat and sulfur content.
      - 17.2.1.2. Fuel consumption during the period (hourly, monthly, etc.).
      - 17.2.1.3. Unit operating parameters:
        - 17.2.1.3.1. Exhaust temperature.
        - 17.2.1.3.2. Percent oxygen.
        - 17.2.1.3.3. Output rate (lb of steam/hr, kW output, etc.).
        - 17.2.1.3.4. Operating hours during the reporting period and cumulative for the year.
        - 17.2.1.3.5. For each combustion turbine, unit start-up and shutdown information.
          - 17.2.1.3.5.1. Start-up day and time.

17.2.1.3.5.2. Time Mode 6 attained.

17.2.1.3.5.3. Error codes during start-up and their effect on start-up.

17.2.1.3.5.4. Ammonia flow as registered on an ammonia flow meter.

17.2.1.3.6. For the auxiliary boiler, start-up and shutdown information.

17.2.1.3.6.1. Start-up day and time.

17.2.1.3.6.2. Shutdown day and time.

#### 18. Continuous Emission Monitoring Systems (CEMS):

- 18.1. CEMS for NO<sub>x</sub> and O<sub>2</sub> compliance shall meet the requirements contained in 40 CFR 75, Emissions Monitoring.
- 18.2. CEMS for ammonia shall meet the requirements contained in 40 CFR, Part 63, Appendix A, Reference Method 301, Validation Protocol, and 40 CFR, Part 60, Appendix F, Quality Assurance Procedures, or other EFSEC-approved performance specifications and quality assurance procedures.
- 18.3. CEMS for CO shall meet the requirements contained in 40 CFR, Part 60, Appendix B, Performance Specification 4 or 4A, and in 40 CFR, Part 60, Appendix F, Quality Assurance Procedures.
- 18.4. Continuous Opacity Monitoring Systems shall meet the requirements contained in 40 CFR Part 60, Appendix B, Performance Specification 1 and in 40 CFR, Part 60, Appendix F, Quality Assurance Procedures.
- 18.5. Continuous emission and opacity monitors must meet the requirements of 40 CFR 60.13, except that the term "applicable subpart" as used in 40 CFR 60.13 means this permit. Monitors shall be capable of determining emissions during start-up, shutdown, and periods of malfunction.
- 18.6. Stack flows for calculating mass emissions must be determined in accordance with the following. Natural gas combusted in the CGT's and boiler must be sampled and analyzed based on the sampling and analysis frequencies established in the requirements of Approval Condition 5.3.6.4 for composition using Universal Oil Products (UOP) Laboratory Test Method 539-97 "Gas Analysis by Gas Chromatography" or equivalent. The gas composition must be used to determine the heat content of the gas in terms of British thermal unit, high heat value, per standard cubic foot (Btu/scf) and to determine the EPA Method 19 Fd factor for the gas. An alternative method to EPA Method 19 can be used to determine the Fd factor if pre-approved by EFSEC.

19. Relative Accuracy Test Audits (RATA) for NO<sub>x</sub> and CO Continuous Emission Monitoring Systems:

- 19.1. RATA testing is to be performed at the calendar year/calendar quarter frequency required by the quality assurance procedures referenced in Condition 18, except as provided for in Conditions 19.2 and 19.3.
- 19.2. The testing shall be based on "QA operating quarters" as that term is defined in 40 CFR 72.2.
- 19.3. A RATA is to be performed for all pollutants measured by CEMs as required by 40 CFR Part 75, Appendix B, Section 2.3, including the minimum frequency of once every eight calendar quarters.
- 19.4. A test plan shall be prepared and submitted to EFSEC and Olympic Regional Clean Air Agency (ORCAA) for review at least 30 days prior to the RATA test. The test plan shall cover all pollutants required to be monitored during that RATA test. The test plan shall include the proposed dates of the testing. The permittee must revise the test plan to address comments provided by EFSEC or ORCAA.
- 19.5. A report of the results of the RATA and other emission testing shall be submitted to EFSEC and ORCAA within 45 days of completing the test.

20. CEMS and process data shall be submitted quarterly, in written form (or electronic if permitted by the EFSEC) within 30 days of the end of each calendar quarter to EFSEC and ORCAA.

21. The format of the reporting described in Approval Condition 20 shall match that required by EPA for demonstrating compliance with the Title IV Acid Rain program reporting requirements. Pollutants not covered by that format shall be reported in a format approved by EFSEC that shall include at least the following:

- 21.1. Process or control equipment operating parameters.
- 21.2. The hourly maximum and average concentration, in the units of the standards, for each pollutant monitored.
- 21.3. The duration and nature of any monitor downtime.
- 21.4. Results of any monitor audits or accuracy checks.
- 21.5. Results of any required stack tests.
- 21.6. Results of any other stack tests performed after the initial performance test.

- 21.7. The above data shall be retained at the Grays Harbor Energy Center for a period of at least five years.
22. For each occurrence of monitored emissions in excess of the limits in this permit, the quarterly emissions report (per Approval Conditions 20 and 21) shall include the following:
  - 22.1. For parameters subject to monitoring and reporting under the Title IV, Acid Rain program, the reporting requirements in that program shall govern excess emissions report content.
  - 22.2. For all other pollutants:
    - 22.2.1. The time of the occurrence.
    - 22.2.2. Magnitude of the emission or process parameters excess.
    - 22.2.3. The duration of the excess.
    - 22.2.4. The probable cause.
    - 22.2.5. Corrective actions taken or planned.
    - 22.2.6. Any other agency contacted.
23. Grays Harbor Energy, LLC shall have on-site, and shall follow, an Operating and Maintenance manual, and an equipment Start-up, Shutdown, and Malfunction Procedures manual for all equipment that has the potential to affect emissions to the atmosphere. Copies of the manuals shall be available to EFSEC or ORCAA at the facility. Emissions that result from a failure to follow the requirements of the manuals may be considered evidence that emission violations have occurred. The above manuals must be reviewed annually and updated as needed. EFSEC and ORCAA shall be notified whenever the manual is updated.
  - 23.1. The Operating and Maintenance manual should contain equipment-specific operating parameter and maintenance information.
  - 23.2. The Start-up, Shutdown, and the Malfunction manual shall contain information on the proper procedures, and sequencing of actions for plant operations staff to follow in order to safely, efficiently start and stop the various equipment at the station under all reasonably ascertainable normal and abnormal start-up and shutdown situations.
24. Any activity, which is undertaken by Grays Harbor Energy, LLC, or others, in a manner, which is inconsistent with the application and this determination, shall be subject to enforcement under applicable regulations. Specific elements in the application to be followed are the structure locations and sizes depicted on site plans, emitting and process equipment specifications, and

emitting equipment stack height and diameters used for demonstrating compliance with ambient air quality impacts.

25. Nothing in this determination shall be construed so as to relieve Grays Harbor Energy, LLC of its obligations under any state, local, or federal laws or regulations.
26. At all times, Grays Harbor Energy, LLC must maintain and operate the emission units covered by this permit, including all associated emission control equipment and work practices, in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operation and maintenance procedures are being used shall be based on information available to EFSEC or ORCAA. This information may include, but is not limited to, monitoring results, opacity observations, operating and maintenance procedures, all operation and maintenance records, and site inspections.
27. Access to the source by EFSEC or ORCAA, shall be permitted upon request for the purpose of compliance assurance inspections. Failure to allow access is grounds for action under the Washington Clean Air Act.

**Prepared by:**

\_\_\_\_\_  
Scott M. Inloes, P.E.  
Air Quality Program  
Washington Department of Ecology

\_\_\_\_\_  
Date

**Approved by:**

\_\_\_\_\_  
Kathleen Drew  
Energy Facility Site Evaluation Council

\_\_\_\_\_  
Date