

**From:** [Peggy Higham](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Wind Farm - Oppose-  
**Date:** Tuesday, March 30, 2021 12:04:26 PM

Informational Meeting Comment #IM0051  
Horse Heaven Wind Farm  
Docket #210011

### External Email

I am writing this to strongly oppose the proposed wind farms in Benton County.

I'm not really sure if these emails will actually be read, but just in case, I would like to give some support for my opinion.

The obvious 1<sup>st</sup> reaction is that the windmills destroy the landscape and the prospect of having nothing but windmills and red flashing lights across the panorama of Horse Heaven Hills is disturbing and sad. If that was the only reason it would probably be enough to make me oppose them but there is more than our scenery at risk here. In looking at the massive numbers of windmills that have been erected, not only in our area but throughout the country, I wonder how much this "Green Energy" has really cost us. Producing and transporting these massive towers requires more energy than they will conceivably produce in their lifetimes, the loss of farmland and the loss of wildlife and migratory and other birds is also a huge concern. Unfortunately, I have never been able to find out just how many of these have been killed, wounded or displaced by the windmill farms because they have been exempt from reporting it. A person can lose the ability to work his land, build on or improve his property because of a frog, bat or a bug, but, the windmill operators are free to destroy the habitat of many animals and the flight paths of migratory birds and butterflies without even keeping or reporting the actual effect on the environment. This so called "Green Energy" is destructive, offensive and inefficient except as a money maker for the owners. We have heard how many jobs it brings. With family in the Dayton area we saw how many jobs it brought to the area, there were many jobs during the construction phase. They were short term and done by workers from outside the area. After that there are no real, substantial jobs produced by the wind farms except a few maintenance workers. The gross loss of profit by the farm areas involved cannot be measured. The noise and vibrations caused by the massive towers has been reported to be extremely disturbing and sometimes damaging to the people who have to live near them and the loss of property value is great. If they were effective it would be one thing but having been in windmill farm areas many, many times I have seen that, more often than not, most of them are not even functioning. It is also my understanding that they require subsidies and additional energy to function at all so our power grid is depleted, and the energy produced is sent elsewhere so our cost goes up. This winter we also saw from the events in Texas how unreliable it is to depend upon them. We don't need them here, we produce enough energy. Let the money hungry companies who build these massive, ugly, noisy, killing machines and the people who want them put them into their own backyards instead of forcing them on communities who neither want, nor need them.

Thank you,

Peggy & Dale Higham  
Benton City, Washington

**From:** [jessica@referredrealestate.com](mailto:jessica@referredrealestate.com)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm  
**Date:** Tuesday, March 30, 2021 12:53:19 PM  
**Attachments:** [sigimg1](#)

Informational Meeting Comment #IM0052  
Horse Heaven Wind Farm  
Docket #210011

### External Email

I oppose the proposed Horse Heaven Wind Farm by SCE for the following reasons;

<!--[if !supportLists]-->1. <!--[endif]-->The height of the turbines- these seem to be some of the tallest in the country.  
<!--[if !supportLists]-->2. <!--[endif]-->The amount of turbines- space needle sized objects littering the skyline.  
<!--[if !supportLists]-->3. <!--[endif]-->The proximity of the turbines to a largely populated area 250,000 people and growing.  
<!--[if !supportLists]-->4. <!--[endif]-->The useful life is around 20 years. There is no good way to dispose of the blades, they are being buried now.  
<!--[if !supportLists]-->5. <!--[endif]-->The Horse Heaven Hills is a beautiful landscape. The backdrop of wineries and recreation.  
<!--[if !supportLists]-->6. <!--[endif]-->The Horse Heaven Hills has much wildlife to be protected.  
<!--[if !supportLists]-->7. <!--[endif]-->The energy generated will not benefit us locally. IN fact it is far more likely to cause our energy prices to go up.  
<!--[if !supportLists]-->8. <!--[endif]-->There is potential for much needed housing developments near parts of the proposed area. Our community is growing and must grow South.  
<!--[if !supportLists]-->9. <!--[endif]-->Real Estate values will absolutely decline as a result of the visual impact and the proximity to homes. People move here for the lower cost of living and that includes low utilities.

Scout Clean Energy is out of Colorado. They are in the business of making wind and solar farms for MONEY. They are not living here or working here when its done. Sure they will generate some temporary jobs but the claims they are making about bolstering our community with an influx of tax dollars fall on deaf ears. We are not a desolate community that needs money for roads and schools.

From what I have read the wind farm and solar farm are going to be some of the biggest accomplishments for their company.

We are a thriving community rich with golf courses, rivers, wineries, hiking, biking, birdwatching and many other recreational activities that draw thousands every year.

Wind is really "IN" right now. What about when it isn't?

Please leave the Horse Heaven Hills as they are.

Jessica Johnson  
Benton County Resident



*Jessica Johnson*  
Broker/Realtor®



Mobile: (509) 947-2230

Email: [jessica@referredrealestate.com](mailto:jessica@referredrealestate.com)

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

**From:** [Carla Martinez](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm - oppose  
**Date:** Tuesday, March 30, 2021 1:01:50 PM

Informational Meeting Comment #IM0053  
Horse Heaven Wind Farm  
Docket #210011

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External Email

EFSEC,

In short, I oppose the proposed Scout Energy Horse Heaven wind project.

As a Benton County resident and energy industry worker I greatly appreciate our region's clean and affordable power supply!

We have far better solutions to achieve our CETA targets than adding a 27-mile stretch of wind turbines on our foothills to meet our future energy needs. Also, our local utilities do not need or support this project.

And, if rumors are true, some, most or all of this proposed new power resource isn't even targeted for Washington customers. If that's true, this project would be a greater travesty.

Respectfully,

Carla Martinez  
Richland



**From:** [Gayle Graves](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Wind turbine project- scout horse heaven hills  
**Date:** Tuesday, March 30, 2021 1:12:40 PM

Informational Meeting Comment #IM0054  
Horse Heaven Wind Farm  
Docket #210011

External Email

In brief I am opposed to this project:

- 1/not benefiting our local community
- 2/not benefiting our local economy
- 3/circumventing process in governmental over reach
- 4/environmental impact to our migration birds
- 5/environmental impact to our heritage and historical trails
- 6/ there are newer technologies for the turbine industry
- 7/waste of turbine blades when our lives span if productivity
- 8/state of WA exceeds in clean energy, supplies our states and sells excess

Regards,  
Gayle Graves Marturano

**From:** [Cindy Edden](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Haven wind farm  
**Date:** Tuesday, March 30, 2021 2:07:29 PM

Informational Meeting Comment #IM0055  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I do not support this project.

I do not want to see more wind mills in the Tri cities. I am opposed.

Do not seem like the benifit out ways the cost.

**From:** [Jim Atkins](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** HHH Wind Farm  
**Date:** Tuesday, March 30, 2021 2:11:38 PM

Informational Meeting Comment #IM0056  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am opposed to the development of the Horse Heaven Hills Wind Farm for several reasons I have listed below.

- 1) The area speculated for use is within the Benton County Urban Growth Area
- 2) The city of Kennewick, Washington is already needing more area for growth and this is in that direct area
- 3) Some of this area is ripe for an industrial park and future housing
- 4) Long term plan 50 years of community growth does not seem to be addressed
- 5) Scout Energy is hoping to use the old shuffle the pea under the nut shell trick hoping to not get asked the proper or tough questions
- 6) Scout Energy is hoping the monetary numbers they threw out to County, WDFW, and others would be enticing enough without specifics almost like we'll build this and discuss later, i.e. we can't afford to pay that much.
- 7) The entire, Draft Habitat Mitigation Plan performed by Tetra Tech in February 2021 is extremely weak, lots of vague information.

The evasive tactic Scout Energy used to go around Benton County and the residents of this county goes to prove their lack of integrity, and shows they are not an environmental and community concerned company; but one that is out for themselves, and to make quick money before it is realized as to what is really happening or what took place.

Jim Atkins  
Benton County Resident



Virus-free. [www.avast.com](https://www.avast.com)

**From:** [Victor Faulds](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** horse heaven wind farm  
**Date:** Tuesday, March 30, 2021 2:13:37 PM

Informational Meeting Comment #IM0057  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Hello I object to the horse heaven wind farm due to the blight on our beautiful sky line in Benton County. Plus I am a over 60 year resident of Benton County and do not want this in our back yard. Why should Benton County be impacted by this wind farm for another part of our state or a totally different state. Let them put them on land they have to get wind power and not destroy our beautiful hills here in Benton County. I do hope you take into consideration the people that live in Benton County that are going to subjected to this wind farm. Please vote no.  
Thank You Sandy Faulds Kennewick WA

**From:** [Sherry Blondheim](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse heaven Hills wind farm project  
**Date:** Tuesday, March 30, 2021 2:25:09 PM

Informational Meeting Comment #IM0058  
Horse Heaven Wind Farm  
Docket #210011

External Email

Good afternoon,

I am writing this email in order to oppose the Horse Haven Hills wind farm project. I agree with all of the points that the Port of Pasco Commissioners expressed in their Resolution of opposition.

The visual impact would be horrendous. This type of project needs to be located in some obscure location where it is not obstructing or visually impairing an area.

I realize that those who reside in Western Washington probably do not think that this is a visually attractive area - of high desert. But we who live here understand and appreciate the beauty of the desert.

All sources of energy production has downsides. And so do wind turbines. It is not worth the downside of wind turbines for the amount of energy they produce.

Sincerely,  
Sherry Blondheim  
Kennewick, WA

**From:** [Amy Bjerke](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm  
**Date:** Tuesday, March 30, 2021 2:35:18 PM

Informational Meeting Comment #IM0059  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Dear EFSEC,

I am writing to let you know that as a resident of West Richland and member of the Tri-Cities community, I am opposed to the Scout Energy plan to install a large wind farm on the Horse Heaven Hills. This construction project is certain to cause terrible, permanent damage to the habitat of the native plant, animal, bird, and insect species that flourish on that ridge. It would dramatically reduce the ridge's usefulness as one of only a very few remaining combined local wildlife habitats/recreation destinations. It would permanently mar the beauty of the landscape in this area, which up until now has been an increasingly popular wine tourism destination. In a short number of years, the non-recyclable wind turbine parts would need to be disassembled and buried in a landfill. This is not an energy project we want in our area.

Sincerely,

Amy Bjerke  
West Richland, WA resident

**From:** [Lynda Armour-Deering](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills  
**Date:** Tuesday, March 30, 2021 2:51:39 PM

Informational Meeting Comment #IM0060  
Horse Heaven Wind Farm  
Docket #210011

### External Email

This email is in Regards to the public hearing scheduled for 5PM this afternoon  
We are Lynda and Deering, we live at 3698 S. Taft St., Kennewick. If you wish to make phone contact with us my cell number is 206-947-3280.

We are totally against placing the wind farm on Horse Heaven Hills. We moved over to the TriCities area to be away from industrial machines and unsightly structures that remove the beauty of our Kennewick Hills. We realize that there is already a wind farm on some of our hills, and yet they are far from the residential areas and our surrounding areas still remain untouched by a "form of energy." This form of energy is heavily distributed and has not been proven to be beneficial and will not have a direct benefit to Benton County Residents. What is in it for us?

The facts are so glaring against Wind Turbines and do not provide what the Scout Clean Energy is implying. We employ Benton County and all those powers that be here to stop this project. One other issue and again this is a fact, once the turbines are "planted" then it will become the counties issues. Please do the research so our beautiful area is not disrupted with machines that do not hold up under the facts.

Respectfully,

Lynda and George Deering

**From:** [Stephanie Swanberg](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Letter  
**Date:** Tuesday, March 30, 2021 2:52:45 PM  
**Attachments:** [image002.png](#)  
[Horse Heaven Wind Project - letter to EFSEC.pdf](#)

Informational Meeting Comment #IM0061  
Horse Heaven Wind Farm  
Docket #210011

External Email

Dear EFSEC,

I wasn't sure whether or not to send this letter, because Scout withdrew the application for an expedited review, but have decided to send it for the record.

Thank you,

**Stephanie Swanberg**  
Government & Regional Affairs Director



**Office:** 509.736.0510 | **Direct:** 509.491.3233 | **Cell:** 509.546.1613  
7130 W. Grandridge Blvd. Ste. C, Kennewick, WA 99336  
[Stephanie.Swanberg@tricityregionalchamber.com](mailto:Stephanie.Swanberg@tricityregionalchamber.com)







March 29, 2021

Energy Facility Site Evaluation Council (EFSEC)  
621 Woodland Square Loop, P.O. Box 43172  
Olympia, WA 98504-3172

**RE: Expedited Review of the Horse Heaven Wind Project**

Dear Energy Facility Site Evaluation Council,

The Chamber opposes Scout Clean Energy's request for an expedited review of the application for the Horse Heaven Wind Project for the following reasons:

- **Local Decision:** Approval should be sought at the local level, by those whose daily lives will be affected by this project. The Tri-City Regional Chamber of Commerce is currently conducting a public opinion survey to help determine community sentiment about the proposed Horse Heaven Wind Project and to identify issues of greatest interest and concern to the region. So far, 1,796 individuals have participated. When asked whether local government (Benton County) should be involved in the decision-making process of the Horse Heaven Wind Project, 80.32% of participants responded in the affirmative.
- **Environment:** The magnitude of this project involves over 6,869 acres - over 24 miles of land - with up to 244 turbines that stand at least 500 feet tall. A wind farm would be a radical departure from the current use of the proposed site, which is a combination of agricultural, recreational, and Department of Natural Resource open space. Land use changes of this scope and complexity demand thorough and independent research, analysis, and review by a group other than the beneficiary company.
- **Tourism and Quality of Life:** With the population of the Tri-Cities over 300,000 and growing, our region is ripe for new development and increased tourism. Citizens place a high value on outdoor activities, parks, open space, unobstructed views, trails, and scenic vistas. Because of this, development decisions must be made with great care - not haste.

For the reasons stated above, an expedited review should be denied.

Again, thank you for your consideration and continued work during this challenging time. If you have questions, please reach out to us directly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Mattson".

Lori Mattson IOM  
President/CEO  
Tri-City Regional Chamber

A handwritten signature in blue ink, appearing to read "Jim Arneson".

Jim Arneson  
President, Community First Bank  
Chair, Local Government Affairs Committee

**From:** [magerber55](#)

**To:** [EFSEC \(UTC\)](#)

**Subject:** The Horse Heaven Wind Farm Project Proposed by Scout Clean Energy

**Date:** Tuesday, March 30, 2021 2:56:36 PM

Informational Meeting Comment #IM0062

Horse Heaven Wind Farm

Docket #210011

### External Email

Dear EF-SEC members,

I am writing you to express my view on the proposed Horse Heaven Wind Farm Project Proposed by Scout Clean Energy. I understand and accept that we need to convert most, if not all, of our fossil fuel based Electric power facilities to non-fossil fuel based facilities in order to help reduce global warming. I also acknowledge that southeastern Washington currently provides nearly all of the wind-based electricity in the State of Washington and will likely continue to do so in the foreseeable future. At the same time, the Tri-cities has been a willing participant in the siting of these alternative resources including 100% of the State's nuclear power and 10% of the State's wind-based Power as well as at least one small demonstration solar electric power facility. However, I don't support the sighting of electric power production facilities that threaten our community's health, safety, social, and economic welfare.

Just because privately power companies can build huge quantities of Wind, Solar, Nuclear, or biomass based facilities in our region, doesn't mean that they are should be allowed to do so when they are inappropriate for our region. We didn't need or support Corp of Energy hydro-electric dam just north of Richland on the Columbia River, because it threatened the Hanford Reach and as well as the nearby nuclear site. We didn't need 30 or more nuclear plants along the Hanford reach as suggested in the 1980s, even though there is enough water to cool them. Likewise, we don't need huge wind turbines along our southern ridgelines just because there is lots of wind there, if they will have a huge negative impact on our views, and especially when there are other equally suitable sites available in the region that do not. Others will talk about the specific negative impacts that Scout Clean Energy proposes near the Tri-Cities. What I want to provide is a better understanding of just how huge the visual impact will be. Currently the Tri-Cities area hosts 63 wind turbines consisting of 49 turbines that are ~ 300 ft tall and 14 turbines that are ~415 ft tall to the turbine blade tip. The proposed wind turbine farm proposes either 244 turbines that are 500 ft tall or 150 turbines that are 670 ft tall to the blade tip. In other words, the height of each turbine and blade system range as much as 2.2 times the heights of the current turbine and blade systems located on the nearby ridges. Likewise, the total number of proposed turbines range to as many as 3.9 times the current number near our communities. Taken together, the geometric impact of the proposed wind turbines on our horizons, could be up to 5 times the current impact on the Ridgelines south of the Tri-Cities. To put this in perspective more relevant to the West Side of the state, the number of proposed turbines to be spread over 65 square miles would produce the same impact as spreading 113 turbines that are 670 feet tall or 183 turbines that are 500 ft tall over the 84 square miles of land-mass that encompasses

the city of Seattle. The proposed 24 miles of ridgeline, proposed for wind turbines, near the Tri-Cities is comparable to turbines spread out along the entire eastern shoreline of Seattle from the northern tip to the southern tip of lake Washington. Even if these turbines were replaced with attractive structures like the iconic Space needle, which stands at 605 ft tall, I would expect the effect to be overwhelming to most people living in the Seattle area.

With virtually all of the best potential wind-turbine sites located East of the Cascades and South of Moses Lake, I would think that the people living that portion of the State should have the main say in determining whether specific proposals are suitable for our health, safety, social, and economic welfare. As a minimum, I would want the State to reject the Scout Clean Energy proposal or refer it back to the local government, because I believe our community considers that the specific proposed sites for their wind turbines are inappropriate. Furthermore, I think the state should place a moratorium on future windmill projects in the state until such time as they have completed a study, to determine exactly where among the all the potential sites with suitable winds, can tall turbines be installed that do not negatively impact the views of nearby communities. Both the number and size of turbines for each candidate site should be provided by the study, so both communities and prospective Wind Power Companies know in advance the type of projects suitable for specific regional sites.

Respectfully,

Mark A. Gerber  
2234 Towhee Lane  
West Richland, WA 99353

From: [Karen Richardson](#)  
To: [EFSEC \(UTC\)](#)  
Subject: Save Our Ridges  
Date: Tuesday, March 30, 2021 3:01:39 PM

External Email



My Grandchildren and I painted this sign and placed it on our property that looks directly over to the Ridges that will be affected!!  
Stop this Wind Turbine Farm!! We will not stop fighting!!

Karen R.

**From:** [Bonsai Audio](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Project  
**Date:** Tuesday, March 30, 2021 3:14:08 PM

Informational Meeting Comment #IM0064  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Hello,

I'm a business owner and resident of Kennewick WA and I just want to say that I, and many members of our community don't want more windmills put in. We have dams and nuclear power, and we would much rather prefer to be known for those types of power in our area. We have plenty of nuclear and dam power potential, the windmills are an eyesore and affect our beautiful skyline and sunset views.

I am against the Horse Heaven Wind Project.

Sincerely,  
Brandon Andersen  
Owner  
Bonsai Audio, LLC  
[www.bonsaiaudio.com](http://www.bonsaiaudio.com)  
509.221.0075

**From:** [pam minelli](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Comments re Horse Heaven Wind Farm  
**Date:** Tuesday, March 30, 2021 3:20:39 PM  
**Attachments:** [Oral comments to EFSEC 33021.pages](#)

Informational Meeting Comment #IM0065  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Attached please find my comments regarding the Horse Heaven Wind Farm.

Respectfully submitted,

Pam Minelli

**From:** [columbia.georesources](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Comments for EFSEC Docket No. EF-210011 Scout Clean Energy – Horse Heaven Hills Wind Project March 30, 2021  
**Date:** Tuesday, March 30, 2021 3:31:53 PM

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Informational Meeting Comment #IM0066  
Horse Heaven Wind Farm  
Docket #210011

### External Email

Scout Clean Energy has indicated they intend to prepare and State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) which is greatly appreciated. With that announcement and this public meeting, below are a few questions regarding the next steps to be taken by EFSEC and Scout Clean Energy:

1. Will EFSEC continue to be the lead agency for the SEPA EIS or will another agency be chosen?
2. Will Public Scoping Meetings be held for the Horse Heaven Hills Wind Project before a Draft EIS is presented for public review and comment?
3. How many and where will future public meetings be held?

Thank you for the opportunity to comment.

G. Cummins

Sent from [Mail](#) for Windows 10



**From:** [Robert Noland](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horseheaven Wind Farm  
**Date:** Tuesday, March 30, 2021 3:32:06 PM

Informational Meeting Comment #IM0067  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I want to express my objections to this wind farm project. First, I question the efficiency of electricity generated from wind turbines. As I understand it, we taxpayers have to subsidize the construction of the turbines, then we electrical ratepayers in the Bonneville system have to purchase any electricity generated from the wind turbines, whether it is needed or not.

Secondly is the blighting of our vistas with these garish monstrosities. We are already coping with hundreds upon hundreds of these things in eastern Washington. The current project calls for windmills as tall as the space needle!

Additionally, there are few, if any, new permanent jobs created from any of these windmill projects. The only financial beneficiaries are the landowners, who make out like bandits. Of course, the landowners are supportive of the project.

Please do not approve this project. The electricity is not needed, and we who live here do not need any more eroding of our vistas. I have an alternative idea - let's set these monstrosities in Lake Washington and see how the public reacts.

Respectfully,

Robert F. Noland



Pasco, WA.



**From:** [mkroberts14@charter.net](mailto:mkroberts14@charter.net)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** opposition to Horse Heaven Wind Project  
**Date:** Tuesday, March 30, 2021 3:37:29 PM

Informational Meeting Comment #IM0068  
Horse Heaven Wind Farm  
Docket #210011

### External Email

As a long time citizen of the Tri-Cities and lifetime resident of Washington State, I appose this proposed project on aesthetic, environmental, and reliability reasons.

Aesthetics - the placement so close to the community will detract from the scenic viewpoint of the tri-cities. Every time I drive to Walla Walla and see the line of wind turbines south of Touchet, or come back at night seeing the line of flashing red lights, I am reminded how much wind turbines destroy the beauty of our countryside.

Environmental –

Night time surface temperature – Studies and models have found that night time surface temperatures in proximity to wind turbines increase by up to 1.5 degrees because of air circulation, similar to orchardists using small wind machines during blossom time to keep the frost from killing the blossoms. If we are trying to reduce global temperatures due to greenhouse gases, which is a long slow, process, why would we accept an immediate temperature increase? If reducing the threat of global warming by reducing carbon free emissions is the goal, this goal would require huge amounts of American land put into use as wind or solar farms, thereby increasing ground temperatures. **This temperature increase by Wind power is contrary to the overall goal of reducing the heat footprint of energy generation.** This increased temperature will also immediately impact plant, animal, and insect life in the wind farm property and surrounding area.

Wind Shadow – There are not adequate studies to provide consistent data on the impact of the wind shadows caused by wind turbines on the local environment.

Reliability - Studies indicate that High Quality Wind sites generate at between 30% to 40% capacity at the best. I doubt this site would be labeled a High Quality Wind site. Both Nuclear and Hydro generate at a much higher reliability rate. We do NOT want to inject a higher level of dependance on an unreliable energy source and risk suffering the outages that brought deaths and damage experienced by Texas in February, 2021.

Sincerely.

M. Roberts

**From:** [Sharon](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm  
**Date:** Tuesday, March 30, 2021 3:38:35 PM

Informational Meeting Comment #IM0069  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Hello,

I believe the farm is too big & should be spread out around the state instead of impacting one area, if it's needed at all. It's too close to Tri-cities, impacts to our airport airspace have not been addressed & there is no net gain replacing the power produced from the dams. The dams hydropower should be counted as green energy but for some political reason it's not. I am against the wind farm so close, there are other more barren areas to consider.

Please reconsider,

Sharon Avery

Sent from my iPhone

**From:** [camanobay@aol.com](mailto:camanobay@aol.com)  
**To:** [EESEC \(UTC\)](#)  
**Date:** Tuesday, March 30, 2021 3:42:09 PM

Informational Meeting Comment #IM0070  
Horse Heaven Wind Farm  
Docket #210011

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External Email

We've read both sides, both pro and con on the Horse Heaven Wind Farm proposition. I look to the east from where we live and see the hills ridged with windmills now and it is not a pretty sight. I understand the need for energy but have heard that storage of wind energy is still questionable and would only provide a fraction of energy that we get from hydro and nuclear in our area. But does this benefit the west side of the state, the side that prevented wind farms from being built there, but who need the energy that comes from the east side. Because of their more populace clout it seems what happens here doesn't really matter, even if there are environmental consequences to our eastern area, such as to wildlife and natural scenic vistas. They on the west side are all up in arms though if their wildlife or vistas are disturbed. I love the west side's natural beauty and realize we have wide open spaces here that could be used for other purposes other than dry farming. So what I wonder is can these windmills be placed further south of Tri-Cities, where their presence would be less visible. The farmers want different means for income and maybe they can have that with windmills dotting their land but other citizens would appreciate if these windmills were out of sight. I am all for progress but only if it makes sense and if there is minimal adverse consequences and collaborative effort. Thank you.

Sincerely;  
Terry and Jackie Lindblom  
Luke and Jamie Graesser  
Jerrod and Alanna Lindblom  
Mike and Jenn Anglesey

**From:** [Greg Wendt](#)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [Jerome Delvin](#); [Will McKay](#); [Shon Small](#); [Jerrod MacPherson](#); [Matt Rasmussen](#); [Shyanne Palmus](#); [Ryan Brown](#); [Cami McKenzie](#); [Adam Fyall](#)  
**Subject:** Benton County, WA-In the Matter of Horse Heaven Wind Farm, LLC  
**Date:** Tuesday, March 30, 2021 3:53:23 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[Statement of Opposition to EFSEC - Horse Heaven Wind Farm Project - 033021.pdf](#)  
[Benton County Attachment A 3-30-21.pdf](#)

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External Email

Good afternoon,

Benton County would like to submit the following documents in the Matter of Horse Heaven Wind Farm, LLC. We would like these documents and associated files to be included as a portion of the County's public comments for the Informational Public Meeting scheduled for March 30, 2021 at 5:00 pm.

1. County Statement Letter- This document is attached to this email and includes the Benton County Commissioners statement letter for the project;
2. Attachment A- This document is attached to this email and is Benton County's initial review and evaluation of the application, including a discussion of some of the project's adverse environmental impacts and consistency with the County's goals, policies, and regulations;
3. Attachment B- A collection of public comments that have been submitted to Benton County. This document may be accessed via the Wind Farm link below:

 [Wind Farm](#)

4. Attachment C- An Audio File of the Town Hall Meeting held in Kennewick, Washington on March 16, 2021. This file may be accessed via the Wind Farm Link below:

 [Wind Farm](#)

Thank you for the opportunity to submit comments on this proposal. If you have any questions regarding this submittal, please do not hesitate to contact us at 509-786-5612.

We appreciate your time and efforts with this project.

Sincerely,

Greg

Greg Wendt

Director of Community Development  
Benton County Public Services Building  
102206 E Wiser Parkway  
Kennewick, WA 99336

(509) 786-5612

Mailing Address:

Benton County Community Development Department  
PO Box 910, Prosser, WA 99350

Jerome Delvin, District 1  
Shon Small, District 2  
Will McKay, District 3



Jerrod MacPherson  
County Administrator  
Matt Rasmussen  
Deputy County Administrator

## Board of County Commissioners

March 30, 2021

Energy Facility Site Evaluation Council  
Sonia Bumpus, EFSEC Manager  
621 Woodland Square Loop, PO Box 43172  
Olympia, WA 98504-3172  
[efsec@utc.wa.gov](mailto:efsec@utc.wa.gov)

Re: Horse Heaven Wind Farm Project Proposal

Dear Ms. Bumpus,

Thank you for the opportunity to comment on the Horse Heaven Wind Farm Project, which is proposed to be located south of the cities of Kennewick and Richland, in unincorporated Benton County.

After a detailed review of the submitted application (dated February 8, 2021), the Benton County Commissioners oppose this project. The location, size, and scope of this project is inconsistent with the County's goals of preserving rural character, enhancing natural resource-based industries, preserving agricultural lands of long-term commercial significance, and preserving the natural setting, views, and rich history of Benton County and the greater Tri-Cities Area.

The County has received over 400 calls and emails from area residents regarding this project, and has hosted a public, town hall meeting. The overwhelming majority (approximately 90%) of people that have provided comment do not support this proposal. They have wide ranging concerns, including loss of habitat and agriculture, negative impacts to wildlife, property values, concerns relating to health and noise, and impacts to viewsheds related to the County's natural setting, history, and tourism. People in Benton County and the Tri-Cities region care deeply about preserving their ridges and skylines for future generations.

This project is being proposed to occur only four miles south of one of the largest urban areas in Eastern Washington (Tri-Cities Region-Kennewick, Richland, and Pasco). The 24-mile long proposal is situated in an area with unique geological features, comprised of naturally vegetated steep slopes, native habitat, commercially significant agricultural land, and visual resources. As referenced in the applicant's proposal, the wind turbines will be visible from up to 87% of the land within a 10-mile radius of the project area. The visual impacts will be significant, with the turbines likely able to be seen from a majority of the incorporated cities and densely populated County neighborhoods and as far away as Franklin County, Walla Walla County, and the State of Oregon. The local public utility districts have not shown an interest in needing or wanting the additional energy created by the project. These and many other concerns are examples of why we, the Board of Benton County Commissioners, are opposed to this project.

Included with today's letter, please find the following attachments:

*Attachment A* –Benton County's review and evaluation of the application, including the project's environmental impacts and consistency with the County's goals, policies, and regulations.

*Attachment B* – Collection of public comments submitted to Benton County.



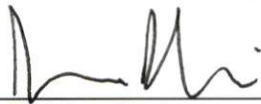
*Attachment C* – Audio file of the town hall meeting hosted by the Board of County Commissioners in Kennewick, Washington on March 16, 2021.

In summary, Benton County finds that the proposed project, as submitted, with its significant adverse environmental impacts, is not consistent and does not comply with the goals and policies of the Benton County Comprehensive Plan, the criteria required to obtain a Benton County conditional use permit, and the requirements of the Benton County Critical Area Ordinance. Further, the public has overwhelmingly stated its desire to preserve and protect the region's unique geologic features, ridges, and skylines for future generations.

Once again, the Board of Benton County Commissioners wish to thank you for the opportunity to comment and to let the Council know that the Benton County Commissioners do not support this project.

Sincerely,

**BOARD OF BENTON COUNTY COMMISSIONERS**



Jerome Delvin, Chairman



Shon Small, Chairman Pro-Tem



Will McKay, Member

## ***ATTACHMENT A***

This document has been prepared and is being submitted by Benton County as public comment regarding the Horse Heaven Wind Farm Project Proposal. Please accept the following as written testimony for the March 30, 2021 Public Meeting.

### ***Public Participation***

The Benton County Commissioner's Office and the Planning Division have received hundreds of emails from interested citizens regarding the project. The County is submitting a copy of the emails and comments into the record which may be found in *Attachment B*.

In addition, Benton County held a town hall meeting on March 16, 2021 to allow residents the opportunity to testify in front of the Benton County Commissioners and present their thoughts and concerns or support of the proposed project. The County is submitting a copy of the recording of this meeting into the record which may be found in *Attachment C*.

Approximately 90% of the comments received in *Attachment B* are in opposition to the project. Local residents have wide ranging concerns about this project, including but not limited to the negative impacts the wind turbines will have on the existing landscape and viewshed. Residents strongly value the County's geologic formations, scenic vistas, open space, and undeveloped hills and ridgelines. Comments have referred to the fact that other wind projects in the Pacific Northwest are located in sparsely populated areas which do not have a large urban population base within its viewshed, and in turn these wind projects do not have the same view impact as this proposal which is located approximately 4 miles south of the City of Kennewick and the Tri Cities urban area.

In addition to the projects impact to the local viewsheds, people have raised concerns about the project's other environmental impacts, some highlights include but are not limited to:

- Birds, wildlife, and native plants;
- Health, noise and vibrations;
- Property values;
- Tourism and the impact to the State recognized Horse Heaven Hills AVA;
- Agricultural land;
- County roads;
- Shadow flicker;
- Flashing lights; Light sensitivity;
- Economic-Tax payers/tax credits;
- Develop a locally agreed upon decommissioning plan for turbines, solar arrays, and associated infrastructure;
- Sustainability of disposals options for project infrastructure at end of project life; and
- Wildland fires.

Both city and county residents have raised concerns about the need for the project to be located in close proximity the to the Tri-Cities Region. The public is concerned that the energy produced as part of this project would not be utilized by the local utility district(s). While many of the local districts have not taken an official position on this project, the largest provider in the County, Benton PUD, is strongly opposed to the project. The negative impacts associated with the project are very personal to residents as described by the hundreds of comments we have received, and the need for the additional energy created by this large facility has not been demonstrated.

A small number of residents did provide alternative mitigation measures, which in their opinion may lessen some of the impacts that a renewable energy project would have on the community/region including: moving the project location further south to decrease the visual impact to the majority of the populated Tri-Cities area, or reduce or wholly remove the wind component. Per the information provided in the application, 800 MW of the potential 1150 MW that the project overall could produce would come from the solar array component (HHWF Application, page 2-15). If this is the case, then the removal of the turbine component, which currently makes up the remaining 350 MW of production, could be replaced with solar.

Based upon the comments received, the community is strongly opposed to the project and the residents of this area have passionately expressed their concerns that this project would have an overall long-term negative impact on the existing landscape and would not benefit the majority of the County residents or this region.

### ***Benton County Comprehensive Plan***

The applicant has stated that the proposed project complies with all applicable provisions of Benton County Code, and supports the implementation of the Benton County Comprehensive Plan by “harnessing the County’s renewable wind and solar resources for economic and environmental benefits, while minimizing impacts to other natural resource values and agricultural lands of commercial long-term significance” (HHWF Application, page 1-67).

However, the County maintains that the location, height, size, and scope of the proposed project is not consistent nor compatible with the County’s Comprehensive Plan or its implementing regulations such as the County Zoning Ordinance and/or Critical Area Regulations. The loss of approximately 6,800 acres of long term commercially significant agricultural land, for a non-agricultural use, furthers the inconsistency with the County’s goals and regulations which seek to protect agricultural and natural resource industries in Benton County.

### ***Growth Management Goals:***

The Growth Management Planning Goals are guides for the development of local plans and regulations which in turn allow communities the ability to implement regulations to determine if a use (location, size and scale) is compatible with an existing area and whether it complies with the associate plans and documents adopted by the County. Of interest, GMA Goals include the following:

- Natural Resource Industries - Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, while discouraging incompatible uses.
- Environment - Protect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water.

### ***Horse Heaven Hills:***

The Benton County Comprehensive Plan was developed to reflect the County’s values and plan for future growth consistent with the Washington State Growth Management Act and guide County decisions on land use, transportation, infrastructure, housing, economic development, and the environment.

The Plan states that the following as it relates to the Horse Heaven Hills:

- This plateau constitutes the southern half of Benton County. The elevations of the Horse Heaven Hills rise from the County’s low point of 265 feet near Crow Butte to 1,600 to 2,200 feet along the ridgeline which overlooks the Yakima Valley and the Badger Coulee. The Horse Heaven Hills are unique among the Yakima Folds: it is the southern-most and longest running ridge in the system at some 60 miles; it is the most severely “lop-sided” of

the ridges, becoming more of a monocline than an anticline in areas; and it takes a definitive, 90 degree turn to the south at Kiona, which is the geographic center of the County. The ridgeline is highest at Jump Off Joe Butte south of Kennewick, and the plateau slides southward toward the Columbia River (BCCP, page 57).

The Horse Heaven Hills are one of the County's primary areas for dryland wheat production and in turn one of our most valuable areas designated for commercially significant agriculture. The Plan states the following related to agricultural activities in the Horse Heaven areas:

- Dryland agricultural activities primarily consist of dryland wheat production, principally in the Horse Heaven and Rattlesnake Hills. Dryland production has an economy of scale requiring large operations, typically in the thousands of acres (BCCP, page 43).

### ***Loss of Long-Term Commercially Significant Agricultural Lands:***

Benton County has highly productive agricultural soils with over \$900 million generated by Benton County crops and livestock per year. The land use designation for the proposed project area is Growth Management Act Agricultural. Agriculture, specifically long term commercially significant agriculture, is the cornerstone to Benton County's economy, natural resources industries, and way of life. The Plan states the following as it relates to agriculture and long term commercially significant agriculture in Benton County:

- NR Goal 1: Conserve and maintain agricultural land of long-term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy (BCCP, 2.3).
  - Policy 1: Conserve areas designated "GMA Agriculture" in the Comprehensive Plan for a broad range of agricultural uses to the maximum extent possible and protect these areas from the encroachment of incompatible uses.
  - Policy 3: Recognize that only uses related or ancillary to, supportive of, complimentary to, and/or not in conflict with agricultural activities are appropriate in areas designated GMA Agriculture.
- Agricultural land is defined as land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees, finfish in upland hatcheries, or livestock, and that has long-term commercial significance for agricultural production (RCW 36.70A.030(2)) (BCCP, page 42).
- Long-term commercial significance includes the growing capacity, productivity, and soil composition of the land for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land. GMA requires each county to designate appropriate agricultural lands that are not already characterized by urban growth and that have long-term significance for the commercial production of food or other agricultural products. (BCCP, page 43)
- GMA Agriculture (GMA AG) includes agricultural land (such as dryland and irrigated land) identified by the County based on the criteria established by the GMA. A GMA Agricultural District zone conserves agricultural lands by establishing a 20-acre minimum parcel size and (with exceptions e.g., resort destinations, wineries) limits the range of other land uses to those which are dependent upon, supportive of, ancillary to, or compatible with, agricultural production as the principal land use (BCCP, page 44). This land constitutes about 59 percent of the total land in Benton County (BCCP, page 33).

The Benton County Comprehensive Plan provides clear guidance on the importance of the County to protect, maintain, conserve, and enhance agricultural lands and their natural resource-based industries while discouraging incompatible uses (BCCP, page 3). It further charges the County to reduce the

inappropriate conversion of agricultural lands and assure that rural development is compatible with surrounding rural and agricultural areas (BCCP, page 14).

This project proposes a loss of 1% of the total agricultural lands within Benton County. This project is not consistent with goals and policies of preserving and protecting the County long term commercially significant agricultural lands.

### ***Conservation of Critical Areas and Views:***

As proposed, the wind turbines could be seen from up to 87% of the areas with a 10-mile radius of the project location in Benton County. The visual impacts will be seen from as far away as Franklin County, Walla Walla County, and the State of Oregon. The 26-mile project consisting of a total project area of approximate 72,000 acres is situated in an area of the Horse Heaven Hills with geological features comprised of naturally vegetated steep slopes, native habitat, commercially significant agricultural land, and unique views. The Comprehensive Plan states that Benton County is to:

- Protect the County's natural areas, shorelines, and critical areas as unique assets to the community (2.5, CA Goal 3).
- Protect five (5) critical areas protected by the GMA, which include:
  - Wetlands;
  - Critical Aquifer Protection Areas;
  - Frequently Flooded Areas;
  - Geologically Hazardous Areas; and
  - Fish and Wildlife Conservation Areas.
- Conserve visually prominent naturally vegetated steep slopes and elevated ridges that define the Columbia Basin landscape and are uniquely a product of the ice age floods (BCCP, page 28).

The proposed project is not in compliance with the County's goals of protecting the critical areas and is not consistent with the County's Critical Area Ordinance. In accordance with BCC Title 15, the County shall require a Critical Area Project Review to determine whether the project is likely to impact the functions and values of a critical area and whether the project adequately addresses the impacts and avoids impacts to critical areas associated with the project.

A major shortcoming of the application is that it does not provide site-specific plans for each turbine and each solar project location. As such the County, EFSEC and other reviewing agencies would be unable to conduct a thorough critical area review for the project locations. With this we are unable to determine if this proposal complies with the County's Critical Area Ordinance and evaluate the true impacts and minimum mitigation measures that would be required of each individual development site. This documentation should be provided to the County simultaneously with the SEPA Checklist for review.

### ***Protection of Rural Character and Lifestyle:***

The protection of rural character and lifestyle is paramount in Benton County. The goals and policies of the Comprehensive Plan seek to ensure that land uses are compatible with surrounding uses that maintain public health, safety, and general welfare. The policies aim to protect surrounding areas from incompatible uses that, if approved, would degrade the existing rural character which residents hold in high regard. The Comprehensive Plan states that Benton County is to:

- Preserve rural lifestyles outside UGAs and incorporated areas while accommodating new population growth consistent with the protection of rural character and to encourage low impact recreational uses and protect open spaces that preserve rural character. (Land Use Goal 6-pg 14-15);

- Promote industries that are diverse and support an agriculturally based economy; and
- Promote and protect tourism related to viticulture and other agricultural activities

The Benton County Comprehensive Plan, Chapter 1.2.3 discusses the community's priorities for Benton County. These include:

- Preservation of rural character;
- Protection of natural resources, hillsides, and open spaces;
- Limiting sprawl; and
- Protecting farmland.

The project size, scope, and location fails to preserve and protect the County's rural character and lacks consistency with the community's vision (BCCP, page 4) for Benton County as it project proposes negative impacts to the County's natural resources, hillsides, views, and preservation of farmland.

### ***Summary- Lack of Consistency with the Comprehensive Plan:***

The County Comprehensive Plan requires the County to encourage long term conservation and wise stewardship of natural resources lands for the benefit of current and future residents. With over 59% of the County's total land area being located in the GMA Agricultural designation, these areas provide not only the agricultural land (dryland and irrigated) which makes up the majority of the County's economy but it also provides the open spaces and vistas which preserves the County's rural character.

The County Comprehensive Plan provides goals and policies that:

- Understand the uniqueness of the Horse Heaven Hills;
- Prevents the loss of the County's long term commercially significant agricultural land;
- Protects the County's naturally vegetated steep slopes, wildlife, and habitat;
- Values the County's ridgelines and scenic views;
- Facilitates tourism; and
- Supports a robust agricultural economy that focuses on preserving and protecting the rural character in Benton County that so many of its residents care about.

The size, height, scope, location, and environmental impacts of this industrial proposal are not consistent with the goals and policies of the Benton County Comprehensive Plan.

### ***Benton County Zoning Regulations***

The applicant has stated the proposed project complies with all applicable provisions of the Benton County Code, including the implementation of the County's Zoning regulations. The County does not believe the proposal is consistent with and does not comply with the following Benton County standards as described below.

### ***Purpose of the Growth Management Act Agricultural District (GMAAD)***

The Benton County Codes states the purpose of this chapter is to meet the minimum requirements of the State Growth Management Act (Chapter 36.70A RCW) that mandates the designation and protection of agricultural lands of long-term commercial significance. The chapter protects the GMA Agricultural District (GMAAD) and the activities therein by limiting non-agricultural uses in the district to those compatible with agriculture and by establishing minimum lot sizes in areas where soils, water, and climate are suitable for agricultural purposes. This chapter is intended to work in conjunction with Chapter 14.05 BCC entitled "Right to Farm" which protects normal agricultural activities from nuisance complaints.

It's clear after reviewing the submitted application that the proposed size, scope, location, and impacts of the proposed industrial project does not meet the intent of RCW 36.70, is not consistent with County's

Comprehensive Plan and GMAAD Zoning District, and fails to protect the inappropriate conversion of County's agricultural lands of long-term significance.

### ***Uses Requiring a Conditional Use Permit- Criteria for Approval***

The Benton County Code identifies in BCC 11.17.070 the uses that require the approval of a conditional use permit in order to be allowed or permitted within the Growth Management Act Agricultural District.

Specifically, BCC 11.17.070 lists the uses that require a conditional use permit in the GMAAD. These uses may be permitted if a conditional use permit is issued by the Hearing Examiner after notice and a public hearing is provided.

It important to emphasize that the uses described in BCC 11.17.070 may only be permitted in Benton County if issued a conditional use permit is issued by the Hearings Examiner. At the conclusion of a public hearing for a conditional use permit, the Hearing Examiner is required to make findings and conclusions based on the evidence presented to them. Please see the following required conclusions which must be affirmed in order to obtain a conditional use permit in Benton County.

Benton County Code Chapter 11.50.040 (d) states a conditional use permit shall be granted only if the Hearings Examiner can make findings of fact based on the evidence presented sufficient to allow the Hearings Examiner to conclude that the proposed use is:

- (1) *Is compatible with other uses in the surrounding area or is no more incompatible than are any other outright permitted uses in the applicable zoning district*

The County concludes the proposed use is not compatible with the surrounding area and is more incompatible than the outright permitted uses in the GMAAD Zoning District.

The applicant argues that the test of compatibility is judged by whether the project would have a substantiated negative impact on the ability of surrounding landowners to maintain their existing use of the land, including the ongoing use for agricultural activities and residential uses. They further assert that the focus of the compatibility test should be on whether the project would undermine existing uses or cause any increase in the costs of agricultural uses and practices of the land (HHWF Application, page 2-153).

The Benton County Code (BBC 11.03.010(53)) defines "compatibility" as the congruent arrangement of land uses and/or project elements to avoid, mitigate, or minimize (to the greatest extent reasonable) conflicts. It does not evaluate the impact on surrounding landowners to maintain their ability to farm or the increase in cost to agricultural uses and practices. The County's definition highlights the necessity that all proposed uses within zoning district shall not create a greater conflict than the allowed uses in that zone. The County assesses compatibility by examining if the proposed use is the same or complementary to surrounding uses in scale, traffic impact and/or operational impact. If the proposed use deviates significantly in density, intensity, scale, form, or activity causing negative impacts on, or being negatively impacted by, surrounding land uses, the project would be deemed to be incompatible.

The application states that "the wind, solar and battery storage uses would be benign in impacts to these existing uses of surrounding lands, enable a highly beneficial use for clean energy, and in no way force changes of uses on surrounding lands" (HHWF Application 2-153). As previously stated, the argument that the impact of the project would not affect adjacent land does not meet the County's test for compatibility.

The proposed project would permanently impact 6,869 acres of land in the Growth Management Act Agriculture (GMAAD) Zoning District. The impacted land has been designated to have long-term commercial significance for the commercial production of food or other agricultural products in accordance with RCW 36.70A.170. The County's Zoning Ordinance does allow flexibility in the GMAAD Zoning District for landowners to conduct both farm and supportive non-farm activities on a small scale. There are no known allowed existing uses other than agricultural activities, as

described in BCC 11.17.040, which have impacted or removed an equivalent or larger area (6,869 acres) from agricultural production in the GMAAD Zoning District in Benton County. The County maintains that the scope of the proposed project is not consistent nor compatible with the Growth Management Act, RCW 36.70A, the County's land use plans, the purpose of the GMAAD Zoning District, and the required conclusions required for a conditional use permit.

As stated above, the overall project would permanently impact 6,869 acres which is equivalent to 1.1% of the GMAAD zone in Benton County, and will temporarily impact 2,957 acres which would create a total of 9,826 acres impacted by the proposed project or 1.5% of Benton County's total GMAAD zone. Further, the Benton County Comprehensive Plan states that only uses related or ancillary to, supportive of, complimentary to, and/or not in conflict with agricultural activities are appropriate in areas designated GMA Agriculture (BCCP, page 17). While the applicant may propose mitigation measures which would lessen the impacts the project may have on birds and wildlife, mapped critical areas, and other environmental concerns, there is no mitigation measure that the County feels is sufficient for the permanent loss of such a large percentage of its agricultural land which is the dominate land use and identifying characteristic of Benton County.

The applicants claim that the solar component of the project "would be no more incompatible (i.e., would be equally compatible) on surrounding areas compared to a minor solar power generating facility or utility substation, which are allowable uses in the GMAAD" (HHWF Application, page 2-155). The County does not agree that the size and scope of the solar component would be similarly compatible as to a minor solar facility. A minor solar facility per Benton County Code 11.03.010(168) defines a minor facility as a use which is to be sited on the owner's parcel for the owner's own power consumption/benefit and which would generate power as a secondary or accessory use to the owner's primary use of the land. The intent of a minor solar facility is solely for the generation of power for an individual such as a few solar panels on the roof of a dwelling or a small ground mounted array. The applicant's proposal which seeks to site two 3,050-4,450-acre sites over multiple property boundaries far exceeds the scope of a minor solar facility. The applicant's proposal includes 6,570 acres that will be permanently disturbed by the solar component alone. Solar sites do not allow for the compatible siting of other agricultural practices and if approved, the project would have a significant impact by wholly changing the use of the land.

If approved, this project would be one of the largest solar farms in the United States and one of the top ten largest solar farms in the world. Despite any proposed mitigation measures, the size of scope of the proposed solar component of the project would be incompatible with the Benton County zoning regulations as the proposal would "preclude over 6,000 acres from agricultural practices" (HHWF Application, page 2-154) and thus would not be a secondary use of the land, but rather would wholly occupy and remove large tracts of agricultural land of long-term commercial significance.

- (2) *Will not materially endanger the health, safety, and welfare of the surrounding community to an extent greater than that associated with any other permitted uses in the applicable zoning district;*  
The County concludes the proposed use will endanger the health, safety and welfare of the surrounding communities. The Benton County has received numerous comments from the public concerning the health and safety related to wind turbines, especially as these impacts relate to health, noise, vibrations, and wildfire. The commenting public has referenced studies and educational material associated with these impacts which are more prominent for those living closer to the project areas. Additional analysis and studies related to the health, noise, vibrations, and wildfires risks of the individual turbines and their exact locations should be completed.
- (3) *Would not cause the pedestrian and vehicular traffic associated with the use to conflict with existing and anticipated traffic in the neighborhood to an extent greater than that associated with any other permitted uses in the applicable zoning district;*



and

- (4) *Will be supported by adequate service facilities and would not adversely affect public services to the surrounding area;*

The County concludes the proposed wind farm project will create significant traffic impacts on public roads including increased volume and over-size and/or over-weight loads. The submitted proposal does not provide adequate detail on the exact location of the proposed infrastructure nor the timing of construction, both of which greatly affect the required mitigation measures, for the County to make a determination on what the full impacts will be.

In order to properly evaluate the impacts to the public road system the County requires a complete, independent, study taking into account the following:

- Identify all potential locations of infrastructure to be installed as part of the project;
- Identify all source locations for products used in the construction and maintenance of the project including but not limited to aggregates, concrete, asphalt, water sources and any location which products are picked up from rail, water or other transportation modes to be transferred to the project site;
- Identify all potential haul routes using any public roadway;
- Identify the location of any new roadways, public or private, to be constructed as a part of this project;
- An analysis of the adequacy of any identified public road to be used as an access or haul road for any part of the construction or maintenance of the project. The analysis shall consider the roadway surface, roadway subgrade, roadway width, roadside obstructions and all other geometric features which may be affected by the roads use as an access or haul route;
- A traffic impact analysis showing how traffic within and surrounding the project area will be impacted during and after construction. The traffic study shall include estimates of the total volume of vehicles, the percentage of truck traffic, the maximum loads (length, width, height, weight) anticipated, the number of oversize/overweight vehicles anticipated and the expected flow of traffic to, from and within the project boundaries. The analysis shall include time periods both during and outside times of significant agricultural activity in the area (e.g. planting and/or harvest seasons);
- A complete geotechnical engineering report, including core sample logs of each roadway taken at multiple locations, that makes recommendations on the required roadway section to accommodate the proposed volumes and loading;
- Consideration for the impacts of weather and different seasons related to hauling of equipment and materials to the project site. Particular consideration will be given to times of significant agricultural activity, the availability of water to maintain non-hard surfaced roads during dry months, and the potential for freeze thaw actions due to inclement weather; and
- Recommended mitigation measures to eliminate impacts to the public road system.

The analysis shall be prepared by a Washington State licensed engineer or engineers with specialty in traffic impact analyses and geotechnical engineering including pavement design.

- (5) *Would not hinder or discourage the development of permitted uses on neighboring properties in the applicable zoning district as a result of the location, size or height of the buildings, structures, walls, or required fences or screening vegetation to a greater extent than other permitted uses in the applicable zoning district.*

The proposed project would hinder the development of permitted uses due to the location, size (length) and height of the overall project. Due to the project's proposed close proximity to

established residential areas, the construction of the wind turbines would hinder any future residential development in those areas. Based on the comments and testimony provided by the public, having such a large project, both height and length of the project area, would discourage the development of homes from the surrounding area. Additionally, as this is an agricultural area, personal and commercial crop-dusting airstrips are often sited in this area of the GMA Agriculture zone. The scale of the wind component of the proposed project would greatly hinder the ability for a property owner to site an airstrip on their property if the project were approved.

In conclusion, the size, scope, and location of this project leads the County to conclude the proposed use is not compatible with the surrounding area and is more incompatible than outright permitted uses in the zoning district. The need to further address impacts to health, public infrastructure, the environment, agriculture, and rural residential and urban areas, furthers the projects inability to meet the required findings and conclusions.

### ***Solar Power Generating Facility, Major***

The Benton County Zoning regulations provide the following definition and regulations for a solar power generating facility:

- BCC 11.03.010 (190) "Solar Power Generator Facility, Major" means the use of solar panels to convert sunlight directly or indirectly into electricity. Solar power generators consist of solar panels, charge controllers, inverters, working fluid system, and storage batteries. Major facilities are developed as the primary land use for a parcel on which it is located and does not meet the siting criteria for a minor facility in BCC 11.03.010(168).
- BCC 11.42.100(b) Major Facilities. Systems that solely serve offsite uses are utility-scale solar facilities sited on a parcel as the principal use.
  - (1) Setbacks: Shall meet the minimum zoning setbacks for the zoning district in which located.
  - (2) Height: Twenty (20) feet maximum.
  - (3) Lot Coverage: The surface area of a ground-mounted system, regardless of the mounted angle, shall be calculated as part of the overall lot coverage for the zoning district in which located.
  - (4) Visibility:
    - (i) Solar facilities with panels located at least one hundred fifty (150) feet from an adjacent public street right-of-way, residentially zoned property, or residential use shall not require screening.
    - (ii) Solar facilities with panels located less than one hundred fifty (150) feet from an adjacent public street right-of-way, residentially zoned property, or residential use shall require screening. Screening is to include a perimeter landscape buffer as determined by the Planning Administrator through the required conditional use permit process.
  - (5) Solar facilities are to be equipped with a non-reflective finish/coating.

The County has found that the project fails to meet the above standards. Specifically, Chapter 11.42.100 (b) General Use Regulations- Solar Power Generator Facility, Major of the Benton County Code identifies the specific requirements for solar facility proposals, including that all proposals shall meet the minimum zoning setbacks and required screening for the zoning district in which the project is located. The applicant states that the "solar array components and security fencing for the solar array sites under consideration would cross side and rear lot lines of adjacent parcels within the Project Lease Boundary. While solar array components and security fencing would cross side and rear lot lines, these components are not walled structures; therefore, the side and rear setbacks under BCC 11.17.120(b) do not apply to the proposed solar arrays within the project lease boundary." (HHWF Application, page 2-147) The

County maintains that the applicant's justifications for encroaching over property lines are not valid and all components of the proposed project must be sited within property boundaries and meet minimum setbacks. No allowances for crossing property boundaries will be granted by the County. As proposed, the solar component of the proposed project does not meet the minimum setback standards and therefore is not compliant with required setbacks within the County's zoning regulations.

The application additionally states that portions of the solar array sites may be located within 150 feet of an adjacent public street right-of-way and that views toward the solar arrays may occur when driving on public roads that border solar array sites. The application further states that there may be topography, vegetation, or structures which may screen the visibility of the sites. In addition, the application notes that's the views of the solar arrays would be limited to a short duration while passing the site and that the traveler focus should be on the road ahead and for these reasons are not proposing landscape buffers and screening of the solar array sites (HHWF Application, page 2-150).

The County does not agree that the reliance on natural features for screening and that passing motorist's attention should be on the road ahead would meet the Code requirements for the mitigation of the project's visibility. The applicants point out that although the solar modules would have anti-reflection coating there could still be some potential for glare. The County has concerns with this possibility especially after seeing the negative impacts that a 58-acre solar project which was installed adjacent to Interstate 84 in Pendleton Oregon has been having on drivers traveling on I-84. This project, constructed in 2018, has received numerous complaints from passing motorists complaining that the glare is not only a nuisance, but also a safety hazard despite the project meeting the minimum FAA requirements. It has been identified that the most appropriate mitigation technique would be the installation of screening to remove the solar panels from view of the road.

Comparatively, the Horse Heaven Wind Farm is proposing solar array sites of 3,045-4,450 acres and for a project of that size and scope it would be nearly impossible not to potentially distract and temporarily blind drivers from the glare of a project of that size without adequate screening. By not proposing landscape buffers or screening as required by the Benton County Code, the County maintains that this is a major safety concern as the buffers and screening are intended to screen views of the project, thus, minimizing or eliminating the glare from the solar arrays for passing motorists. Without this screening, the glare from the project could potentially increase the risk of traffic accidents. One of the proposed sites spans either side of Interstate 82 which is a major corridor connecting southeast Washington to eastern Oregon and Idaho. The County maintains as proposed; the project does not meet the screening requirements within section 11.42.100(b) of the Benton County Code and therefore is not consistent with zoning regulations.

In addition the County is requesting more in-depth site-specific information as to the exact location of each solar array site, including setback distances from adjacent road rights-of-way, in order to accurately assess to what extent landscape buffers or screening should be required in order to be compliant with County zoning regulations. At a minimum, the County would like to see the applicants be required to install signs along the road rights-of-way prior to the solar array sites becoming visible which would warn drivers of possible solar glare.

Throughout the application, it is stated that the proposal would comply with Benton County's applicable setback and screening standards, however based on the above information, the County feels that the project does not meet the minimum setback and screening requirements for solar facilities and lacks consistency with the County's zoning regulations.

### *State Environmental Policy Act (SEPA) Checklist*

The County has found that that the application:

1. Fails to be consistent with the goals and policies of the Benton County Comprehensive Plan; and
2. Fails to meet the required criteria to obtain a conditional use permit in Benton County.

In addition to the lack of consistency with locally adopted plans and ordinances, the project proposes significant environmental impacts that require further studies and analysis. An expedited review shall for this application should not be granted. The project fails to propose specific site locations for wind turbines, battery storage, or solar sites. Requiring an EIS would give the applicant the ability to provide site specific detail, environmental analysis, and applicable mitigation measures for each impacted site.

At a minimum, studies and analysis should occur for the following significant impacts:

1. Loss of commercially significant agricultural lands;
2. Loss of habitat;
3. Impacts to streams and water;
4. Impacts to Critical Aquifer Recharge Areas;
5. Impacts to public roadways and infrastructure;
6. Fire risk and associated impacts to emergency services;
7. Shadow flicker impacts; and
8. Visual impacts for solar and wind facilities.

### ***1. Loss/Lack of Agricultural Land Protection***

Benton County Code 11.17.010 states the purpose of this chapter is to meet the minimum requirements of the State Growth Management Act (RCW 36.70A) that mandates the designation and protection of agricultural lands of long-term commercial significance. The chapter's intent is to protect the GMA Agricultural District (GMAAD) and the activities therein by limiting non-agricultural uses in the district to those compatible with agriculture and by establishing minimum lot sizes in areas where soils, water, and climate are suitable for agricultural purposes.

The Benton County Comprehensive Plan provides clear guidance on the importance of the County to protect, maintain, conserve, and enhance agricultural lands and their natural resource-based industries while discouraging incompatible uses (BCCP, page 3). It further charges the County to reduce the inappropriate conversion of agricultural lands and assure that rural development is compatible with surrounding rural and agricultural areas (BCCP, page 14).

Benton County has highly productive agricultural soils with over \$900 million generated by Benton County crops and livestock per year (BERK Consulting 2017). Designated agricultural resource lands make up a majority of the County. The soils in Benton County are generally suitable for both agriculture and structural development, with localized constraints relating to slope, geo-hydrology, and pockets of sandy soils and fines. Soils in the region are very susceptible to wind and water erosion once stripped of their natural cover. However, in undisturbed condition, the indigenous shrub-steppe and bunch grass vegetative cover has adapted to hold basin soils in place. When stripped of natural cover, prevention of erosion requires the application of deliberate and aggressive management techniques (BCCP, page 58). Further, dryland agricultural activities primarily consist of dryland wheat production, principally in the Horse Heaven and Rattlesnake Hills. Dryland production has an economy of scale requiring large operations, typically in the thousands of acres (BCCP, page 43). With this project proposing a loss of 1% of the total agricultural lands in Benton County, it would have significant impacts to the economy of scale required for agricultural production in the County.

The project would be within the GMA AG land use designation, which encompasses approximately 649,153 acres or 59 percent of the County's land base (HHWF Application page 4-33). The project's permanent footprint would occupy up to approximately 1.1 percent of the existing Growth Management Act Agriculture (GMA AG) land use designation/ Growth Management Act Agricultural District (GMAAD) zone of Benton County.

In *Lewis County v. Western Washington Growth Management Hearings Board*, the Washington State Supreme Court held that allowed uses on resource lands must not negatively impact agricultural lands of long-term commercial significance. The Supreme Court affirmed the Western Board's conclusion that allowing non-farm uses within farmlands (including mining, residential development, telecommunication towers, public facilities, etc.) violated the Growth Management Act. Because of the intensity of the size and scope of the proposed project and the fact that nearly 7,000 acres or 1 percent of the County's agricultural land would be permanently disturbed, the County does not feel that this project is consistent with the Washington State Growth Management Act or existing case law which seeks to protect agricultural lands in Washington State. The County maintains that it has properly designated its agricultural lands and that the approval of this project would undermine the Washington State's Growth Management Act's agricultural conservation mandate by allowing the inappropriate conversion of large tracts of prime agricultural land to an unrelated use, thus resulting in the long term removal of agricultural lands of long-term commercial significance.

Per the BCCP and Washington State case law, the protection of agricultural lands is of the utmost importance and seeks to conserve areas designated "GMA Agriculture" in the Comprehensive Plan for a broad range of agricultural uses which would protect these areas from the encroachment of incompatible uses. The permanent removal of over 6,000 acres of agricultural land does not make this proposal compatible with the goals and policies of the Benton County Comprehensive Plan, Natural Resource Lands Element. Section 2.3 of the Comprehensive Plan tasks Benton County with conserving and maintaining agricultural land of long-term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy. Further it identifies that only uses related or ancillary to, supportive of, complimentary to, and/or not in conflict with agricultural activities are appropriate in areas designated GMA Agriculture (BCCP, page 17).

The primary impacts from construction would involve approximately 9,826 acres of earth-disturbing activities including approximately 6,869 acres of permanent disturbance and 2,957 acres of temporary disturbance (HHWF Application, pages 3-11 and 1-66). The applicant claims that the project complies with and supports the Benton County Code and Comprehensive Plan as the renewable energy project would create economic and environmental benefits while minimizing impacts to agricultural lands (HHWF Application, page 2-136). The justification that the proposed energy uses would "protect" agricultural land from residential development is unfounded as the zoning code already protects agriculturally zoned land from incompatible uses and residential development. As seen throughout the County's review of this application, although there may be forecasted economic benefits as a result of the project, this does not justify the impact to and loss of the County's natural resources and open spaces as the sheer volume of the project's scope and size greatly diminishes the County's efforts to protect and conserve agricultural lands of long-term significance and its critical areas, primarily shrub steppe habitat which is a habitat of significant local importance.

## ***2. Loss/Lack of Habitat Preservation***

The proposed project is not in compliance with the County's Critical Area Ordinance. In accordance with BCC Title 15, the County shall require a Critical Area Project Review to determine whether the project is likely to impact the functions and values of critical areas and whether the project adequately avoids the impacts to critical areas as a result of the project.

A major shortcoming of the application is that it does not provide site-specific plans for each turbine and each solar project location. As such, the County is unable to conduct a thorough critical area review for the project proposed locations and therefore is unable to determine if this proposal complies with the County's Critical Area Ordinance and if the proposed mitigation measures would be sufficient or if further studies and information are needed.

The applicant identifies that all the potential sites have not been fully surveyed and evaluated for consistency with the County's Critical Area Ordinance. To date, the surveys have verified, mapped, and

characterized the habitat at only 44 of the 244 proposed turbine locations and indicates that the solar site areas have not been studied. The application proposes that the habitat and plant surveys would only be conducted prior to construction (HHWF Application, 1-9). The County requests that an EIS be required for this project so that these and other studies can be conducted which would allow for a fully informed evaluation of the impacts that this project would have on the County's critical areas. The County firmly believes that it would be irresponsible to preliminarily approve a project of this size and scope without all potential environmental impacts from the project fully evaluated.

According to WDFW's database, approximately 2,756 acres of shrub-steppe have been mapped within the project lease boundary area (WDFW 2020a, 2020b). During the limited field surveys conducted by the applicant, approximately 704 acres were confirmed as sagebrush shrub-steppe, 23 acres were determined as dwarf shrub steppe, 42 acres were determined to be some other habitat type and the remaining 1,988 acres were not field-verified during their surveys (HHWF Application, page 3-73). Given that almost 2,000 acres of the project area have yet to be studied, it would be difficult for the County or EFSEC to accurately assess the impact to and loss of habitat which would be a result of this project.

From the studies that have been conducted on 44 of the proposed 244 wind turbine sites, the application identifies that approximately 1,379 acres of scrubland and 2,744 acres of grassland have been mapped within the studied locations of the micrositing corridor and solar siting areas (HHWF Application, page 3-69). Of that small mapped area, the application estimates that only 97 acres (Appendix L, page 8) would be impacted from construction and operation of the project. The County finds this estimate extremely conservative given the size and scope of the project and the fact that only a small fraction of the potential sites has been adequately studied. Requiring an EIS would give the applicant the opportunity to accurately identify the true impact to the County's critical areas.

Further, the County has concerns over the estimated impacts to habitat presented throughout the application due to the discrepancy of data presented. While in Appendix L the application claims that only an estimated 97 acres would be impacted by the project, Table 3.4-14 of the application estimates that a temporary impact to 552 acres and a permanent disturbance to approximately 42 acres within the wind micrositing corridors and a temporary impact to 20 acres and permanent impact to 52 acres of habitat within the solar siting areas (HHWF Application, page 3-130). These numbers are not consistent with the figures presented earlier in the application which state that the wind energy components of the project would permanently impact up to approximately 93 acres of grassland and shrubland habitat, and temporarily impact up to 571 acres of grassland and shrubland habitat and approximately 891 acres of grassland and shrubland habitat would become 'modified' habitat under the solar array (HHWF Application, 1-63). Regardless of the true number of acres impacted by the project, the County would like to see the applicant mitigate for any habitat loss by banking the same amount or more in another location which would be mutually agreed upon by the County and WDFW that would seek to enhance habitat connectivity and improve wildlife corridors in Benton County.

In 2018, Benton County began its participation in Washington State's Voluntary Stewardship Program, a landmark State program which seeks to protect critical areas while also maintaining and enhancing agricultural viability in the County. The disturbance of additional acres of habitat would detrimentally impact the objectives of this program by the significant loss of habitat without a proposal to bank a similar number of acres for conservation. This impact would also diminish Benton County's ability to meet the goals set forth in the VSP Work Plan, a community led participatory plan that local stakeholders worked on for over two years to develop and implement.

Chapter 2.5 - Critical Areas of the Benton County Comprehensive Plan identifies the need to protect river, stream, wetlands, and fish and wildlife habitat conservation area functions and values as well as integrating natural resources and critical areas into a linked pattern of open lands in order to serve multiple functions, including wildlife habitat corridors. Examples of ecological functions and values include improved water quality, improved water storage and availability, buffering and control of storm water and floods, pollination, food production, soil fertility, pest control and the reduction of carbon dioxide.

The Washington Wildlife Habitat Connectivity Working Group, a group of state and federal agencies, universities, and environmental groups have created guidance which promotes the long-term viability of wildlife populations in Washington State through a science-based, collaborative approach that identifies opportunities and priorities to conserve and restore habitat connectivity. This goal of creating habitat corridors and connectivity has also been identified as a priority by the Washington State Department of Fish and Wildlife. Wildlife corridors seek to keep large, connected patches of undeveloped native vegetation intact by encouraging areas of low development, managing road systems to minimize the number of new roads and new barriers to important animal movement corridors, and implement appropriate planning for open space to incorporate high-value habitat and corridors for animal movement. The approval of a project of this size and scope would create countless barriers to the vast tracts of open space which currently exist across the Horse Heaven Hills. Not only would the far-reaching expanse of the wind turbines significantly fragment the landscape, which is valued for its high ecological functions, the solar component would create approximately 10-12 square miles of physical barriers to any wildlife connectivity.

A 2009 study of the impact of solar farms, identified detrimental impacts including landscape fragmentation, vegetation degradation, interference with flora and fauna as well as microclimatic changes caused by the daytime warming of the surface of solar arrays (Chiabrando R, Fabrizio E, Garnerio G (2009) The territorial and landscape impacts of photovoltaic systems: definition of impacts and assessment of the glare risk. Renewable and Sustainable Energy Review, 13(2009):2441-2451).

The County cannot stress enough the necessity of requiring an EIS so that thorough surveys of each site can be conducted, and the associated reports submitted prior to a decision, not prior to construction. The County feels that this analysis is critical for a fully informed final determination as to whether the proposed mitigation measures intended to address the impact to, and loss of, the critical area habitat would be adequate. Per Benton County Code 15.14.040(c), mitigation sites shall be located to preserve or achieve contiguous wildlife habitat corridors in accordance with a mitigation plan that is part of an approved critical area report to minimize the isolating effects of development on habitat areas. The County respectfully request that the final design and actual BMPs and mitigation measures identified shall be agreed upon by the County in addition to EFSEC's approval of these practices and measures.

### ***3. Impacts to Streams/Water***

Per Benton County Code 15.14.040(a) any alteration of a habitat conservation area shall not degrade the functions and values of the habitat. A habitat conservation area may be altered only if the proposed alteration of the habitat or the mitigation proposed does not degrade the quantitative and qualitative functions and values of the habitat. All new structures and land alterations shall be prohibited from habitat conservation areas, except in accordance with Chapter 15.14.

The project as proposed would have temporary impacts on 19 of the 31 mapped ephemeral stream channels and two mapped intermittent streams, while permanent impacts would occur to one ephemeral stream within the Ordinary High-Water Level (HHWF Application, page1-63). The application further states that the one ephemeral stream with permanent impacts would likely require a culvert for road placement if this impact as well as temporary impacts in other ephemeral and intermittent stream channels cannot be avoided and work in the OHWL will occur, a Hydraulic Project Approval may be required and would be developed upon final design of the Project (HHWF Application, page 3-41).

This proposal shall meet all performance standards of Benton County's Fish and Wildlife Habitat Conservation Areas Chapter 15.14 including, but not limited to, meeting the minimum required buffers from creeks and streams. The applicant further states in their application that the National Hydrography Dataset "databases typically overestimate the extent of waterbodies" (HHWF Application, page 3-33).

This position deeply concerns Benton County as the County feels that it is grossly erroneous to assume that the national database inventory of the critical areas present is an overestimate, and therefore downplays the importance of the County's streams functions and values to the natural landscape.

The County requests a site specific study, with alternatives and mitigation for each facility, road, and associated infrastructure shall be evaluated to determine compliance with all performance standards of Benton County's Fish and Wildlife Habitat Conservation Areas Chapter 15.14 including, but not limited to, meeting the minimum required buffers from creeks and streams.

The average volume of water needed for cleaning solar panels is approximated at 500-1000 gallons per MWp of panels per year. Further, the hydrological footprint of large solar arrays, particularly in arid or semi-arid environments, is likely to be considerable (Turney D, Fthenakis V (2011) Environmental impacts from the installation and operation of large-scale solar power plants. Renewable and Sustainable Energy Review 15(2011):3261-3270). This is an important consideration for Benton County and Washington State as limited water resources in the County's two major watersheds are becoming an ever more important criteria when evaluating land use decisions.

#### **4. *Impacts to Critical Aquifer Recharge Areas***

The Columbia River basalts of the Columbia Plateau provide a locally important aquifer system. These areas, referred to as Critical Aquifer Recharge Areas (CARA's) are areas with a critical recharging effect on aquifers used for potable water, including areas where an aquifer that is a source of drinking water is vulnerable to contamination that would affect the potability of the water, or is susceptible to reduced recharge.

WAC 365-190-080 charges counties with the protection of surface and groundwater, these critical areas are vital to recharging the State's water resources. Further, WAC 365-190-080(2) identifies CARAs as areas that are determined to have a critical recharging effect on aquifers. Critical aquifer recharge areas have prevailing geologic conditions associated with infiltration rates that create a high potential for contamination of ground water resources or contribute significantly to the replenishment of ground water. With the high use of chemicals, such as fertilizers and pesticides in agricultural areas, it is vitally important to protect CARAs in these areas help to alleviate possible groundwater contamination.

Studies have found nitrate concentrations exceeding drinking water quality 535 standards in shallow wells in eastern and southern Benton County (Washington State Interagency 536 Groundwater Committee 1996, Ecology 2016). Based on the number of wells and the percentage of wells exceeding 10 mg/L of nitrate, Ecology has identified eastern Benton County as one of the top ten nitrate priority area candidates within Washington State (Benton County VSP Work Plan 2018).

The application identifies that there are approximately 149 acres of 100-year floodplains, which are associated with Critical Aquifer Recharge Areas (CARAs) as defined by Benton County, within the project lease boundary (HHWF Application, page 3-34). This reflects approximately 7% of the entire County's mapped CARA areas for dryland and rangeland or approximately 25% of the Rock-Glade Watershed, the watershed in which the project is entirely located (VSP Work Plan 2018). Such a large impact to the County's CARAs by this project has the potential to significantly change the hydrology and increase groundwater contamination in these areas due to the degradation and loss of CARAs as well as and the significant increase of impervious surfaces to the existing open spaces of the Horse Heaven Hills.

The County requests a site-specific study, with a hydrogeological evaluation, including alternatives and mitigation for each facility, road, and associated infrastructure shall be evaluated to determine compliance with Benton County's Critical Aquifer Recharge Areas Chapter 15.06

#### **5. *Impacts to Public Roadways***

The proposed wind farm project will create significant traffic impacts on public roads including increased volume and over-size and/or over-weight loads. The submitted proposal does not provide adequate detail on the exact location of the proposed infrastructure nor the timing of construction, both of which greatly affect the required mitigation measures, for the County to make a determination on what the full impacts will be.



In order to properly evaluate the impacts to the public road system the County requires a complete, independent, study taking into account the following:

- Identify all potential locations of infrastructure to be installed as part of the project;
- Identify all source locations for products used in the construction and maintenance of the project including but not limited to aggregates, concrete, asphalt, water sources and any location which products are picked up from rail, water or other transportation modes to be transferred to the project site;
- Identify all potential haul routes using any public roadway;
- Identify the location of any new roadways, public or private, to be constructed as a part of this project;
- An analysis of the adequacy of any identified public road to be used as an access or haul road for any part of the construction or maintenance of the project. The analysis shall consider the roadway surface, roadway subgrade, roadway width, roadside obstructions and all other geometric features which may be affected by the roads use as an access or haul route;
- A traffic impact analysis showing how traffic within and surrounding the project area will be impacted during and after construction. The traffic study shall include estimates of the total volume of vehicles, the percentage of truck traffic, the maximum loads (length, width, height, weight) anticipated, the number of oversize/overweight vehicles anticipated and the expected flow of traffic to, from and within the project boundaries. The analysis shall include time periods both during and outside times of significant agricultural activity in the area (e.g. planting and/or harvest seasons);
- A complete geotechnical engineering report, including core sample logs of each roadway taken at multiple locations, that makes recommendations on the required roadway section to accommodate the proposed volumes and loading;
- Consideration for the impacts of weather and different seasons related to hauling of equipment and materials to the project site. Particular consideration will be given to times of significant agricultural activity, the availability of water to maintain non-hard surfaced roads during dry months, and the potential for freeze thaw actions due to inclement weather; and
- Recommended mitigation measures to eliminate impacts to the public road system.

The analysis is to be prepared by a Washington State licensed engineer or engineers with specialty in traffic impact analyses and geotechnical engineering including pavement design. The project developer and the selected engineer shall coordinate with the Benton County Public Works Department before undertaking any study work to ensure that all relevant items are addressed, including but not limited to, the number and location of core samples to be taken.

The project developer shall comply with all recommended mitigation measures identified in the study, and agreed to by the Public Works Department, prior to the beginning of any construction activities.

The Public Works Department reserves the right to seek a third-party review and evaluation of the submitted study and supporting information. The cost of any third-party evaluation shall be borne by the project developer.

Should damage to any public roads become evident during the developers use, even after the mitigation to the roads is completed, the developer shall repair the road within two days of notification by the County. Should any gravel roads be used during construction, the developer shall enter into an agreement with the County to maintain such roads in accordance with County standards and expectations until construction is complete.

## **6. *Increased Fire Risk and Associated Impacts to Emergency Services***

The applicant has provided a draft emergency plan (Appendix P) within their application materials. Appendix P states that the applicant has not yet coordinated with local emergency responders and will do so only prior to construction. The County finds this lack of evaluation to be insufficient and request to have information provided about the potential fire risks associated from the project, an analysis of the potential need for on-site fire flow, and an evaluation of the burden this project will have on public services that will be necessary to protect the proposed infrastructure. The lack of engagement with Benton County Emergency Services and the local fire districts at this point in the application process is concerning. The County requests an EIS be completed that includes a full analysis of the risks, burdens, and options to public safety, emergency services, and fire suppression.

Wind turbines, solar arrays, and associated infrastructure will all contribute to additional ignition sources for increased wildfire risk. Initial construction activities will increase the burden on local emergency services as the construction activities will lead to an increase of emergency calls for medical and fire services. Construction activities will also increase the potential of fire risk from activities such as the use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives. The application states that it will observe periods of restriction to the extent practical. The County feels that this position is not a sufficient mitigation measure and that no fire-risk activities such as those listed above, shall be permitted during high-extreme fire danger days in order to minimize the risk of ignition sources.

The project is almost entirely located within Fire District #5, a volunteer only district, and Fire District #1. It is estimated that it would take either of these districts approximately 15 minutes or more to respond to an incident within the project area. Given the fact that grassland wildfires can travel up to 14 miles-per-hours and the estimated fire response time, a fire caused by this project has the potential to spread over 3 miles before emergency responders would arrive on-site. In July 2019, a wildfire burned 253 acres in nearby Klickitat County due to a fire in the generator unit of a wind turbine. That incident required State mobilization of resources including 25 fire teams in order to contain the fire. A similar fire would create a burden on the local rural volunteer-only fire district before State resources could be deployed. Additionally, due to the height of the wind turbines, air support resources, which are commonly used in our area to combat any potential wildfires may not be able to be deployed.

The solar arrays are also an additional hazard for fire fighters as they are difficult to disconnect and deenergize which would increase the emergency responders' risk of electrical shock. The applicant states that the employee should not attempt fire suppression due to this risk, however it does not address the increased risk to local responders. Further, water inundation cannot be used to combat fire with the solar sites and special recovery equipment and techniques will be required.

## **7. *Shadow Flicker Impacts***

Per the application, the widely used industry standard threshold for shadow flicker is 30 hours per year. Of the 742 receptors analyzed in the applicant's study, seven were predicted to experience more than 30 hours of shadow flicker per year (HHWF Application, page 4-75). As such, the County would like to see the removal of those seven identified sites as they exceed the maximum industry standards.

## **8. *Visual Impacts***

The Horse Heaven Hills are a sparsely populated plateau which constitutes the southern half of Benton County and is unique among the Yakima Folds Belt. It is the southern-most and longest running ridge in the system at some 60 miles; it is the most severely "lop-sided" of the ridges in the County, becoming more of a monocline than an anticline in areas; and it takes a definitive, 90 degree turn to the south at Kiona, which is the geographic center of the County. (BBCP, page 57). The proposed expanse of this project will cover approximately 43% of the entire Horse Heaven Hills ridgeline. This iconic geological feature which visually defines Benton County is not only important for the County's wine and agricultural

economy, but this prominent geological feature is also held by the community as an incredibly important ecological aesthetic. That is, the residents of Benton County view the aesthetic quality of the Horse Heaven Hills as an ecological benefit to the local environment.

There is an increasing amount of research on the benefits of open spaces for health, well-being and overall sustainability and quality of human habitat (The role of aesthetic quality in the preference and use of green open spaces, Yusufzyanova, Dinara N, 2020). As provided in Appendix B, over 90% of the comments received by the County highlight the important benefits that the Horse Heaven Hills have on the local resident's health, well-being and quality of life.

The protection of ecological aesthetics has many important public benefits. There is an important relationship between land-use and landscape and how the impact of additional development or structures may influence landscape ecology. Human's perceive that areas of high aesthetic value are areas of good ecological health. In addition, there is a correlation between physical landscape and ecological attributes, and the factors related to ecological quality have been found to influence peoples' perception of the ecological aesthetics important critical areas.

County residents have identified that the preservation of rural character; protection of natural resources, hillsides, and open spaces and the protection of farmland are of high importance to the local citizens. The proposed project is in direct conflict with these priorities which were establish through a public participation process (BCCP, pages 4-5). Further, the applicant has referenced that the Washington State Comprehensive Outdoor Recreation Plan has identified that individual recreational activities in the South-Central Region such as walking in a park or trail setting (82 percent), day-hiking (50 percent), scenic or wilderness areas (48 percent), and wildlife or nature viewing (47 percent) were amongst the highest participation rates for recreation (HHWF Application, page 4-91).

The Benton County Comprehensive Plan highlights the significance of conserving the visually prominent naturally vegetated steep slopes and elevated ridges that define the Columbia Plateau (BCCP, page 28). The intent of the goal is to preserve and keep publicly defined inappropriate development from impacting the slopes which define the Benton County landscape.

The applicant has demonstrated in their application that the scope of the wind component of the proposed project would visually impact between 81-87% of the 10-mile viewshed analysis area, including neighboring counties and states. Given the close proximity of the project to the incorporated city limits and densely populated neighborhoods of the County, the project would be visible from every city in the County.

As proposed, project turbines under turbine layout option 1 would potentially be visible from approximately 86% of the area located within 5 miles of the project and from 81% of the area within 10 miles of the project. Project turbines under turbine layout option 2 would potentially be visible from a slightly larger portion of the analysis area, approximately 87% of the area located within 5 miles of the project and approximately 83% of the area within 10 miles of the project. The County believes that the 10-mile viewshed analysis which was conducted is too small given the size and scope of the project. The County requests that an EIS shall be required for this project in order for a more detailed and expansive viewshed analysis to be conducted so that the true visual impact of the project on Benton County and surrounding counties and states will be identified. The impacts to wineries, businesses, existing rural residential neighborhoods and the urban areas shall be evaluated, alternatives provided, and sufficient mitigation should be proposed.

Table 4.2.3-2 highlights that of the viewpoints studied, locations 2a, 2b, 2c, and 5 would be the areas of highest visual impact (HHWF Application, page 4-75). These viewpoints are also the areas of the largest concentration of established residential neighborhoods in the cities and County. For this reason, the County maintains that the significant environmental impact to the existing landscape which would affect the majority of cities and County residents, does not meet the intent of the goals and policies within the County's land use plans and zoning regulations.

The Comprehensive Plan further states the importance of protecting the natural slopes and ridgelines which define our area through the acquisition of land and other mechanisms which would seek to protect the natural landforms and vegetative cover of these areas (BCCP, page 28). The County has held this mandate of the utmost importance and has worked to acquire a portion of two local iconic mountains, Candy and Badger mountains, and establish them as nature preserves/conservation areas for the public's benefit and enjoyment as well as improving the ecological functions and values through preservation.

Per Table 4.2.3-2 in the application, these two considerable preserves as well as many other parks and nature preserves in the Columbia Basin, including McNary National Wildlife Refuge and Chandler Butte, would experience a significant visual impact by the size and scope of the project. Approval of this project as proposed would seek to undermine the vast efforts undertaken by the County and other conservation groups to preserve the basin's natural landscape for its ecological and community benefits to its residents.

To further the County's efforts of having a connected corridor of natural hills/ridges for the public's enjoyment and benefit as well as expanding the functions and values of the corridors to promote wildlife habitat connectivity as identified by WDFW as a local priority, the County encourages the conservation easements and the acquisition of land which would be for the public benefit and would preserve other existing hillsides and ridges in Benton County.

In addition to the visual impacts created by the wind component of the project, the County maintains that the lack of mitigation for visual impacts from the solar component is not sufficient. Each of the proposed solar sites would span across either a County road or a major interstate and as identified by the applicant, views of the solar arrays would occur when driving within a mile of the solar arrays (HHWF Application, page 4-78). The applicant is not proposing any landscape buffers or screening as required by the Benton County Code for solar facilities. The assumption that "traveler focus would be on the road ahead" is an insufficient argument in lieu of appropriate mitigation measures for the visual impact to and safety of drivers traveling along the roadways and interstate. Although the application identifies that an anti-reflective coating will be used on the solar panels (HHWF Application, page 4-36), the County maintains that this is not sufficient to mitigate for the visual impact and potential glare which would be created by the project. For this reason, the County is requesting that an EIS be required in order to provide an opportunity for the applicant to develop sufficient mitigation measures which would address the visual impacts from the solar component of their proposal.

**From:** [Chris wright](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Re: Horse Heavens Hills Windfarm  
**Date:** Tuesday, March 30, 2021 3:53:39 PM

Informational Meeting Comment #IM0072  
Horse Heaven Wind Farm  
Docket #210011

External Email

Scout Clean Energy has indicated they intend to prepare and State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) which is greatly appreciated. With that announcement and this public meeting, below are a few questions regarding the next steps to be taken by EFSEC and Scout Clean Energy:

1. Will EFSEC continue to be the lead agency for the SEPA EIS or will another agency be chosen?
2. Will Public Scoping Meetings be held for the Horse Heaven Hills Wind Project before a Draft EIS is presented for public review and comment?
3. How many and where will future public meetings be held?

Thank you for the opportunity to comment.

Chris Wright  
Sent from my iPhone

On Mar 28, 2021, at 5:52 PM, Chris wright <cswakw@frontier.com> wrote:

An additional comment. Scout claims no loss of property value from the project in their application. There is some evidence that this is incorrect. Please see attached

<Real Estate Values.pdf>

Chris Wright  
Sent from my iPhone

On Mar 28, 2021, at 2:38 PM, Chris wright <cswakw@frontier.com> wrote:

I'd also like to add a comment:

Scout provided an estimate of public support in their application of 61% of the tri cites population in favor of the wind farm. At the March 15 public meeting opinion was about 85% against the project. Scout seems to have a significant data disparity with an informed public or scout is cherry-picking their questions. Either way the ASC

should be denied until this is resolved

Chris Wright  
Sent from my iPhone

On Mar 28, 2021, at 11:21 AM, cswakw@frontier.com  
wrote:

Attached are comments on the proposed Horse Heaven Hills  
Windfarm in Benton County  
Thank you for your consideration of these comments.

Chris Wright,  
West Richland, WA  
<EFSCE Comments on Hores Heaven Wind Farm.docx>

**From:** [Robert Bonner](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Tuesday, March 30, 2021 3:57:10 PM

Informational Meeting Comment #IM0073  
Horse Heaven Wind Farm  
Docket #210011

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External Email

This wind farm will deplete our already vanishing bird population along the Pacific Flyway. Please do not allow these windmills to be built.

Joyce Bonner 3/30/21

Sent from [Mail](#) for Windows 10

**From:** [Robinson16824@charter.net](mailto:Robinson16824@charter.net)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** The proposed Horse Heaven Wind Farm Project  
**Date:** Tuesday, March 30, 2021 3:59:25 PM  
**Importance:** High

Informational Meeting Comment #IM0074  
Horse Heaven Wind Farm  
Docket #210011

### External Email

EFSEC Committee,

Although the proposed Horse Heaven Wind Farm Project desires to produce “clean energy”, this project is of no benefit to the any community within Benton County or any other adjoining county as all of the energy generated will be used outside of eastern Washington. The proposed route of the wind farm will be detrimental to local and migrating wildlife as well as an eyesore to those communities that it will bisect. The developers of the Horse Heaven Wind Farm Project can easily locate this wind farm to numerous unpopulated areas in Washington state or other western states where it will not have a negative impact upon any community or the wildlife.

Thank you for your attention to this matter.

Pete Robinson



**From:** [leecat.slape@frontier.com](mailto:leecat.slape@frontier.com)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** SCOUT CLEAN ENERGY HORSE HEAVEN HILLS PROJECT  
**Date:** Tuesday, March 30, 2021 4:02:00 PM

Informational Meeting Comment #IM0075  
Horse Heaven Wind Farm  
Docket #210011

External Email

Hello,

Wanted to make sure my comments were recorded.

I am against this project. These are unsightly contraptions that will not have any long-term benefit to our area.

The short-term jobs, do not out-weigh the meager 8 jobs that this would create, or the mass landfill garbage this would generate.

Take it west, and let THEM harness it, as they say they need it. I've also read too many comments from west of the cascades that they are too ugly to have there. If they want more 'clean' power, they need to live with the sight of them.

We have hydroelectric power, and it's already in place, and is of better use.

Also, you cannot trust a company that goes AROUND a county that has already said, 'NO, we don't want you'.

We already have 'Clean' power.

Thank you,

Cathy Slape

[Sent from Yahoo Mail for iPhone](#)

**From:** [Dori Luzzo Gilmour](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Wind projects  
**Date:** Tuesday, March 30, 2021 4:06:19 PM

Informational Meeting Comment #IM0076  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I had a couple of questions:

The Save the Ridges group is backed by what organizations?

Has the power been sold?

How many jobs will this project add?

Thank you

Dori Luzzo Gilmour  
509.366.9706

**From:** [Andrue Ott](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills proposal  
**Date:** Tuesday, March 30, 2021 4:07:37 PM

Informational Meeting Comment #IM0077  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I think the project should be assessed on the merits of the proposal and advice from subject matter experts with some relevant input from local government. Public outcry is negative by definition but rarely is it universal. I find it humorous that many who advocate for free markets are so quick to call for regulation when they feel aggrieved. The arguments I've seen in opposition read mostly as privileged "NIMBYs" ( not in my back yard) feigning concern for the environment when their primary concerns are the impacts to the subjective beauty of the landscape and their property value. It is bit the role of government to protect any one group's wealth but merely administer and equal playing field. Please don't be swayed by emotional tantrums but on the ultimate impact(s) on the many and various stakeholders.

Andrue ott  
509.416.6881

Composed on miPhone

**From:** [wimunn@aol.com](mailto:wimunn@aol.com)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Fwd: Horse Heavens Wind Farm hearing comments  
**Date:** Tuesday, March 30, 2021 4:17:03 PM

Informational Meeting Comment #IM0078  
Horse Heaven Wind Farm  
Docket #210011

External Email

Sent: Tue, Mar 30, 2021 4:13 pm  
Subject: Horse Heavens Wind Farm hearing comments

March 29, 2021

Energy Facility Site Evaluation Council  
Olympia, WA

COMMENTS FOR MARCH 30, 2021 PUBLIC HEARING  
RE PROPOSED HORSE HEAVENS WIND FARM – Scout Energy

Ladies and Gentlemen:

Unable to attend the public hearing in person, I am submitting these electronic comments in **strong opposition** to the building of the proposed wind turbine farm on the designated site in Benton County, Washington. My technical colleagues, highly skilled in energy issues and broadly experienced in all forms of electrical generation and operation of our grid, have expressed similar positions in this matter. We urge you to make your decisions based solely on fact. Our plea is that your vision remain fixed on the 50-year requisite of a rapid growing highly technical society requiring, above all else, inherently reliable and economically feasible sources of electricity.

Fact: In Eastern Washington we have, if not the cheapest electricity in the United States, certainly very nearly so. The addition of these wind sources to the grid will measurably increase the electrical rates of the entire customer base, in all likelihood, permanently.

Fact: In order to follow the demand load as needed, this source, being variable by definition, would place undue, unnecessary pressure on all other generation facilities and the operation of the grid as a whole.

Fact: Landowners within the farm footprint are, for the most part, ecstatic at the extra income they will be accorded, as are the companies who promote them and enjoy the generous front end subsidies and sales. The cost is borne by the broader ratepayer base and the generally uninformed taxpayers nationally.

The multiple arguments regarding aesthetics need not be made again here, as they are emotional. The words of physicist Richard Feynman, written in 1986, however, remain a basic truth: "Reality must take precedence over public relations, for nature can not be fooled".

Thank you for your attention and service to our state.

Wanda Munn  
1104 Pine Street  
Richland, WA 99354  
[wimunn@aol.com](mailto:wimunn@aol.com)  
landline 509-943-4391  
cell 509-531-8456

**From:** [Jermaine Smiley](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm Public Comments  
**Date:** Tuesday, March 30, 2021 4:18:52 PM  
**Attachments:** [Horse Heaven Wind Farm.docx](#)

Informational Meeting Comment #IM0079  
Horse Heaven Wind Farm  
Docket #210011

External Email

Hello My name is Jermaine Smiley. I'm submitting my comments regarding the Horse Heaven Wind Farm project for the record as an attachment to this email.

Jermaine Smiley  
Business Manager & Secretary Treasurer  
WA & Northern Idaho District Council of Laborers  
Office: 425-741-3556  
Cell: 206-747-6898  
[www.nwlaborers.org](http://www.nwlaborers.org)



Thank you Director Drew and the entire commission for allowing me the opportunity to speak to you all this evening. My name is Jermaine Smiley and I am the Business Manager and Secretary Treasurer of the Washington and Northern Idaho District Council of Laborers. I represent around 15,000 members in the council area. I am here to speak to you today in support of this project. The work completed by a recent wind farm that had community support and that had the commissioners' support locally, was Rattlesnake Ridge. This past project provided members with not only full-time jobs, but overtime and nearly a years' worth of work in less than eight months. These are the types of projects that would be carried over to the Horse Heaven Project. These are the types of projects that grow the economy, increase property tax revenue, and decrease the amount the community is paying for taxes.

Project operation would increase property tax revenues collected in Benton County. During its first full year of operation Phase 1 would generate an estimated \$10.4 million in annual property taxes, an increase of 4.1 percent over current property tax revenues.

To add, over the 35-year operating life of the Project, Phase 1 would generate an estimated total of \$140.6 million in property tax revenues. Operation of Phase 2 would generate an additional \$121.7 million to \$122.3 million in total property tax revenues over the same period.

Operation of Phase 2 would generate an additional \$9.0 million in property tax revenues, a further increase of 3.5 percent over current property tax revenues. Together, both phases would generate almost \$20 million in property tax revenues during the first year of operation, an increase of 7.6 percent over current levels.

It is important that the workforce on this project be done with a local and union workforce. I trust that the commission will make the right decisions.

Thank you for your time.

Sincerely,

Jermaine Smiley  
Business Manager & Secretary Treasurer  
Washington & Northern Idaho District Council of Laborers

**From:** [Greg Hammer INLINE](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Comments for Horse Heaven Hills Wind Farm project  
**Date:** Tuesday, March 30, 2021 4:22:34 PM

Informational Meeting Comment #IM0080  
Horse Heaven Wind Farm  
Docket #210011

### External Email

To: Energy Facility Site Evaluation Council

Date: 03/30/2021

Subject: Horse Heaven Wind Farm LLC – Scout Clean Energy – HHH Wind Farm Project

I am writing to express my opposition to the Scout Clean Energy Wind farm project proposed in the Horse Heaven Hills of Benton County WA.

I oppose this development for multiple reasons listed below.

There are multiple economic reasons for my opposition:

- There are many homes and properties within close proximity to the development site, the value of these properties will be greatly diminished by the development.
- There are multiple Wineries and other businesses that rely on tourism, tourism will be negatively affected by the development. The tourists arrive to see soaring vistas, not 500 - 671 foot towers dotting the landscape. Visitor spending in 2019 was \$560.2 million, creating 6,370 jobs in Benton and Franklin counties, \$54.5 million in local and state tax receipts were collected; \$19.3 million in tax receipts were retained locally," according to Visit Tri-Cities. These jobs pale in comparison to the 45 long term jobs that the
- The tax credits being offered to Scout Energy will undoubtedly be taken out of state and even out of the country due to Scout Energy being foreign owned.
- The detriment to the county and its residents will far outweigh the benefit to the county in jobs and tax revenue.

Danger to wildlife:

- The area is home to many bird species, as well as being located in the path of migrating Canadian Geese, Snow Geese, Sandhill Cranes, Ducks and others. A full Environmental Impact Assessment needs to be performed. An EIS should be required.

Lack of need for the small amount of Green power at a great cost:

- The Benton County Public Utility District has voiced its opposition to the Wind Farm. Wind is intermittent and electricity is only generated about a third of the time. The Benton County PUD issued a position paper in July that it will no longer connect wind power to its grid; the unpredictable electricity generation forces the PUD to have equivalent backup power generation which is costly.
- When the current wind turbine farms (Nine Canyon and State Line Wind Project) generate power in the spring, they displace energy that the dams already produce. Hydroelectric dams that are already providing a very steady and reliable source of power are shut down to allow for the additional wind power to be added to the grid.

- Wind farms in this area have a low average capacity, due to the variation in wind speeds, at 27%. This wind farm would be better suited at a location that has a higher wind generation capacity.
- The green power from this project will only displace other green power, making the investment and the impacts of the project too costly to justify the installation.

Lack of consistent Land Use:

- Current uses for this area are farming and grape vineyards. This use is not consistent with the current uses and should be closely evaluated. The area is also very close to growth area boundaries for the South of Kennewick and the south of Richland. The installation of the wind farm will likely hinder future city growth for both Kennewick and Richland. These items need to be evaluated in more depth.

Aesthetic value:

- The views from all over the Tri-Cities region will be affected by the towers and blinking lights that will be visible at night. The Tri-Cities residents and the local tribes have been diligent about saving the ridges and the views that they provide currently.

Scout Clean Energy's method of bypassing local decision making and involvement:

- Scout Clean Energy bypassed the Benton County Commission and the standard permitting processes by applying with the state agency. Local input for a project of this size is important and should be considered before making a determination.

For the multiple reasons that I have presented, I would ask that you deny the application for the Horse Heaven Wind Farm Project.

Greg Hammer  
106 Piper Court  
Richland, WA 99352



**From:** [Robert Vallem](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Tri-Cities Wind Farm  
**Date:** Tuesday, March 30, 2021 4:36:40 PM

Informational Meeting Comment #IM0081  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I object to the establishment of the Scout Clean Energy wind farm in the Tri-Cities. The power will simply replace other clean energy produced in this area.

**From:** [Minyuan Li](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Comments on the proposed Horse Heaven Wind Farm  
**Date:** Tuesday, March 30, 2021 4:38:51 PM

Informational Meeting Comment #IM0082  
Horse Heaven Wind Farm  
Docket #210011

External Email

To the Washington state Energy Facility Site Evaluation Council

As a resident only recently moved to the Tri-Cities area (about one year), my sentimental attachment to the view on ridgeline has been minimal. So without a doubt, my view is biased. While an argument can be made on the tourism impact, especially on the wine industry, I can only say that the lure is from the great products by the local vineyards rather than the visual appeals. The view as of now is decent at the best, and I will get used to the view after adding two hundred wind mills. In the end, this place is really not that much a tourist destination, and I doubt the wind farm will make a difference on that aspect.

Best,

Minyuan Miller Li

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**From:** [John Smoot](#)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [john.smoot@4dgeoviz.com](mailto:john.smoot@4dgeoviz.com)  
**Subject:** Written comment on Scout Energy Proposal for Benton County wind farm  
**Date:** Tuesday, March 30, 2021 4:46:05 PM  
**Attachments:** [John Smoot Statement on Scout Energy Proposal.docx](#)

Informational Meeting Comment #IM0083  
Horse Heaven Wind Farm  
Docket #210011

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External Email

To: State of Washington, Energy Facility Site Evaluation Council, Written comment of John Smoot

I am writing to express concerns about the wind farm in Benton County proposed by Scout Clean Energy. I am generally in favor of clean energy and I believe that we in Benton County are doing our part for zero-carbon energy production between the current Nine Canyon wind project, solar, hydro, and nuclear generation of Northwest Energy. Benton County is already a large net energy exporter.

Between the ridge tops of Rattlesnake Mountain and the Horse Heaven Hills we have a relatively undisturbed landscape within the Shrub-Steppe habitat of south-central Washington. This is an important component of our daily experience here in Benton County. While our shrubs and sagebrush are not as photogenic as the larger green trees in other parts of the state, we enjoy what we have, including the open terrain. For anyone driving down the driving down the Columbia Gorge, much of the east end of the gorge has been overrun with wind turbines. The landscape has been impacted there.

The Benton PUD has published a study of the relative merits of various electricity sources and found wind power not to be cost effective. The main issue is that we need to have zero-carbon base-load power. Northwest Energy has recently entered into preliminary agreements with TerraPower and X-energy at the former WNP-1 and WNP-4 sites adjacent to Columbia Generating Station to plan for construction of Small Modular Reactors (SMRs) at these sites.

These SMRs would be able to supply similar amounts of power to the proposed wind farm in a small footprint in relative visual obscurity from most residents of the county, while providing a more significant tax base and many more good paying, high tech jobs in the region. This will provide great benefits locally and globally.

SMRs are a very safe and significant future component of clean energy for not just the U.S. but the world. The U.S. accounts for only about 15% of global greenhouse gas emissions. It is important for Benton County to build on our existing strong competencies in nuclear generation to serve as a world resource for SMRs. This will be an important tool to significantly impact climate change globally.

While the residents of the Puget Sound region of the state live in harmony with the comings and goings of the U.S. nuclear navy, multiple reactors can be tested here in relative obscurity in a dry place. Ultimately they could be constructed here and sent forth into the world. The world needs zero-carbon baseload power and we can deliver that. The large wind farm needlessly disfigures our landscape without providing a more comprehensive solution to a

zero-carbon energy future. The wind farm is not our brand.

President Biden's push for off-shore wind power on the east coast can be replicated here with significantly less impact on the land and the ability to provide electricity in proximity to the large regional population center on the west side of the Cascades.

Sincerely,  
John Smoot, Ph.D  
Kennewick, Washington

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John L. Smoot, Ph.D, PMP, LG  
Owner, 4D GeoViz, LLC  
[john.smoot@4dgeoviz.com](mailto:john.smoot@4dgeoviz.com)  
[www.4dgeoviz.com](http://www.4dgeoviz.com)  
509-539-7117



To: State of Washington, Energy Facility Site Evaluation Council

I am writing to express concerns about the wind farm in Benton County proposed by Scout Clean Energy. I am generally in favor of clean energy and I believe that we in Benton County are doing our part for zero-carbon energy production between the current Nine Canyon wind project, solar, hydro, and nuclear generation of Northwest Energy. Benton County is already a large net energy exporter.

Between the ridge tops of Rattlesnake Mountain and the Horse Heaven Hills we have a relatively undisturbed landscape within the Shrub-Steppe habitat of south-central Washington. This is an important component of our daily experience here in Benton County. While our shrubs and sagebrush are not as photogenic as the larger green trees in other parts of the state, we enjoy what we have, including the open terrain. For anyone driving down the driving down the Columbia Gorge, much of the east end of the gorge has been overrun with wind turbines. The landscape has been impacted there.

The Benton PUD has published a study of the relative merits of various electricity sources and found wind power not to be cost effective. The main issue is that we need to have zero-carbon base-load power. Northwest Energy has recently entered into preliminary agreements with TerraPower and X-energy at the former WNP-1 and WNP-4 sites adjacent to Columbia Generating Station to plan for construction of Small Modular Reactors (SMRs) at these sites.

These SMRs would be able to supply similar amounts of power to the proposed wind farm in a small footprint in relative visual obscurity from most residents of the county, while providing a more significant tax base and many more good paying, high tech jobs in the region. This will provide great benefits locally and globally.

SMRs are a very safe and significant future component of clean energy for not just the U.S. but the world. The U.S. accounts for only about 15% of global greenhouse gas emissions. It is important for Benton County to build on our existing strong competencies in nuclear generation to serve as a world resource for SMRs. This will be an important tool to significantly impact climate change globally.

While the residents of the Puget Sound region of the state live in harmony with the comings and goings of the U.S. nuclear navy, multiple reactors can be tested here in relative obscurity in a dry place. Ultimately they could be constructed here and sent forth into the world. The world needs zero-carbon baseload power and we can deliver that. The large wind farm needlessly disfigures our landscape without providing a more comprehensive solution to a zero-carbon energy future. The wind farm is not our brand.

President Biden's push for off-shore wind power on the east coast can be replicated here with significantly less impact on the land and the ability to provide electricity in proximity to the large regional population center on the west side of the Cascades.

Sincerely,

John Smoot, Ph.D

Kennewick, Washington

**From:** [Jessie Wadsworth](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm  
**Date:** Tuesday, March 30, 2021 4:47:54 PM

Informational Meeting Comment #IM0084  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I'm in favor of the wind farm and all the benefits that come along with it. This is not only a tax revenue for the county but it is also low impact development.

**From:** [Patrick Paulson](#)

**To:** [EESEC \(UTC\)](#)

**Cc:** [Laurie Ness](#)

**Subject:** Comments on habitat Mitigation, Scout Energy, Horse Heaven Hills

**Date:** Tuesday, March 30, 2021 4:56:55 PM

**Attachments:** [Comments on Habitat Mitigation Plan.docx](#)  
[Comments on Habitat Mitigation Plan.pdf](#)

Informational Meeting Comment #IM0085  
Horse Heaven Wind Farm  
Docket #210011

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External Email

# Comments on Scout's Habitat Mitigation Plan

Patrick Paulson<sup>1</sup> and Laurie Ness<sup>2</sup>

## 1. Introduction

We have reviewed the applicant's habitat mitigation plan (Tetra Tech 2021). We have several suggestions to improve the plan.

1. As noted in the plan<sup>3</sup>, a thorough on-site habitat assessment must be performed before any habitat modification. *Current WDFW recommendations for assessment should be used. Note especially that fire-altered shrub-steppe must be classified as shrub-steppe and mitigated as such.*<sup>4</sup> It should be clear that that these surveys will be carried out on *all* construction sites, not just those located in unclassified grassland or unclassified shrub-steppe.
2. For the solar sites, the 'Temporary' impact acreage should be considered 'permanent'. The temporary acreage is a 10 ft strip on the outside of the fence; the fence will have negative impacts by providing perch points for ravens, etc. Because of the negative impacts of fencing, additional acreage should be added to total permanent impact acreage.
3. The credit for planting under solar arrays (0.5:1 mitigation ratio vs. 1:1) is likely too generous.

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<sup>1</sup> Patrick Paulson, 2253 Davison Avenue, Richland WA. [patrick@3rivers-ashtanga.org](mailto:patrick@3rivers-ashtanga.org)

<sup>2</sup> Laurie Ness, 2253 Davison Avenue, Richland WA. [pennifurs.mom@gmail.com](mailto:pennifurs.mom@gmail.com)

<sup>3</sup> Unclassified grassland and shrub-step "may" be reclassified following additional field verification prior to construction", pp. 6 and 7, (Tetra Tech 2021); "Acres of impacts to each of these "unclassified" habitat subtypes may be revised following habitat surveys of the Solar Siting Areas and Micrositing Corridor that are planned to occur prior to construction", note 3, Table 2.

<sup>4</sup> Azerrad, et. al (Azerrad et al. 2020), p. A-18: "Because fire is a component of shrubsteppe, fire-disturbed shrubsteppe is still shrubsteppe, only in a temporarily altered or early successional state."



4. Proposed wind sites at both the eastern and western edges of the proposed project area have the most impact on both habitat and on protected species; these sites should be removed from the project.

These points are covered in more detail below.

## **2. Require On-site Habitat assessment for all sites**

The report specifically says that on-site field verification will be carried out for all sites on ‘unclassified’ grassland or shrub-steppe. It should be a condition of approval that this field verification be carried out for all sites in order to verify the GIS findings and ensure that no priority habitats are lost. These studies should follow the protocol given by WDFW management recommendations<sup>5</sup>. Rabbitbrush, in particular, may be found in areas of shrub-steppe recovering from fire. WDFW states that “fire- disturbed shrubsteppe is still shrubsteppe, only in a temporarily altered or early successional state.” And that “Post-fire, few if any of the pre-fire shrubs may remain in shrubsteppe habitat”. The management recommendations

strongly advise reviewing data for sites lacking shrubs to look for signs of fire, traits of later successional vegetation, or use by obligate shrubsteppe wildlife. Past aerial photos ... are an important tool to assess historic condition and signs of disturbance. DNR’s web-map tools show wildfire locations as early as 1973 ... Other data, such as verified occurrences of shrubsteppe plants and animals ... also help to assess past ecosystem condition. Together these tools can help identify evidence of shrubsteppe in the absence of shrubs and should be used to map fire-disturbed shrubsteppe (Azerrad et al. 2020, p. A-18)

## **3. Insufficient ‘permanent impact’ acreage given for Solar Arrays**

The report states that the acreage under “Temporary Impact” for Solar sites “include a 10-foot construction buffer along the outside of the solar fencelines.” (Tetra Tech 2021, footnote 2, Table 2). Introducing fences into grasslands causes additional permanent impacts. In addition to the increased likelihood of bird collisions, they provide perch-points for Ravens and other predators. (Liebezeit and George 2002) note that “Ravens use perches to hunt and they may facilitate nesting. Consequently, removal of perch sites and (or) establishment of anti-perching

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<sup>5</sup> “Appendix 9. A protocol for identifying, mapping, and assessing quality of shrubsteppe on an individual parcel”, at pp. A-25 to A-44 in (Azerrad et al. 2020).

devices are methods used to discourage such behavior.” Consequently, the addition of perch points—such as fencing—is likely to lead to an increase in Ravens, which predate other grassland and shrubsteppe species.

Because of the ongoing impacts due to the addition of fences we suggest that the acreage specified as ‘temporary impact’ for solar sites be rolled into the area specified as permanently impacted.

#### **4. Mitigation Ratio for Solar Sites**

The applicant proposes to classify the area used for solar sites as ‘modified habitat’ and mitigate it with a 0.5:1 ratio rather than the 1:1 ratio standard for the Class III habitats being affected.<sup>6</sup> However, the report also notes that the proposed solar sites support “a modified avifaunal community”; that is, the original habitat is replaced by a different habitat. This is not an acceptable replacement for the lost habitat, since WDFW guidelines specify that the applicant must “fully mitigate for habitat losses for all species”.<sup>7</sup> The 1:1 ratio specified by WDFW mitigates for the lost habitat for reasons that include:

- The replacement habitat was at some risk of development and is now given permanent protection.
- The replacement habitat is likely to improve in habitat function and value over time as degrading forces are removed.
- The value of the replacement habitat is equal to or better than the habitat value of the impacted area.

None of these reasons apply to the applicants proposed ‘altered habitat’. The areas being proposed for solar siting are not at risk of development, will not improve in lost habitat function over time, and does not have value that is equal or better than the lost habitat.<sup>8</sup>

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<sup>6</sup> Table 3, (Tetra Tech 2021); p. 10 (Washington Department of Fish and Wildlife 2009).

<sup>7</sup> (Washington Department of Fish and Wildlife 2009), p. 8.

<sup>8</sup> (Tetra Tech 2021) p. 10 cites study that concludes “bird diversity and density were higher outside of the facility”.

Nonetheless, the applicant's approach does have merit, particularly since it provides some degree of on-site mitigation. We urge WDFW to require all solar sites to use this approach *in addition to* mitigating at a 1:1 ratio for Class III habitat. If this change in regulations cannot be made given time constraints, we urge that a suitable mitigation ratio be negotiated with the applicant to determine the minimum reduction in mitigation ratio that will make it feasible to plant and maintain vegetation on the solar sites.<sup>9</sup>

## **5. Wind sites should not be located near viable shrub-steppe; nesting raptors**

In Figure 1 we show an overlay of PHS recognized by WDFW<sup>10</sup> over the proposed siting of the applicant's wind-powered turbines (Horse Heaven Wind Farm 2020, Figure 3). The sites we've outlined are located on or near priority habitat, including shrub-steppe and occurrences of Ferruginous Hawk and Townsends Ground Squirrels. We request that these wind sites *not* be developed.

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<sup>9</sup> (Washington Department of Fish and Wildlife 2009), p. 9, notes that "alternative ratio may be negotiated for replacement habitat that differs from impacted habitat".

<sup>10</sup> <https://geodataservices.wdfw.wa.gov/hp/phs/>

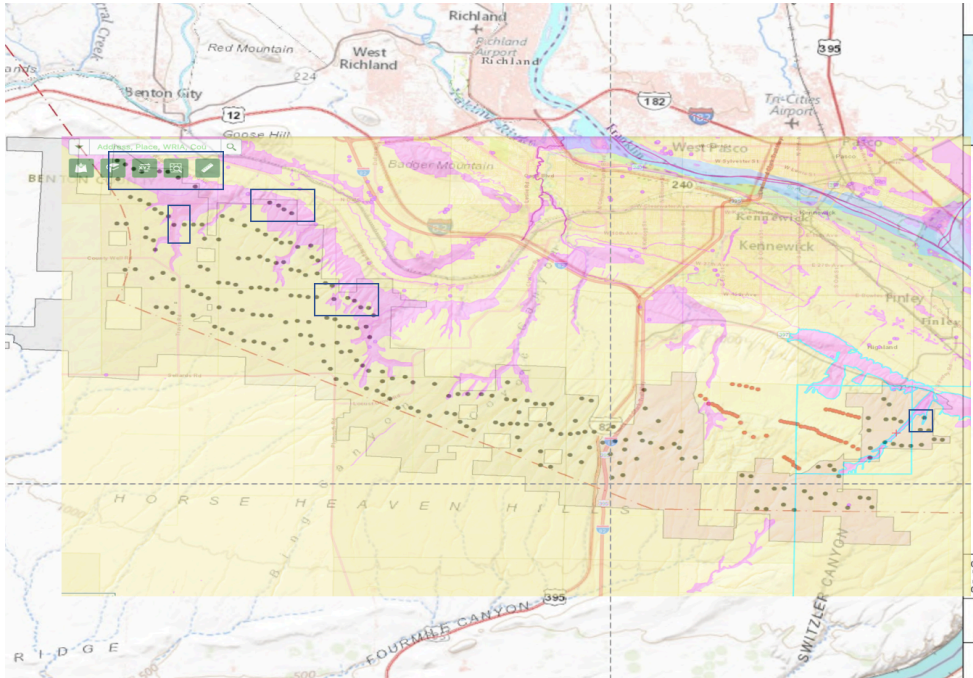


Figure 1. Wind sites should be located away from PHS Habitat, nesting raptors

## 6. References

- Azerrad, J. M., K. A. Divens, M. F. Livingston, M. S. Teske, H. L. Ferguson, and J. L. Davis. 2020. "MANAGEMENT RECOMMENDATIONS FOR WASHINGTON ' S PRIORITY HABITATS : Managing Shrub-Steppe in Developing Landscapes." Olympia, WA. <https://wdfw.wa.gov/sites/default/files/publications/01333/wdfw01333.pdf>.
- Horse Heaven Wind Farm, LLC. 2020. "Bird and Bat Conservation Strategy-- Horse Heaven Wind Farm, Benton County, Washington."
- Liebezeit, J, and T George. 2002. "A Summary of Predation by Corvids on Threatened and Endangered Species in California and Management Recommendations to Reduce Corvid Predation." In . <https://www.semanticscholar.org/paper/A-Summary-of-Predation-by-Corvids-on-Threatened-and-Liebezeit-George/cb97f91229317b0d8b02beca4077284ec01030dc>.
- Tetra Tech. 2021. "Draft Habitat Mitigation Plan Horse Heaven Wind Farm." Bothel, WA. <https://www.efsec.wa.gov/energy-facilities/horse-heaven-wind-project/horse-heaven->

application.

Washington Department of Fish and Wildlife. 2009. "Washington Department of Fish and Wildlife Wind Power Guidelines."

**From:** [Vince Shawver](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Proposed Scout Energy Project  
**Date:** Tuesday, March 30, 2021 5:02:48 PM

Informational Meeting Comment #IM0086  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am very against the Scout Energy Project. It is too close to many properties and will hurt property values. It will litter our hillsides and ridges with 24 miles of ugly noisy windmills and 6500 acres of ugly solar panels, taking land away from wildlife and ag use and causing pollution. It will also kill many migratory birds at that location. If more energy production is needed our area is more suited to sources that will not need much land mass such as nuclear. Our area does not want or need this project--Scout Energy should find another place it is not welcome here.

Sincerely  
Vince Shawver  
West Richland

**From:** [Steve Lancaster](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Wind farm  
**Date:** Tuesday, March 30, 2021 5:45:05 PM

Informational Meeting Comment #IM0087  
Horse Heaven Wind Farm  
Docket #210011

External Email

This is not needed in this area we have water and other sources of power generation. This project if needed should be built on the west side of the state. No to this unsightly project.

**Steve Lancaster** SVP/Team Leader/Agriculture and Commercial Loan Officer  
Loan Originator Identifier 796289 | Loan Originator Company Identifier 466014  
[9715 Sandifur Pkwy, Pasco, WA 99301](#)  
P: [509.545.3832](#) | M: [509.521.1434](#) | F: [509.545.2119](#) | [Steve.Lancaster@wheatlandbank.com](mailto:Steve.Lancaster@wheatlandbank.com)



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**From:** [Sydnie Roberts](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Project Comments  
**Date:** Tuesday, March 30, 2021 5:47:10 PM

Informational Meeting Comment #IM0088  
Horse Heaven Wind Farm  
Docket #210011

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External Email

To EFSEC,

Reasons the Horse Heaven Hills wind farm project should not be approved.

1) If you google Tri-Cities, WA....the picture displayed along with the Google summary of our community....is the Horse Heaven Hills! Let's not destroy our signature scenic ridges.

2) Within the Wikipedia description of the Tri-Cities one of the advantages of our community listed...is lack of of photo/light pollution. Specifically making our hills a prime location for stargazing and astronomy.

3) The proposed Horse Heaven Hills Wind Farm faces 5 different AVA (American Viticulture Areas), including the oldest Yakima Valley AVA and largest, Columbia Valley AVA. With over 120 wineries in the vicinity, many of which have tasting rooms, restaurants and event venues that showcase the views of the HH hills. This project would destroy the Washington Wine Country aesthetic. Hurting tourism, businesses and local arts and culture. No one wants to get married with those heinous monstrosities in the background.

4) Decreased property values. No one wants to buy home or property that have to look at those things.

5) We stunt the cultural growth and development that's beginning to root in Tri-Cities, by continuing to treat the area as an after thought. We have very limited areas of beauty in the vicinity. We should be allowed to keep what we do have. The Tri-Cities has been the 'utility' of the state for it's entire existence. If Washington was a house, we have been the trash compactor or water heater. Out of site and out of mind in a garage or cupboard. We had the Hanford site, missile silos on Rattlesnake mountain and multiple dams nearby. We have more than supplied our fair share of support to clean energy state support. It's time to let Tri-Cities mature into the Napa Valley of Washington.

Please protect our community from something so detrimental to the area. As a family who just purchased our dream property for opening a tasting room and wedding venue last September, we would be one of many to see existing and future businesses wither and die. Protect our ridges, there are more than enough unpopulated areas that they can put those things.

Thank you,

Erik and Sydnie Roberts  
Bella Vita Vineyards  
Benton City, WA



**From:** [Debbie Stein Savino](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Please reject the wind farms!  
**Date:** Tuesday, March 30, 2021 5:56:25 PM

Informational Meeting Comment #IM0089  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Because you need to look out for us: please reject the wind farm proposal.  
Thank you.  
Debbie Savino

**From:** [FOLLETT Robert \(Framatome\)](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Wind Farm Proposal in Benton County  
**Date:** Tuesday, March 30, 2021 5:59:12 PM

Informational Meeting Comment #IM0090  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am opposed to a massive wind farm being proposed to be built in Eastern Washington in the Horse Heaven Hills area south of the Tri-Cities. Scout Clean Energy has purposely by-passed our local authorities and instead they have gone directly to the State authorities to gain approval for this project, which is not needed for our area. Our area already has plenty of renewable energy sources, such as hydro and this new energy source is simply not needed. Our state is already doing great generating clean energy and currently only has 9% from fossil fuels (5% gas & 4% coal) and the single coal plant will be retired in 2025. Any electricity produced would be sent elsewhere, only benefiting a few local farmers. We already have way too many wind turbines in our area and half the time they don't even generate electricity. In fact, on average the turbines in our area only produce energy at 27% of capacity. In addition, they make our beautiful landscape an eyesore. These proposed turbines would be massive at 500 feet tall and cover over 10 square miles or 6,500 acres. If our state really wants to install these wind turbines, they should consider having them located near Seattle or Olympia. Of course then we would hear an even bigger outcry from those in that area. The bottom-line is that this wind farm is simply not needed and our state leaders should have the courage to stand up and say, "No thank you".

Respectfully,  
Robert Follett  
Kennewick, WA

**From:** [ggm2000@aol.com](mailto:ggm2000@aol.com)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [ggm2000@aol.com](mailto:ggm2000@aol.com)  
**Subject:** Horse Heaven Hills Wind Farm Project  
**Date:** Tuesday, March 30, 2021 6:15:19 PM

Informational Meeting Comment #IM0091  
Horse Heaven Wind Farm  
Docket #210011

External Email

Dear Committee,

My name is Glen Marshall, resident of Kennewick, WA and property owner in Benton City, WA with Horse Heaven Hills as a back drop to our property. We purchased the property as we entered retirement to build our retirement home. I am opposed to the project for a multitude of reasons and will cite several of those in this email.

I would like to state that I am not opposed in general to wind or solar energy, but this project is one that I cannot support. The location, size and scope of this project is inconsistent with preserving the rural character and preservation of our natural setting and views. This project will have serious negative impact on wildlife, property values and will cause significant noise and view pollution.

This project is very close to one of the largest urban areas in Washington State. These wind turbines will be visible from up to 85% of the land within a 10-mile radius of the project area. The visual impacts will be significant, with the turbines likely able to be seen from a majority of residents in the area. According to our PUD's, we are not in need of additional energy and thus this energy generated by this project will be used elsewhere.

For these and other reasons, I am opposed to this massive project that will not benefit our area and will ruin our ridges and skylines for years to come and for future generations. Our quality of life is not for sale. Please reject this proposal.

Respectfully Submitted,

Glen Marshall  
Kennewick, WA

From: [lincalm@aol.com](mailto:lincalm@aol.com)  
To: [EFSEC \(UTC\)](#)  
Subject: Opposing the Wind Farm  
Date: Tuesday, March 30, 2021 7:08:00 PM

Informational Meeting Comment #IM0092  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Dear members of the Energy Facility Site Evaluation Council,

As we Tri-Cities citizens have always felt protected, safe, and secure that our leaders have our best interest in mind, we have **never before** had to consider the probability that the entire region would be taken over by a wind farm. Now, that is indeed happening.

This is not just a case of 'not in my back yard'. It is certain that having the Scout Wind Farm project developed in our area would devastate the wildlife, hills, and majestic views over the Tri-Cities region. Is wind-energy even the best renewable form of energy out there? Does anyone here want or need it?

Allowing this project to be built would seriously disrupt tourism, business, and property values. This, in turn would affect tax revenue. The land we have is a treasure, which once decimated, cannot be reclaimed. You know all the pros and cons about wind energy. I will not try to list them here. But the one irrefutable absolute is that this is our little piece of earth. We need to care for it, and protect it.

An online petition is circulating, but many citizens still **have no idea** that this enormous project is on the horizon. From where I have lived since 1997, on Clodfelter Road, I have seen many mammals, reptiles and birds that surprise and delight us. The first 2 weeks every May, we walk amidst the purple lupine, and yellow wildflowers. We watch the glorious sunsets and even glimpse the top of Mt. Adams on the horizon.

Please help us keep this place our sanctuary. Please allow the owls, coyotes, badgers, rattlesnakes, bluebirds, kestrels, killdeer, pheasant, Swainson's hawks, western meadowlarks, antelope and plentiful deer space for their habitat needs.

Please don't support the wind-farm project at the expense of all we hold dear, and hope to pass on to our grandchildren.

As a community, let us consider other green and renewable energy sources that won't destroy the beauty that surrounds us. Let's do our research on the real impact of wind farms, and remember that we have an important, life-altering, decision to make for our surrounding area.

Thank you,

Linda C. McCalmant, M.Ed.  
97208 E. 382 PRSE  
Kennewick, Washington 99338  
lincalm@aol.com

**From:** [Christina Caprio](#)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [Sherman, Bill \(ATG\)](#)  
**Subject:** HHH Comment that wouldn't go through the portal  
**Date:** Tuesday, March 30, 2021 7:13:24 PM

Informational Meeting Comment #IM0093  
Horse Heaven Wind Farm  
Docket #210011

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External Email

The homes directly below the ridge sure will have the flicker in a huge way. My mom has a home by the smaller windmills near Dayton, Wa. She has negative health impacts from the flicker and the vibrations. As soon as it hits evening the huge cliff with the huge windmills will cause huge flicker. These are all high end homes in West Kennewick. Most people in the Tri City area do not know about this project!!!! People are shocked about this. It would ruin the entire view for the Tri Cities. The Horse Heaven hills is the view for the entire area. This would be like creating a skyline of Seattle but gives no positive impact for the entire community. The energy goes out of the area. They are only using the Tri for making money. We have nuclear power and dams here. The windmills do not pay for themselves. They use a lot of oil to run; therefore, they are not all green. In fact, for land use much of the large parts are not recyclable. That is not green. As a scientist I can not support the overall process of windmills. I do know Biden wants windmills off shore. The homes will lose value. The native birds including a hawk to be soon listed as endangered will be killed. The huge amount of migratory birds will be killed. The local government officials are opposed and were not included in the process. This geological feature is created by the missoula flood. We have a great wine area where people come for the views. Our views are beautiful. We are so lucky to have treeless hills so we can see for miles and miles. These Space Needle sized turbines would ruin our peaceful views and kill our birds.

Thank you,

Christina Caprio  
NEPA scientist

Sent from my iPhone

**From:** [Christina Caprio](#)

**To:** [EESEC \(UTC\)](#)

**Subject:** Question

**Date:** Tuesday, March 30, 2021 7:14:42 PM

Informational Meeting Comment #IM0094  
Horse Heaven Wind Farm  
[Docket #210011](#)

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External Email

Why is the man running the meeting so rude and demeaning?

Christina Caprio

Sent from my iPhone

**From:** [Pat Sullivan](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heavens Hills Wind Farm  
**Date:** Tuesday, March 30, 2021 7:21:41 PM

Informational Meeting Comment #IM0095  
Horse Heaven Wind Farm  
Docket #210011

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External Email

To EFSEC members,

Thank you for hosting the meeting tonight about the Scout Horse Heaven Hills Wind Farm project. I am very concerned about the fact that the community has not been made aware of this project, in particular the size/scope that it entails. Scout claims they did outreach efforts but as a landowner in Badger Canyon we did not receive any notification until March 10, 2021 informing us of this March 30 meeting. There has not been an effort by Scout to ensure the public is informed.

I have lived in the tri-cities area my entire life other than a few years for college. I currently reside in Benton City - off Badger road, below the proposed project. I would like to voice that I am OPPOSED to this project for several reasons:

Having lived in this area for a total of 46 years I believe that my opinion should matter. I have chosen to stay here because of the beautiful landscape and the access to areas that are not paved or built upon. I access the nearby hills daily to walk my dogs and enjoy the peace that the landscape provides. Not only do I not want to walk between windmills, but I am concerned that I may no longer enjoy these areas if access to them is limited when the equipment is in place.

Many people tonight talked about the birds. I know in some people's minds money is more important than wildlife, but for most of us that is not true. I have seen chukar/quail, cranes, geese, ducks, heron, curlews, hawks, and many owls in these hills. I know not all of those are migrating, but all will be affected by the construction of such a huge system. We also have coyotes, deer and in the last few years even antelope. The wildlife should matter.

All of the community should care about this. It was a big deal to save Badger and Candy mountain ridgelines from houses to conserve our horizons, but this is even bigger. Since this has not been advertised widely and the massive length realized by people, I am afraid people won't understand what is happening until it is too late. If you get rid of the things that make this area beautiful and unique then there really is no longer an attraction to the area. Every winery in the area talks about their beautiful views and their patio spaces are set up for you to sit and look over the rolling hills. It's just not the same once you put 500-foot windmills into the picture.

I do not see any benefit for our community. The energy is not going to help us. As many people brought up, the jobs only last a brief period. And with the growth of the area in housing and commercial spaces I do not see this as needed to support our local Unions. They will most likely bring workers from elsewhere to do the work. I do not understand why this community should sacrifice its hill tops for energy to be sent elsewhere and money to line a



Colorado company's pockets. I also don't understand why they are proposing such a large scale, and have it placed on the edge of the ridges where we can all see it. If they really need this area they should consider how to limit the impact to the community by moving it further back and decreasing the number of windmills if needed, in order for it to not take away our views.

This wind farm will completely change the view from our property both day and night. Our view looks down Badger Canyon to the lights of Benton City. Not only does this affect our enjoyment of our property but it will also affect the resale of our home if we choose to leave. No one is offering compensation to those of us that have to live next to this new farm. Scout certainly doesn't care if our house prices drop. They will keep all that money tight in their hands while our community pays for it.

That is all I am going to highlight because I think the attendees tonight did a great job of expressing all of our concerns. I will continue to monitor meetings and send emails to whoever will listen.

Robin Sullivan

Benton City, WA

**From:** [Dale and LouAnn Schielke](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm project  
**Date:** Tuesday, March 30, 2021 7:26:07 PM

Informational Meeting Comment #IM0096  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am opposed to the Horse Heaven Wind Farm project. I believe this will be a blight on the land, negatively effecting the views in south-eastern Washington. I am also concerned about the impact of the windmills on the bird populations. The project is not feasible without public taxpayer dollars. I do not want any of my taxes to be used for projects like this.

Sincerely,

Dale Schielke  
2635 Harris Ave  
Richland, WA 99354

**From:** [kmbrun@gmail.com](mailto:kmbrun@gmail.com)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm Opposition  
**Date:** Tuesday, March 30, 2021 7:43:16 PM

Informational Meeting Comment #IM0097  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I just want to let you know that an on-line petition that was posted on 2/25/21 has garnered 1563 signatures in opposition to this project which is significantly more than the 500 people surveyed by Scout Clean Energy. I can't believe that they think the opinions of so few people actually has merit. It makes me wonder what else is being exaggerated.

We didn't have the big bucks to advertise the petition's existence but only used fliers, social media, and word-of-mouth to let people know about it. I was very surprised at the number of people who had no idea that this project is being proposed and an application submitted.

I've been listening to tonight's on-line public hearing and the only people in favor of it are the landowners and union members.

Karen

**From:** [Paul Bond](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse heaven hills  
**Date:** Tuesday, March 30, 2021 7:55:03 PM

Informational Meeting Comment #IM0098  
Horse Heaven Wind Farm  
Docket #210011

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External Email

NO to the windmill tax credit scam. Have we learned nothing from the Texas mess last winter when all the windmills were frozen and sucking up scarce electricity to thaw back out?

Pau Bond

**From:** [Rey Espinoza](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Comments for Horse Heaven wind Farm - In Favor of  
**Date:** Tuesday, March 30, 2021 7:55:57 PM

Informational Meeting Comment #IM0099  
Horse Heaven Wind Farm  
Docket #210011

### External Email

Thank you Chair Drew and the entire commission for allowing me the opportunity to speak to you all this evening. My name is Rey Espinoza and I am the Assistant Northwest Regional Manager for the Laborers International Union of North America. I also am a lifelong resident of the tri-cities and have a strong support for the communities here. I am here today to speak in favor of this project. The workforce that would benefit from this project, is more than a few as some may continue to state.

According to the [esd.wa.gov](https://esd.wa.gov) website for Benton county, goods-producing industries, which include natural resources, mining, construction and manufacturing, increased in employment from 2018 to 2019 by 3.6 percent, or 643 jobs. Average annual employment in 2019 was 18,284 workers and annual wages totaled \$989.6 million, which translates to a \$54,122 average annual wage for goods-producing workers.

The manufacturing industry increased in employment 0.2 percent over the year. The average employment was at 4,524 jobs in 2019, with an average annual pay of \$58,997. Manufacturing represented 4.9 percent of total covered employment in Benton County. Construction accounted for 8.2 percent of the total average annual employment in the county with 7,541 jobs. The average annual wage in construction was \$69,757 in 2019. Construction employment in the county increased for the seventh year in a row, with a 12.3 percent change over the year.

If we take a look at the work forecast for the Horse Heaven Hill project, construction of Phase 1 of the Project is estimated to support 458 total (direct, indirect, and induced) jobs in Benton and Franklin counties and approximately \$37.0 million in labor income, with total economic output of approximately \$70.6 million. During Phase 2, Project construction is estimated to support approximately 472 to 539 total jobs and approximately \$37.6 million to \$41.9 million in labor income, with total economic output of approximately \$73.0 million to \$85.7 million.

On the Rattlesnake Ridge project, a local workforce and support from elected officials, created a successful renewable project. With the project labor agreement, workers were working 12-15 hours per day, including getting double time on Sundays. They brought in on average \$2700-\$3000 per week after taxes. According to the Business Manager of Local 348, members brought in a year's worth of pay in 6-7 months. This is just an overview of what renewable projects bring to communities like this.

The numbers seem to be clear. Renewable jobs provide not only a paycheck for local workers, they provide a good career for themselves and their families, as well as the opportunity to give back to the communities they live in.

Thank you for your time.

*Rey Espinoza*

*Assistant Regional Manager*

**LiUNA!** - Northwest Region

*Feel the Power*

***12201 Tukwila International Blvd - Suite 140***

***Seattle, WA 98168***

Office: 206-441-6507 / Cell: 509-845-6433

[LiUNA!](#) / [Northwest Region](#)

**From:** [Emilee Davis](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** I oppose the windmills very much!  
**Date:** Tuesday, March 30, 2021 7:58:13 PM

Informational Meeting Comment #IM0100  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I oppose the Horse Heaven Hills Wind Farm Project. It is completely unnecessary and a waste of money. They kill migratory birds as well. I have a friend that had to sell her house and farm after windmills were placed by her property. She did so because every time they were on the low vibrations gave her migraines. No surprise they disappeared when she moved. It was a beautiful place and it's so sad they impacted her life like that. Say all you want that they don't effect people's health but they can. We already have a lovely form of renewable energy in the form of dams. We already have nuclear energy as well. We don't need these extraordinarily expense windmills in any way shape or form. Not to mention the power will be mostly sold to California. I also know that these are not recyclable and they become giant, unsightly, graveyards. This is the worst idea for this area. Please do not use the tricities for these farms.

Emilee Davis