

# Comment 20210331-1WKuix0

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**Comment:**

From 1983 to 1998, I worked as a Wildlife Biologist in Benton County, Washington. During that time, I was employed by the USCOE at McNary Dam and as a District Wildlife Biologist for WDFW. My graduate school research, on native passerines, was conducted on the USDOE Hanford Site. Although my job entailed collecting data on numerous wildlife species, I primarily worked with small and nongame wildlife (waterfowl, upland birds, and nongame).

While working as a biologist, I often I traversed the area being considered for wind/solar development. Although many people think of the wheat fields between the crest of the Horse Heavens and the Columbia River as being a biological desert, the number of raptors that utilize the wheat fields is substantial. During the fall and winter, I frequently observed raptors including, kestrels, prairie falcons, red-tailed hawks, rough-legged hawks, and northern harriers foraging in the wheat fields. I also observed golden eagles and occasionally bald eagles, utilizing these habitats. In early fall, large groups of Swainson's Hawks perch on the powerlines just south of the McBee Grade summit (this species often congregates in large flocks before migrating to South America).

Trees that grow near the alfalfa fields in Badger Canyon provide nesting habitat for numerous raptors including, Swainson's and red-tailed hawks, and various species of owl. Burrowing owls successfully raise their young in the deep soils that occur in Badger Canyon. Cliff habitats in the Horse Heavens provide nesting substrate for ferruginous hawks as do isolated trees that occur near the Horse Heaven ridge line. Before migrating, some of these species fatten on rodents that reside in harvested or fallowed wheat. All these species can be found in the area that Horse Heaven Wind Farm LLC proposes for development.

The incredible wind resources of the Tri-Cities appear to be enhanced by the convergence of Rattlesnake and Horse Heaven Hills. Birds, especially raptors, utilize the thermals created by the strong winds to power their migration. In addition to raptors, flocks of songbirds migrate along these ridgetops. I have personally observed large flocks of songbirds (ie. bluebirds and horned larks) flying along the ridgelines of Benton County.

In addition to raptors and songbirds, sandhill cranes (hundreds if not thousands) migrate across the top of the Horse Heavens. Although I have not personally observed cranes on the ground, other individuals have reported seeing them in the wheat fields just south of the Horse Heaven Hills.

Amazing numbers of waterfowl, winter on the Columbia and Yakima Rivers. The Umatilla Wildlife Refuge provides wintering habitat for a good portion of the ducks in the Pacific Flyway. Waterfowl also breed along rivers, ponds, and canals near the base of the Horse Heaven Hills.

Due to the incredible avian resources of the Tri-Cities area I have serious concerns about placing wind turbines along such an extensive area of the Horse Heaven Ridgeline. A few of my numerous questions are as follows:

Will the thousands of waterfowl that utilize the Columbia and Yakima Rivers mistake solar farms for water; only to be lured to their death?

How extensively is the Horse Heaven Ridgeline utilized as a migratory corridor? Strong winds often preclude doing accurate wildlife surveys in this area. Many years of data will need to be collected to get a true understanding of how this area is being utilized. Current data collected by West Inc.

is not substantial enough to draw conclusions about the wildlife use of this area. Will the birds/bats that migrate along the Horse Heaven ridgeline be cut to pieces in wind turbines?

To answer these and many of many other questions, a thorough Environmental Impact Study should be conducted prior to any energy development. Issuing a Determination of Non-Significance would be completely irresponsible.

For over 30 years I have protected nearly 170 acres of pristine shrub-steppe habitat at the base of the Horse Heavens. I sincerely hope my efforts to provide wildlife habitat in this area has not been for naught.

Sincerely,

Lisa Fitzner