Hi-

My name is Jacob LaRiviere. I am born and raised in the Tri-Cities but currently live in Seattle where I am affiliate faculty at University of Washington, Department of Economics, Senior Principal Researcher and Research Manager in the Office of the Chief Economist at Microsoft, and co-editor of the Journal of the Association of the Environmental and Resource Economists, the highest impact environmental economics journal. I have published over 20 articles on environmental economics including articles on the economics of efficient siting of windfarms.

The proposed project has diffuse benefits in terms of reduced CO2, lower wholesale electricity prices and a productive use of space currently used for dryland farming (not to mention jobs). However, there are localized costs: property values with a view of the windfarms will decrease wealth. Recent economics literature finds effects on the order of 2-10% when a property looks at a windmill relative to natural landscape. This explains fierce NIMBYism and local opposition to the windfarm.

I’d like to comment to encourage policymakers to think creatively about how they might change property taxes for homes with a view of the windfarms to offset the decrease in property values from the windfarms. This property tax decrease when combined with appropriate taxation of the sales revenue from the windfarm and effective spending on public goods which benefit affected homes so that they are better off on net despite having to look at windmills. Indeed Alaska already does something like this through the oil revenue payout to all Alaskans. I think this is not just an important project but a chance for local and state policymakers to be leaders on creative policymaking.

Thanks,

Jacob LaRiviere, PhD
www.jacoblariviere.com
858.531.5170
Dear EFSEC Members:

Please deny Scout Clean Energy’s 'Request for Expedited Processing' of their Horse Heaven Wind Farm application.

When contacting Benton County residents, MOST were unaware of this mega wind farm. This included local city officials, real estate people, Visit the Tri-Cities tourism office, local businesses and residents I personally contacted.

Additional time is needed to inform locals of this enormous project that will alter our ridges, agricultural environment and quality of life for years to come.

In their proposal on page 1-56, Scout notes a phone survey of 500 Benton County voters done in December 2020. This survey claims public support (54% to 35%) of the Horse Heaven Wind Farm. Local comments recently submitted to the Benton County Commissioners show 90% opposing the Horse Heaven Wind Farm.

Additional time is needed for Tri City residents, businesses, agri-business, the wine/tourism industry, city governments, etc. to weigh in on the effect this massive wind farm will have on our environment, economy, property values and future growth of our area.

What’s the rush? Please deny Scout Clean Energy’s ‘Request for Expedited Processing’ of their Horse Heaven Wind Farm application.

Respectfully submitted,

Pam Minelli
Kennewick, WA
I just wanted to send a quick email to encourage you guys to please do all that you can to oppose the wind farm project. Even if it seems like it's hopeless please raise your voice for us citizens that we do not want this project here. If they are wanting to pursue they could always move further south toward the Oregon border where there would be less impact to our beautiful cities. I live in a home that would be in direct sight of the windmills which would blight the beautiful hills and I also watch the migrating birds right over my home twice a year...I would hate for them to get injured.

Thank you so much. Please oppose for us!

Tenika Morrison
External Email

Sent from my iPhone
Ms. Bumpus,

Attached please find a letter from the Franklin County Board of Commissioners regarding the above subject matter. A hard copy is being mailed today via the U.S. Post Office.

If you have any questions please contact Keith Johnson, County Administrator at 509-545-3578 or via email at kjohnson@co.franklin.wa.us.

Thank you,

Shirley

Shirley J. Jones, Admin to County Administrator
Franklin County Administration
Franklin County Commissioner's Office
509-546-3555, sjones@co.franklin.wa.us

This message contains information that may be confidential per RCW 13.50.050 or 42CFR, Part 2. If this message was sent to you in error, any use, or disclosure or distribution of its contents is prohibited. If you receive this message in error, please contact me at the email address listed above and delete this message without printing, copying, or forwarding. Thank you.
March 23, 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

Re: Horse Heaven Wind Farm Project Proposal

Dear Ms. Bumpus,

Thank you for the opportunity to comment on the Scout Clean Energy Horse Heaven Wind Farm Project, which is proposed to be located in unincorporated Benton County just south of Franklin County.

As 2 of the 3 elected Franklin County Commissioners, we do not support this project. (Our 3rd board colleague has abstained from participating in this matter due to a potential perceived conflict of interest.) We believe the location, size and scope of this project is inconsistent with the region’s desire to protect and maintain important characteristics of this area such as critical agricultural lands and preserving the natural setting, views, and rich history that make the greater Tri Cities Area an attractive place to live and work.

It is our understanding that the applicant, Scout Clean Energy, is requesting that their application for Site Certification be reviewed in accordance with the EFSEC expedited process requirements. The Commissioners strongly encourages EFSEC to deny the applicant’s request for expedited review based upon the following: 1) the environmental impacts are significant; and 2) the project is inconsistent with Benton County’s plans including the Comprehensive Plan, Zoning Ordinance, and Critical Area Ordinance; and 3) the negative impact to Franklin County’s viewscape and other vital economic interests.

We are aware that this project has generated extensive calls, emails, and comments from area residents and organizations regarding this proposal. The overwhelming majority of people in the region do not support this project. They have wide ranging concerns about the loss of habitat and agriculture, negative impacts to wildlife, property values, concerns relating to health and noise, impacts to viewsheds, including those related to the County’s natural setting, history, and tourism. People in Franklin County and the greater Tri Cities regional area care deeply about preserving these ridges and skylines for future generations.

This project is being proposed to occur only 4 miles south from one of the largest urban areas in Eastern Washington (Tri-Cities Region-Kennewick, Richland, and Pasco). The twenty-six (26)
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 unique views. As proposed, the wind turbines will be seen from 86% of the land area in Benton County and the most populated area of Franklin County. The visual impacts will be seen from as far away as Walla Walla County to the east, and the State of Oregon to the south. Importantly, the local public utility districts have not shown an interest in needing or wanting additional energy from this project to service the region. These and many other concerns are examples of issues being discussed by many people living in this region.

In conclusion, Franklin County is a critical regional partner with Benton County in protecting and enhancing important values that are held by the majority of residents in the Tri Cities region that affect both economic and quality of life issues. We do not believe this project, with the proposed significant environmental impacts, complies with the goals and policies of the Benton County Comprehensive Plan, the criteria required to obtain a conditional use permit, or the requirements of the Benton County Critical Area Ordinance. This effort to essentially bypass local governing authorities to gain approval for the project only further advances the notion that local values are not being fairly considered and in fact seems to acknowledge the reality that the project would not be approved if the local community’s positions were considered.

The Franklin County Board of Commissioners thanks you for the opportunity to comment and to let the Council know that a majority of the County Commissioners do not support this project. We respectfully request that EFSEC deny the applicant’s request for expedited review of this application due to the proposed environmental impacts and the lack of local support for this project.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

Clint Didier, Chairman

Brad Peck, Member
TO: Whom it may concern,

I am a resident of Kennewick in the badger canyon area. I am deeply saddened by this project going in on top of our homes. We have all worked so hard to carefully find a peaceful, beautiful, clean, and enjoyable area to plant our roots and call home. I am grateful for the hydro and nuclear plants that supply energy to us and surrounding areas. I love green resources, but a wind farm right here makes no sense to me. The cons heavily outweigh the pro's. Therefore, I am pleading with you to do whatever it takes to stop this project from happening here. The Tricities will never be the same if it goes in. Thanks for your time and consideration.

Valerie Miller
Thanks,

~Joan Owens

Energy Facility Site Evaluation Council
Secretary Supervisor
Email: joan.owens@utc.wa.gov
Phone number: (360) 664-1920
EFSEC Email: efsec@utc.wa.gov
EFSEC phone number: (360) 664-1345
Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172
Mailstop/P.O. Box: 43172
www.efsec.wa.gov

From: V Miller <valjean.miller100@gmail.com>
Sent: Tuesday, March 23, 2021 12:43 PM
To: Drew, Kathleen (UTC) <kathleen.drew@utc.wa.gov>; Kidder, Ami (UTC) <ami.kidder@utc.wa.gov>; Moon, Amy (UTC) <amy.moon@utc.wa.gov>; Overton, Kyle (UTC) <kyle.overton@utc.wa.gov>; Mastro, Tammy (UTC) <tammy.mastro@utc.wa.gov>; Owens, Joan (UTC) <joan.owens@utc.wa.gov>; EFSEC (UTC) <EFSEC@utc.wa.gov>
Subject: PLEASE STOP THE WIND FARM PROJECT!!!
23 March 2021

TO: efsec@utc.wa.gov

FROM: Jerald L. Holm
Richland WA
509.627.2911
jeraldlholm@gmail.com

My name is Jerald L. Holm. I am a resident of Richland, WA for the past 25 years. I write to urge you to reject the application of Scout Energy to build wind turbines along Horse Heaven Hills.

I spent most of my career working to help provide reliable electric generation. In the absence of reliable and affordable electric storage capacity, which we do not yet have, the electric grid needs to provide generation immediately to exactly meet the customers' demand. I learned from my colleagues that a power supply grid needs to have a variety of generation types to be reliable … base load, intermediate, and peaking, in the jargon.

Wind turbine (and photovoltaic) generation are none of these. They can at best replace some other generation, when the wind or sunlight are available. Here in eastern Washington, the Scout turbines would mostly replace hydro generation, another “carbon free” generation. So our existing hydro capacity would either be deferred, or discarded by spilling water due to other requirements. The Scout wind turbines would provide no net carbon benefit, at the cost of underutilizing other existing generation capacity.

Perhaps an analogy is a garden here in eastern Washington. To have a productive garden you have to regularly water it from a reliable source, like a water utility or a well. If it happens to rain, you of course can defer watering the garden on that day; both are not needed. But you still have to have - and pay for – the water system on standby. If you rely on only rain to supply your garden, your garden will die.

If you rely on only wind turbines to meet electricity demand, your grid will fail. If you use electricity from wind turbines to replace existing carbon free generation, the total generation costs will increase with no lessening of carbon emissions.

Eastern Washington is the wrong place to add large scale wind turbine generation. Reject the Scout wind turbine application.

Thank you.
What is the point of offsetting already clean energy with windmills that eventually create waste and can't be recycled. This is not the place for this project. The cons outweigh the benefits. This will put money in the pockets of a few property owners but disrupt the load balance of our dams. Please don't add more windmills to our ridge.

Tina Glines
External Email

Do not allow loud and unsightly wind towers to but put up on our pristine landscape.

Sent from my iPad
External Email

I am writing to state I am against the wind farm. Not only will it ruin our beautiful Eastern Washington landscape but kill thousands of birds flying into the blades. We talk about pollution and how to solve the problem, then we build wind turbines placing thousands of pounds of steel on our beautiful hillsides. This is pollution of the worst kind selling it to people as clean energy. Clean energy does not pollute our landscapes and kill wildlife you may fool people into believing it, but we all know it is not clean. I want my voice to be heard. Please stop this, it is so sad to see every single piece of ground destroyed by humans.

Thank you for your time

Jeanette Ward

Sent from my iPhone
External Email

NO! We don't need it and it does not really benefit our community.

Sent from my iPhone
I am against the proposed wind farm. It doesn't provide baseline power and therefore when the wind doesn't blow, the power must be provided by hydroelectric dams, nuclear or fossil fuel plants that must always be available to fill the needs. The promise that storage batteries will soon provide the power when the wind doesn't blow or the sun doesn't shine is a hope-not reality. This project is driven by outside investors wanting to cash in on government subsidies, and the avid support of some western governors for renewable energy that will enable them to fulfil their promise to eliminate fossil fuels in the near term. Please do not support this ugly project!
Sincerely,
Don Wodrich
113 Mattis Dr.
Richland, WA 99352
From: Jay McCue
To: EFSEC (UTC)
Subject: No to the HHHWIND FARM PROJECT
Date: Tuesday, March 23, 2021 4:21:51 PM

External Email

Get Outlook for Android
External Email

Attention EFSEC Board,

My wife and I have lived in Eastern Washington for the vast majority of our 72 years on this planet. We are writing to urge you to reject the application of Scout Energy to build wind turbines and solar panels along the Horse Heaven Hills.

We are very concerned with the size and scope of this project and what it will do to our vibrant agricultural surroundings. Placing wind turbines and solar panels in wheat fields, alfalfa fields, orchards, vineyards or any other thriving agricultural areas is counterproductive to our way of life. And the small amount of energy produced by these wind turbines and solar panels is of little or no consequence to our local region. This green energy production needs to be located closer to regions that actually need it. We do not have any carbon emission energy sources in our region so there is nothing to be gained by this project.

We strongly object to the manner in which Scout Energy has sidestepped input from the local community and filed necessary documents with EFSEC. Even though they are within the requirements of the law, their path reeks of disregard for our community. They are obviously in hot pursuit of the almighty dollar.

Erection of these wind turbines and solar panels will damage our countryside forever. As we look to address future energy needs of our region there are numerous alternatives to this project, all of which are more acceptable in our community.

Thank you for your consideration.

Larry and Kathi Christensen
Richland, Washington

Sent from my iPad
Larry Christensen
To Members of EFSEC Committee:

We live in the Tripple Vista area of Southeast Kennewick and have lived in the Tri-Cities since the late '70's. We few months ago we learned about Scout Clean Energy’s plan to erect approximately 500-foot wind turbines on our all-encompassing view of the Horse Heaven Hills (HHH) to the south of us. This project is of significant concern to us, from both an environmental and property valuation standpoint. We want to protect, save and preserve our ridges in the Horse Heaven Hills and keep those gigantic turbines away from our skylines. The Horse Heaven Hills are some of the most beautiful hills in our state and we don’t want our beautiful panoramic landscape ridges marred by a turbine wind farm. They are the home of bald eagles, golden eagles, burrowing owls, Canada geese, deer, and the recently re-introduced pronghorn antelope. Our well-known local photographer, John Clement, recently posted a beautiful photo of the antelope on his Facebook page (See Photo Below).

This project would destroy twenty-four miles from Finley to Benton City of naturally beautiful hilltops overlooking the Tri-Cities. The annoying noise and flashing red lights at night will be an irritation to what is normally quiet, peaceful evenings. The view of our spectacular sunsets will be spoiled by these wind turbines! This wind farm will reduce our home values and cause difficulties in selling our home due to these distracting, intrusive turbines. These gigantic turbines will injure and kill many migratory birds on their sky highway to the South such as sand hill cranes, Canadian geese, ducks, blue herons, snow geese (John Clement posted a picture of these on his web page too. See photo below), etc. Thousands of these birds fly over our homes in the fall and I and my neighbors have numerous pictures to prove it. If you want pictures, we will send them to you. I hear their delightful calls and watch them fly overhead while working in my yard. In the last few years, I’ve seen and heard eagles too; in fact, one of my neighbors took a picture of a Golden Eagle that had landed on a pole nearby and another neighbor had 3-4 young eagles in one of his trees! These turbines will injure, kill and devastate many predatory birds like bald eagles, hawks and owls. We don’t know how other bird species in our area will be affected like pheasants, doves, chukars, quail, hummingbirds, warblers, wood peckers, finches, etc. We don’t know how it will affect the antelope that have recently migrated to the Horse Heaven Hills and other animals that live there too.

This project will be damaging in numerous ways to our area. Our neighborhood plus many residents in other neighboring cities don’t want these landscape-destroying projects connected to the electric grid for customers in far-away areas such as Los Angeles, Portland and Seattle. If they want the power, they can have these turbines in their area, not ours. We support the effort to build wind farms in remote areas far away from residential homes and offshore wind sites where they are not visible from land and are much closer to the population centers where the energy is needed. We moved to the country to enjoy the beauty, peace and quiet it provides and don’t want it destroyed by ugly, noisy, irritating turbines that kill...
the magnificent birds that use the sky highway above us as they migrate south. I recently read an article where there’s an energy company that wants to breed endangered CA condors to replace birds killed by turbine blades. FYI, here’s the link: https://www.wind-watch.org/news/2021/03/01/energy-company-to-breed-endangered-california-condors-to-replace-birds-killed-by-turbine-blades/ I could send you lots of articles of the damaging effects of turbine wind farms!

And finally, why isn't Scout Clean Energy required to go through the same process the rest of the Benton County residents do when applying for a conditional use permit? Why are they allowed to bypass our county elected officials whose responsibility is to protect the best interests of the citizens they represent? Why is Scout Clean Energy allowed to bypass our elected officials so that someone on the opposite side of the state, who doesn’t live in our community, make a life changing decision for our community which will not negatively affect his lifestyle one iota? Why doesn't Scout Clean Energy have to meet the required conditions for their conditional use permit? Is Scout Clean Energy's wind farm project compatible with others uses in the surrounding area? No, it would be incompatible with the neighborhoods right next to the wind farm! Will the wind farm and the material the turbines are made from endanger the health and welfare of the surrounding neighborhoods? Yes, the wind farm will endanger our health and welfare due to the noise, the toxic resin the turbines are made from and blinking lights that will cause sleepless nights, numerous health issues and mental distress. Will this wind project cause damage and danger on the existing roads? Yes, the added traffic will cause damage to roads and be a danger to bicyclists, school buses, joggers and residential traffic. Will this wind project size and height hinder or discourage the development of neighboring properties in the current zoning district? Yes, it will cause our property values to go down, it will be difficult to sell homes and discourage any new residential building and growth. These massive industrial sized turbines will be so overpowering that no one will want to live anywhere near them! It will remove the ability of using the best fertile soil of HHH for the development and expansion of vineyards and similar agricultural products. The HHH is a registered American Viticulture area (AVA). This turbine wind/solar project will adversely impact the designated use of the HHH. This turbine wind project is not consistent with current uses so the approval of this permit should be denied!

Thank you,
Gene & Judy Guse
104902 E Tripple Vista Dr
Kennewick, WA 99338

Horse Heaven Hills before and after simulation photo
I am writing to voice my opposition to the proposed Scout Clean Energy wind farm in Benton County. Not only do I oppose the wind farm, I oppose the manner in which Scout is bypassing local control and moving for approval of the wind farm at the state level. Our community will be ruined if this project is approved.

Respectfully,

Thank you,
Christie McAloon
I am writing to voice my opposition to the proposed Scout Clean Energy wind farm in Benton County. Not only do I oppose the wind farm, I oppose the manner in which Scout is bypassing local control and moving for approval of the wind farm at the state level. Our community will be ruined if this project is approved.

Respectfully,

Jim McAloon
EFSEC,

I do not support Scout Energies Wind Farm Project or proposal based on this attached Benton PUD Perspectives attached link on wind farms. This Benton PUD report should be included in any appendix if it has not already been included. There are Commissioners names and General Manager listed on the Benton PUD report which was a publicly obtained document and report from July 14, 2020 to verify the authenticity.

Report link:


It does not appear that a majority of the people in Benton County currently support this project as well based on local comments according to different media platforms. People who live in the region are Washingtonians as well, and they should have a say to what happens in the region they live in. Please remand the vote, or any vote on this project, back to the people and citizens that represent the region the project affects. This would be the right thing and Democratic thing to do in this particular instance in my opinion to address this issue.

In my opinion, the EFSEC should strive to promote economic growth in Washington by not making Washingtonians pay for energy options that could raise people’s rates, and also by not resorting to energy options that could affect the natural environment with towering structures close to a mid size metro area that is sprawling. This should be the standard in Washington now that some alternative energy options have already been met per the state laws.

I am also requesting that anyone who has any special interest or relationships (close or distant) with this project, or any companies involved will restrain themselves from placing any type of vote for or against this project and recuse themselves.

Thank you,

Mr. J. Lawrence
Kennewick, WA
Sent from my iPhone
I am opposed to the horse heaven hills wind farm being proposed by Scout Clean Energy. We call upon EFSEC to reject SCE’s permit application for this project. This project will forever alter the scenic views of our ridges, industrialize our rural environment, and change our outdoor quality of life.

Ally English
Sent from my iPhone
I vote no for wind turbines. Do not mar our hills with inefficient machines. We need to develop nuclear power.
From: John Fulton
To: EFSEC (UTC)
Subject: Horse Heaven Wind Farm
Date: Wednesday, March 24, 2021 8:33:54 AM

External Email

I am opposed to the subject wind farm planned for the Kennewick WA area for several reasons.
1. There is currently no market or customer for the electricity to be generated by these machines.
2. The electricity generated is hugely expensive compared to our hydro and nuclear generated electricity.
3. Taxpayer funds are always used to support the construction and operation of these projects and it is not a good return on our money.
4. These wind machines are not environmentally friendly. They require significant use of resources to pour the foundations and to construct the blades and turbines, as well as the roads and power distribution infrastructure. They are harmful to wildlife.
5. They are aesthetically grotesque.
6. The power generated by these machines will eventually be shipped to the grid in California. If they need more power, build them there.
7. The underhanded move by Inslee to bypass local authority borders on a dictatorship. He should be ashamed of himself.

John Fulton
509-222-8196
Sent from my iPad
To : EFSEC Committee

Please preserve the current status of the Horse Heaven Hills lands and views south of the Tri-Cities and VOTE NO on approval of the Horse Heaven Hills Wind Farm Proposed by Scout Energy. Local residents believe this proposal will created a permanent Mechanical Ugliness to the area and harm the environment with construction, noise, blinking red lights, harm to wildlife and birds, and limited mechanical lifetime of inefficient energy production requiring tax payer subsidies.

Respectfully submitted,
J. and D. Sloan
Richland, WA
External Email

To whom it may concern,

I’m totally against the new proposed windmills being planned for the Horse Heaven Hills. Ore communities are growing and moving further south. Not only is the beautiful view at stake but the birds that are killed each year is appalling. Normally I see flocks of robins in my neighborhood and this year, because of all the windmills surrounding our communities already, I have seen but ONE robin.

Please, please do not build this eyesore.

Sheilah Archibald
Kennewick

Sent from my iPhone
While solar power in an attempt to develop carbon-free energy is admirable, wind turbines are a terrible idea.

They absolutely spoil the aesthetic views but most importantly they kill thousands of raptors every year. While I live in Washington I own an alfalfa ranch in Oregon. In the last 15 years electricity rates have increased substantially to the point where I and many other family farmers are no longer competitive with our alfalfa. All caused by buying wind-generated electricity at uneconomic government mandated rates. It’s a disaster and the costs far outweigh the benefits.

The US Forest Service estimates that wind turbines killed 140,000-500,000 raptors and 880,000 bats each year. Raptors have very small families typically hatching 2-3 eggs per year. Some of these raptors are on the endangered species act.


This site is well within the migratory range of golden eagles that nest on our property in Oregon. I urge the council to deny a permit for the industrial raptor choppers……or the wind turbines. Solar power is much less invasive and much less harmful to wildlife. Wind power is uneconomic and reeks utter havoc on bird populations.

Sincerely,

Bruce C. Rhine
Vancouver, WA
541-408-5185
Good afternoon,

My name is Kahryn Campbell and I live on McBee Road in Benton City, which is also the home to my winery, Anelare. The McBee hillside has been my home for over 7 years and I’ve had my business for over 14. As the years have gone by, (I, along with my industry counterparts), are amazed at how many people are coming to this area to taste our wines and enjoy the incredible views of Washington wine country. I believe we are in one of the most sacred areas, Red Mountain and Horse Heaven Hills. I also open up my property for RV’s to come stay through a company called Harvest Host. Cannot believe the amount of people that drive from all corners of the country to come stay… and their reviews of the area we call home makes me emotional (in a beautiful way). They are truly blown away. I take a lot of pride in educating people about this area and telling them why I love it. The hiking and biking community on McBee has grown substantially over the years! It is a tough trail where many train to complete climbs on our big mountains in the NW. I love sharing my home and property to the peaceful views, terrain, and agriculture we have been blessed with.

With all my heart, I oppose the HHH Wind Farm Project with Scout Clean Energy. I am all for creating jobs, purpose, and renewable energy… but there are other ways. Better ways, that make more sense. Please keep the preservation of our hillsides in mind. Cannot imagine folks sitting on Red Mountain and having to stare back at all the turbines, or enjoying a hike on McBee to get a glimpse of Adams and Rainier… while trying to zone out all pollution.

I have nothing but respect for your service and listening to the people. In the last handful of years (particularly 2020), I have never felt such an imbalance of power in our state. Checks and balances are why our country is so great. It cannot come down to the decision of one man anymore. Please help us get our voices heard.

P.S. Some pics attached of our culture out here and what people enjoy.

Thank you kindly,

Kahryn Campbell
Proprietor
Anelare Wines
19205 N. McBee Rd NW
Benton City, WA 99320
(509) 521.8926
www.anelare.com
Virus-free. [www.avg.com]
Attached are WSDOT’s comments for the Horse Heaven Wind Project.

Mark Kaiser
WSDOT – Planning
2809 Rudkin Rd.
Union Gap, WA 98903-1648

Phone: 509-577-1668
March 24, 2021

Energy Facility Site Evaluation Council  
P.O. Box 43172  
Olympia, WA 98504-3172

Attention: Sonia Bumpus, EFSEC Manager

Subject: Horse Heaven Hills Wind Project – EFSEC Docket No. EF-210011  
I-82 Exit 114 – Locust Rd, I-82 Exit 122 – Coffin Rd,  
I-82 Exit 131 – SR 14 Jct., SR 397 MP 0.00 to MP 8.37

We have reviewed the proposed project and have the following comments.

- The subject property is in the vicinity of Interstate 82 (I-82), State Route 14 (SR 14), and State Route 397 (SR 397). Access restrictions for each highway is as follows.

  **I-82**, including the interchanges, is a fully-controlled limited access facility with a posted speed limit of 70 miles per hour. The Washington State Department of Transportation (WSDOT) has acquired all access rights to I-82, including the on- and off-ramps and interchange crossroads. Direct access to I-82 or within the limits of our access control is prohibited.

  **SR 14** is a partially-controlled limited access highway with a posted speed of 55 miles per hour. Access to the highway is restricted solely to public county road intersections or private deeded approaches. No new access to SR 14 is allowed.

  **SR 397** is a managed access class 2 highway with a posted speed of 60 miles per hour. Access to SR 397 is available via existing county road intersections and permitted access connections. New or modified access to SR 397 may be allowed; however, an approved Access Connection Permit must be obtained from the department, prior to construction.

- Surveying, geometric design, or any other activity or work proposed inside WSDOT right-of-way is required to follow current WSDOT permitting, design documentation and approval processes. In addition, any proposed modification to I-82 must be reviewed and approved by the Federal Highway Administration (FHWA). In order to avoid any potential project delays, the proponent should coordinate any proposed modifications to the state highway system with this office as early as possible and not underestimate the time and effort necessary to satisfy the above requirements. It is anticipated the proponent will reimburse the department for all direct and in-direct related costs incurred for this proposal.
• All loads transported on WSDOT rights-of-way must be within the legal size and load limits, or have a valid oversize and/or overweight permit, if allowed. The applicant is responsible for the safe transportation of materials and adherence to permit conditions.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding this letter, please contact Jacob Prilucik at (509) 577-1635.

Sincerely,

Paul Gonsell, P.E.
Region Planning Engineer

PG: jjp/mnk

cc: SR 82, File #2021_004
    Kara Shute, Area 3 Maintenance Superintendent
From: Karen Richardson <zimbaz2910@gmail.com>
Sent: Wednesday, March 24, 2021 12:43 PM
To: EFSEC (UTC)
Subject: On wind turbine plan, WA Gov. Inslee should listen to Tri-Cities | Wind Energy News

Follow Up Flag: Follow up
Flag Status: Flagged

External Email

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wind-watch.org%2Fnews%2F2021%2F03%2F20%2Fon-wind-turbine-plan-wa-gov-inslee-should-listen-to-tri-cities%2F&data=04%7C01%7Cefsec%40utc.wa.gov%7Cef6a0ef8b83049a9ab7208d8eefd154e%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C637522118458669593%7CUnknown%7CCTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000%3D&amp;reserved=0

Karen R.
Greetings: Please know I am writing this in opposition to the subject proposed windfarm. Thank you for taking the time to read this. My reasons for this opposition are listed below, some of which are excerpts (italicized) from an article in Forbes Magazine and the Tri-City Herald written by Jim Conka, whom is a longtime resident and scientist in the Tri-Cities, a trustee of the Herbert M. Parker Foundation, and a science contributor to Forbes.

I quote from the article:

“The Pacific Northwest is a lousy place to build wind turbines for two very good reasons. The power will not displace any fossil fuels but will only displace hydro, another renewable. And wind in this region just doesn’t produce much energy, only 30% of its total capacity.

The real problem is that Scout Clean Energy is building this wind farm in the wrong state.

Tornado Alley is the optimal place for wind turbines in the United States, pushing capacity factors to 50%, and has made wind the second largest generator of electricity in Kansas, South Dakota and Iowa, where they actually displace coal power.

The capacity factor is the percentage of the time a system is supplying its nameplate or installed capacity. The nameplate capacity times the capacity factor equals the actual output of the generating system.

According to the Scout Clean Energy plan, the new farm’s nameplate capacity will be 1,150 MW. Since the capacity factor for this wind farm is only 30%, the generation will actually be only 345 MW operationally. Wind turbines in this area have an average capacity factor of only 27%.

In comparison, the capacity factor for the Columbia Generating Station, our local nuclear power plant, is 98%. With a nameplate capacity of 1,207 MW, it’s producing about 1,180 MW continuously, over 3 times that of the similarly-sized proposed wind farm.

Scout Clean Energy claims that this wind farm will offset 3.5 million tons of CO2, but that’s not true either. There is little fossil fuel in Washington State, which is 70% hydro, 8% nuclear, 13% renewables (mostly wind), 5% gas and 4% coal, the latter from a single coal plant scheduled to be retired in 2025.

This new Scout Clean Energy wind power will only displace hydro, another renewable, thus having no effect on carbon emissions, no matter where the energy ends up. We know this because it’s what happens all the time in this state. Just look at weekly electrical load maps from the Bonneville Power Administration, who is the main system operator in the Pacific Northwest.
The grid must be closely balanced between load, or power draw off the grid, and the power coming onto the grid from all energy sources. Hydro is used almost exclusively to load-follow and balance the grid. When load goes down, or more energy comes onto the grid like wind, hydro drops. When load goes up or wind dies away, hydro increases.

This wind farm will have no effect on climate change or carbon emissions, will not replace fossil fuel at all, will mar the beautiful vistas of this area, and provide a trivial number of temp construction jobs. But it will make Olympia feel good.

And it definitely will make someone out of state a lot of money”.

If Governor Inslee wants this power for his comrades in Western Washington, Oregon or California, then locate this project in one of those areas where it is needed and wanted. We don’t need it here, nor do we want it.

In addition to the above, I submit the following as additional reasons for not building this project in our area: I have lived in the Tri-Cities for 49 years, spending 36 of those years developing residential communities, including the building of over 250 homes, and developing/owning many commercial projects. In all of this development, I had to conform with consistent land use policies which were essential and beneficial for the community, and with which I agree. The windfarm’s location is in an agriculture area. Please know we are a registered American Viticulture Area (AVA) in these Horse Heaven Hills. The highest and best use of the proposed windfarm area should be consistent with the vineyards and wineries already utilizing the unique soil qualities. The wind/solar project would in fact adversely impact this designated use! This impact would damage property values and prohibit the development of jobs in numbers larger than the reported 1,000 mostly temporary jobs it is said it will create. Washington State, aided in large part by the area from Yakima to Walla Walla in which this project would be located in the middle, has been put on the map as one of the best wine producing areas in the world; adding 6,000 acres of solar panels and the windmills would take away this prime real estate of south facing hillside from future vineyard expansion dependent of our special soil. This hard earned designation would be heavily damaged regarding tourism.

Benton PUD has taken a position of opposition to this windfarm, including stating the existing 9 canyon wind turbines should not be expanded. They have pointed out that the demand for power in this region and other regions are in the summer and winter which is when the wind blows the least here.

This so called green energy resolution project requires mass spending with a poor return on investment; maybe making a few (possibly uneducated without the facts/truth) “feel good” if it is allowed, but should not happen at the expense on the MANY who oppose this project based on facts, and have to live with it visually and economically for a very long time.

In essence, the large majority of people who live here and have invested their lives and livelihoods here do not want this project, and do not want the decision to be made against us by people who don’t live here. Please let us control our own area and the quality of our lives, and we won’t try to control yours. Return the decision to allow or reject this project to the local Benton County authorities whose job it is to make these types of decisions.

Respectfully,
External Email

To Whom It May Concern,

I am AGAINST the proposed HHH Wind Farm! I am a Realtor & homeowner, & I believe it will negatively impact home values. As well as issues with health, environment (migratory bird kill) habitat & environment of the Horse Heaven Hills, plus a multitude of other issues/concerns. I do not feel, it is in the best interest, for the residents of our Tri Cities & community.
I ask & encourage you, to vote against the HHH Wind Farm.

Thank you,
Susan Waldo

Sent from my iPad
Gentlemen & Board Members:

I submitted a brief letter (attached) to my Benton County Commissioners as soon as I found out that Scout Clean Energy was proposing to build a gargantuan wind farm south of Kennewick in the surrounding hills and drylands wheat fields that define our community. I was gravely concerned, and remain so, that our Benton County Commissioners were intentionally bypassed in the decision making process concerning the construction of this mother-of-all wind farm facilities. Scout Clean Energy’s decision to submit their proposal directly to EFSEC was strategic and intentionally avoids public scrutiny from those who will be most affected by the construction of their wind farm. Our local community is overwhelmingly NOT IN FAVOR of this wind farm. It will permanently scar and cast red-blinking blight on our southern landscape and change the very character of our beautiful Ice Age floodscape region. We know full well that this foreign-owned entity has no (zero) interest in providing benefit to our community from alternative energy sources. Scout Clean Energy’s business model is purely one of global profit - securing billions through practiced finesse in capitalizing on federal tax credits and selling them to 'energy' investors while the US federal tax credit system lasts.

Please ask yourself, at what price would you put 300-500 massive and towering wind turbines anywhere near our beloved Mt. Rainier? Australian-owned Scout Clean Energy does not give a fig about the people who live in Benton County or what we think is a beautiful desert shrub steppe landscape. We have been targeted precisely because we have no political clout. And yet we are the very people who have suffered the most from Federal indignities like the snail’s pace cleanup at the Hanford Nuclear Waste Site. We have struggled to build a vibrant community and create a destination wine country with tourist appeal - and we have done this despite the continued neglect we have received from the Department of Energy and Washington State’s own environmental cleanup agencies. For your committee to throw our Horse Heaven Hills under the bus of a gargantuan wind turbine/energy tax exchange scheme to make some foreign company even richer - would truly be the final insult.

Please hear our voices. Please recognize that Scout Clean Energy has perfected a strategy of duping rural communities with no political clout into a long term loss of their precious natural resources in exchange for a short-term promise of minuscule property tax kickbacks.

Finally, Scout Clean Energy’s 600 page tome of a proposal is a near duplicate to their Texas proposals. They are playing the same game over again and again. Please show your southeastern Washington citizens some respect. Please soundly reject this Garantua of a wind farm and send these guys packing back to Australia or back to Texas. Let them lift their Aussie legs in someone else’s backyard - not in Washington’s.

Sincerely,
Christine Barnes
Kennewick taxpayer for over 45 years

--
2616 South Kellogg Street
Kennewick, WA 99338

c: (509) 430-0990
Dear Benton Co. Commissioners:

SCOUT CLEAN ENERGY is FOREIGN OWNED. (Australian)

They have ZERO interest in ‘SAVING OUR PLANET’ through green energy production or reducing energy cost in eastern Washington. They are driven by greed and racing to harvest energy tax subsidies before they end.

SCOUT’s only interest is in making ‘BILLIONS’ by selling wind energy ‘TAX CREDITS’ to investors. Those investors, in turn, fund the entire construction of ‘SCOUT’ WIND FARMS. SCOUT proudly calls this ‘Tax Equity Financing’. (Check out their track record in Texas where SCOUT builds these debacle wind farms by the handful until they run out of land). They just finished one this summer in McCulloch County, TX. (‘HTX’) – Heart of Texas.

In 2016 the federal government began subsidizing renewable energy projects through tax credits and super-accelerated write-offs. The BIGGEST credits and write-offs were in WIND. The US government created the TROUGH and foreign companies jumped in to lap it up and get very wealthy by trading investment tax credits and reaping production tax credits.

The tax credit TROUGH is scheduled to dry up in 2022 – so guess who is PUSHING HARD to get those WIND FARMS built right NOW?!? Even if they have to skip over the County officials and go right to the tree-hugging Energy Facility Site Evaluation Council.

This company is slick. They have perfected ‘SCOUTING’ for rural, ill-informed agri-based communities, with farmers eager for more handouts, and compliant city officials willing to scar the face of the local landscape for generations in return for immediate property tax payouts. McCulloch County, TX sold their soul for $36 million for a mere 180 MW. Seems like SCOUT is selling Benton County a bit short with $20M.

SEND THESE GUYS BACK TO TEXAS or Australia. And each one of you – please go buy a John Clement Calendar, lest you forget what a beautiful place we are privileged to call home.

Most sincerely, Chris Barnes (tax payer for over 47 years – Kennewick)
March 24, 2021

Dear Energy Facility Site Evaluation Council:

Re: Scout Clean Energy Horse Heaven Wind Farm

Please do not overlook the adverse impacts of the proposed Horse Heaven Wind Project on the local environment in the Horse Heaven Hills of Benton County, Washington for the threatened Ferruginous hawk.

We own 500 acres currently enrolled in the US Department of Agriculture’s SAFE (State Acres for Wildlife Enhancement) program, specifically for the threatened Ferruginous hawk program. (The Ferruginous hawk is now being considered for listing as endangered). Our land is within a few miles of the proposed wind farm.

Here is my reason for concern:

The Washington State Fish and wildlife Service conducted a survey in 2017 of Ferruginous hawk nesting sites in Benton County. The following is a copy of that survey and an abstract of the report. If you compare the wind farm proposed sites to the WDFW hawk map you see right away that the wind farm will be situated right in the hawk habitat.

The following map and report is from the www.fsa.usda.gov website. It’s easy to see that the wind farm will be directly in the same ridges designated as prime Ferruginous hawk habitat.

fs_fhawk_safe_updated_may2017
“Scout’s map to EFSEC in their permit application shows the proposed locations of the wind turbines. It shows up to 6 rows of the 650 foot turbines on the ridges from Finley to Benton City.”
Overlay Scout’s map with the WDFW map and you can see the problem for the hawk habitat.

In addition if you are not familiar with the Ferruginous hawk SAFE program the following is an overview for your information.

“The Ferruginous Hawk SAFE is a new initiative of the familiar Conservation Reserve Program (CRP). Like traditional CRP, SAFE is a voluntary program that pays eligible landowners and operators to address priority natural resource concerns. Unlike traditional CRP, SAFE signup is non-competitive and offers more financial benefits. Landowners, including those with previous CRP, in Adams, Benton, Franklin and Walla Walla counties may be eligible to participate in this initiative. The ferruginous hawk is the largest hawk species in North America and is reliant on shrub-steppe habitat for both nesting and foraging. Due primarily to habitat loss, ferruginous hawk populations are declining. They are a species of federal special concern and are threatened in Washington. Ferruginous hawks primarily forage in territory around their nesting sites. Hawks are also sensitive to disturbance near the nest. Therefore, land enrolled in SAFE must be near potentially active nests and planted to grass, broadleaf forbs and shrubs that provide quality wildlife habitat.”

Updated May 2017
The population size of ferruginous hawks in Washington is low. This species is impacted by the loss and fragmentation of shrubsteppe and grasslands from agriculture and residential development and associated declines in distribution and abundance of its primary prey, jackrabbits and ground squirrels. Direct sources of mortality include illegal shooting, electrocution from powerlines, and collision with wind turbines.

Ecology and life
This species arrives on its breeding areas from late April through July.

Geographic range
Washington state is on the northwestern edge of the species' breeding range. Over 200 territories have been documented in Washington, with Franklin and Benton counties together hosting about 60 percent. Grant, Walla Walla, Adams, and Yakima counties have had 13 or more territories each. In 2002, only 20 percent of historical ferruginous hawk nesting territories in Washington were occupied, with many vacant for years. The current population size is unknown, but likely is very small. The map illustrates potential range and habitat distribution of this species in Washington.

The reality is that this proposed wind farm may have unforeseen negative consequences for the hawk and environmentally sensitive areas the hawk needs to be able to hunt and nest in. I’m so disappointed that all the work we have done on our land to help restore the hawk habitat may be all for naught if you decide to allow this wind farm to be built as planned.

In addition there is currently NO MEANINGFULLY COMPENSATION nor any real mitigation efforts for any negative effects suffered from this super sized wind farm for the hawk or its habitat that I could find in the SEPA.

This is what I found in Scout’s Draft Habitat Mitigation Plan Horse Heaven Wind Farm, Benton County, Washington

Prepared for:
Horse Heaven Wind Farm, LLC
Prepared by:
Tetra Tech
19803 North Creek Parkway Bothell, WA 98011

“Avian Use and Raptor Nest Surveys”

“WDFW noted set back recommendations that may be appropriate during construction during the nesting/fledging season for the ferruginous hawk (Buteo regalis) nest observed near the Project that was occupied all 3 years it was surveyed (2017-2019)”

“During construction, WDFW-recommended seasonal buffers (per Larsen et al. 2004) for ferruginous hawk nests would be observed to avoid disturbing nesting ferruginous hawks.”

Pathetically inadequate.

Here’s a better idea. The hawks migrate to their breeding grounds in Benton County from late April to July. The windmills could be shut down during this time period to protect the air space for the hawks and fledglings. I believe the summer is not a peak time for energy
demand as well. Scout’s solar farm could make up any difference in energy production. Please consider this idea for the hawks.

And finally, can you really call this project “Green Energy” when the outcome will be to install these wind machines right in the very ridges that U.S. Fish and Wildlife Service has designated as some of the last remaining viable habitat areas for the threatened hawk and the SAFE program in Benton County. Can you really call this project “green energy “ when the windmill blades may cause lethal strikes on the few remaining threatened Ferruginous hawks in Benton County?

Please do not approve this industrial sized wind farm as it is planned. Please choose to protect the hawk by protecting the air space surrounding the Horse Heaven Hill ridges for the hawks during their breeding season in Benton County, Washington. You have the option to either send the hawk down the road into extinction or to do the moral thing and deny the wind farm application as it is presented and protect a magnificent creature.

The Ferruginous hawks in Benton County should not be sacrificed for this wind farm for profit or for Washington State’s green energy goals. There needs to be a genuine and dedicated commitment from Scout to protect the hawks rather than offer up a few lines in the SEPA “suggesting” a few “mitigation options” for the hawks.

Respectfully,

Kathryn Knutson
Mailing address
1333 Hains Avenue
Richland, WA 99354
kknutsonwa@gmail.com
I recently returned home from a trip to western Oregon. As I passed through the area between Biggs Junction and Arlington I observed hundreds of windmills along the tops of nearly every ridge. Since I live in Benton City, WA, I couldn't help but notice how distracting this would be to anyone who enjoys the natural scenery of the eastern side of both Oregon and Washington. With my mind on the distractions these white windmills caused, I began to observe other obstacles along the horizon, i.e. cell phone towers, metal and wooden electrical poles, cement light posts, etc. and began to wonder why they don't pose the same amount of distaste as the windmills. My conclusion is that because the windmills are white they draw the eye to them immediately. Now with the amount of technology available in today's world, surely the company that manufactures the windmills can come up a product that blends in better with the natural surroundings, such as a dark gray or dark tan. Perhaps we can then begin to overlook them with time, or at least not find them so offensive.

Janet Becker
Benton City, WA
Attached are my comments for your response and public record.  
Thank you,  
G. Cummins

Sent from Mail for Windows 10
SUBJECT: Recommendation to require a SEPA Environmental Impact Statement

EFSEC Docket No. EF-210011 Scout Clean Energy – Horse Heaven Hills Wind Project

ATTENTION: Energy Facilities Site Evaluation Council Members and SEPA Decision Makers

This is a request for you to reject an Application for Site Certification (ASC) Determination of Non-Significance (DNS) under SEPA, for the 6900-acre, 27-mile-long proposed wind turbine farm along the top of the Horse Heaven Hills Ridge adjacent to the Tri-Cities in Benton County. The 244 (500 ft. tall) wind turbines will lie within a Project Lease Boundary of 72,428 acres that contains the Project’s Wind Energy Micrositing Corridor (i.e., the area in which the Turbines and supporting facilities would be sited during the final design) and the Solar Siting Areas (which consist of the three areas under consideration for siting of the proposed solar arrays during the final design).

Note that objections to this project are bi-partisan in nature. Both democrats and republicans in the Tri-Cities and surrounding area believe the EFSEC ASC and ensuing expedited response action is an attempt by out-of-state Scout Clean Energy and their associated corporate investors to circumvent the NEPA/SEPA cumulative impacts analysis and regulatory process required of all other energy producing entities constructing new sites in this state. For any other energy related project of this scope, magnitude, impact and potential for segmentation, an Environmental Impact Statement (EIS) would be required under NEPA or SEPA.

Scout and its supporters cannot uphold their assertion that 61% of the public is in favor of the project, when 80% of public meeting respondents in Benton County opposed the project. The Applicant is attempting to buy off and mislead public opinion with promises of cheap renewable energy, jobs, and property tax benefits. This sales tactic does not work in the Tri-Cities and surrounding area for the following reasons:

1. The Tri-Cities and Washington State ranks 3rd in the nation for lowest energy costs. It doesn’t get cheaper than what we currently produce, especially in this region.

2. The Tri-Cities has hydroelectric, solar, natural gas, nuclear power, wind energy available from nearby existing wind farms if needed. In 2017 Washington ranked 3rd in the nation for clean energy production at 80% including hydroelectric power.

3. Benton County has met or exceeded federal and state mandates for renewable energy and has the largest population in the state of scientists and engineers in residence. Some are working on small modular reactors (SMRs) which have the potential for much less environmental impact.

4. The justification of need does not exist in Benton County or the Columbia Basin.
Placing wind turbines on every available ridgetop in central and eastern Washington not only degrades the scenic vistas our state is lauded for, but also creates more long-term problems than it solves in (1) power overgeneration (2) oversupply storage concerns (3) hazardous waste disposal costs (the blades are not recyclable and made of hazardous materials), and (4) eventual cumulative remediation costs of projects within the 72,428 acre Project Lease Boundary including the 6900 acres land, solar, and wind turbines to be paid for by taxpayers long after the developers leave the project.

The NEPA process is intended to be a comprehensive project planning tool to review the needs of society against all available alternatives and their environmental, social, cultural, historical and financial impacts. When NEPA or SEPA is used in conjunction with the Washington State Utility Resource Planning Report for it’s intended purpose, then the state should be able to achieve its most transparent, cost effective, and efficient energy production program. This ASC application process appears to put more weight on the financial benefits of a contrived, supposed eco-friendly, mega project, in support of land owners and wealthy investors, and less weight on the long-term negative impacts to the residents of Benton County and Washington State.

In addition, Washington State Department of Fish and Wildlife has identified endangered, threatened, and sensitive bird species, that fly their migratory pathways over the Horse Heaven Hills and the Tri-Cities to nest and forage in the Columbia, Snake, and Yakima river valleys, to and from Canada. Migratory birds (e.g. sandhill crane, ferruginous hawk, bald eagle, American white pelican) are protected under the Migratory Bird Act. A 27-mile wall, 5 rows deep, of wind turbines along their flyway and foraging grounds could significantly result in a reduction of these protected species.

The Columbia Basin area is known for its wind, but also for the number of sun-filled days. It would seem a solar farm or other renewable, in lieu of a wind farm in this area would be better source suited for providing the desired jobs and tax benefits while protecting endangered species flyways and providing the renewable clean energy you seek to deploy. However, by not conducting an environmental impact statement, it is not known by the residents of Benton County, the Tri-Cities, or the State of Washington, which clean energy alternative (e.g. solar, additional wind, geothermal, upgraded or modified hydroelectric, small modular reactors (SMRs) etc.) would provide the most beneficial source of renewable energy.

Lastly, the proposed project lies within the viewshed and scenic vistas of valley wineries, large Tri-Cities residential and developing real estate communities, and Native American tribal vistas. Having 244 wind turbines at a height of 500 feet (equivalent to a 33-story building) along a 27-mile ridge, will clearly have a significant visual impact on these entities. Visual Impact Assessments (VIA) are required by other state infrastructure departments. A VIA provides decision makers with information on both the positive and negative visual quality impacts to tourism and real estate development that may result from a proposed project. Would solar or an “other” renewable alternative with a low visual footprint be a better option?

Attached is a list of NEPA/SEPA related questions for you to consider. Based on the scope, magnitude, and potential for significant environmental impacts as presented herein, it is requested that you and your EFSEC decision makers, reject an ACS SEPA determination of non-significance (DNS). Instead of signing a Site Certification Agreement (SCA), require a SEPA Environmental Impact Statement (EIS) and Record of Decision (ROD) be prepared for the Horse Heaven Hills Wind Farm Project and associated facilities being planned within the 72,428-acre Project Lease Boundary. A final EIS decision would provide the most transparent, cumulative impacts analysis, and comprehensive approach to clean energy grid planning in the Columbia Basin and the State of Washington.

Respectfully,
G. Cummins
Kennewick, Washington
Comments for Proposed Horse Heaven Hills Wind Project EFSEC Virtual Public Informational Meeting and Land Use Consistency Hearing March 30, 2021 5 PM

State Environmental Policy Act Questions

1. Although the Applicant elected to be sited under EFSEC jurisdiction, does the Horse Heaven Hills Wind Farm Project expedited Application for Site Certification (ASC) process exceed the authority and provisions of Chapter 80.50 RCW? Wind is defined as an “Alternative energy resource” and considered an energy facility type according to 80.50.020 (1)(a). If a wind farm is defined as an energy facility type, and an “Energy facility” means it is an “energy plant” according to 80.50.020 (11), and “Construction” is defined as on-site improvements according to 80.50.020(7); then, how does “new construction” of a 27 mile, 6900 acre wind farm/energy plant with a Project Lease Boundary of 72,428 acres that contains the Project’s Wind Energy Micrositing Corridor (Micrositing Corridor; i.e., the area in which the Turbines and supporting facilities would be sited during the final design) and the Solar Siting Areas (which consist of the three areas under consideration for siting of the proposed solar arrays during the final design) apply to the provisions of Chapter 80.50 RCW?

2. The proposed project appears to lie within the Lesser Pacific Flyway for Sandhill Cranes. What is the environmental impact to endangered bird species such as the sandhill crane? What is the estimated “take” of cranes and the impact to their staging, foraging and nesting habitat within the Project Lease Boundary? The Habitat Mitigation Plan for this project only addresses the 6900 acre portion of the total planned project lease area. It should address the cumulative impacts to endangered species for the total Project Lease Boundary Area along with Cultural and Historical impacts for consistency with NEPA/SEPA regulations to avoid segmentation issues.

3. The proposed project lies within the viewshed and scenic vistas of valley wineries, West Richland and Tri-Cities residential neighborhoods and new real estate development communities, and Rattlesnake Mountain tribal vistas. Was a Visual Impact Assessment (VIA) prepared to provide decision makers with information on both the positive and negative visual quality impacts to tourism and real estate development that may result from this project?

4. Was an engineering feasibility study conducted comparing alternative “other” renewable energy options such as geothermal, nuclear, upgrades to existing hydro, and solar in lieu of this particular proposed wind project? Also, has an assessment been done comparing the environmental impacts of alternative sources to this project?

5. According to the Washington State Department of Natural Resources document Geothermal Favorability Model of Washington State 2014, south central Washington near Roosevelt, has a relatively high geothermal resource potential, due in part, to proximity to transmission lines and low elevation. A plant in California produces 1.5 gigawatts of energy that can heat 700,000 homes within a much smaller footprint and fewer adverse impacts. Shouldn’t this resource option be considered in lieu of a massive wind farm?

6. What are the cumulative impacts of this project including the activities planned for the 72,428 lease acres? Segmentation of the total project plan is not compliant with State Environmental Policy Act provisions.

7. Were Emerging Technologies considered as renewable energy alternatives such as Small Modular Reactors, new geothermal technologies and bladeless wind turbines?

8. The wind turbine blades are not currently recycled. The hazardous waste generated from wind turbine blades requires massive storage and landfill/burial ground disposal space. What will be the environmental and economic cost of this project for blade and turbine disposal?
9. Who is going to pay the bill for cleanup and disposal at a hazardous waste landfill of over 244 wind turbine blades, each 150 feet long of epoxy fibre and carbon fibre at approximately 12,786 lbs. for a total of 732 blades for 9.359 million pounds of hazardous waste to be stored or placed in a landfill?


11. What is the justification of need? Washington State ranks 3rd in the country for lowest electricity cost and in 2017 3rd in the country for renewable energy production at 80%. We have met or exceeded all renewable energy government mandates. 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 and storage which is costly. Is there truly a need for this project? Or is this an out of state (Colorado) power brokerage company and land investor creating a business opportunity for themselves, which is not needed where there are hydroelectric dams, nuclear energy, solar energy and potential geothermal energy available? Where is the transparency of the investors benefiting from this project?

12. What is the exact number of estimated permanent jobs on this project? The numerous jobs the project presents is temporary. In Benton County, at our hydro-electric plants, at Energy Northwest, and at the Hanford Site there are more union and non-union jobs that are low-carbon footprint generating facilities that are available and more permanent. Why do we need this project?

13. Is Scout planning to sell emission credits from this project to coal plants outside the State of Washington?

14. What are the anticipated cumulative noise levels (244 turbine engines potentially equivalent to 244 car motors) and lighting (244 beacon lights and operating lights) impacts to residents adjacent to the project area and to Finley, Tri-Cities, and Benton City businesses and residents?

15. Washington State Utility Resource Planning Report 2018- Tables 1 and 2 indicate a reduction in wind power demand from 2017 to 2022 and 2027. According to the Planning Report, Table 1 Washington State Projected Requirements and Resources, Annual Energy, aMW, the 5 and 10 year forecasts from a 2017 base year to 2027 indicate a reduction in required wind power from 502 to 534 to 465 aMW. If the demand for wind power is reducing over the next 5-10 years what is the need for this project? Note Tables 1 and 2 show an increase in “other renewables” in the 2017-2027 forecast. If “other renewables” are increasing and “wind” is decreasing in these forecasts why do we need this project?

16. How are Public Utility concerns regarding overgeneration addressed in the project application? Northwest Public Utility Districts have had continuous concerns during spring months in the Northwest, when hydroelectric resources produce significant amounts of energy from spring run-off. At the same time, windy spring conditions result in large quantities of wind energy available at the same time when demands for electricity are low. This results in oversupply and power storage capacity problem for utility districts. Will Benton PUD be subject to BPA’s Oversupply Management Protocol and have to pay the oversupply rate assessed by BPA during peak wind and hydroelectric flow and low demand which would increase costs to Benton County and Tri-Cities consumers?
I just want you all to know that I do OPPOSE the building of wind farms (turbines) south of Kennewick. Also, I think the way this company went about making their proposal, that is, going around the local governmental entities and going straight to the State of Washington is reprehensible! Just goes to show the kind of people they are, not beginning with the County nor City even having an open forum months ago when in the planning stages.
Disgusting!
Monte M. LaDow
2643 S. Kellogg St.
Kennewick, WA  99338
509-521-6620
mmladow@hotmail.com
I’ve been a resident of the Tri-Cities for my entire life other than when attending WSU (70 years).

One of the main attractions of the Tri-Cities and eastern Washington is the wide-open spaces and the ability to enjoy the outdoors in our beautiful area. The thought of lining the horizons of our countryside with these tall, unattractive turbines is unsettling to anyone that currently enjoys outdoor activities in the area.

Another factor that makes the area attractive to business and industry is the very reliable and affordable, renewable power that is available from our hydro-electric and nuclear power plant (WNP-2). It makes no sense to bring in wind and solar power to this area without a local customer base that needs this power. Wind and solar power has a much lower capacity factor than our existing grid suppliers, and introducing this less reliable, more expensive power to our grid will only increase the cost of power to the entire population, and cause a loss of potential business development that the state and local governments rely on for our economic growth.

The Governor of our state should allow the people of eastern Washington, who are most affected by this project, to make the decisions that affect their well-being.

Tim Lamberson
1602 Naples Lane
Richland, WA 99352
509-591-1611
Hi. I am against the Horse Heaven Wind Project. I think the Tricities area would be more beneficial for utilizing nuclear power over wind power. We have a great location for nuclear power plants. The wind turbines are also ugly, contribute to landfills, and create noise pollution while also decreasing home values. I think we can come up with a better solution than polluting our land with eye sores.

Please consider another form of energy production and save the beauty of our land. Thank you, Melinda Yunker
Thanks,

~Joan Owens

Energy Facility Site Evaluation Council
Secretary Supervisor
Email: joan.owens@utc.wa.gov
Phone number: (360) 664-1920
EFSEC Email: efsec@utc.wa.gov
EFSEC phone number: (360) 664-1345
Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172
Mailstop/P.O. Box: 43172
www.efsec.wa.gov

Hi Joan,

I want to express my support for the proposed Horse Heaven Hills Wind Farm. Build the wind farm! There are flyers going around asking folks to sign a petition against the wind farm. But I cannot find a petition in support of the wind farm. So I wanted to email you.

We want progress in our town and county, and the wind farm is a great addition. It will not spoil the skyline. It will enhance the skyline! The wine industry will be bolstered by this, because the younger generation see clean energy as the way forward.

How can people fight this silly petition, and how can we support the building of the wind farm?

Cheers,
Ryan Renslow
I am writing this email to express my opposition to the Scout Clean Energy proposed Horse Heaven Hills wind farm for the following reasons:

1. The power provided by the turbines will only displace hydro power, another renewable, not any fossil fuels, and will have no effect on carbon emissions. The claimed offset of 3.5 million tons of CO2 is totally inaccurate since Washington State currently has just one coal-fire plant producing 4% of the state’s energy needs and that plant is scheduled to be decommissioned in 2025.

2. Given that the wind only blows with any significant force 80 days a year in this area, the turbines will sit idle for 79% of the year which seems a poor return on investment. The capacity factor will only be 27% of the purported 1150 MW.

3. The Horse Heaven Hills is a registered American Viticulture Area and, therefore, best use should be consistent with the vineyards already using the unique soil qualities. This project will adversely impact this designated use.

4. The urban growth area has not been addressed by Scout Clean Energy at all. The only expansion Kennewick can make is to the south and west – exactly where these monstrosities are going to be.

5. The impact on tourism will be huge. The pristine hills viewed by so many wineries will be destroyed forever. Not many will want to sip a glass of wine and look at them.

6. None of the Benton County Commissioners, the Franklin and Benton County Public Utility Districts, nor the 1250 signatures we’ve gathered over the last 30 days are in favor of this project.

Thank you for your consideration.

Karen Brun
Kennewick, WA
Thanks,

~Joan Owens

Energy Facility Site Evaluation Council
Secretary Supervisor
Email: joan.owens@utc.wa.gov
Phone number: (360) 664-1920
EFSEC Email: efsec@utc.wa.gov
EFSEC phone number: (360) 664-1345
Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172
Mailstop/P.O. Box: 43172
www.efsec.wa.gov

From: Kidder, Ami (UTC) <ami.kidder@utc.wa.gov>
Sent: Thursday, March 25, 2021 12:54 PM
To: Owens, Joan (UTC) <joan.owens@utc.wa.gov>
Cc: Bumpus, Sonia (UTC) <sonia.bumpus@utc.wa.gov>
Subject: FW: Tetra Tech Lawsuit (Falsified Soil Samples)

Joan,

Can you please file with comments received for the project?

Best Wishes,

Amí Kidder
EFSEC Siting and Compliance Manager
ami.kidder@utc.wa.gov
Office - 360.664.1305
Cell - 360.706.4997

From: Barry Bush <atomicbt@charter.net>
Sent: Thursday, March 25, 2021 12:39 PM
To: Bumpus, Sonia (UTC) <sonia.bumpus@utc.wa.gov>; Drew, Kathleen (UTC)
<kathleen.drew@utc.wa.gov>
Cc: Kidder, Ami (UTC) <ami.kidder@utc.wa.gov>
Subject: Tetra Tech Lawsuit (Falsified Soil Samples)
EFSEC Chair,

I respectfully ask that all documents provided by Tetra Tech concerning the Horse Heaven Wind Farm be disallowed. Tetra Tech is currently embroiled in a massive lawsuit with the Federal Government involving falsified soil samples. We have no way of knowing if Tetra Tech has also submitted false documentation for the Horse Heaven Wind Farm. We ask that the state require Scout Clean Energy, to pay for the state to conduct new studies. Please review the attached link to review the details of the lawsuit.

https://www.courthousenews.com/developer-sues-tetra-tech-and-feds-over-hunters-point-project/

Barry A. Bush  
709 S. Hawaii St.  
Kennewick, WA. 99336  
(509) 460-1051  
atomicbt@charter.net

www.gofundme.com/f/save-our-horse-heaven-hills

https://m.facebook.com/SaveOurRidgesTC/?tsid=0.1271890715724434&source=result

http://save-our-ridges.org/


https://www.efsec.wa.gov/

This is a picture of what our view to the South will look like if the Horse Heaven Hills Wind Farm is approved by the state. Is this what we want for the Tri-Cities and our Horse Heaven Hills?
I strongly oppose the Horse Haven Hills Wind Farm in Tri-Cities. The power will not displace any fossil fuels but will only displace hydro, another renewable. Wind in the Tri-Cities region does not produce much energy, only 30% of its total capacity. The windmills would kill migratory Pacific birds in the great Northwest Flyway zone. It would also destroy the beauty of our golden hills. Please listen to the local people and put the windmills in an area where the people want and need them and that is definitely not Tri-Cities.

Thank you,

Brittney Strebel
Resident of Kennewick
EFSEC
State of Washington

Ladies/Gentlemen,

Being unable to attend the subject meeting, ATTACHED below are my comments for the record for the proposed HORSE HEAVEN WIND FARM public meeting scheduled for Tues., MARCH 30, 2021.

It includes,
1. Summary (1 page),
2. ATTACHMENT 1 (2-pages) with more information on each point which was written in May 2020 in response to Scout Clean Energy's original proposal for a wind farm only. I did not update this but the information in it still applies.
3. ATTACHMENT 2 (1 page) My letter-to-the-editor relevant to the topic.

Thanks for your consideration,
Craig Brown
70 year resident of Benton County
From Amber Hatcher  amber_adair@yahoo.com
Date: March 24, 2021 at 1:59:11 PM PDT
To: efsec@utc.wa.gov
Subject: EFSEC Committee HHH Wind Farm

To Whom It May Concern,

I am AGAINST the proposed HHH Wind Farm! I am a concerned homeowner, & I believe it will negatively impact home values. As well as issues with health, environment (migratory bird kill) habitat & environment of the Horse Heaven Hills, plus a multitude of other issues/concerns. I do not feel, it is in the best interest, for the residents of our Tri Cities & community. I ask & encourage you, to vote NO for the HHH Wind Farm.

Thank you,
Amber Hatcher

Sent from my iPad
To Whom It May Concern,
I will get straight to the point, this is a, “No” . The windfarm is not as productive and as environmentally green as many proponents claim nor do they produce the jobs that their proponents claim they do.

It takes a tremendous amount of fossil fuels to create the parts and transport them. They wear out and currently only a handful of locations in the USA will accept their waste products, sounds familiar…spent radioactive products and fuel. What happens when the states that currently accept them decide not to, or make it exorbitantly expensive to dispose of and again sound familiar…radioactive products and spent fuel. The blades take up miles of land to dispose of, layered on top of each other like bodies in the crypts of New Orleans, waiting to breakdown. Or, some are now trying to grind down the blades and try to make the remains into other products or simply bury the ground down waste, taking less room than the blades left intact. Let’s talk about potential ground water contamination or soil contamination.

What about fire concerns, is it possible that the junction boxes to these turbines, could spark and cause wildland and prairie fires? I think that is a serious possibility, or what concerns /process are there that restrict the employees working and checking on them from accidently starting a fire by indirect or direct means? Cigarettes, tail pipes?

The negative and positive impacts on the environment are hotly disputed and I for one think that they do harm to the environment by creation of roads to maintain them in often otherwise pristine and fairly pristine locations. They disrupt the breeding grounds of many animals and particularly invasive to the breeding grounds of birds and well as killing birds while in flight.

They are a visual blight, very disruptive and disturbing to those of us to have to look at them while traveling and living. They are a visual invasion. That visual blight does not go away at night either. Due to the height , they require blinking red lights to indicate where they are at night and to avoid collisions with airplanes.

The creation of jobs such as this one touting 1000 jobs, will the jobs be at lower wage base, have diversity, or higher pay scale or not have diversity based on the needed skill level? And, they are temporary. After the construction is completed, the remaining jobs will consist of only a handful of individuals employed as permanent. What will their wage package look like? Sure, in some cases the leases have helped out some farmers (Kansas one example) and others but the benefit is for a few, not many.

Just say “no” to this project. I’ve looked at these wind farms from here , down Interstate 90, Indian John Hill to Vantage, across the Horse Heavens, down the Columbia Gorge, down
the valley to Walla Walla and across Kansas and I can only cry at the loss of the beautiful and picturesque landscape and try to keep the visual in my head of what it used to look like. I used to be able to stand in my yard in Pasco and look across to the Horse Heavens, now they are covered with wind turbines, it is not the same. And, with the passing of each generation, the memory goes away of the impressive skyline of hills and slopes and will only be recalled through historical photograph or ones that have been altered. Let’s spend the money improving our dams and their fish ladders to make them truly as efficient as possible and help out the salmon recovery and support more industries than what the turbines do.

Sincerely,

Kathryn Sheldon
12602 147th St E
Puyallup, Washington 98374
Tel: 253 445 2739
I have hiked the Horse Heaven ridge from Kennewick to Prosser twice.

I marvel at the badgers, coyotes, various rodents, occasional deer, the antelope that escaped from the Yakima Reservation, and the multitude of winged creatures.

Migratory birds like geese, sandhill cranes, and ducks often feed near the crest of Horse Heaven on their flight through Washington.

Game birds like quail, chukar, pheasant, and dove can be found in draws in the northern slopes of Horse Heaven.

Recreation people use Horse Heaven for hiking and the occasional hang glider. Horseback riders have trailheads at the bottom and top of McBee Grade, near Benton City.

Fire departments use a repeater station on the crest of Horse Heaven.

I own 2.4 acres at the base of Horse Heaven near McBee Grade; I don't want my property value to decline because of a hum or thump that I've heard is attributable to the rotation of the huge blades.

Maintenance roads and substations will follow the erection of numerous turbine towers.
I've heard how the Audubon Society supports your effort but nothing is as it seems and I feel you're using Covid 19 to cover an action that will eventually embarrass you, me and the all-to-often gullible public.

How many red tail hawks are killed by your rotors?
How many meadow larks do you kill?
How many geese
How many ducks
Tell me you've never killed a bald eagle. Golden eagle.

My government & big business will blame Covid 19 for hundreds of blunders before I die.

I'm sickened by the monster rotors as I travel west on highway 14. I don't want to see them in my backyard.

Semper Fi
Steve Rouse

Copy on file
Energy Facility Site Evaluation Council  
621 Woodland Square Loop
P. O. Box 4312
Salem, WA 98503-3172

Dear Sirs,

My name is Loyette Eby. My family has owned property, known as Cotswold Farms, in Horse Heaven for many years. I also own property in Iowa, a state with a large number of wind farms, all welcome, supported and approved by the many farmers in the state.

Construction jobs on wind farms have been needed and welcome. Plentiful wind in Iowa and Washington makes wind energy a win for all - using no water - providing extra income - providing needed electric power - causing no smog or asthma problems.

Please approve construction of wind turbines on our wheat ranch in Benton Co, Wa.

Loyette E. Eby

Eby Family Renewable Trust

704 Duggan Dr.

Dubuque, IA 52003
Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172
Gordon Tomaske  
6372 Provence Rd.  
San Gabriel, California 91775  
626-287-3244  
gdtomaske@sbglobal.net

Energy Facility Site Evaluation Council  
621 Woodland Square Loop  
PO Box 43172  
Lacey, Washington 98503-3172

RE: Horse Heaven Wind Farm, EFSEC Docket Number: EF-210011

Dear Washington Energy Facility Site Evaluation Council:

My name is Gordon Tomaske and my family has been farming in the Horse Heaven Hill country of Benton County for over 100 years. I am also a participating land owner in the Horse Heaven Wind Farm and strongly support the proposed project for a number of reasons. At a personal level, the revenue from the project will help ensure that our family will be able to hold this land now and for generations to come. As you know, income from farming can be variable and adding a more reliable source of income to the mix will do much to help our family during periods when crops are not generating needed revenue. More importantly, the Horse Heaven Wind Farm will provide increased tax revenue to Benton County helping to maintain and improve the infrastructure needed to support this region’s economy. Further, this project will serve as a vital source of employment during both the project’s construction and operation. Finally, this project will provide a critical source of clean, economical, and renewable energy for our country.

For generations the land owners in this region have worked to be good neighbors and to support the economic growth of Benton County and I believe strongly that this project will benefit everyone in the region. For the reasons noted above and more I enthusiastically support the Horse Heaven Wind Farm as a vital and historically significant opportunity to advance the interests of the region and our country.

Sincerely,

[Signature]

Gordon Tomaske
Dear Washington Energy Facility Site Evaluation Commission,

Greetings,
My name is Carl C. Moore, I'm 89 years old, and live in Prosser, WA. My Grandfather came to the territory when 10 years old with his family via oxen pulled wagon in 1859. He homesteaded in Horse Heaven along with his two older sons in 1900. My Dad homesteaded by Hooper before W.W.I. After a stint in the Army, he and his brother-in-law rented land in Horse Heaven till quitting in mid 1920's. He rented land again in late 1920's and farmed till depression forced him off. I was born in Benton City Wa., Benton Co. Dad again farmed in Horse Heaven starting in 1943 I Started Jan.1, 1950. After four years in the Navy, and getting married, I sold out. Then my wife and I bought land south of Benton City in 1958. We have worked to enlarge our farm and have paid much in taxes since. We now have two sons and two grandsons farming after they all graduating from college. We have taken good care of the land and paid lots of taxes to schools, fire, hospitals, etc. in Benton Co. Wind machines and solar pannels will increase the revenue Benton Co. receives, besides the extra electricity they generate for Washington State. I think by approving this project it will benefit the whole northwest. I know the farmers in this project could use the extra income. After having actively engaged in farming and paying taxes for over 79 years, I believe the land owners should have the right to say who or what becomes of their property. Thank you, God Bless and stay well.

Carl C. Moore
901 Parkside Drive
Prosser, WA 99350

Sincerely,
Energy Facility Site Evaluation Council
621 Woodland Square Loop
P.O. Box 43172
Lacey, WA 98503-3172
March 15, 2021

Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, Washington 98503-3172

RE: Horse Heaven Wind Farm, EFSEC Docket Number EF-210011

Dear Washington Energy Facility Site Evaluation Commission

My name is Thomas Smith President of a family partnership Kovach Land Company and our family has owned land and produced crops in Benton County for over 80 years. Kovach Land Company is a seven member family partnership. Our father originally purchased the land and built our dryland wheat farm in the 1930's. Kovach Land Company is a participating landowner in the Horse Heaven Wind Farm and support the proposal.

Building a wind and solar farm in the Horse Heaven Hills will bring positive economic impacts to the local community, including increased tax revenues for the county and good jobs during construction and operations. Creating new sources of renewable energy is an excellent way to protect the natural environment and keep energy prices low, The project will also help diversify our Kovach Land Company's revenue stream and help keep this land in our family for future generations.

Please approve this project so that the local community can start reaping the many benefits it will provide.

Sincerely,

Thomas Smith
Kovach Land Company
412 Viewmont Place
Yakima, Washington 98908
Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172
To Whom it May Concern,

My name is Gary Wooden, and my family has owned land and produced crops in Benton County, Washington for over 150 years. Carole and I currently own and operate over 10,000 acres on the Horse Heaven Hills.

We are participating landowner in the Horse Heaven Wind Farm and support the proposal for the following reasons:

Building a wind farm in the Horse Heaven Hills will bring positive economic impacts to the local community, including increased tax revenue for the county and good jobs during construction and operations.

Creating new sources of renewable energy is an excellent way to protect the natural environment and keep energy prices low.

The project will also help diversify our farm's revenue stream and help keep this land in our family for future generations.

Please approve this project so that the local community can start reaping the many benefits it will provide.

Sincerely,

Carole Wooden
Gary Wooden

Gary & Carole Wooden

13602 SW Brim Place
Tigard, Oregon 97223
Energy Facility Site Evaluation Council
621 Woodland Square Loop
PO Box 43172
Lacey, WA 98503-3172