

From: [Vicky Keller](#)  
To: [EFSEC \(UTC\)](#)  
Subject: AGAINST Scout Energy Wind Farm  
Date: Thursday, March 25, 2021 7:13:47 PM

Public Comment #0201  
Horse Heaven Wind Farm  
Docket #210011

External Email

I am AGAINST Scout Clean Energy siting a 6500 acre wind project along the southern section of the towns spanning from Benton City to Kennewick. These are my reasons that I hope you will consider thoughtfully to deny this project.

1) Scout Energy has applied directly with the state, deceitfully circumventing our county government and the local citizens, who they know are against this project. They instead are hoping that EFSEC, and our Governor, will give them permission for this project because of Washington's goal to be carbon free by 2045. This under-handed maneuver proves to me that they are not committed to my community nor will be an honest and trustworthy company I want in my community.

2) According to their own data the majority of homes in the Tri-Cities and surrounding areas will see a minimum of 50 windmills from their home windows. Not only is this a disgusting thought but it will destroy any property value growth for our region. Would you want to look out at your view and see these monstrosities?

3) Kennewick's growth management plan will be impacted to the point that Kennewick will become stagnant since growth can only occur on the property this project has identified to construct the 250 wind turbines. Property values will decrease overnight and our tourism economy will be affected because who wants to drink wine while staring at rusting wind turbines.

4) The wind turbines will be in direct flight of migrating birds killing and maiming hundreds of thousands over the lifetime of the project.

5) This is the wrong state to construct wind farms. According to Scout Energy, this farm's installed capacity will be 1,150 megawatts, but in reality they are operating at a capacity factor of only 30%, thus they will only actually generate 345 megawatts operationally. And, wind turbines in this area of the state have a proven average capacity factor of only 27%. This in itself should determine this is the not the appropriate location for this project.

6) The Tri-Cities has two sources of renewable and clean energy power generation. The Snake River dams and the Columbia Generating plant. Each of these run circles around wind energy and generate consistent energy at more than 95% capacity even if the wind does not blow. Instead of wind maybe the state should consider more nuclear.

7) Scout's claim that this wind farm will offset 3.5 million tons of CO2 is not true. There is little fossil fuel in Washington State, and this wind power will only displace hydro, which again is a reliable and consistent renewable, and will have not effect on carbon emissions, no matter where this energy ends up.

8) The employment numbers, although robust in the building of the project, drops off exponentially when the turbines are operational. The project does not produce enough economic viability for this community, the power grid and the fact that they are unreliable and unsightly are more reasons to deny this project.

Protect my community and DENY Scout Energy's certification to build an unwanted, unsightly and energy deficient project in my backyard.

Thank you

Vicky Keller

Kennewick, WA

From: [Brent Strecker](#)  
To: [EFSEC \(UTC\)](#)  
Subject: EFSEC Committee. Oppose the Horse Heaven Wind project  
Date: Friday, March 26, 2021 7:09:42 AM

Public Comment #0202  
Horse Heaven Wind Farm  
Docket #210011

External Email

**EFSEC Committee,**

As a Benton County taxpayer since 1971 who loves this area I am **TOTALLY OPPOSED** to the Horse Heaven Hills Wind Farm being pushed on us by Scout Energy. **The residents of Benton County do not need and cannot use the unreliable power from this project.**

The nameplate 1150 MWs of unpredictable power from this project will only have a capacity factor of 27% in reality. That means it will only net 310 MW's of unpredictable power. Is it worth stopping Kennewick's growth of our vineyards, business, and homes to the south? Not according to the people that live here.

I witness hundreds to thousands of sandhill cranes almost daily fly directly into the path of the proposed wind turbine area year around. The seemingly thorough "Horse Heaven Wind Farm Bird and Bat Conservation Strategy" does not adequately address this with regards to the massive 500 foot high, 100 mph blades. This is a much different situation in location and size than the Nine Canyon turbines. It will be a meat grinder.

This area is arguably the most GREEN Carbon Free area in the **WORLD** already. Our community says no to this senseless, enormously, negatively impacting project. Please do not ram it down our throats.

Supporting Documents to cite a few:

- 

Conventional Wind Energy – A Design Deadly for Birds, American Eagle Foundation. This article refers to wind turbines 212' high with blades at 116'. Scout Clean Energy is proposing 500' towers with commensurate blades. I find it interesting that their website makes this statement: ***"From sponsoring local events to protecting wildlife, we've formed happy, win-win relationships with the communities that are home to our wind farms"***. They have done nothing to involve the community – in fact, it is in their best interest to keep this as quiet as possible to avoid public uproar when word gets out. I want to make sure this project will not be permitted.

And as for protecting wildlife - the proposed site is in the migration path of thousands of geese and sand hill cranes, not to mention the plethora of hawks and other birds of prey that live in our area.

- [Category Archives: Wind Turbine Noise Issues](#), MasterResource, a free-market energy blog
- [The True Cost of Wind Turbine Fires and Protection](#) , Windpower Energy Development, by Angela Krcmar, Global Sales Manager, Wind, [Firetrace International](#), September 8, 2020
- [Wind Turbine Blades Can't Be Recycled, So They're Piling Up in Landfills](#), Bloomberg Green, February 5, 2020, and the Tri-Cities Area Journal of Business, October 2020, vol 19, issue 10.
- [Save Our Ridges](#), July 2020
- [Wind Power Development Questioned](#), Benton PUD, September 3, 2020. Our own public utility districts, PUD, Franklin, and Benton REA all say we do not need this power here and that all of it will be delivered to other parts of our beautiful state. Why would you allow our pristine skyline and landfills be polluted forever to send the power elsewhere?
- [What's Wrong with Wind and Solar?](#), Prager University, September 14, 202 Michael Shellenberger
- "Do We Have to Destroy the Earth to Save It? <https://www.youtube.com/watch?v=Rc5AlFo3zTk>
- Mark Mills, Senior Fellow at the Manhattan Institute "What's Wrong With Wind and Solar?" <https://www.youtube.com/watch?v=RqppRC37Ogl>
- Alex Epstein of the Center for Industrial Progress "Can We Rely on Wind and Solar Energy?" <https://www.youtube.com/watch?v=ObvdSmPbdLg>

D. Brent and Karen Strecker



35401 S. Valley Vista PRSE

Kennewick Wa 99338

Ph 509 528-3000

**From:** [Sarah Cawley](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** HHWF Comment Submission  
**Date:** Friday, March 26, 2021 7:45:59 AM  
**Attachments:** [Horse Heaven Wind Farm LCTHF.pdf](#)

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Public Comment #0203  
Horse Heaven Wind Farm  
Docket #210011

External Email

To Whom It May Concern,

Please accept the attached letter as our comment from the Lewis and Clark Trail Heritage Foundation.

If there are any questions or comments, please let me know. Thank you for your time in advance.

-Sarah

--

Sarah Cawley  
Lewis and Clark Trail Heritage Foundation  
Executive Director  
406.204.7504





*Keepers of the Story ~ Stewards of the Trail<sup>SM</sup>*

*We preserve, promote and teach the diverse heritage of Lewis and Clark for the benefit of all people*

March 25, 2021

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

RE: Horse Heaven Wind Farm Project

Dear Energy Facility Site Evaluation Council:

Thank you for providing the Lewis and Clark Trail Heritage Foundation, Inc. (LCTHF) information on the Horse Heaven Wind Farm Project (HHWF). We are interested in submitting our comments on this matter, and we appreciate the opportunity to be a part of the Project process.

The Lewis and Clark Trail Heritage Foundation, Inc. (LCTHF) is a national organization established in 1969 and dedicated to preserving the historic accuracy of the story of the Lewis and Clark Expedition and protecting the cultural and historic integrity of the landscapes through which the Expedition traveled from 1803-1806. We currently have about 1,000 members organized in 22 local chapters across the country. Our membership comes from all walks of life who share a common passion for passing along the lessons that can be learned from this important era of our nation's history to future generations. This includes preservation of the landscape through which the Expedition traveled.

The Lewis and Clark National Historic Trail was designated by Congress in the National Trails System Act, (P.L. 90-543, as amended through P.L. 111-11, March 30, 2009 and the succeeding John D. Dingell, Jr. Conservation, Management and Recreation Act signed on March 12, 2019). It is 4,900 miles long and is officially recognized from Pittsburg, Pennsylvania to Fort Clatsop, Oregon. The trail is one of 30 National Scenic and Historic Trails in the collection of long-distance trails in our National Trails Systems.

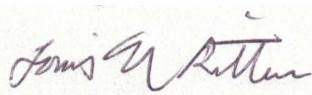
We have been provided information that indicates the Horse Heaven Wind Farm Project would have a significant and negative effect on the viewshed of the Columbia River, Snake River and portions of the Yakima River that are within the Lewis and Clark National Historic Trail. Our organization has inspected the area of the proposed encroachment of the Columbia River/Snake River/Yakima River viewshed, and we agree that the proposed Horse Heaven Wind Farm Project will have a detrimental effect on the viewshed of the rivers that are within the Lewis and Clark National Historic Trail.

This portion of the Columbia River, Snake River and Yakima River is, of course, an integral part of the Lewis and Clark National Historic Trail, and as such is entitled to certain protections. Significant Expedition locations and campsites in the 10 mile buffer zone include: campsite of October 16-17, 1805 at Sacajawea State Park and Interpretative Center at the mouth of the Snake River; Captain William Clark's view of the Yakima River on October 17, 1805; campsite of October 18, 1805 near Spring Gulch; campsite of April 26, 1806 at Fourmile Creek; campsite of April 27-28, 1806 at Yellepit; campsite of April 29, 1806 near Wallula, and campsite of April 30, 1806 on the Touchet River. There are also several area locations described by the Expedition involving rapids, Native American settlements and other unique features.

In addition, the visual effect at Sacajawea State Park and Interpretative Center would be significant and in a negative manner, with approximately 200 of the Horse Heaven Wind Farm Project's 244 towers visible. Also at that site is the Confluence Project site installation by acclaimed designer Maya Lin, just a few feet from the water's edge where the Snake River and Columbia River meet. The significance and importance of the integrity of Sacajawea State Park and Interpretative Center and its environs cannot be overstated.

Because the Horse Heaven Wind Farm Project will clearly have a negative effect of the viewshed of significant locations on the Lewis and Clark National Historic Trail, we feel that any and all efforts to mitigate the effect of the Horse Heaven Wind Farm Project, including the project not being authorized or approved, should be undertaken.

Sincerely,



Louis N. Ritten  
President, LCTHF



Sarah Cawley  
Executive Director, LCTHF



Robert Heacock  
Chairman, LCTHF Trail Stewardship Committee  
LCTHF Washington Chapter Officer

**From:** [Leslie Hauer](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Scout Clean Energy Project near Tri-Cities  
**Date:** Friday, March 26, 2021 8:39:59 AM

Public Comment #0204  
Horse Heaven Wind Farm  
Docket #210011

External Email

Please accept these comments for the record on this project that proposes to ruin our skyline:

1. The impact on the visual environment has no doubt been covered at length by others, so I will not discuss this issue in any detail, other than to note that the folks in the Denver area had the foresight to protect their ridgelines along the Front Range to preserve their viewshed. We should have the foresight to do the same here.
2. Wind power is not consistent, therefore is unpredictable and not reliable as a replacement for other generation sources. If it's not reliable, it's really not a worthwhile investment of public resources of any sort including tax breaks of any kind.
3. Where is the energy generation to be used? Is the power for local needs or in support of green good intentions in other locations where the visual blight and general nuisance are undesirable?
4. I understand that the project is largely intended for private land and that some farmers will benefit from land leases. However, a careful review of costs and benefits should be undertaken and should consider the loss of agricultural land from the tower pads and associated roadways, potential jobs after construction, and impact on the power grid of unpredictable surges or equally unpredictable lack of generation. In short: how does this project benefit the area that will be most impacted?
5. The Horse Heaven Hills is on a major migratory bird flyway. Wind farm operators don't like to talk about the impact on birds, especially raptors, and in some cases, are allowed to hide the bird kill as proprietary information (I reviewed wind projects in my professional career as a land use planner and planning consultant). The impact here could be massive. Just this morning, for example, there are hundreds of Sandhill Cranes browsing across a recently plowed irrigation circle. Hawks pass here regularly. We even, occasionally, see Snowy Owls whose usual habitat is much further north. Do not lightly dismiss the impact that these tall bird-killers will have!
6. The Tri-Cities area is unusual in Washington State, having a highly educated, technically adept workforce, an entire "area" that already has one nuclear generating facility, and ready access to the power grid because of that facility and the network of dams along the Columbia and Snake Rivers. If this state--and indeed, the country-- was in fact serious about moving away from carbon-based fuels for electricity generation, the obvious choice is nuclear. The nuclear generating plant here is safely operated and reliably keeps the lights on in Seattle. Until EFSEC and the Governor support nuclear energy, the whole "green energy" push reveals it's true nature as a massive boondoggle and giveaway to people and firms that really don't care about sustainability or the impact on local people or the environment.

Leslie Hauer  
6100 Collins Road  
West Richland, WA 99353  
509-967-9101

**From:** [Richard Yrjanson](#)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [Brown, Sharon](#); [Klippert, Brad](#); [Boehnke, Matt](#)  
**Subject:** Scout Application for Site Certification Wind Farm please add the following information into application process.  
**Date:** Friday, March 26, 2021 10:13:10 AM

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Public Comment #0205  
Horse Heaven Wind Farm  
Docket #210011

### External Email

Members of Site Approval for Scouts application:

In case the following information was not forwarded to you I would like to enter this into the application process.

The complete lack of concern of “we the People” who you represent to approve such a project with so many negatives it represents, unreliable peak supply, excess cost for rate payers, complete disregard for degrading the country side, impedes farm land, use of state lands, kills large and small birds, noise both heard and unheard health problems possible, excess cost for production of power / megawatt, prairie land loss that we enjoy here in the mid-state, being built on the hills where the “Goose Gap” has been hunted for years for geese. I could go on but this project is so “not needed” but is nothing more than the promise for more money on the backs of the rate payers. It is like approving Marijuana the only ones addicted to it are the users and the ability to collect taxes or receive funds. We pay for something that may leave the state both citizens and electricity. The truth is self evident wind, solar, and battery storage are no longer needed, build small nuclear reactors whose foot print is small instead of the “SPIKED BOOT PRINT OF THE SCOUT WIND FARM”

Richard Yrjanson  
5207 W. 14<sup>th</sup> Ave  
Kennewick, WA 99338

509-783-2994 dyrjanson@hotmail.com

Sent from [Mail](#) for Windows 10



# MUTTERINGS...

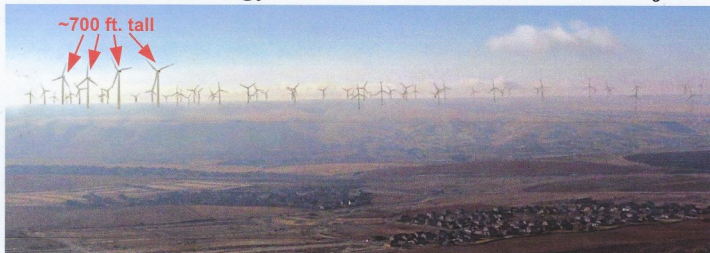
*Keeping Benton County Voters Informed*



March 24, 2021 Vol. 7 Special Edition

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## Scout Clean Energy-Horse Heaven Hills Wind Project



Here is a simulation from Scout Clean Energy. However it is phony for two reasons.: 1)There are only about fifty towers shown; whereas the project "includes up to 244 turbine locations and two solar arrays," plus two battery energy storage systems." Further, the elevation difference from the valley floor to the front ridge tops is approximately 500 feet. Scout mentions 500 foot towers with a second option with wind turbines of 657 to 671 feet tall. The planned turbines will be two to three times taller than those shown in the picture and matching the elevation change of the hills as shown. The added four towers at the left better demonstrate the height and demonstrate the towers won't fade into the background quite like shown because the hills under the back rows of turbines are 200 to 600 feet higher than the front rows of hills. For a very complete overview of the project go to

Save Our Ridges at [http://save-our-ridges.org/?page\\_id=16](http://save-our-ridges.org/?page_id=16)

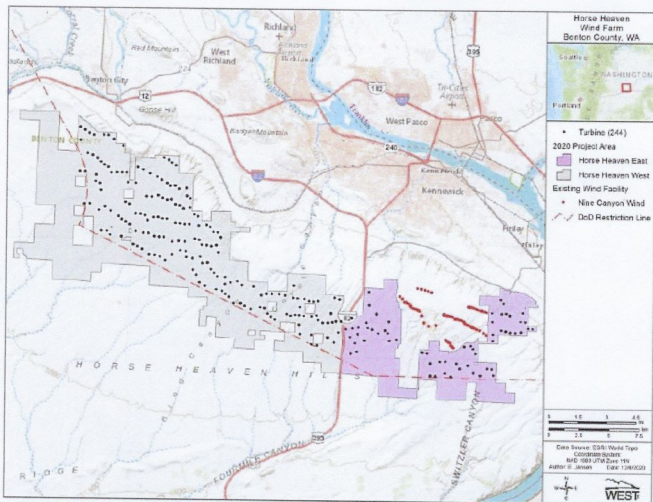
This Mutterings is dedicated to providing information concerning the proposed Horse Heaven Hills Wind Project so that readers can be informed of the nature of the project, it's status, various impacts on adjoining environment, population and habitat, and the opportunities for public input. The following will serve to guide the reader to the page where information of interest is to be found,

Map and siting of wind turbine farm . . . . .	2
Impact on county economy, and uselessness of wind turbines . . . . .	3
County comprehensive plan, poor wind efficiency . . . . .	4
Poor soils for building will add to upkeep costs . . . . .	5
Things we won't be told . . . . .	6
Letter from EFSEC . . . . .	7&8
In Summary . . . . .	9

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This newsletter is published and distributed by Karen Batishko, the current precinct committee officer for Benton County Precinct 1365. It's purpose is to keep PCOs and voters informed of legislative activity, and how their own elected officials are representing their interests. Karen may be contacted by email at [BigLouie@pocketinet.com](mailto:BigLouie@pocketinet.com), or by phone at 509-628-8442.





## Save Our Ridges

[http://save-our-ridges.org/?page\\_id=20](http://save-our-ridges.org/?page_id=20) also found at

<https://www.forbes.com/sites/jamesconca/2021/03/08/wind-turbines-on-washingtons-horse-heaven-hills-how-not-to-pursue-a-green-new-deal/?sh=7eb49a6c508d>

**Please note:** Talk to your County Commissioners. I (Karen) talked to the Planning Commission. They tell me they are not welcome to voice an "opinion." Support your County Commissioners in standing against this proposal.

**Will.McKay@co.benton.wa.us**  
**Jerome.Delvin@co.benton.wa.us**  
**Shon.Small@co.benton.wa.us**

**At first the public is told:** "The Horse Heaven Hills Wind Farm is a project planned by Scout Clean Energy of Boulder Colorado. The wind farm will be on 60,000 acres of farmland consisting of up to 244 wind turbines, each one from 500 foot to 671 feet tall. The turbines will be in up to 6 rows along 24 miles of our Western [Southern] skyline.

"EFSEC [Energy Facility Site Evaluation Council] is the state board charged with the siting of major energy facilities, and will review the application for environmental, **social and fiscal impacts** [these words disappear in any further communications]. The review process will ensure robust public involvement opportunities and participation by Benton County, who will also review the application for consistency with local land use and zoning laws."

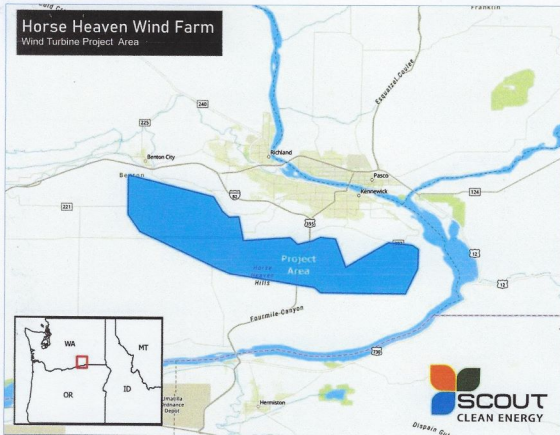
**(Please, see page 4 & 5 discussing Benton County Comprehensive Plan.)**

### **Then we are told: State of Washington Energy Facility Site Evaluation Council**

"The State of Washington Energy Facility Site Evaluation Council (EFSEC or Council) provides a "one-stop" siting process for major energy facilities in the State of Washington. EFSEC coordinates all evaluation and licensing steps for siting certain energy facilities in Washington. EFSEC specifies the conditions of construction and operation. **If approved, a Site Certification Agreement is issued in lieu of any other individual state or local agency permits.** EFSEC also manages an environmental and safety oversight program of facility and site operations."

## Horse Heaven Wind Farm

Wind Turbine Project Area



**Horse Heaven  
Wind Farm  
destroys 60,000  
Acres of farm land.**

**60,000 acres  
equals one tenth of  
Benton County  
Farm Land Acres.  
(613,530 acres)**

**The Market  
value of the  
agricultural  
products sold  
in 2017 was over  
one billion dollars,  
\$1,005,288,000.**

**It is a major part  
of our economy.**

## Mr. Christian is a commissioner of the Texas Railroad Commission, which regulates the state's oil and gas industry.

"Regardless of your thoughts on climate change, last month's storm made painfully clear that climate catastrophists have an oversize influence on public policy. An obsessive focus on reaching the unattainable goal of zero carbon emissions led to decades of poor decisions that prioritized and subsidized unreliable energy sources (wind and solar) at the expense of reliable ones (natural gas, coal and nuclear). Texans now know that reliable energy is essential to our everyday lives.

"The catastrophists' oversize influence has produced a dangerous hypocrisy. Greens say that wind and solar can replace natural gas and coal to meet our energy needs while reducing carbon emissions. But when "renewables" fail, greens claim they aren't to blame. "Wind power was expected to make up only a fraction of what the state planned for during the winter," according to the Texas Tribune. Which is it?

Ratepayers and taxpayers don't have unlimited funds to invest in energy infrastructure. One choice always comes at the expense of another. The problem with wind and solar power is that investment in unreliable renewable sources has displaced investment in electricity generation from reliable energy sources. Worse, these investment decisions weren't made voluntarily by individuals in the free market. They were forced on Texans by politicians in Washington.

"According to the nonprofit Texas Public Policy Foundation, for every 39 cents the oil-and-gas industry received in federal taxpayer subsidies from 2010 to 2019, the wind industry received \$18.86, 48 times as much, and the solar industry received \$82.46, 211 times as much.

Credit: By Wayne Christian  
The Wall Street Journal March 19, 2021: [www.wsj.com](https://www.wsj.com/articles/The-Grid-Nearly-Failed-Because-Of-An-Energy-Mix-Weighted-2021-03-20)  
"The Grid Nearly Failed Because Of An Energy Mix Weighted ..."  
See <https://www.wind-watch.org/news/2021/03/20/texas-blackouts-blew-in-on-the-wind/>

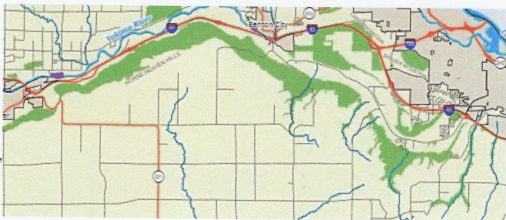
By 2029 Texans will have spent \$2.5 billion subsidizing wind and solar farms through local property-tax abatements and \$14 billion building the Competitive Renewable Energy Zone's transmission lines through their electricity bills. While most businesses must pay to bring their product to market, wind and solar get a free ride from Texas taxpayers.

If you add it all up, Texas taxpayers and ratepayers will shell out an estimated \$36 billion by the end of the decade to subsidize wind and solar energy. These subsidies have tripled wind and solar capacity in the Lone Star State in the past 10 years, but as Texans learned first-hand during the storm, there is a huge difference between capacity and generation.

"Instead of seeking solutions that increase reliable generation, several Democrats in Congress have suggested the answer lies in connecting ERCOT, Texas' independent electricity grid, with the rest of the nation. As someone who lives in East Texas, one of the few parts of the state not served by ERCOT, I can tell you first-hand this wouldn't have prevented the blackouts—we lost power too. "Having a grid that could have drawn more power from other states would have done little to ease the crisis," Loren Steffy wrote in Texas Monthly. "With most of the country also facing bitterly cold temperatures, the rest of the U.S. wouldn't have had much to spare anyway.

"Texas can't afford to come within minutes of total system failure ever again, and the only way to ensure it never happens is to reverse policy choices that have tilted the state's energy mix in favor of inefficient and unreliable sources. The mix needs to be rebalanced, with an emphasis on cheap, plentiful and reliable sources such as natural gas, coal and nuclear."

# Benton County Comprehensive Plan Update 2018



**LU [Land Use] Goal 2:** Follow controlling Law and constitutional Requirements, both state and federal, to ensure the appropriate protection of private property rights. **Policy 1:** Prevent regulations that create undue adverse economic impacts, or unnecessarily restrict the use of private property.

**LU Goal 5:** Identify the location, site planning, and density of new non-farm development outside of UGAs [Urban Growth Area] to protect existing agriculture from incompatible adjacent land uses. **Policy 1:** Establish compatible land uses adjacent to areas designated as GMA Agriculture to minimize conflicts associated with farm activities such as spray, dust, noise, odors, and liability.

**NR Goal 1:** Conserve and maintain agricultural land of long term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy. **Policy 1:** Conserve areas designated "GMA Agriculture" in the Comprehensive Plan for a broad range of agricultural uses to the maximum extent possible and protect these areas from the encroachment of incompatible uses.

**Policy 2:** In the event of a conflict between residential uses and normal and routine practices of commercial agriculture on lands designated as GMA Agriculture, support the agricultural use where it is evident that the agricultural practice is consistent with or equivalent to recognized Best Management Practices.

**ED Goal 3:** Provide areas for the location of light and environmentally acceptable heavy industrial uses, while minimizing impacts on surrounding rural uses. **Policy 1:** Establish industrial sites on lands designated for industrial use to protect from incompatible uses by using performance and/or site design criteria. **Policy 2:** Do not locate non-agricultural related industry on "GMA Agriculture" designated land.

Soils and Agricultural Resources Benton County has highly productive agricultural soils with over \$900 million generated by Benton County crops and livestock per year (BERK Consulting 2017). Designated agricultural resource lands make up a majority of the County. (See Appendix A: Map Folio, Figure 4 and 5 for existing and proposed Land Use Designations Maps and Appendix L Agricultural Resource Land Reclassification Memo.) The soils in Benton County are generally suitable for both agriculture and structural development, with localized constraints relating to slope, geology, and pockets of sandy soils and fines. **Soils in the region are very susceptible to wind and water erosion once stripped of their natural cover. However, in undisturbed condition, the indigenous shrub-steppe and bunch grass vegetative cover has adapted to hold basin soils in place. When stripped of natural cover, prevention of erosion requires the application of deliberate and aggressive management techniques.**

 **Priority Habitats and Species**

**There is no plan from Scout that will mitigate the losses to Wildlife Habitat Conservation Areas!**



[bpa.gov/transmission](http://bpa.gov/transmission)

According to Dr. Jim Conca, **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 (where average wind speeds exceed 6.5 m/s), pushing capacity-factor-a-measure-of-reliability 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.

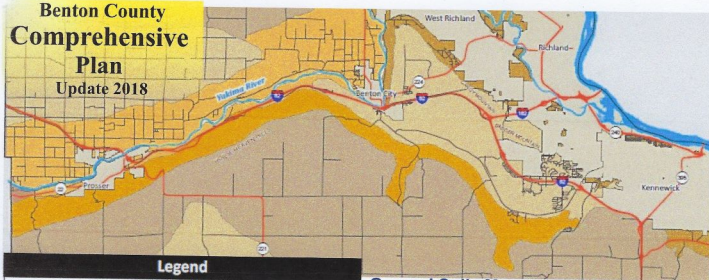
This new Scout Clean Energy wind power will only displace hydro, another renewable, thus having no effect on carbon emissions, no matter where the energy ends up. We know this because it's what happens all the time in this state. The [mentioned] figure below is an example of a weekly electrical load map from the Bonneville Power Administration, who is the main system operator in the Pacific Northwest.

Every megawatt of electricity generated by windmills in the Mid-Columbia must be backed up with dispatchable generating sources to ensure electricity when the wind is not blowing but demand is high during the hottest days or coldest nights of winter. Wind energy is not a reliable energy resource until we have the capacity to store huge amounts of electricity.

The Generation diagram from BPA is at: <https://transmission.bpa.gov/Business/Operations/Wind/ba1twg.aspx>



# Benton County Comprehensive Plan Update 2018



## General Soils Map - Benton County Comprehensive Plan Update Appendix A: Map Folio / February 2018 MainDocApxA129020130020718PM- 1.pdf. 4.3.2 – 4.3.4 Soil Construction Limitations

The ordinance requires that developments avoid or maintain setbacks from potentially unstable areas or adequately assess the degree of instability and locate, design, and engineer the development to address the level of hazard.

Soil ratings developed by the Natural Resources Conservation Service are used to indicate the potential degree of limitations for different types of development on different soil types. For example, a soil type might be rated as having slight, moderate, or severe limitations for the development of roads or dwellings. A variety of criteria are used in making such determinations, including such factors as depth to bedrock, shrink-swell potential, permeability, and slope.

It should be noted that even a "severe" rating does not preclude construction from occurring. Rather, it means that the potential limitation should be recognized and that the construction techniques employed may have to take the special soil conditions into consideration. In all cases, Natural Resources Conservation Service emphasizes that an on-site inspection or soil survey would be necessary before it can be determined for certain if such soil characteristics are present.

Agricultural production is expected to continue to be a major activity and to play a vital role in the Benton County and Washington State economies. Population growth in the region will require proper management of soils and agricultural resources to protect them from development-induced erosion, contamination, and other impacts.

Because of their importance to the local and state economy, agricultural lands of long-term commercial significance should continue to be protected from future development, while promoting agricultural viability, will encourage conservation practices such as erosion control measures that will protect and enhance agricultural soils.

<https://bentoncounty.municipalcms.com/files/documents/2017CompPlanUpdate-Feb2018MainDocApxA129020130020718PM.pdf>

There is no plan from Scout that mentions gaining an understanding of which soils and where will be safe building sites. Building on unstable and particularly easily wind-borne soil will be 5 thoughtless negligence for future endangerment.

<https://bentoncounty.municipalcms.com/files/documents/2017CompPlanUpdate-Feb2018MainDocApxA129020130020718PM.pdf>

### How Long Do Wind Turbines Last?

The cost of operation and maintenance (also known as O&M costs) make up a sizeable proportion of the total annual costs of a wind turbine. These costs vary depending upon the age of the asset, but average out at around 20-25% of the total levelised cost per kWh produced over the lifetime of the turbine. For a new turbine, these costs may be only 10-15%, but can increase to 20-35% towards the end of the turbine's lifecycle.

How long do Wind Turbines Last?

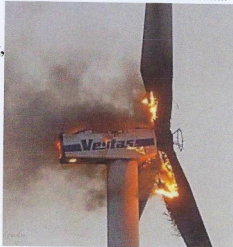
<https://www.twi-global.com/technical-knowledge/faqs/how-long-do-wind-turbines-last>

**They may have planned for Decommissioning,**

**but there are NO plans so far for disposing of 732 turbine blades 200 feet long.**

The blades, which are mostly made of fiberglass, carbon fiber, resin, and balsa wood, can't be melted down and remanufactured like recycled

aluminum cans or glass bottles. Blades get "recycled" by being shredded and mixed into construction materials or burned for cement production. Otherwise, they get hauled off to landfills. (Burning oils and epoxy are also toxic.)



# Things we won't be told

Effects of "Ice Throw" and "Shadow Flicker" are addressed in this paper **Turbine Health Impact Study**  
<https://puc.sd.gov/commission/dockets/electric/2018/EL18-003/testimony/dakotarange/rExhibit7.pdf>  
Notice the EFSEC paper of Mar 17 "Appendix O, Baseline sound Survey" makes absolutely no comment on the noise that will be created by putting a wind turbine on top of Horse Haven Hills. See:  
<https://www.efsec.wa.gov/energy-facilities/horse-heaven-wind-project>

These resources mostly out of Europe expose the truth: Wind turbines appear to be at the apex of producing human discomfort, annoyance, and harm, in particular, infrasound and low-frequency noise (ILFN) harm because of impacts unique to this concoction of noise.  
<https://stopthesethings.com/2019/05/07/far-out-german-study-finds-pulsing-wind-farm-infrasound-20-kilometres-from-turbines/>  
<https://www.masterresource.org/wind-power-health-effects/infrasound-growing-liability-windpower/>

Industrial wind turbine infrasound is not the best weapon, but it is a weapon. This German video documents the harmful effects of the infrasound produced by industrial-sized wind turbines.

The dangers of infrasound have been known since the 1980s when the U.S. military heavily invested in infrasound (below 20 Hz) as a weapon. It looked like it had great promise, according to Col. John B. Alexander who was involved in weaponizing it.

The military gave up on infrasound as its effects on people were too random: some potential targets were seriously debilitated; others not so much. This video presents various studies by acoustical engineers and other scientists showing infrasound's affect on the ear, the heart, the brain and other organs.

A component of the cacophony of low-frequency, amplitude modulated noise generated by these things occurs in frequencies meant to be below what humans can ordinarily hear. But that does not mean that they can't sense what's referred to as 'infrasound.'

The evidence proving the unnecessary damage done to wind farm neighbours by the noise generated by giant industrial wind turbines is mounting by the day: Germany's Max Planck Institute has identified sub-audible infrasound as the cause of stress, sleep disruption and more (see our post here); and a Swedish group have shown that it's the pulsing nature of low-frequency wind turbine noise ('amplitude modulation') that is responsible for sleep problems in those forced to live with it (see our post here.)

Refer to this for entire transcript.

(continue top-right column)

... evidence of wind noise harms accrue. A recent Finnish assessment, scientifically valid and reproducible, found that infrasound (IS) only began to really attenuate after 15-20 km.

*The pilot study does not show any significant reduction in damage caused by infrasound until over 15 kilometers from wind farms*

*The pilot study carried out in Satakunta and Northern Ostrobothnia in Finland shows that the damage caused by infrasound from wind power plants will only decrease significantly more than 15 kilometers away from wind turbines. The study was carried out by the Finnish Association for Environmental Health (SYTe) in the spring 2016.*

*It has been noticed from experience that after the construction of wind power plants, usually within a few months, people in the surrounding area have begun to get a wide range of symptoms, says Markku Mehtätalo, Chairman of the Finnish Association for Environmental Health.*

<https://www.masterresource.org/wind-power-health-effects/infrasound-growing-liability-windpower/>

**All bats and some birds** interpret sounds surrounding them using their ears, and emit ultrasonic sounds of such high frequencies, that a human ear can't even hear them. Scout tells us in their survey of bats and birds that they inventoried eight different species of bats in their project area by using two frequencies of ultrasound which would call the bats to them for counting. What Scout didn't tell us is that these same ultrasound frequencies are among the mechanical sounds emitted from their wind turbine structures.

## Before destroying more cropland Spend your Energy Money to Get Texas Cleaned Up There were 14,000 dead, standing wind turbines in the USA before the Storm

**I did notice these comments about the hazardous materials used at the HHWF which need special handling:**

During decommissioning, hazardous materials will be temporarily stored and utilized. These hazardous materials may consist of fuel, lubricating oil, hydraulic oil, propylene glycol, and other materials required for the decommissioning. Also, decommissioning will require the removal of pad-mounted transformers that contain large quantities of cooling fluids, likely consisting of mineral oil. BESS components may contain hazardous materials such as lithium. Due to the presence of hazardous materials during decommissioning, there is the potential for spills and/or leaks. The primary concerns associated with these spills and/or leaks are the potential

impacts to surface and ground water resources and the potential for soil contamination. A Spill Prevention, Control, and Countermeasure Plan (SPCC) will be created for decommissioning. The SPCC Plan will detail the appropriate storage, cleanup, and disposal of hazardous wastes to ensure potential impacts are avoided. Any wastes generated will be handled and disposed of in accordance with state and local rules and regulations, and the site-specific SPCC Plan. Any monitoring, transportation, or handling of materials will be conducted by trained and qualified personnel utilizing established procedures and proper equipment.

**State of Washington  
Energy Facility Site Evaluation Council**

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

**NOTICE OF INFORMATIONAL PUBLIC MEETING AND LANDUSE  
CONSISTENCY HEARING MARCH 30, 2021**

**5 PM  
Virtual Meeting**

**Description of Proposal:** On February 8, 2021 Horse Heaven Wind Farm, LLC (Applicant) submitted an Application for Site Certification (ASC) to the Energy Facility Site Evaluation Council (EFSEC) to develop, construct and operate the Horse Heaven Wind Farm Project (Project). The proposed Project location is in Benton County south of Kennewick and will have a maximum generating capacity of 1,150 Megawatts (MW). The Applicant has requested review under EFSEC expedited process for the ASC. **An ASC may be eligible for expedited review when the EFSEC Council finds (1) the environmental impacts of the proposed project are not significant or can be mitigated to non-significant levels and (2) the Project is consistent and in compliance with city, county, or regional land use plans.**

The ASC and other materials are posted on the EFSEC website: [www.efsec.wa.gov](http://www.efsec.wa.gov). Copies of the ASC will also be provided to the Washington State Library and to local libraries.

**Proponent:** Horse Heaven Wind Farm, LLC, 5775 Flatiron Parkway, Suite 120, Boulder, CO, 80301.

**State Environmental Policy Act (SEPA) Lead Agency: EFSEC**

**SEPA Threshold Determination Required:** A threshold determination is required to determine whether an Environmental Impact Statement (EIS) is required. The threshold determination will be made based on the probable project impacts identified in the information presented in the ASC. A threshold determination of non-significance (DNS) may be issued if the SEPA responsible official (EFSEC Manager) determines there will be no probable significant adverse environmental impacts. An EIS is not required if a DNS is issued.

**Public Comment** –Public Comment will be accepted during the Public Information Meeting and Land Use Consistency Hearing. If you are unable to attend the meeting please send your comment in writing to [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov) or at the mailing address below.

**Meeting Location** – The Public Information Meeting and Land Use Consistency Hearing will be held virtually due to public health concerns related to the spread of the novel corona virus (COVID-19). We appreciate your participation and thank you for your patience and understanding.

You may attend the meeting via Skype online or via phone at:

- <https://lync.wa.gov/utc.wa.gov/meet/joan.owens/DPSH9WFT>
- 1 (360) 407-3810 ID: 6702140#

[continued on page 8]



To facilitate this remote meeting, EFSEC would like to invite speakers to sign up ahead of the meeting. Anyone wishing to speak during the public meeting please notify EFSEC by phone at (360) 664-1345 or email at [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov) before 5:00 pm on March 30, 2021.

**Open House – March 30, 2021, 5:00 – 5:30 PM:** The Applicant and EFSEC staff will be available to answer questions about the Project and the EFSEC review process.

**Informational Public Meeting – March 30, 2021, 5:30 – 7:30 PM or last speaker, whichever comes first:** As required by RCW 80.50.090 (1) and WAC 463-26-025 EFSEC will hold a Public Informational Meeting. At this meeting, the Applicant and EFSEC staff will make presentations. Also, at this meeting, Counsel for the Environment, an Assistant Attorney General appointed by the Washington Attorney General will be introduced and will explain the duties of this position. Public comment will be taken during this meeting. To sign up to speak at this meeting please send an email to [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov) or call EFSEC staff at (360) 664-1345 before 5:00 pm on March 30, 2021.

**Land Use Consistency Hearing – March 30, 2021, 7:30 – 9:00 PM or last speaker, whichever comes first:** As required by RCW 80.50.090 (2) and WAC 463-26-050 and 463-26-060 subsequent to the informational public hearing, at approximately 7:30 PM EFSEC will hold a Land Use Hearing. During this hearing, the public will be given an opportunity to provide testimony regarding the proposed Project's consistency and compliance with land use plans and zoning ordinances. To sign up to give testimony at this hearing please send an email to [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov) or call EFSEC staff at (360) 664-1345 before 5:00 pm on March 30, 2021.

**Note: The Land Use Consistency Hearing will begin no later than 30 minutes after the conclusion of the Informational Public Meeting, which may end before 7:30 PM.**

For information regarding the Project please contact Amy Moon, EFSEC Site Specialist at (360) 664-1362. If you have special accommodation needs or need language translation services to provide your comment, please contact EFSEC staff at (360) 664-1345 or send an email to [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov).

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

March 9, 2021

# In Summary

## THREE EVENTS

**Application for Site Certification (ASC)**  
EFSEC Docket No. EF-210011

### The Public Information Open House

March 30, 2021, 5:00 – 5:30 PM  
EFSEC staff will be available to answer questions about the Project and the EFSEC review process.

### Informational Public Meeting

March 30, 2021, 5:30 – 7:30 PM or last speaker, whichever comes first:  
Also, Counsel for the Environment, an Assistant Attorney General will be introduced and will explain the duties of this position.

**Public comment will be taken. To sign up to speak at this meeting please send an email to**

**efsec@utc.wa.gov or**  
**call EFSEC staff at (360) 664-1345**  
**before 5:00 pm on March 30, 2021.**

**Land Use Consistency Hearing** – March 30, 2021,  
7:30 or last speaker, whichever comes first:  
UNTIL – 9:00 PM.

**NOTE** for those unable to attend: If you are unable to attend the meeting please send your comment in writing to [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov) or at the mailing address below.

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

For more information submitted by  
**Scout Clean Energy-Horse Heaven Hills Wind Project:**  
<https://tinyurl.com/yzxht7mn>

This page includes links to the following and more

**Read about how many roads and corners will have to be rebuilt at our expense:**

<https://apiproxy.utc.wa.gov/efsec/GetDocument?docID=31&year=EFSEC&docketNumber=210011>

### Appendix A – Decommissioning Plan

**Appendix E – Turbine and Access roads** Permanent disturbance acreage for: 1) maximum potential number of Turbines (244 total, each with a tower base of 5,278 square feet (73x73)), 2) associated Turbine access roads (104.5 miles total of 16-ft wide access roads), 3) met tower sites (all 13 possible locations with a base of 1,764 square feet), and 4) access roads to the met towers (2.8 miles total of 16-foot-wide access roads). The acreage per parcel accounts for spatial overlap of features. Pursuant to Benton County Code 11.17.070(t)(11), “wind turbine(s) and all associated service roads may not displace more than five (5) percent of the area of that parcel(s) on which they are located.” [The above four items **DO NOT** include: proposed solar arrays, battery storage, transmission (lines, transformers, etc.) or maintenance, management and/or storage facilities.]

### Appendix L - Habitat Mitigation Plan

### Appendix O additional information - Baseline Sound Survey

### Appendix M – Bird and Bat Conservation Strategy

“An Application for Site Certification (ASC) may be eligible for expedited review when the EFSEC Council finds (1) the environmental impacts of the proposed project are not significant or can be mitigated to non-significant levels and (2) the Project is consistent and in compliance with city, county, or regional land use plans.”

See informational materials posted at  
<https://www.efsec.wa.gov/>

It would appear obvious that environmental impacts will be significant for wildlife, migration, loss of fertile soil, human living conditions, loss of agriculture productivity, tourism. It will be interesting to see how 60,000 acres of “slowing the wind down” will change the local micro-climates and resettle the blowing sand. It is not plain that the towers will stand up well to the electrical storms common in our area or that they can stay upright without bedrock under their platforms.

### The contract has already been issued:

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

“It is our belief that a competitive contractor with experience would not have the level of knowledge of the EFSEC siting and permitting processes, unique design features of the project and experience with the Washington Administrative Procedure Act (APA) necessary to complete this work in a timely manner, so an intent to Sole Source is being sought.

The contract will be issued on or about March 19, 2021. The dollar value is estimated at \$100,000.

Offerors contemplating the above requirements are required to submit capability statements detailing their ability to meet the state’s requirements by March 11, 2021. In the absence of other qualified sources, it is the state’s intent to make a sole source award of the contract.”



**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Ferruginous Hawks are in Decline  
**Date:** Friday, March 26, 2021 10:03:37 AM  
**Attachments:** [image001.png](#)  
[fs\\_hawk\\_safe\\_updated\\_may2017 \(2\).pdf](#)

Public Comment #0206  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Sonia,

Please see the attached document.

The area that is proposed by Scout Clean energy is a safe space for the Ferruginous Hawk. The state of Washington has spent a significant amount of money to save the hawk. The Washington Department of Fish and Wildlife is currently considering downgrading the classification of the hawk to endangered. Will EFSEC be considering this as part of the decision making process?

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

[www.gofundme.com/f/save-our-horse-heaven-hills](http://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.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**

**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Kennewick City Council Meeting  
**Date:** Friday, March 26, 2021 9:04:27 AM  
**Attachments:** [image001.png](#)

---

Public Comment #0207  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Sonia,

This is a video link to a video presentation that was done for the City of Kennewick Council this past week. The Presenter is Rick Dunn, who is the Benton PUD General Manager. Rick is an electrical engineer with over 30 years of industry experience.

The presentation starts at 28:30.

<https://kennewickwa.new.swagit.com/videos/116705>

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

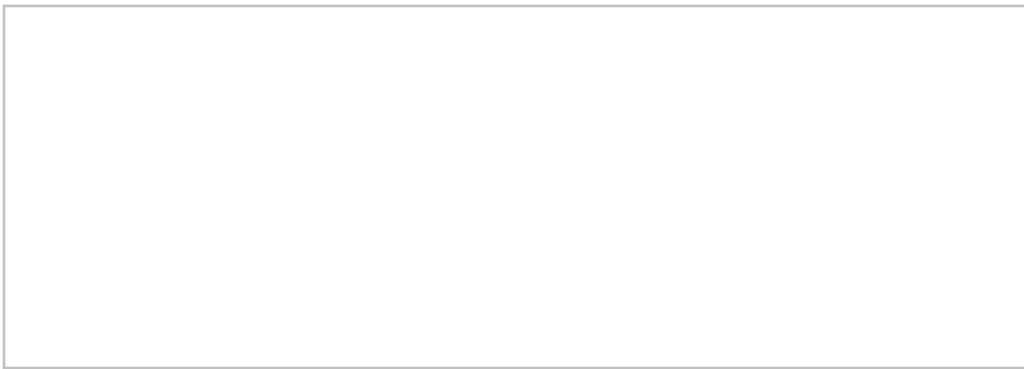
[www.gofundme.com/f/save-our-horse-heaven-hills](http://www.gofundme.com/f/save-our-horse-heaven-hills)

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

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

<https://www.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**

**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Wind Power and Clean Energy Policy Perspectives (Benton PUD)  
**Date:** Friday, March 26, 2021 9:01:27 AM  
**Attachments:** [image001.png](#)

Public Comment #0208  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Sonia,

Please include this wind paper from Benton PUD into the record for the upcoming Horse Heaven Hills Meeting on March 30, 2021. Benton PUD is the service territory in which the turbines and solar panels will be installed. The PUD is opposed to this project.

<https://www.bentonpud.org/getattachment/Safety-Education/Safety/Wind/Wind-Power-and-Clean-Energy-Policy-Perspectives-Report-Benton-PUD-FINAL-July-14-2020.PDF.aspx?lang=en-US>

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

[www.gofundme.com/f/save-our-horse-heaven-hills](http://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.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**

**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Kennewick Irrigation District  
**Date:** Thursday, March 25, 2021 4:14:18 PM  
**Attachments:** [image001.png](#)  
[20210316 L Governor Inslee.pdf](#)

Public Comment #0209  
Horse Heaven Wind Farm  
Docket #210011

### External Email

Sonia,

Please see the letter from the Kennewick Irrigation District. It was sent via certified mail to the Governor and EFSEC this afternoon.

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

[www.gofundme.com/f/save-our-horse-heaven-hills](http://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.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**







2015 South Ely Street  
Kennewick, WA 99337  
Phone 509-586-9111  
FAX 509-586-7663  
[www.kid.org](http://www.kid.org)

March 16, 2021

Governor Jay Inslee  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

Dear Governor Inslee,

On behalf of the Kennewick Irrigation District's Board of Directors, I write to express serious concerns about the Horse Heaven Hills ("H3") Wind Project. Horse Heaven Wind Farm, LLC ("HHWF") is the project component of the H3 Wind Project, a project of Scout Energy, which is an electricity broker based in Colorado and owned by foreign investors.

The Kennewick Irrigation District ("KID") delivers irrigation water to over 20,200 acres in the Tri-Cities area. KID serves both a productive agricultural community, and a growing, dynamic residential base.

Over the last several years, Scout Energy has approached KID on multiple occasions with proposals to purchase KID lands to construct the first transmission line segment to interconnect their project to the Bonneville Power Administration transmission grid at the Red Mountain Substation. KID considered HHWF's proposal in good faith, but could not come to an agreement that would be to the benefit of KID ratepayers and our community.

As you know, on February 8, 2021, HHWF submitted an application for site certification ("ASC") to the Energy Facility Site Evaluation Council ("EFSEC") to develop, construct, and operate the H3 Wind Project. The ASC proposes the construction of a massive wind, solar, and battery storage facility in Benton County. HHWF proposes to construct hundreds of wind turbines with heights exceeding 500 feet across 6,500 acres of the Horse Heaven Hills above the Tri-Cities.

KID appreciates efforts to advance a diverse renewable energy portfolio in Washington State. Fortunately, however, central Washington already benefits from such a portfolio. The dams along the Snake and Columbia Rivers, and the Columbia Generating Station generate reliable, carbon-free electricity, the baseloads of which enable the integration of the following intermittent sources of electricity into the region's grid: the Nine Canyon Wind Project, which includes 63 wind turbines south of Kennewick; the Horn Rapids Solar Project; and the White Bluffs Solar Station.

Right now, there is a proposal in the U.S. Congress to remove the Snake River dams. KID relies on the region's inexpensive, clean electricity to run its pump stations. KID has serious concerns about the introduction of a large amount of intermittent power into the local grid, when at the same time, a large of amount of the region's reliable baseload may be removed. While the H3 Wind Project has been in works for some time, it is hard not to see the opportunism in HHWF's filing of the ASC on the heels of the dam removal proposal.

HHWF has requested review under EFSEC expedited process for the ASC. KID opposes an expedited process. The EFSEC needs to fully investigate the implications of introducing intermittent sources of electricity into our region at the expense of reliable, carbon-free hydropower.

Scout Energy and its foreign investors no doubt see the H3 Wind Project as an opportunity to exploit the U.S. tax code to ensure a significant return on their investment. That investment, however, may not provide such a return to our community here in the Tri-Cities.

KID respectfully requests a full and thorough investigation into long-term effects of this project on our community's environment and electrical grid.

Sincerely,



Gene Huffman  
KID Board President

C: KID Board of Directors  
Charles Freeman, District Manager

**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Columbia Irrigation District  
**Date:** Thursday, March 25, 2021 4:13:13 PM  
**Attachments:** [image001.png](#)  
[IMG\\_20210325\\_0005.pdf](#)

Public Comment #0210  
Horse Heaven Wind Farm  
Docket #210011

External Email

Sonia,

Please see the attached letter regarding the Horse Heaven Hills Wind Farm. The letter is from the Columbia Irrigation District. This letter was sent via certified mail today. Copies were sent to the Governor and EFSEC.

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

[www.gofundme.com/f/save-our-horse-heaven-hills](http://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.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**



**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Project Letter  
**Date:** Thursday, March 25, 2021 4:06:02 PM  
**Attachments:** [Wind Farm Letter.pdf](#)  
[Horse Heavens Hills Wind Project letter with edits made 2-15-21.docx](#)

Public Comment #0211  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Sonia,

Please see the attached letter from the Badger Mountain Irrigation District. This will be sent tomorrow via registered mail.

Barry

Barry,

This was sent a few weeks ago but some how it did not make it out of our email server so I am sending it again. The letter attached is in support of your position as well as the other utilities positions I hope it helps.

Thanks

Colby Getchell  
District Manager  
[bmidmanager@badgermountainirrigation.com](mailto:bmidmanager@badgermountainirrigation.com)  
Badger Mountain Irrigation District  
87525 E. Reata Rd.  
Kennewick, WA 99338  
509-531-2938 (Cell)  
509-628-0777 (Office)  
509-628-0112 (Fax)

*When the well is dry,  
we will know the  
worth of water.  
-Benjamin Franklin*



---

## **Badger Mountain Irrigation District**

87525 East Reata Road  
Kennewick, WA 99338

Phone (509) 628-0777  
Fax (509) 628-0112

March 10, 2021

Mr. Bush

Badger Mountain Irrigation District and its Board of Directors support the rejection of the EFSEC application from Scout Clean Energy to build two-hundred and thirty-five wind turbines in the Horse Heaven Hills. We agree with the area utilities and municipalities that this wind project is not suited for our area and would be better off being built in an area that can better utilize the energy produced by these wind farms. In closing BMID fully supports your letter to the Governor.

Sincerely,

Colby Getchell

Secretary Manager

Badger Mountain Irrigation District

February 15, 2021

Honorable Jay Inslee  
Governor, State of Washington  
PO Box 40002  
Olympia, WA 98504

**RE: Horse Heaven Hills Wind Project**

Dear Honorable Jay Inslee:

Benton County is the home of Columbia Generating Station; the states only nuclear plant. It is also the home of McNary Dam, Nine Canyon Wind Farm, White Bluffs Solar Station, and Horn Rapids Solar, Storage and Training Project. These projects combined create enough energy to power the Puget Sound area.

Benton County is the home of the most contaminated nuclear site in the United States. The Hanford nuclear reservation continues to be cleaned up after its land and water were contaminated in order to help win World War II. This is the location in which the plutonium for the nuclear bomb "Fatman" was created. This bomb was later dropped on Nagasaki, which ended World War II and saved millions of lives.

Just to the south of Benton County the Umatilla Chemical Depot is visible. This location has 1,000 concrete igloo bunkers that protrude from the ground. This was the location in which tons of VX and nerve agents were stored for the World War II effort. At one point 12 % of the countries chemical weapons were stored at this one location. This location has finally been cleaned up and now remains a federally owned eyesore.

Benton County has always stepped up when our country and our state needed us. We understand that in order to meet the states clean energy mandate that wind projects will be built in this state. We just do not believe that a wind project of this magnitude should be built near such a large population center. We do not believe that just because you are able to build a wind project on this location that you must build one. This project would destroy twenty-four miles of naturally beautiful hilltops overlooking the Tri-Cities.

The Horse Heaven Hills are some of the most beautiful hills in our state. They are the home of bald eagles, burrowing owls, Canada geese, and the recently re-introduced prong horned antelope. They are also located in the middle of the Pacific Flyway, which is one of the nation's

largest bird migration flyways. It is not unusual to see flocks of geese and ducks that number in the thousands fly through the proposed wind site heading south for the winter.

Benton County is also the home of the Hanford Reach National Monument that includes Rattlesnake Mountain. The Columbia, Yakima, and Snake Rivers also intersect in Benton County. Benton County is truly an amazing place to live. This location has long been paradise for outdoorsman. The hiking trails are abundant and growing and the hunting and fishing is world class. More recently wine was introduced into this region. Within an hour's drive, the Tri-Cities is home to two hundred wineries. Wine tourism has become a major economic boost for the region. We believe constructing two hundred and thirty-five wind turbines in the middle of this region would be detrimental for tourism.

None of the four electrical utilities that are located in the Benton County area have expressed any interest in this project. Local utilities need energy when it is coldest and hottest during the year. The wind does not blow during those times of the year at this location and these turbines will not create the needed energy. We support President Biden's effort to build more offshore wind sites. Generally, these sites are not visible from land and they are much closer to the population centers where the energy is needed.

Scout Clean Energy submitted its application to EFSEC to build two hundred and thirty turbines in the Kennewick area on February 9, 2021. These turbines are not the normal sized turbines that stand 350 feet. These are the massive 500 feet variety. Once considering the issues outlined in this letter, we hope you agree that this is not an appropriate site for this project. Please reject the EFSEC application and ask Scout Clean Energy to build a project in a location closer to the population centers that need the energy.

Sincerely,



**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Letter to the Governor and EFSEC  
**Date:** Thursday, March 25, 2021 4:05:12 PM  
**Attachments:** [image012.png](#)  
[HHH signature page.docx](#)  
[Horse Heavens Hills Wind Project letter with edits made 2-15-21.docx](#)

Public Comment #0212  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Sonia,

This letter was sent via registered mail yesterday. It was sent to both the Governor and the EFSEC committee. It I signed by all of the representative and senators from the 8<sup>th</sup>, 9<sup>th</sup>, and 16<sup>th</sup> except for one. Retires US Congressman Doc Hastings has also signed on to the letter. Please submit this as part of the record for the EFSEC Committee.

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

[www.gofundme.com/f/save-our-horse-heaven-hills](http://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.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**

February 15, 2021

Honorable Jay Inslee  
Governor, State of Washington  
PO Box 40002  
Olympia, WA 98504

**RE: Horse Heaven Hills Wind Project**

Dear Honorable Jay Inslee:

Benton County is the home of Columbia Generating Station; the states only nuclear plant. It is also the home of McNary Dam, Nine Canyon Wind Farm, White Bluffs Solar Station, and Horn Rapids Solar, Storage and Training Project. These projects combined create enough energy to power the Puget Sound area.

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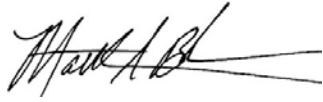
largest bird migration flyways. It is not unusual to see flocks of geese and ducks that number in the thousands fly through the proposed wind site heading south for the winter.

Benton County is also the home of the Hanford Reach National Monument that includes Rattlesnake Mountain. The Columbia, Yakima, and Snake Rivers also intersect in Benton County. Benton County is truly an amazing place to live. This location has long been paradise for outdoorsman. The hiking trails are abundant and growing and the hunting and fishing is world class. More recently wine was introduced into this region. Within an hour's drive, the Tri-Cities is home to two hundred wineries. Wine tourism has become a major economic boost for the region. We believe constructing two hundred and thirty-five wind turbines in the middle of this region would be detrimental for tourism.

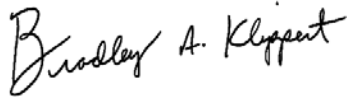
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Sincerely,



Rep. Matt Boehnke  
8<sup>th</sup> Legislative District



Rep. Brad Klippert  
8<sup>th</sup> Legislative District



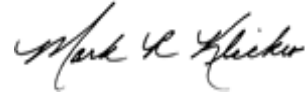
Sen. Sharon Brown  
8<sup>th</sup> Legislative District



Sen. Perry Dozier  
16<sup>th</sup> Legislative District



Rep. Skyler Rude  
16<sup>th</sup> Legislative District



Rep. Mark Klicker  
16<sup>th</sup> Legislative District



Rep. Joe Schmick  
9<sup>th</sup> Legislative District



Rep. Mary Dye  
9<sup>th</sup> Legislative District



Doc Hastings, Retired U.S. Congressman

**From:** [Barry Bush](#)  
**To:** [Bumpus, Sonia \(UTC\)](#); [Drew, Kathleen \(UTC\)](#)  
**Cc:** [Kidder, Ami \(UTC\)](#)  
**Subject:** Tetra Tech Lawsuit (Falsified Soil Samples)  
**Date:** Thursday, March 25, 2021 12:41:12 PM  
**Attachments:** [image002.png](#)

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Public Comment #0213  
Horse Heaven Wind Farm  
Docket #210011

## External Email

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](mailto:atomicbt@charter.net)

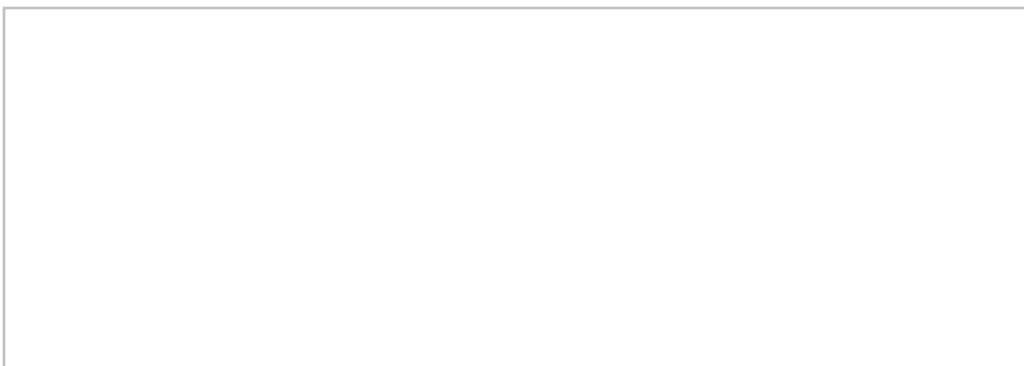
[www.gofundme.com/f/save-our-horse-heaven-hills](http://www.gofundme.com/f/save-our-horse-heaven-hills)

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

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

<https://www.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**



**From:** [Hailey Caprio](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Windmills  
**Date:** Friday, March 26, 2021 1:30:38 PM

Public Comment #0214  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Good afternoon,

I oppose the horse heaven hills wind project proposed by scout clean energy. It will ruin our views for Finley, Bubank, Pasco, Kennewick, Richland, West Richland, Kiona and Benton City.

Thank you

Get [Outlook for iOS](#)

**From:** [White, Samantha](#)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [Whitney, Clinton](#); [Amundson, Jon](#); [Throop, Hannah](#)  
**Subject:** Horse Heaven Wind Project - Letter of Opposition  
**Date:** Friday, March 26, 2021 2:33:01 PM  
**Attachments:** [image001.png](#)  
[Horse Heaven Wind Project - COR Letter of Opposition.pdf](#)

Public Comment #0215  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Good Afternoon,

Attached is a letter from the City of Richland opposing the Horse Heaven Wind Project to be included with the public comments for the meeting on March 30, 2021.

If you would be so kind as to confirm receipt, I would appreciate it!

Thank you,



**Samantha White**  
Administrative Assistant II  
625 Swift Blvd., MS-23 | Richland, WA 99352  
(509) 942-7403

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*Disclaimer: Emails and attachments sent to or from the City of Richland are public records subject to release under the Washington Public Records Act, Chapter 42.56 RCW. Sender and Recipient have no expectation of privacy in emails transmitted to or from the City of Richland.*



**CITY OF RICHLAND**  
**RICHLAND CITY COUNCIL**  
625 Swift Boulevard, MS-04  
Richland, WA 99352  
Telephone (509) 942-7381  
Fax (509) 942-7379

CI.RICHLAND.WA.US · 509-942-7390

March 26, 2021

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

RE: Scout Clean Energy's Horse Heaven Wind Project

Energy Facility Site Evaluation Council:

I am writing today to voice my opposition to Scout Clean Energy's Horse Heaven Wind Project, which is proposed to be located in unincorporated Benton County and directly adjacent to the City of Richland. As Mayor of the City of Richland, I am well aware of how it will affect the greater Richland area and its surrounding communities, and ask that EFSEC deny Scout Clean Energy's request for an expedited review of this application for the reasons outlined below.

The City of Richland is home to 60,000 residents, many of whom work for agricultural and technical employers in Benton County. The City has wonderful parks that citizens have shown consistent and strong support for. To be clear: parks and outdoor recreation are very important to our residents and to many others in Benton County.

The City collaborates with Benton County for recreational areas similar to Horse Heaven Hills for the enjoyment of local residents. One area includes Badger Mountain Natural Preserve, which is accessed from several City trailhead parks. Badger Mountain Natural Preserve, like Horse Heaven Hills, is a favorite recreational hike for many citizens in and around Richland. Wind mills would negatively impact the natural area enjoyed by City and County residents.

Additionally, an expedited review should not be approved during an emergency declaration from the Governor, the nature of which prevents complete participation of public, regulatory, and site certification processes. The Horse Heaven Wind Project satisfies several of the criteria indicating that a full review should be conducted (as defined in WAC 463-60-117): environmental impact, area affected, magnitude of project, and the degree to which the project represents a change of use of the proposed site. No previous application for a project this complexity – combining wind, solar, and battery storage – has ever been considered by EFSEC. This alone is a sufficient basis upon which an expedited review should be denied. However, the following should also be taken into consideration when deciding whether or not an expedited review should be permitted:

- The full environmental impacts are not fully documented, addressed, or known by the applicant. Some negative impacts to the bat population are addressed, but minimally. What other environmental impacts from this project are not known and will not be considered due to the truncated nature of an expedited review?

- On pages 1-66 of the application, the applicant identifies over 6,869 acres of area that will be either temporarily or permanently impacted. This along with the complexity of the proposed project exceed the magnitude that is appropriate for expedited review.
- A wind farm would be a radical departure from the current use of the proposed site, which land that is currently a combination of agricultural, recreational, and Department of Natural Resource open space.

To further elaborate, the Horse Heaven Wind Project is neither needed nor beneficial for our community. This may sound counterintuitive considering events in other states, such as rolling blackouts in California during August 2020 followed by the rolling blackouts and multi-day power outages in Texas in February 2021. However, wind and solar projects are intermittent energy resources that do not provide any firm energy capacity. City of Richland customers expect reliable energy resources and the City concurs with the technical aspects of Benton PUD's wind policy perspective. The Horse Heaven Wind Project will not be a reliable source of energy generation.

The City of Richland is a municipal electric utility and a load-following customer of Bonneville Power Administration (BPA). The City proudly provides its customers with low-cost electricity, using a fuel mix composition where the percentage from clean, carbon-free resources exceeds 92%. The City is already well positioned to meet the Clean Energy Transformation Act (CETA) requirements codified in Chapter 19.405 RCW. While the City has to meet the renewable energy, requirements set forth in Chapter 19.285 RCW, the City is already covered with renewable resources through 2026. Even after 2026, any renewable resource would need to be shaped into a flat block energy resource. Currently, shaping and ancillary services for renewables add approximately \$20/MWh compared to BPA wholesale energy resources, which presently cost a total of \$40/MWh. Unshaped energy resources from the Horse Heaven Wind Project would not be economical for the City's electrical rate payers.

In summary, I appreciate the opportunity to share my concerns with you regarding the Horse Heaven Wind Project. This project will negatively impact natural areas, will not meet the City's firm energy needs, and it will not be an economical resource as an unshaped product. With respect to technical and business considerations, as well as our natural resources, please consider this letter as our formal opposition to the Horse Heaven Wind Project.

Sincerely,



Ryan Lukson  
Mayor

Cc:

Richland City Council  
Jon Amundson, Interim City Manager  
Clint Whitney, Energy Services Director

Enclosure:  
Benton PUD's Wind Power and Clean Energy Policy Perspectives

# ***Wind Power and Clean Energy Policy Perspectives***



**Rick Dunn, General Manager**

**Commissioners:**

**Barry Bush**

**Jeff Hall**

**Lori Sanders**

**July 14, 2020**

### Executive Summary

Clean energy technology and public-policy development continue to be in the news and at the forefront of much political debate and discussion. While wind power has emerged as a popular choice for helping meet greenhouse gas emission reduction goals, reasonable questions continue to be raised regarding its ability to cost-effectively contribute to the powering of modern civilization and how the lifecycle environmental and ecological impacts compare to other types of technologies.

With Washington State's passage of the Clean Energy Transformation Act (CETA) in 2019 and the current schedule for expiration of renewable energy federal tax credits, there is a resurgence in proposed wind power development activity in the Pacific Northwest (PNW), including projects proposed for eastern Washington and Benton County specifically.

As developers and many elected officials tout the economic and environmental benefits of wind farms, Benton PUD believes it is important for our customers and the general public to hear utility perspectives. Unlike the narrower focus of some wind power interests, utilities must balance environmental benefits and concerns with costs and power grid reliability; and we will be held accountable if we fail on any of these dimensions.

While Benton PUD acknowledges wind power development in the PNW will likely continue as Washington State utilities respond to the 2025 CETA deadline for eliminating coal-fired energy and in response to nearby state and corporate clean energy mandates and goals, we do not support further development of wind power in the PNW for the following primary reasons:

- 1) Benton PUD's current power supply is hydro and nuclear based and is over 93% "non-emitting" by Washington State standards. While we are ahead of the clean energy curve, we do experience supply deficits during hot summer months and deeply cold winter periods. To cover these deficits, we make power market purchases from generation resources that can be counted on to run on the days and hours needed (dispatchable). Since wind power relies on natural weather conditions decoupled from electricity demand, it is not dispatchable generation and therefore will not help us resolve our seasonal energy deficit problems.
- 2) The PNW's hydroelectric generation resources are the foundation of a reliable and clean energy supply that has historically resulted in Washington State contributing no more than 0.5% to the nation's annual total greenhouse gas (GHG) emissions from electricity production; even with soon to be retired coal-fired power plants in the mix. Further development of wind power in the PNW will not result in consequential reductions in national or global GHG emissions attributable to Washington State utilities and will do very little to mitigate the increasing risk of northwest power grid blackouts; which could grow to a 26% probability by 2026 if utilities are unable to replace the reliable generating capacity of shuttered coal plants.

- 3) The low availability of wind power requires utilities to continue paying for dispatchable generation capacity that may run infrequently but is still sized to meet most of the peak energy demand on the grid. This “double paying” is why electricity rates in countries and states with high wind penetrations are rising despite the declining costs of this popular renewable energy source. Benton PUD believes further wind power development will unnecessarily contribute to increases in northwest utility retail electricity rates which could erode the economic development advantage low rates has given our region for many years.
- 4) Energy production from wind farms in the PNW is often high during periods of maximum hydro generation contributing to energy gluts that can drive short-term market prices to zero or even to negative values due to federal tax credits received by wind power. To minimize the net cost of hydro generation the region needs for year-round flexible and reliable electricity, the value of surplus hydro energy sales needs to be maximized. Building more wind farms in the PNW will contribute to untimely energy supply gluts and low short-term market prices which reduces surplus hydro energy sales revenues, increases net hydro power costs and puts upward pressure on retail rates Benton PUD and other utilities charge our customers.
- 5) Benton PUD believes the best long-term, sustainable and environmentally responsible strategy toward meeting the CETA goal of 100% clean electricity in Washington State by 2045 could be to transition coal power to natural gas and then natural gas to nuclear. It is estimated wind power requires 30 to 45 times as much land and about 10 times as much concrete and steel to produce the equivalent power of nuclear. In addition, a recent study estimates that assuming hydro and nuclear power in the PNW stay in place, meeting a theoretical 100% clean electricity goal in our region using wind (and solar) power would require a land area 20 to 100 times the area of Seattle and Portland combined.
- 6) Benton PUD supports Energy Northwest (EN) in their efforts to develop small modular reactor (SMR) technology. However, we are concerned continued large-scale investments in PNW wind power projects will contribute to increases in the normally surplus annual energy supplies in the region thereby eroding the hourly energy supply opportunities needed by SMRs to achieve economic feasibility. Maintaining the existing Columbia Generating Station operations while expanding SMR technology development and possible manufacturing in the Tri-Cities represent opportunities for economic stability and growth in an area with a long history of grid-scale energy production and world class scientific research capabilities.

As some legislators and certain advocacy groups continue to call for more wind power while simultaneously calling for removal of hydro-electric dams, Benton PUD believes it is important

for our customers and citizens of Washington State to hear the utility side of the energy story. To this end, we are committed to facilitating education and outreach efforts based on the premise that all energy choices represent economic and environmental tradeoffs and that consideration of utility business models and the physics of the power grid matter when taking a position to promote one form of power generation technology over another.

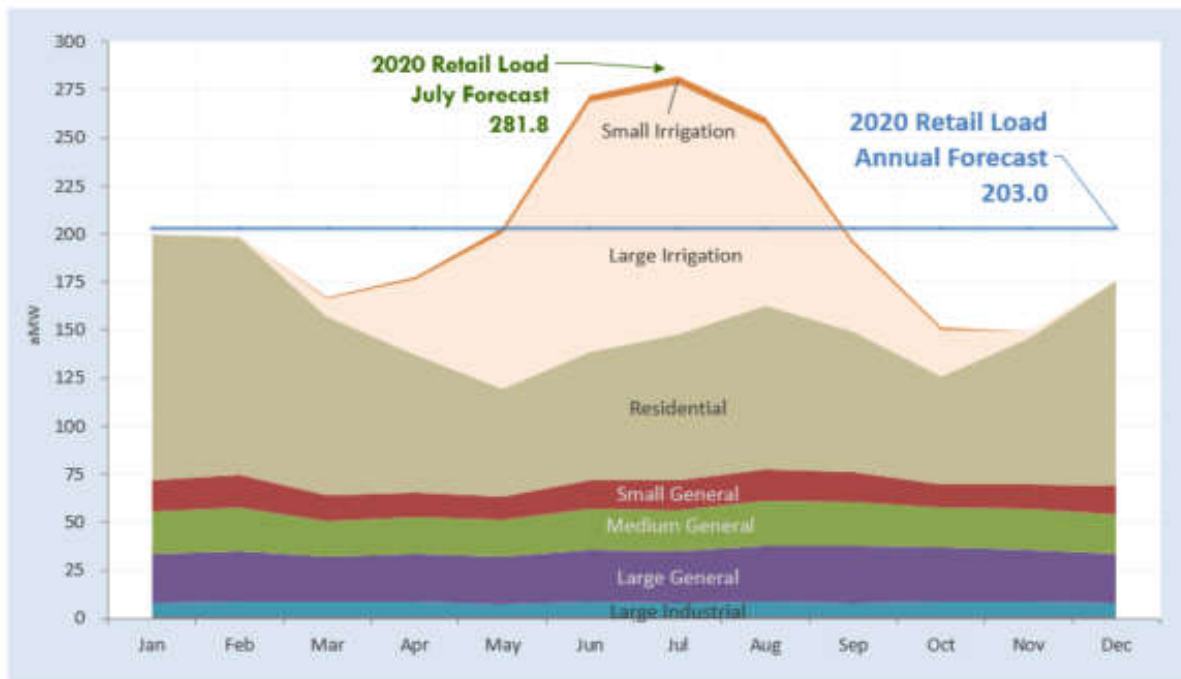
Existing wind farm development in Washington State and along the northern Oregon border has already resulted in the industrialization of previously scenic hillsides, canyons and desert vistas in the region in and around Benton County. Before Benton PUD customers and citizens throughout our region accept further sacrifice of the natural beauty and open spaces that are part of our way of life, we want them to know there are other options we should be asking our legislators and utility industry leaders to urgently and seriously consider. This is the reason for this report and for our formal declaration that Benton PUD does not support further development of wind power in the PNW.



### Existing Power Resources and Loads

Despite clean energy policies and trends favoring wind and solar power, continued development of wind farms in the northwest is not expected to be necessary or beneficial to serving the interests of Benton PUD customers for at least the next decade or more. This is primarily due to our hydro and nuclear rich wholesale power supply contract with the Bonneville Power Administration (BPA) which entitles Benton PUD to annual energy amounts that are normally greater than what is consumed by our customers. In addition, our BPA contract in combination with other energy purchases and contracts results in a power supply that is already over 93% “non-emitting” and clean by Washington State standards.

With this said, it is important to recognize Benton PUD does face significant power supply challenges under the terms and conditions of our current BPA contract. These challenges are rooted in the timing of BPA energy delivery which does not always align with our customer demand for electricity. Benton PUD is a “summer peaking” utility with our highest customer demand being driven by irrigated-agriculture pumping operations combined with high residential and business air conditioning; see FIGURE 1.

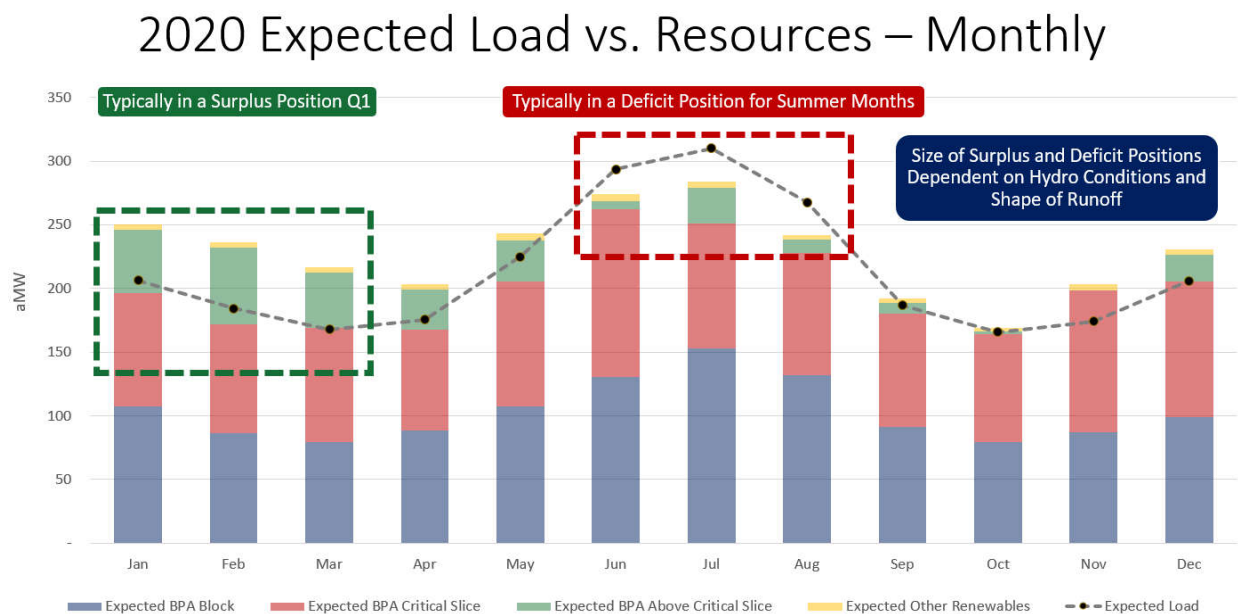


**FIGURE 1**

As a “Slice” customer of BPA, Benton PUD has rights to a fixed percentage of the electricity generated by BPA resources for any given hour of the year which can be highly variable. As BPA resources are predominantly hydro-electric, the variability is driven by the timing and quantity

of runoff from snowpack as well as short term precipitation events which must be managed to serve interests that compete with power generation; including fish and wildlife, flood control, river navigation and recreation.

To gain further perspective, it is instructive to know that Benton PUD's annual allocation of BPA wholesale energy in typical water years delivers about 225 average megawatts (aMW) which is more than our total annual customer retail energy consumption forecast beyond the year 2030. On average, our BPA supply is currently 11 aMW more than our customers consume on an annual basis. However, while Benton PUD currently has a "long" annual energy supply position, we do experience regular seasonal energy supply deficits in the summer and on occasion can come up short during deep cold periods in the winter. These seasonal energy supply shortfalls, referred to as capacity deficits, are a function of Benton PUD's dependence on the availability of "fuel" (river flows) for BPA's hydro resources which can vary significantly from year-to-year and month-to-month; see FIGURE 2.



**FIGURE 2**

Under Benton PUD's Slice contract with BPA, they are required to guarantee delivery of firm monthly energy represented by the combined total of a "Block" and "Critical Slice" amount. The "Above Critical Slice" is the amount of energy BPA is forecasting will be available to Benton PUD but not guaranteed. Slice customers can re-sell surplus energy received from BPA when supply exceeds what is required to serve customer loads but in return must accept and independently manage the risk that loads may be higher than the available BPA supply.

Any forecasted capacity deficits require Benton PUD to make purchases from wholesale electricity markets in order to augment our long-term power supply contracts. Consequently, we have people, processes and contracts in place to be sure our customer electricity demand is completely supplied on an hourly and around the clock basis. Benton PUD's wholesale electricity purchases are typically made in short-term monthly, weekly, day-ahead and hourly markets from generation resources that can be counted on to run on the days and hours needed (dispatchable). These dispatchable generation resources provide needed capacity to cover energy supply deficits that occur on the hottest and coldest days of the year.

Since wind power relies on natural weather conditions decoupled from electricity demand, it is not a dispatchable generation resource and therefore development of more wind power will not help Benton PUD resolve our seasonal capacity deficit problems; particularly our most acute deficits which occur in summer months with very low levels of wind. We are also concerned that preferences for wind power risk under investment in dependable and dispatchable natural-gas generation plants most utilities believe will be essential for replacing the capacity of coal-fired plants being rapidly retired and shut down in the Pacific Northwest and throughout the western United States.

While wind energy developed on a large scale can be a substitute for much of the annual energy produced by fossil-fueled power plants, it cannot provide the equivalent capacity required for balancing electricity supply and demand on an around the clock basis, and under a wide variety of weather conditions. Because the northwest is so dependent on the availability of water for hydro-electric generation, the coldest and hottest days of a year in which water resources are at a critically low level are of particular concern for electric utilities and is why other reliable and dispatchable generation must be standing by and ready to run on demand. When power grid supply does not meet demand on a moment-by-moment basis, blackouts can occur. Benton PUD is concerned that a deepening dependence on wind power as a replacement for energy produced by coal plants in the northwest could have serious consequences in the not-too-distant future if grid operators are faced with the simultaneous occurrence of drought conditions (low hydro power production), extreme temperatures, low wind and not enough dispatchable electricity generators to meet peak customer demands.

To gain further perspective, it is also instructive to consider Benton PUD's 11 aMW "long" BPA annual energy position in the context of customer growth which is currently forecasted to result in an increase of about 0.4 aMW of energy consumption per year. This relatively low growth rate is driven by our continued investments in effective conservation measures as well as improvements in the energy efficiency of new homes and businesses. In the simplest analysis, Benton PUD's expected annual supply of BPA power represents over 27 years of

customer growth which means we are not currently looking to add substantial amounts of “baseload” annual energy to our power supply portfolio from wind power or other resources.

With this said, new large loads associated with electricity intensive businesses or industry locating in Benton PUD’s service territory are a wild card that could require acquisition of new generation resources. Another resource acquisition driver could be preferences for wind and solar power which are often used to brand businesses as sustainable. In either case, given the requirements of Washington State’s Clean Energy Transformation Act (CETA) and other clean energy policies and preferences in adjacent states and regions, wind and solar power may be the only significant energy resources available to meet a future Benton PUD need. While not ideal, we would choose solar power over wind given that solar energy production curves are better aligned with our summer peaking load profile and would contribute to reducing our regular summer capacity deficits on most days.

### **Existing Wind Power Resources**

Currently, Benton PUD’s power supply portfolio includes wind energy through direct contracts from the Nine Canyon (9 MW) and White Creek (9.1 MW) projects delivering about 5.7 aMW of total energy on an annual basis. These contracts were initiated by Benton PUD in response to the qualifying renewable energy requirements of Washington State’s Energy Independence Act (EIA) which initially did not include energy from existing hydro generation.

In addition to direct wind power purchases, Benton PUD’s contract with BPA includes an allocation of about 1.4 aMW of their wind portfolio’s annual energy production. All the wind resources in Benton PUD’s portfolio along with BPA’s hydro generation resulting from incremental improvements to turbine-generator efficiency (incremental hydro) are considered EIA qualifying renewable energy. This means energy from these resources provide a renewable energy credit (REC) for every megawatt-hour of electricity generated.

REC allocations and purchases are how Benton PUD meets the renewable portfolio standard (RPS) currently required by EIA mandates. In 2020 Benton PUD will need a total of about 30 aMW of REC allocations and purchases each year to meet the current 15% RPS requirement. We plan to meet our compliance requirement with 7.1 aMW of total wind power RECs from Nine Canyon, White Creek and BPA; 2.6 aMW of BPA incremental hydro REC allocations; and 20.4 aMW of REC purchases from other entities, including wind farms.

It is important to emphasize that a REC is a certificate corresponding to the environmental attributes of energy produced from qualifying renewable resources and does not necessarily

represent purchases of physical electricity. While Benton PUD has contractual rights to the electricity produced by the Nine Canyon and White Creek projects, it is usually surplus to our annual customer energy requirements except under a worst-case low hydro generation scenario.

With that said, Benton PUD's share of Nine Canyon's physical electricity is always scheduled to supply our load with the net effect during low customer load periods of increasing our BPA hydro surplus which we sell in regional wholesale electricity markets. Due to power scheduling complexities, Benton PUD's share of the White Creek project's physical electricity is bundled with other utility shares and sold to another counterparty at a price currently well below the relevant market power index. This below index pricing is an indicator of the reduced value of wind energy compared to other more dependable generation resources.

Revenues from the sales of physical electricity attributed to Nine Canyon and White Creek are considered as offsets to the total annual cost of Benton PUD's EIA renewable-energy compliance which is budgeted to be \$3.8 million in 2020. We expect to continue to rely on REC purchases as the primary means for meeting EIA mandates with some relief possible in 2030, depending on CETA rules which are currently under development.

Benton PUD considers the incremental cost and dependence we have on continued operation and development of wind and solar power for REC purchases as a perverse outcome of EIA mandates given our extraordinarily clean power supply and surplus annual hydro and nuclear-based energy position.

### **Surplus Energy and Market Sales**

With respect to Benton PUD's net annual surplus of energy, it is important to understand the timing of when most surplus hydro generation occurs. For Benton PUD, the best combination of market price and volume of surpluses occurs in January through March with the highest volume and lowest prices occurring in April and May. When our hydro supply exceeds customer demand, our BPA contract allows us to sell the surplus energy into wholesale electricity markets. The revenues generated by our sales have the effect of buying down our annual wholesale power costs.

Energy production from wind farms in the northwest can also be high during periods of maximum hydro generation contributing to energy gluts that can drive market prices to zero or even to negative values due to federal tax credits received by wind power. The wholesale electricity market distortions created by wind power tax credits combined with the availability

of abundant and low-priced natural gas has driven market prices to very low levels in recent years. Consequently, the value of Benton PUD surplus hydro energy sales has been significantly reduced from over \$50 million in 2008 to under \$20 million today.

While there are efforts underway centered on possible expansion of the Western Energy Imbalance Market (EIM) to an extended day ahead market (EDAM) that could increase the economic value of BPA hydro flexibility and capacity, Benton PUD believes further development of wind power in existing “energy only” wholesale markets will continue to contribute to the devaluation of hydro. To be clear, Benton PUD believes abundant and low-cost natural gas has been the major driver of wholesale electricity price reductions but building more wind farms will contribute to downward pressure on prices.

Overall, the erosion of the market value of hydro energy has resulted in upward pressure on the prices BPA charges Benton PUD and consequently on the retail rates we charge our customers. Since 2007, BPA’s revenues derived from market sales have dropped from over \$400 million to under \$200 million in some years which leaves them looking to their ratepayers to make up the difference. Benton PUD’s net power supply costs are budgeted to be \$84 million in 2020 which is up 40% since 2010 when actual costs were \$60 million.

### **Oversupply and Curtailments**

Additional concerns regarding the development of more wind power are oversupply and curtailments which are well described in a report developed by Harvard University for the Bonneville Power Administration in May 2018.<sup>1</sup>

*...As more intermittent renewable energy is added to the grid it creates oversupply, particularly during low demand hours, when generation exceeds load. Oversupply causes low or negative prices for wholesale energy during periods of overgeneration. When scheduled generation exceeds scheduled demand in the hour-ahead market, the price of energy falls below zero in an attempt to balance supply and demand. After accounting for changes in generation and load between the hour-ahead and real-time markets, if generation still exceeds load and there are no more generators willing to receive payments to reduce their output, then balancing authorities must order generators to curtail output to maintain system frequency. Negative bids often represent the lost opportunities for the generator to take advantage of tax credits for renewable energy production.*

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<sup>1</sup> Patricia Florescu and Jack Pead, “Realizing the Value of Bonneville Power Administration’s Flexible Hydroelectric Assets”, 12, 13, 14, Mossavar-Rahmani Center for Business & Government, Harvard University, May 2018.

*...Due to the Pacific Northwest's reliance on hydroelectricity, oversupply becomes more problematic in the springtime when both river flows and wind generation are high. Under those circumstances, extra water can be spilled from the dams so that it does not contribute to oversupply, but too much spill exceeds water quality standards and can harm fish and other aquatic species. If water cannot be spilled, it must be passed through the hydropower turbines, thus generating electricity.*

*For conditions like these, BPA implemented the Oversupply Management Protocol, under which non-hydrogeneration is displaced to protect aquatic life and maintain system reliability. Displacement decisions are made according to a least-cost displacement cost curve that lists generation in order of cost, from the least cost facility to the highest-cost facility, until the required displacement quantity is achieved.<sup>53</sup> After a federal court case concluded in 2011, BPA enacted a new protocol that compensated wind generators for lost revenues from curtailment and assigned the costs of curtailing generation during oversupply events to BPA transmission customers.<sup>54</sup>*

While Oversupply Management Protocol costs have not been extremely high<sup>2</sup> relative to other costs incurred by Benton PUD through our BPA transmission contract, we are concerned more wind power on the grid will contribute to increases in BPA costs and will add more complexity to the already difficult balancing act of managing river flows to meet the competing interests of power generation, environmental stewardship, barging operations, flood control and recreation.

### **Pacific Northwest Resource Adequacy Challenges**

The Pacific Northwest's clean hydroelectric generation resources are unmatched anywhere in the United States and are the primary reason Washington State contributed on average no more than 0.5% to the nation's annual total greenhouse gas emissions from electricity production each year between 1980 and 2017<sup>3</sup>; even with coal plants in the mix.

While our already clean electricity sector is the envy of the nation, policy makers in Washington State have set the course for 100% clean by 2045 through passage of the Clean Energy Transformation Act (CETA). While a long-term goal like this is clearly aspirational at this point,

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<sup>2</sup> BPA's displacement costs of OMP were around \$4.87 million in 2018 and \$2.2 million in 2017 <https://www.bpa.gov/Projects/Initiatives/Oversupply/Pages/Annual-Oversupply-Review.aspx>.

<sup>3</sup>U.S. Energy Information Administration, "State Carbon Dioxide Emissions Data" <https://www.eia.gov/environment/emissions/state/>.



the near-term consequences of CETA's underlying requirements are significant and very concerning when it comes to maintaining power grid reliability. The most consequential requirements are the explicit removal of coal power from utility portfolios by 2025 and the "social cost of carbon" which must be used as a cost adder when utilities evaluate investments in new generation resources. As intended by legislators, this cost adder will have a chilling effect on investments to construct new natural-gas power plants which utilities would normally consider to be the logical replacement for dispatchable capacity associated with retiring coal plants.

Unfortunately, CETA along with other anti-fossil-fuel sentiment in Oregon and California energy policies has put northwest utilities in a position where it appears only wind and solar power along with batteries, pumped hydro and customer load curtailments (demand response) will be allowed to try and solve utility capacity deficits. The problem is that science, economics and project development cycle times indicate the politically preferred technologies are not ready to provide solutions at the scale needed to mitigate the already unacceptable increase in the risk of blackouts projected for the Pacific Northwest beginning in 2021<sup>4</sup>. In their most recent assessment, the Northwest Power and Conservation Council (NWPCC) estimates that accelerated coal-plant retirements could increase the likelihood that generating capacity will not be adequate for meeting demand to a level of 26% by 2026. This is well above the 5% threshold established as the limit for an adequate regional power supply.

Benton PUD is a relatively small player in the northwest grid, but our seasonal capacity deficits are significant. This is why we joined forces with other members of the Public Generating Pool (PGP) and several investor owned utilities to co-fund a study by E3 Consulting<sup>5</sup> of what will be required to maintain power grid reliability in the Pacific Northwest while further de-carbonizing the electricity sector. This study found that deep de-carbonization is possible but that natural gas fired generation will be needed to maintain power grid reliability; it would just run infrequently.

While development of wind farms may be politically fashionable and appeal to many in the general public as a harmonization of nature with electricity production, the science and economics indicate powering modern civilization with intermittent generation resources like wind and solar power comes at a high financial and environmental cost. E3's study concludes that increasing the Pacific Northwest's inventory of wind power from the 2018 level of 7

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<sup>4</sup> Northwest Power and Conservation Council, "*Pacific Northwest Power Supply Adequacy Assessment for 2024*": October 2019.

<sup>5</sup> Energy+Environmental Economics, "*Resource Adequacy in the Pacific Northwest*": Public Generating Pool, March 2019.



gigawatts to a level of 38 gigawatts by 2050<sup>6</sup> would only result in an effective capacity contribution from wind of 19%. In other words, a more than fivefold investment in wind power which E3 estimates would cover an area as much as 37 times the combined areas of Seattle and Portland, would only allow regional utilities to count on 19% of the capital investment to produce electricity when it is most critically needed. The E3 study also estimates the area required to achieve a theoretical 100% clean electricity sector in the northwest using only wind and solar power (assuming existing hydro and nuclear stay in place) would require a land area as much 100 times the combined areas of Seattle and Portland.

On November 12, 2019 Benton PUD Commissioners adopted Resolution 2523 in support of actions to ensure electric sector resource adequacy in the Pacific Northwest. This resolution provides a sound argument for why northwest utilities have serious concerns regarding the reliability of the northwest power grid and why Benton PUD questions the wisdom of continued development of large numbers of wind farms in our region when we are facing potentially serious consequences associated with power grid blackouts.

### **Other Considerations**

The “fuel” for wind power is dilute and intermittent requiring additional investments in backup generation technologies to meet the always-on requirements of power grids. While developers and advocates often tout continued reductions in the cost of wind energy, the low availability of wind power requires utilities to continue paying for dispatchable generation capacity that may run infrequently but is sized to meet most of the peak energy demand on the grid. This “double paying” is why electricity rates in countries and states with high wind penetrations have risen significantly amid claims of low-cost renewable energy.

CETA together with the Energy Independence Act (EIA) appears to have established an undefined increase in Washington State’s renewable portfolio standard (RPS) which will undoubtedly lead to some level of double paying in Washington State. Establishing preferences for wind and solar energy with no accompanying targets for greenhouse gas (GHG) emission reductions in the electricity sector has been shown through comprehensive study to result in unnecessary increases in the cost of electricity while not reducing GHG emissions in the most cost-effective manner possible<sup>7</sup>.

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<sup>6</sup> 38 gigawatts of nameplate wind power capacity is what E3 determined would be required in an optimal scenario to reduce greenhouse gas emissions from electricity production by 80% below 1990 levels; an often-quoted goal from the Intergovernmental Panel on Climate Change (IPCC).

<sup>7</sup> Energy+Environmental Economics, “*Pacific Northwest Low Carbon Scenario Analysis - Achieving Least-Cost Carbon Emissions Reductions in the Electricity Sector*”: Public Generating Pool, December 2017.

Additionally, the land area required for wind turbine construction and transmission lines needed for grid interconnections can be immense and the negative ecological and environmental impacts of this “energy sprawl” may outweigh the perceived or real benefits. Benton PUD believes lifecycle economic and environmental impacts expected to result from further development of wind power need to be scrutinized to a much higher degree with greater recognition of issues like the global impacts of raw materials mining and the disposal of wind turbine blades which are currently destined for landfills.

Benton PUD acknowledges every source of energy production takes a toll on the environment but believes wind power is often given a pass due to its popularity with policy makers and many in the general public. One source estimates wind power requires about 30 to 45 times as much land to produce a comparable amount of power as nuclear and that concrete and steel requirements for wind are about 10 times greater<sup>8</sup>. We believe these are important and relevant considerations as investments are made in power generation projects that will have long lasting environmental and financial impacts.

Benton PUD supports provisions of CETA that count hydro and nuclear energy toward the 100% clean by 2045 objective. However, we believe a more cost-effective and potentially less risky trajectory toward this goal would have been to allow for the transition from coal to natural gas and to promote an increase in the development of nuclear energy as the best long-term and sustainable strategy. We believe it is reasonable to suggest the most balanced and environmentally responsible actions you can take to “clean up” the electricity sector is to produce as much low or non-emitting electricity as possible in the smallest area possible. This seems to be best accomplished with energy dense fuels like natural gas and uranium.

Benton PUD supports EN in their efforts to develop small modular reactor (SMR) technology. However, we are concerned continued large-scale investments in wind power will substantially increase the normally surplus annual energy supplies in the Pacific Northwest (PNW) thereby eroding the hourly energy supply opportunities needed by SMRs to achieve economic feasibility. According to the Bonneville Power Administration (BPA)<sup>9</sup> the generating potential from federal and non-federal hydro projects in the PNW can vary by almost 7,000 aMW annually and by almost 14,000 aMW in some months, depending on project operations and the availability of water. But even in the worst water years, the PNW region is projected to have annual firm energy surpluses for the next ten years, assuming the region’s 4,000 MW of uncommitted independent power producer (IPP) generation capacity is available to serve regional loads. Adding to this “long” regional energy position with continued development of

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<sup>8</sup> Robert Bryce, *“Power Hungry – The Myths of “Green” Energy and the Real Fuels of the Future”*: Pages 84, 91.

<sup>9</sup> Bonneville Power Administration, *“2018 Pacific Northwest Loads and Resources Study”*: April 2019, Section 3.

large-scale wind farms does not bode well for the development of SMR based generating projects given their relatively high capital costs and the need for lots of run time in order to reduce energy production costs to levels that will make them competitive with other technologies.

### **Conclusions**

It appears additional wind farm development in the Pacific Northwest (PNW) is gaining momentum and is a foregone conclusion in the minds of many legislators, members of the general public and even some utilities. Benton PUD believes it is reasonable to question whether continuing to favor investments in intermittent wind power and putting up roadblocks to the development of dispatchable natural-gas power plants is more about environmental virtue signaling than it is about serving the best interests of the citizens of Washington State.

There is no denying the fact that thanks to abundant PNW hydro energy, Washington State has historically been one of the lowest contributors to electricity sector greenhouse gas (GHG) emissions in the United States and that electricity sector contributions to total statewide GHG emissions have been only 16 to 19%<sup>10</sup>, even with coal plants in the mix. Put another way, what urgent “dirty energy” problem are we attempting to solve through the aggressive timelines and technology restrictions of the Clean Energy Transformation Act (CETA) that is worth sacrificing vast amounts of our natural landscapes and risking blackouts that jeopardize the health, safety and wellbeing of northwest electricity customers?

While language exists within CETA requiring future reporting to the governor’s office to address concerns with power grid reliability, it appears legislators do not believe the risk of blackouts is real. If they did, they would accept the results of already existing utility studies and immediately begin to work on modifications to CETA to remove disincentives for the development of dispatchable natural gas plants needed for replacing retiring coal-plant capacity. So, at this point, investor owned utilities are announcing plans for new wind power projects to meet CETA deadlines, and along with all northwest utilities, are hoping the efforts of the Northwest Power Pool (NWPP) to develop power-generation resource adequacy standards can be completed and implemented in time to avoid blackouts<sup>11</sup>.

Benton PUD strongly supports the efforts of the NWPP, but we do not support further development of wind power in the PNW. We believe continued investments in large-scale wind farm development in the PNW will: (1) contribute very little to keeping the regional power grid

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<sup>10</sup> Department of Ecology State of Washington, “*Washington State Greenhouse Gas Emissions Inventory: 1990-2015 Report to the Legislature*,” December 2018, Publication 18-02-043, Pg. 6, Table 2.

<sup>11</sup> Northwest Power Pool Resource Adequacy: <https://www.nwpp.org/about/workgroups/12>

## ***Wind Power and Clean Energy Policy Perspectives***

reliable and will not help Benton PUD solve our seasonal energy deficit problems; (2) contribute to the devaluation of hydro-generation assets and put upward pressure on retail rates Benton PUD and other utilities charge our customers; (3) risk underinvestment in needed dispatchable capacity today and future investments in visionary advancements in nuclear energy technology; (4) further sacrifice scenic hillsides, canyons and desert vistas in our region for little if any net environmental benefit.

**From:** [Tony L. Waldo](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Wind Turbines  
**Date:** Friday, March 26, 2021 2:50:16 PM

Public Comment #0216  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am against wind farms until a thorough investigation is made.

Benton county in WA state is considering the installation of wind turbines for a power source. I feel strongly that this should be looked into by all parties. Here is why. In the 1990's I was driving back to WA from Los Angeles. I'm not sure where in CA that I saw dozens and dozens of abandoned windmills and in an ugly state of disrepair. Our economy had tanked and they had simply been abandoned. Here is what we need to ask of our government.

Who is going to take care of them if our economy tanks.

As a side question what happens to existing turbines and blades? I have recently read that they salvage what they can but the rest goes to landfill. Especially so for the blades. Also who builds them and who installs them?

Again there are many unanswered questions that first need answering.

**From:** [Owens, Joan \(UTC\)](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Comment received as voicemail on the EFSEC main line  
**Date:** Friday, March 26, 2021 3:01:18 PM

Public Comment #0217  
Horse Heaven Wind Farm  
Docket #210011

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Dennis Sinlake is against the project.

Thanks,

*~Joan Owens*

## Energy Facility Site Evaluation Council

Secretary Supervisor

Email: [joan.owens@utc.wa.gov](mailto:joan.owens@utc.wa.gov)

Phone number: (360) 664-1920

EFSEC Email: [efsec@utc.wa.gov](mailto: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](http://www.efsec.wa.gov)

**From:** [Owens, Joan \(UTC\)](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Comment received as voicemail on the EFSEC main line  
**Date:** Friday, March 26, 2021 3:02:08 PM

Public Comment #0218  
Horse Heaven Wind Farm  
Docket #210011

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Marcy Landers lives in Richland/ Tri-Cities. She does not approve of Scout/Horse Heaven, doesn't think it will help WA and will hurt property values, believes people in the eastern WA area don't want that. Hopes that Governor Inslee will take that into consideration to bring more peace between Eastern WA and Inslee.

Thanks,

*~Joan Owens*

### Energy Facility Site Evaluation Council

Secretary Supervisor

Email: [joan.owens@utc.wa.gov](mailto:joan.owens@utc.wa.gov)

Phone number: (360) 664-1920

EFSEC Email: [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov)

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Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172

Mailstop/P.O. Box: 43172

[www.efsec.wa.gov](http://www.efsec.wa.gov)

**From:** [Marleen Lechelt](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Fwd: Comments on Horse Heaven Windmill project  
**Date:** Friday, March 26, 2021 3:46:46 PM

Public Comment #0219  
Horse Heaven Wind Farm  
Docket #210011

External Email

From Randy and Marleen Lechelt  
34203 S Cantera St  
Kennewick, wa 99338

Sent from my iPhone

Begin forwarded message:

**From:** Marleen Lechelt <jtcj@me.com>  
**Date:** March 15, 2021 at 11:46:21 PM PDT  
**To:** >EFSEC Committee  
**Subject:** Fwd: Comments on Horse Heaven Windmill project

Comments



**From:** [Marleen Lechelt](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Fwd: Comments on Horse Heaven Windmill project  
**Date:** Friday, March 26, 2021 3:51:13 PM

Public Comment #0220  
Horse Heaven Wind Farm  
Docket #210011

External Email

From Randy & Marleen Lechelt  
35203 S Cantera St  
Kennewick, Wa. 99338

Sent from my iPhone

Begin forwarded message:

**From:** Marleen Lechelt <jtcj@me.com>  
**Date:** March 15, 2021 at 11:44:01 PM PDT  
**To:** commissioners@co.benton.wa.us. And EFSEC  
**Subject:** Comments on Horse Heaven Windmill project

We respectfully oppose the Horse Heaven Windmill project for the following reasons:

1. This large windmill farm with 500 to 600ft. + tall windmills is unprecedented in Benton County , there is no simulation that can give the surrounding residents a realistic idea of how tall these units are and how devastating the effects of these windmills will be, and on top of this add a wall of blinking red lights , it's unimaginable.

2 Scout Energy has chosen to bypass the Benton County Conditional Use Permit process which is designed to protect business and homeowners property values. While applying to the EFSEC Is legal, it is our opinion that it disenfranchises the residents of this community. We are listing the 5 conditions Benton County requires for this permit and our answers . Will EFSEC require the same conditions?

3. Under Benton County code ( see bcc 11:50:040 ) Scout Energy would be required

To apply for a Conditional Use Permit , this process allows the Hearings Examiner to review the location and design of certain proposed uses including the potential impacts on the surrounding area.

(D) A conditional use permit shall be granted ONLY if the Hearings Examiner can make findings of fact based on the evidence presented sufficient to allow the Hearings Examiner to conclude that as conditioned, the proposed use:

1. Is compatible with other uses in the surrounding area. ( our answer to this is no, a sea of 500 to 600 ft windmills planted every 1 1/2 acres with a wall of blinking

red lights at night with loud whooshing like sounds would be incompatible to any neighborhood.

2. Will not materially endanger the health, safety, and welfare of the surrounding community to an extent greater than that associated with any other permitted uses in the applicable zoning district. ( our answer to this is yes, it will endanger our health and welfare , as the noise of the windmills and blinking lights so close to our resident will cause sleepless nights and mental anguish.)

3. Would not cause the pedestrian and vehicular traffic associated with the use to conflict with existing and anticipated traffic in the neighborhood. ( our answer is yes, the construction of these windmills will require an unimaginable amount of cement for the bases which will result in hundreds of cement trucks traveling on clodfelter where we have bicyclers, school busses, and residential traffic. )

4. —

5. Would not hinder or discourage the development of permitted uses or neighboring properties in the applicable zoning district as a result of the location, size or HEIGHT

of the buildings, structures, walls or required fences or surrounding vegetation to a greater extent than other permitted uses. In the applicable zoning district. ( our answer is yes, all surrounding properties in our neighborhood would lose value, be hard to sell, and discourage any new residential building and growth. The Height of these windmills are so overpowering, the blinking lights at night, no one would want to live in our residential community. )

In closing, how can we allow a large corporation like Scout Energy who will receive millions in energy credits to come in our community and ruin our property values, ridge views, birds and serenity of life , just so they can make a big profit ?

Sent from my iPad

**From:** [Jim Conca](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Comment on the proposed Horse Heaven Wind Project  
**Date:** Friday, March 26, 2021 4:52:07 PM

Public Comment #0221  
Horse Heaven Wind Farm  
Docket #210011

### External Email

Dear EFSEC,

I would like to comment on the proposed Horse Heaven Wind Project here in Richland, Washington.

### Wind Turbines On The Horse Heaven Hills – How Not To Pursue A Green New Deal

A company out of Boulder, Colorado called [Scout Clean Energy](#) has applied for a permit to build a massive turbine [wind farm](#) in Washington State on the Horse Heaven Hills, extending from the town of Benton City, through the Tri-Cities, to the town of Finley. The wind farm will have upwards of 250 turbines that are 500 feet tall and cover about 6,500 acres (over 10 square miles).

But 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.

There is a growing [opposition to this project in the region](#), just for these reasons.

Interestingly, Scout Clean Energy has applied for [Site Certification](#) by going straight to the State authorities, circumventing the county government, knowing that the [locals do not want this](#) project and hoping that the state's goal of 100% non-fossil fuel by 2045 will push this through against them.

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

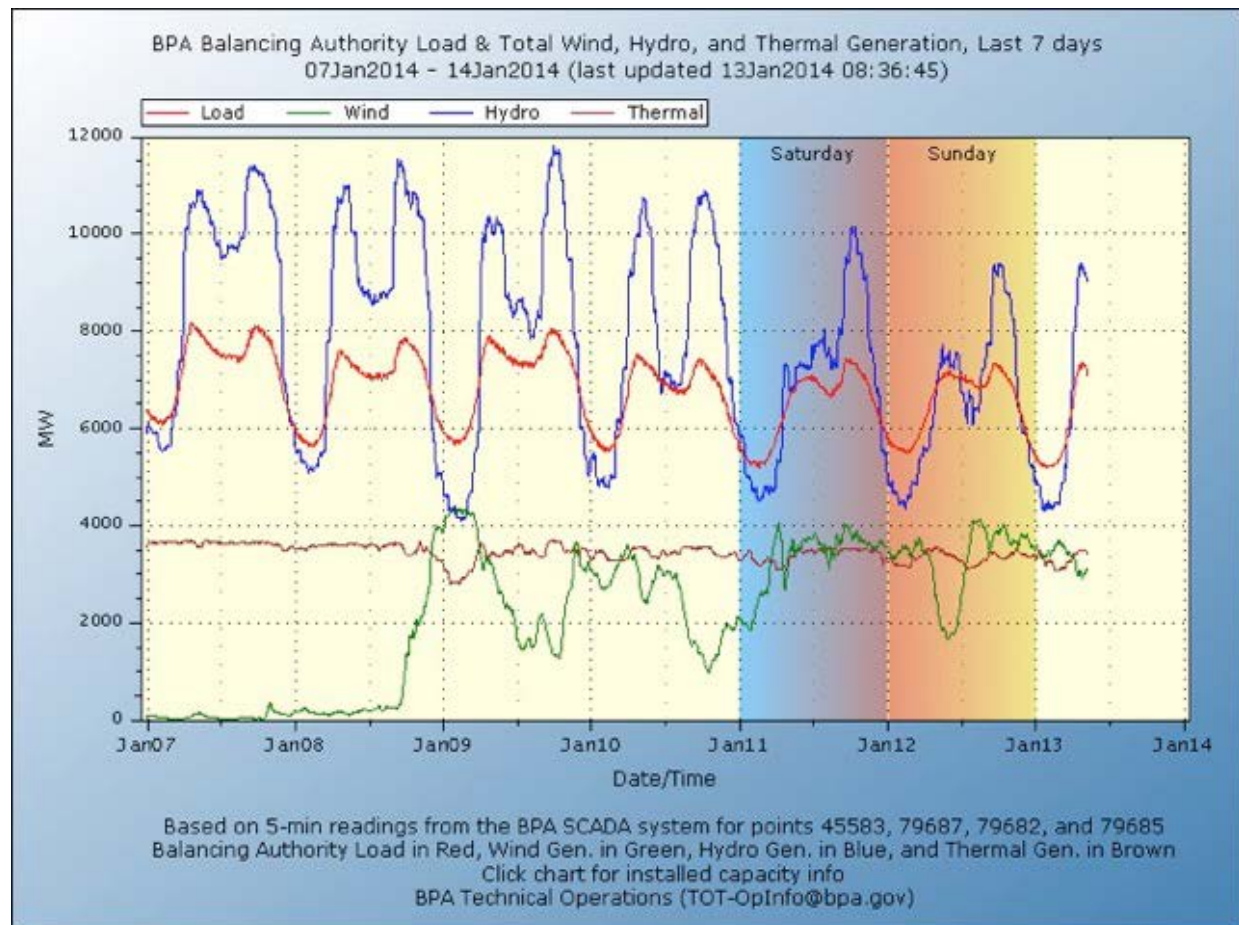
retired in 2025.

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 (figure below). 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.



I have a longer version of this published in [Forbes.com](#) where I am a Science Contributor on energy issues.

## **Wind Turbines On Washington's Horse Heaven Hills – How Not To Pursue A Green New Deal**

A company out of Boulder, CO called Scout Clean Energy has applied for a permit to build a massive turbine wind farm in Washington State on the Horse Heaven Hills, circumventing the local government. But they're building it in the wrong state for the wrong reasons and the people of this area are not happy about it.

<https://www.forbes.com/sites/jamesconca/2021/03/08/wind-turbines-on-washingtons-horse-heaven-hills--how-not-to-pursue-a-green-new-deal/>

I appreciate all your efforts and hope you hear from many residents in Benton County.

Sincerely,

Jim

Dr. James Conca, Trustee  
Herbert M. Parker Foundation  
2801 Appaloosa Way  
Richland, WA 99352  
509-205-7541  
[jim@ufaventures.com](mailto:jim@ufaventures.com)  
Forbes.com Science Contributor  
<http://www.forbes.com/sites/jamesconca/>

**From:** [Donna White](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Friday, March 26, 2021 5:38:00 PM

Public Comment #0222  
Horse Heaven Wind Farm  
Docket #210011

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External Email

This wind farm doesn't belong in the Tri-Cities! It only benefits the out of state owners. For residents it will create an eyesore. I ask Governor Inslee to say no to this project.

**From:** [sangwon shin](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** HHH Wind Project Opposition  
**Date:** Friday, March 26, 2021 7:15:34 PM

Public Comment #0223  
Horse Heaven Wind Farm  
Docket #210011

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External Email

To whom it may concern in the EFSEC Committee:

Greetings,

Our family of second-generation immigrants moved from Seattle last year to live in a beautiful, serene, prime wine country and agricultural valuable land with mountainous territorial views. Also, there are tourists that come from all over the world to enjoy this area for those exact reasons.

We live in Tripple Vista which has a natural paramount view of the skyline with extinct migratory birds flying every season with wheat growing fields all around the terrain hills.

But with the projected HHH Wind Farm Project of Scout Clean Energy's plan to install enormous 500-foot wind turbines on our gorgeous views of the Horse Heaven Hills to the south of us will destroy all the skyline territorial hill ridges and also kill various extinct migratory birds that live around here and also birds that fly over every season. Considering environmental and property devaluation is a great concern to our family, when we invested so much of our finances and physical hardships to move here.

When we lived overseas, we didn't have these vast and natural beautiful territorial views and agricultural land values like we see here. This state of Washington and in America in general, we don't have that in other parts of the world. There is no other nation that equals what American land and soil produces, not one. Sometimes we have to live in other parts of the world to truly see what a blessed land we have and not destroy it further.

For these few reasons and many other reasons, too many to name here, our family is unanimously OPPOSED to this HHH Wind Farm with Scout Clean Energy's plan to destroy the natural beauty of the last frontier of Northeast Washington.

Please consider to preserve the natural beauty of this area of Horse Heaven Hills and for the future sake of the next generation of children who will come after us and to preserve the legacy of this beautiful and great state of Washington in the United States of America.

Thank you!

Sincerely,  
Youngki & Sangwon Chung

104305 Tripple Vista Dr  
Kennewick, WA 99338



**From:** [Mark Tudor](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm.  
**Date:** Friday, March 26, 2021 8:19:34 PM

Public Comment #0224  
Horse Heaven Wind Farm  
Docket #210011

---

External Email

Dear EFSCE Committee,

I am a resident of Richland Washington and also a Apple an Wine grape grower. I am totally against placing a wind farm on the proposed Horse Heaven Hills site.

The unsightly machines will have a negative effect on our tourism industry, our native birds, and long term they will become a ecological problem when it comes to disposing of the blades, removing the obsolete towers and concrete pads. There are abandoned wind farms back east that have become an issue for the local areas adjacent to these farms.

The out of state company that is proposing this project has no vested interest in the local area. The power generated is schedule to be sold out of our local area.

In closing it is my hopes that the committee will really listen to the concerns of the local people that live here as there is a lot of opposition by Tri-City residents.

Thank you for your attention  
Mark Tudor

Sent from my iPad

**From:** [Adam Miller](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Haven Wind Farm  
**Date:** Friday, March 26, 2021 9:43:59 PM

Public Comment #0225  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am strongly opposed to these windmills. They will negatively affect our community with very little to any positive gain. Benton PUD's report on why these are not in our best interest says it better than I could. There is also a Forbes article about how this is a prime example of how to NOT do green energy. Thanks.

Adam Miller

**From:** [Mark Morton](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** NOT ONLY NO - Horse Heaven Hills Wind project  
**Date:** Friday, March 26, 2021 10:19:56 PM

Public Comment #0226  
Horse Heaven Wind Farm  
Docket #210011

### External Email

While there are a few minor positive impacts to this project, the negative visual impacts far outweigh any positives for our local area. WA and eastern WA have some of the lowest energy costs in the country and additional energy is not needed locally - where ALL of the negative impacts are concentrated.

Put me firmly in the "WE DON'T NEED OR WANT THIS PROJECT" camp and having the west side politicians ram it down our throats is not the way to ingratiate anyone on the east side to the project or any government sponsored green energy projects.

Mark Morton  
3262 Mt Adams View Dr  
West Richland, WA

**From:** [artisticportraits@charter.net](mailto:artisticportraits@charter.net)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Project  
**Date:** Saturday, March 27, 2021 11:26:13 AM

Public Comment #0227  
Horse Heaven Wind Farm  
Docket #210011

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### External Email

I would like to state that I am fully against this project for many reasons.

Firstly, the wind turbines are not environmentally friendly. They have approximately a 20-25 year life and when decommissioned or need complete overhauls they are not biodegradable .  
The blades alone must be buried somewhere and will not break down over time.

Secondly, the components are made from non-environmental alloys. Lithium is a horrible product and most comes from strip mining in China. Cobalt is mined in the Congo of Africa and they utilize a lot of child labor. Steel is horrible for the environment do to how it's manufactured.

Thirdly, the subsidies that are spent to even have a place for them to go are ridiculously high costs to the taxpayers of America.

Fourth, they do create some high paying jobs but only for a short time during construction and setup. The amount of concrete necessary to hold them up is also a long term issue for the environment.

Fifth, Economic impact of the travel industry to wine country and small local businesses. How many of these wind farms are in the CA wine country? Or the OR wine country?

Lastly, they destroy the views of the natural landscape.. How many of these are in the Cascades or Olympic Forest? Just imagine that is the legacy you choose for the children of WA and the tourists.

I strongly encourage you to look at working towards building more Nuclear Energy as it is truly the most efficient and environmentally friend energy source in the world!

Sincerely, Robert Di Piazza Concerned Citizen of Kennewick for 26 years. Also, 26 year owner of a small business in Kennewick.

3416 S, Huntington Loop  
Kennewick, WA 99337

**From:** [Arleen Miller](#)  
**To:** [EFSEC \(UTC\)](#)  
**Date:** Saturday, March 27, 2021 11:27:51 AM

Public Comment #0228  
Horse Heaven Wind Farm  
Docket #210011

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External Email

windmill farms

--I have a question. What is their purpose and who is benefitting from the power the windmills generate? I don't see my power bill going down, only up.

**Arleen Miller**

**From:** [jon.crawford](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Saturday, March 27, 2021 12:13:37 PM

Public comment #0229  
Horse Heaven Wind Farm  
Docket #210011

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External Email

As a resident of the Greater Tri-Cities area I would like to express my adamant opposition to the proposed Horse Heaven Hills Wind Farm. Scout Clean Energy has taken the underhanded route of bypassing local consideration and approval for a state forum where the climate is much more likely for approval given the present political climate where if something is sold as "green energy" it is okay even if it is not truly green. The decision should be in the hands of those who will be involved and directly affected.

Take a drive down the classified "Wild and Scenic" Columbia River Gorge and see the blight the turbines are that have been allowed to destroy its beauty. There are numerous economic, environmental and moral negatives that are present in opposition to this project which are too lengthy to fit in this format.

The bottom line is Scout Clean Energy is looking for a big payday at the expense of those of us who live here. Once this is started there is no turning back. It does not make esthetic, monetary or environmental sense for our region. The only sense it makes is to fill Scout Clean Energy's pocket.

The negatives far outweigh the positives!

Dr. Jon Crawford

**From:** [Barry Bush](#)  
**To:** [Legislative Affairs \(DFW\)](#)  
**Cc:** [Director \(DFW\)](#); [Public Affairs \(DFW\)](#); [EFSEC \(UTC\)](#)  
**Subject:** Ferruginous Hawk In Columbia Basin  
**Date:** Saturday, March 27, 2021 2:20:16 PM  
**Attachments:** [image002.png](#)  
[fs\\_fhawk\\_safe\\_updated\\_may2017 \(2\).pdf](#)

Public comment #0230  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Dear sir,

Scout Clean Energy is proposing a massive wind farm that appears to be in the middle of the Ferruginous Hawk habitat. This project is due to go in front of the EFSEC committee on March 30, 2021. I believe his project will be detrimental to the SAFE initiative. I believe that the population of the Ferruginous Hawk will decline if 244 wind turbines that are as tall as 671' tall are installed South of Kennewick in the Horse Heaven Hills. The proposed project also includes miles of solar panels that will also be detrimental to the Ferruginous Hawk population.

The Ferruginous Hawk: It appears that its status is about to be changed from threatened to endangered.

<https://www.columbian.com/news/2021/feb/07/washington-department-of-fish-and-wildlife-recommends-endangered-status-for-ferruginous-hawk/>

[https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/State-Offices/Washington/programs/fs\\_fhawk\\_safe\\_updated\\_may2017.pdf](https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/State-Offices/Washington/programs/fs_fhawk_safe_updated_may2017.pdf)

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

[www.gofundme.com/f/save-our-horse-heaven-hills](http://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.gopetition.com/petitions/just-say-no-to-the-horse-heaven-wind-farm.html>

<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?**





### Washington Fact Sheet

# State Acres for Wildlife Enhancement (SAFE) Washington Ferruginous Hawk

Updated May 2017

## Overview

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.



## Ferruginous Hawk Project SAFE Area

## Benefits

Landowners will benefit from reliable annual income. SAFE provides a way to enroll land in CRP on a non-competitive basis. Removing difficult to farm or low productive areas can increase the average profit on remaining cropland. Landowners familiar with CRP will find many similarities. Because SAFE is a CRP initiative, contracts will look familiar. The main difference is the program has more cost-share dollars, a signing incentive for land not previously in CRP and an option for a longer contract. Also, SAFE permits a 2-stage planting scenario to allow for chemical broadleaf control the first growing season. Landowners may also just enjoy increased wildlife on acres enrolled in SAFE.

(continued on next page)

SAFE will increase the amount of foraging and nesting habitat available for ferruginous hawks. Also, it will help provide habitat for numerous other wildlife species. Ferruginous hawks feed on small mammals, such as cottontail rabbits and ground squirrels, which will benefit from additional habitat. SAFE acres will provide important nesting and brood-rearing habitat for at-risk species, such as migratory songbirds. Also, new habitat will benefit game species, such as ring-necked pheasant and mule deer.

## Goals

The goal of the Ferruginous Hawk SAFE is to enhance foraging habitat and buffers around ferruginous hawk nests in Adams, Benton, Franklin and Walla Walla counties of eastern Washington by:

- establishing shrubs, grasses and broadleaf forbs on cropland to provide quality habitat
- buffering and expanding upon remnant native shrub-steppe and grassland habitat near ferruginous hawk nests.

## Eligible Areas and Land Eligibility Requirements

The project area includes portions of Adams, Benton, Franklin and Walla Walla counties in eastern Washington. Eligible land must:

1. Have been planted or considered planted to an agricultural commodity, including CRP or rotational crops, during 4 of the 6 crop years from 2008-2013; **and**
2. Be within the designated project boundaries (see map). To find out if your operation is located within the project area, contact your Farm Service Agency office in Adams, Benton, Franklin, or Walla Walla counties.

## Approved Conservation Practices

The following conservation practices may be eligible for land enrolled into the Ferruginous Hawk SAFE:

1. CP38E Grass
  - Minimum 7 total species: 3 grasses, 3 forbs (1 may be introduced), and big sagebrush (by seed).
2. CP38A Buffers
  - Forested riparian buffers typically 50-180 feet wide on cropland or pastureland bordering perennial or seasonal streams that will support trees and shrubs.

## Sign-up and Payments

SAFE enrollment is on a continuous basis starting May 13, 2013. Landowners can sign up at their local FSA office in Adams, Benton, Franklin and Walla Walla counties for 10- to 15-year SAFE CRP contracts. Enrollment is approved on a first-come, first-served basis. FSA will stop approving contracts when the acreage cap of 20,000 acres is reached.

Hawk SAFE participants are eligible for four types of USDA payments:

- Signing Incentive Payment – a one-time payment of \$75 per acre for land not previously enrolled in CRP
- Practice Incentive Payment – equal to about 40 percent of establishment costs
- Cost-share assistance – 50 percent of establishment costs (same as traditional CRP)
- Annual rental payment – same as traditional CRP.

(continued on next page)

## **Payment Limitation**

Annual rental payments, including the incentives, are subject to a payment limitation of \$50,000 per person, per year. The limit applies collectively to all CRP contracts the producer has throughout the U.S. There is no limit on the cost-share payments.

## **Contract Requirements**

Participants entering into a SAFE contract are required to have in place, or plant, specific seed mixes for wildlife food and cover that are similar to those required for traditional CRP. Weed control is required on SAFE acreage just like with traditional CRP. A list of seed mixes is available from the Natural Resources Conservation Service (NRCS) or Washington Department of Fish and Wildlife (WDFW).

A 2-stage planting scenario to allow for chemical broadleaf control the first growing season is an option for SAFE seedings. Grasses may be planted the first year and forbs the second year. Native vegetation may take several growing seasons to fully establish. The potential of invasion by non-native weedy species makes staged plantings much more successful. A planting and maintenance schedule will be developed as part of a conservation plan with NRCS.

## **Access**

Hunting or other public access to land enrolled in the SAFE program will be at the landowner's discretion just like with traditional CRP.

## **Additional Information**

For more information about SAFE, contact your local USDA Service Center or Washington Department of Fish and Wildlife (WDFW) biologist.

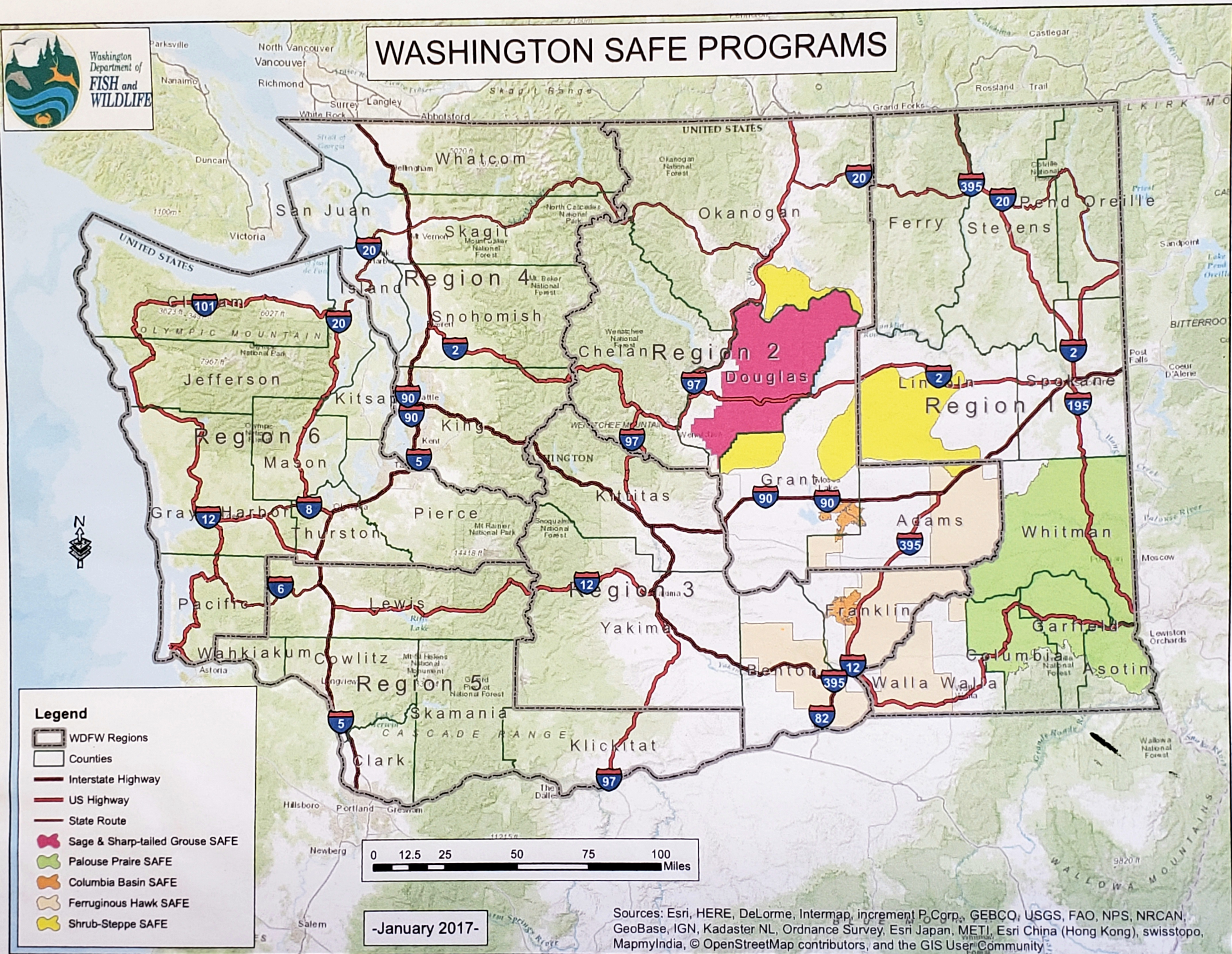
This fact sheet is a summary of the SAFE program and is not intended to cover all situations and program provisions.

USDA is an equal opportunity provider, employer, and lender.





# WASHINGTON SAFE PROGRAMS



Sources: Esri, HERE, DeLorme, Intermap, increment P. Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



**From:** [Jeannie Frieauf](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Proposed Horse Heaven Hills Wind Farm Comment  
**Date:** Saturday, March 27, 2021 3:46:55 PM

Public Comment #0231  
Horse Heaven Wind Farm  
Docket #210011

External Email

To whom it may concern,

I would like to comment on the proposed wind farm in the Horse Heaven Hills. I am opposed, as well as appalled, at this 'so-called' green energy project. I have lived in this beautiful community my whole life of 57 years. I love this land and have seen many changes and I believe this one is not for the good. I have to ask myself, "At what expense are they proposing to do this for the sake of employing people?" Do we, as stewards of this majestic land, realize the huge environmental footprint this project would leave? I believe there are far better ways to create energy and jobs with less expense to our world. I look at this proposed wind farm as a complete flop.

We must stand taller as a people united, taller than these proposed wind turbines, and not let a project of this catastrophic magnitude be implemented.

Thank you for serving in this capacity and for taking the time to read my letter. I know this is a big decision you have to make. I pray you make the right choice.

Sincerely,

Jeanette (Jeannie) A. Frieauf  
2528 Falconcrest Loop  
Richland, WA 99352

(509) 735-2227

**From:** [Gary Yager](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Saturday, March 27, 2021 4:06:41 PM

Public Comment #0232  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Hello:

We do not want our beautiful local scenery ruined by another ugly wind farm. Our local area will not benefit from an energy produced; it will all be sold to other states like California at very high rates and the only one profiting from this high energy rate is the company running the utility. Wind is not a predictable, dependable energy source, particularly in our area and the cost to remove this equipment will be very expensive, and likely will be abandoned in place, permanently scarring our local scenery. If California, or Seattle, need energy, build utilities in these areas and don't make us look at these ugly, distracting spectacles every day.

Sincerely,

G. Yager  
1216 Richmond Blvd.  
Richland, WA 99354

**From:** [R Birney](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Farm, LLC - AGAINST!  
**Date:** Saturday, March 27, 2021 5:04:00 PM

Public Comment #0232  
Horse Heaven Wind Farm  
Docket #210011

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External Email

The mere fact this LLC would not take the issue to the LOCAL voters indicates they know how well accepted this BAD idea would be.

The facts are the tax payers are already paying wind farm operators to NOT produce energy during times such as peak spring run off and we have NO methods of storing the energy such systems might produce on a very unpredictable and undependable manner. If it were not for tax breaks and political favoritism, there would be NO wind farms in the US as they are not sustainable. Not to mention the waste created by them, such as not being able to recycle the blades when they fail.

If the State wants these UGLY monstrosities, put them on the West side! Then that population can deal with the adverse effects and learn about noise, vibration, uncontrolled killing of wildlife, etc.

By now you should have caught on I am AGAINST these UNSUSTAINABLE pipe dreams. Let someone else be hampered with these albatrosses.

Robert Birney  
Richland, WA. 99352

From: [Chris Sloan](#)  
To: [EFSEC \(UTC\)](#)  
Subject: Horse Heaven Hills  
Date: Saturday, March 27, 2021 5:53:28 PM

Public Comment #0234  
Horse Heaven Wind Farm  
Docket #210011

External Email

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 create a permanent Mechanical Ugliness to the area and harm the environment with

construction, noise from wind machines I have been around a lot of them they are very noisy, blinking red lights not very attractive let alone the sight of them all over a hillside, harm to wildlife and birds, and limited mechanical lifetime of inefficient energy production requiring tax payer subsidies there is a reason California has abandoned them due to maintenance costs.

Respectfully,

Chris Sloan

Richland, WA

[Sent from Yahoo Mail on Android](#)



**From:** [Samuel Dechter](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Wind Turbine Farm Project near the Tri-City-Cities  
**Date:** Saturday, March 27, 2021 11:30:41 PM

Public Comment #0235  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Sir,

I am submitting my comments to you regarding the Scout Clean Energy proposed Wind Turbine Farm in the Horse Heaven Hills just south of the Tri-Cities.

I am opposed to the proposal for several reasons. The wind turbine farm is not needed for our area of Washington state since there is already an abundance of power produced by the hydroelectric dam facilities and the existing nuclear plant. This power is green energy and meets or exceeds all expectations for non-polluting power production. Wind turbines are very inefficient producers of power in that they cannot operate when there is no or low wind and when there are high winds. Wind turbine power generation is not cost effective and must be subsidized by the government to be profitable for the parent companies.

The wind turbines will be detrimental to wildlife, especially birds—a well-known consequence from existing wind turbine farms. This aspect of the wind turbines is of real concern since many species of birds have a migration flyway path right through the Tri-Cities and since the McNary Wildlife Refuge is so close.

The wind turbines will degrade our beautiful scenery in the Horse Heaven Hills and once it is gone, it will be gone forever. Scout Clean Energy does not care about our environment here in Washington. It is a Colorado-based company with no roots in Washington. Perhaps they can build their wind turbine farm in Colorado and ship their power to California from there instead of sacrificing Washington for their profits.

Local employment for construction will be short-lived at best and the size of the continuing maintenance workforce will be very small (only a handful of employees). Any promises of continuing good high-paying jobs are false promises.

From my point of view, the negatives far outweigh any positives the wind farm may offer. No doubt this is why the proposal is being submitted to a state agency not residing in eastern Washington instead of going directly to Benton County. We in Eastern Washington can see the overwhelming negatives and the lack of any benefit to be gained from constructing the wind turbine farm.

The proposal should either be sent to Benton County for resolution or should be denied.

Thank you very much for this opportunity to state my concerns.

Samuel J Dechter  
113 Bebb Ct  
Richland, WA 99352  
509-627-0950

**From:** [Steve Lorence](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Wind Project  
**Date:** Sunday, March 28, 2021 8:46:04 AM

Public Comment #0236  
Horse Heaven Wind Farm  
Docket #210011

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External Email

To EFSEC:

We are writing you to express our opinion that the developers of the Horse Heaven Wind project are attempting an end around the local county permitting process. Our opinion is that the developer needs to work with the local county and its citizens for the project.

Thanks for listening.

Steve and Janal Lorence  
2858 Crosswater Loop  
Richland, WA 99354

Sent from [Mail](#) for Windows 10

**From:** [Mike & Joanne Simmons](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heavens Hills Wind Farm  
**Date:** Sunday, March 28, 2021 9:01:23 AM

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Public Comment #0237  
Horse Heaven Wind Farm  
Docket #210011

External Email

This project is unwanted and unneeded as well as being a blatant end run around the residents of Eastern Washington. Please respect the rights and wishes of your constituents in this area by rejecting this project.

Michael and Joanne Simmons  
Richland

**From:** [Steve Gomez](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm - Please Reject !!!  
**Date:** Sunday, March 28, 2021 9:26:43 AM

Public Comment #0238  
Horse Heaven Wind Farm  
Docket #210011

External Email

Greetings: I am writing you to let you know of my strong objection to the establishment and installation of up to 244 wind turbines along the ridge lines of Horse Heaven Hills. Not only is this project unnecessary but we currently have sufficient energy in the Tri-Cities from Hydro Electric and Nuclear Power plants. I currently live in West Richland, Washington and each time I open my front door, I look out over Horse Heaven Hills and enjoy that view each and every time. I would hate to see that ridge line marred by the view of 244 wind turbines, which would be the last thing I would want to see. It's visual pollution of our beautiful landscape and an unnecessary inclusion of an inefficient energy source. One of the main reasons I moved to Washington from Mississippi was because of the beautiful mountains, hills, rivers and forests that Washington has and I would hate to see that ruined by installing wind turbine along that beautiful ridge line of Horse Heaven Hills. Numerous wineries thrive in that area and attract thousands of visitors every year along with the agriculture which thrive there as well. So please, I strongly encourage those in a position to approve or reject this project to deny any further consideration of installing a wind farm on our precious Horse Heaven Hills.

Thank You,

Steve Gomez

**From:** [Linda Redding](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Sunday, March 28, 2021 10:55:56 AM

---

Public Comment #0239  
Horse Heaven Wind Farm  
Docket #210011

External Email

I don't want these noise making, bird killing windmills above my home. Build them in your own backyard Scout!  
Stop this project Inslee.

**From:** [Don Rives](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm Project  
**Date:** Sunday, March 28, 2021 11:12:11 AM  
**Attachments:** [Energy Facility Site Evaluation Council Questions and Comments.docx](#)

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Public Comment #0240  
Horse Heaven Wind Farm  
Docket #210011

## External Email

Council Members,

Please submit this letter into public record during the hearing on March 31st 2021.

Thank you,

Don Rives

## Energy Facility Site Evaluation Council

Good afternoon Governor, Commissioners, Council Members, Legislative Members and fellow residents, my name is Don Rives and I have a few questions and some comments and suggestions regarding the Wind Farm proposal for the south Horse Heaven Hills.

- Where are the impact statements for this project so that they can be reviewed and analyzed?
- What is the current status of the existing farms in our area? Are they performing at maximum?
- What is the downtime for wind farms?
- What are the maintenance costs? How are those costs layered in this proposal? Who manages those costs?
- When a turbine fails, what is done with the turbine? Is it complete replacement or repair? If it is a repair who is managing the costs of repairs?
- If there is a replacement, who funds the deconstruction, transport and disposal of waste?
- Is there a recycling program for failed/replaced turbines?
- What is the amount of energy stored per farm? How is the energy stored? Who maintains the storage facility?
- What is the amount of energy used per farm?
- Who uses the energy? Is it locally used or is it allocated/sold to somewhere else?
- If it is sold/allocated elsewhere, how does that help our local area? Who benefits?
- What is the current Cost/Benefit analysis of the current farms?
- Has there been consultation with Energy Northwest and also Pacific Northwest Center of Excellence for Clean Energy to determine what is working in our area and what is not?

It is my opinion that until All of these questions are answered and answered with a significant pro to con ratio, I do not believe this is the project for our community. There needs to be public input for this is to become reality. I do not agree with nor accept the idea that only the WA State Energy Facility Site Evaluation Council and the Gov are the only ones to make a decision as to what happens in our area. This is an overreach of powers. If there is a need for such a project, it must be done with public input. I am sure there is a better way to use that land than for this project. We are also asking that there is an Environmental

Determination (SEPA) Checklist packet completed so that there is a complete understanding of the Project.

I would also like to propose that our priority for this be a focus on Storage and Usage locally, before planting anymore Turbines. We can still create jobs in the process by constructing Storage Facilities and Infrastructure for Power Distribution to the local Public Utility Districts. We would be able to enhance and build upon the current locally administered programs such as Pacific Northwest Center of Excellence for Clean Energy, which is a Community Technical College Program. Energy Northwest has relationships with the local colleges to help students with job placements after completing their degrees. These are the types of solutions that are wanted in this community. We want to improve and enhance the quality of life through education and job placement here locally. The proposed funding can also be used for Research and Development in Green Energy as well as the advancement in cutting edge technology and the Infrastructure that goes with it.

We already have Hydro, Nuclear, Wind, and Solar let's figure out a Power Distribution System that incorporates all that we are producing here locally and make that as efficient as possible instead of throwing more money at and destroying the landscape that we prefer to keep as native as possible. We all believe in the future advancement of our society, but we want it done with common sense and intelligent decision making on All those involved, including, and not limited to the resident stakeholders as well as local and State government. Our community is requesting to be included in the decisions that are made in our community.

Thank you for your time and consideration on this matter.

Signed:

Don Rives – Benton County resident

Bill Mager – Benton County resident

Marvin Miese – Benton County Resident



**From:** [cswakw@frontier.com](mailto:cswakw@frontier.com)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heavens Hills Windfarm  
**Date:** Sunday, March 28, 2021 11:22:07 AM  
**Attachments:** [EFSCE Comments on Hores Heaven Wind Farm.docx](#)

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Public Comment #0241  
Horse Heaven Wind Farm  
Docket #210011

### External Email

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

Chris Wright,  
West Richland, WA

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

March 28, 2021

Dear Council Members:

I strenuously oppose Scout Clean Energy's (Scout) proposed Horse Heaven Wind Farm. EFSEC should not approve Scout's Application for Site Certification (ASC) on the proposed windfarm.

At the March 30<sup>th</sup>, 2021 public meeting, and in the Tic City Herald, Scout stated that the reason they chose to use EFSEC for permitting was "the project was too complex for the local government to handle. This appears to be a lie. Benton County permitted the 9-Canyon windfarm in the early 200's with no issues, and the county currently works with a potato processing plant, an airport, a uranium reprocessing facility, a nuclear power plant, a hydroelectric dam and a nuclear waste site. In a March 28, 202 editorial Scout is now stating the reason behind going to EFSEC is "because they cannot get a fair hearing in Benton County". I believe Scout is going to EFSEC is to avoid input from the 285,000 residents of the Tri Cities, approximately 150,000 to 175,000 of whom will be visually impacted by the Project. Scout is making a despicable end run around the residents of the Tri Cities, and for that reason alone the ASC should be rejected.

On the project webpage in November, Scout listed the permanent jobs created by the windfarm as 8. Not 80 or 800 but 8. 23 miles of 500-foot towers visible to 175,000 people to create 8 jobs? This does not seem to be a fair trade for the people of Washington. I understand it's up to about ~50 jobs if they can get the solar farm to work.

Scout is vastly overstating the power production from the Wind Farm. The listed output of wind power is ~600 megawatts. However, the planning paperwork states the farm will only produce power 27% of the time. This makes it about a ~162-megawatt facility impacting nearly 7000 acres in direct line of sight to about 175,000 residents. The solar component seems somewhat dubious. At the last minute, in what appears to be an attempt to address the massive inefficiency of the project, Scout threw into this project "energy storage capacity" in the form of lithium batteries, and they added massive solar arrays. What the local experts are telling me, is that there is no current (or affordable) battery technology for batteries that could effectively store even a fraction of the total energy they say they can generate. Given the dismal efficiency of this project and the dubious technical basis for the solar and battery component, I suggest this project is more of a tax subsidy farm than a solar or wind farm.

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 which is costly. Is there truly a need for this project? Or is this an out of state (Colorado) power brokerage company and Louisiana land investor creating a business opportunity for themselves which may be needed where there are not hydroelectric dams, nuclear energy, solar energy and potential geothermal energy available.

Scouts Application discussed limited visitor impacts at places like Hover Park and Badger Mountain. What Scout does not address is that these areas are not where we get visitors. We get them at area wineries, golf courses, and along the Columbia River. All of which will have visual impacts from this project. The proposed project lies within the viewshed of West Richland and Tri-Cities residential neighborhoods and new real estate development communities, and Rattlesnake Mountain tribal vistas. The project is too big and too close to residential areas. It will hurt the wine industry and hurt tourism.

I worked for Washington Department of Natural Resources from 2012-2014 in the State Lands office. I worked on two windfarm projects, Nine Canyon and Wildhorse. From that experience I can guess that Scout is planning on selling pollution credits for this project to a coal fired power plant, probably in the four corners area, to allow that plant to continue to pollute. More smog in the Grand Canyon. In addition, Scout will not own the windfarm, neither will a power company. It will be owned by an LLC in Delaware. At the end of the project, Benton County will be left holding the bag for cleanup and disposal of and over 200 windmills 24 miles of land reclamation. The 732 blades from the windfarm, assuming no replacement, amount to 6,000,000 to 9,000,000 pounds of waste every 10 years that cannot be recycled and probably need to go to a hazardous waste facility. Scout will be long gone, leaving a 23-mile-long turd for Benton County to deal with.

Lastly, this project will fill the western horizons of Richland, West Richland, Kennewick, and Pasco with a sea of blinking anti collision lights every night for the next 30 years. Using Scouts estimates, the project will be visible to about 175,000 residents that get no benefit. Scout benefits, about 60 landowners who already get a lot of farm subsidies benefit, the rest of us get to look at this abortion of a project for the rest of our lives.

Given these issues, and the deliberate lack of local input into the project, the state should reject Scout's Application for Site Certification (ASC) on the proposed Horse Heaven Hills Windfarm.

Thanks for your consideration of this matter.

Chris Wright  
5502 Astoria Road  
West Richland, WA 99353  
509-531-7638

**From:** [Jim Redding](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Sunday, March 28, 2021 11:51:46 AM

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Public Comment #0242  
Horse Heaven Wind Farm  
Docket #210011

External Email

I don't want these noise making, bird killing and red light blinking wind mills right above my home.  
Scout, put these monstrosities in your own backyard!  
Inslee, do the right thing and stop this environmental tragedy.

**From:** [Tara Hansen](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Please STOP Horse Heaven Hills Wind Farm  
**Date:** Sunday, March 28, 2021 12:40:21 PM

Public Comment #0243  
Horse Heaven Wind Farm  
Docket #210011

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External Email

Please understand I am for clean energy, I support wind and solar and detest that we still need to use fossil fuels. I need you to understand how important Horse Heaven Hills are to this area. I have traveled across the US many times and I've never seen any other place like it. Literally, the only reason my husband and I live here right now is because we plan to build closer to the Hills because that is my happy place.

**From:** [Dan](#)  
**To:** [EFSEC \(UTC\)](#); [TCH](#); [KNDO](#) (DOHI); [newsroom@keprtv.com](mailto:newsroom@keprtv.com)  
**Cc:** [DOR Benton County Leg Authority](#); [Cynthia Jackson-de Leur](#); [Klicker, Mark](#); [Dozier, Perry](#); [Rude, Skyler](#); [Brad Klippert](#)  
**Subject:** Horse Heaven Wind Project  
**Date:** Sunday, March 28, 2021 1:18:57 PM

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### External Email

#### **As a union member, I'm writing to OPPOSE this project!**

Bypassing the local communities to develop this project is blatant evidence the developers have no interest in what the community desires, no matter what they (Horse Heaven Wind Farm, LLC) may assert in any publication! In seeking to bypass the local community, it leads me to wonder and ask why? If the developer was honest and sought to work with its neighbors, then there would have been no need to seek a go-around-them solution!

I'm not against turbines per se. What I am against is the path this developer has taken to hopefully ram this project through. I've tried to get straight answers as to how this will affect the power output and loads from our current sources IF this project is allowed to proceed. But no luck so far and it's certainly NOT AVAILABLE on or by the information the developer is distributing! Why is that? Variable winds change power output so our current suppliers have to ramp up or down on an increased basis? Yes? No? How does that affect those sources financially? What types of issues does this force onto them? What about the different times of the year when these turbines aren't of any value? As in no wind(s)? Who/whom is paying the subsidies these units are getting? If this project is indeed making money, then why does it need or deserve any subsidies?

It's a fact our area doesn't require this 'new green power' so it has to be sold somewhere. How does that affect the future rates for power from our "already green" power providers? When this excess power is sold, who/whom receives the money? I'd bet a dollar to a donut the local community isn't reaping 100% of the rewards. Yet the community is forced to unwillingly 'host' this boondoggle by individuals that don't live/work or play here?

How about locating this project in Boulder, Co. where the company is located? According to [noaa \(https://psl.noaa.gov/boulder/wind.html\)](https://psl.noaa.gov/boulder/wind.html) there's wind enough to power their turbines down there! They may not even require units as tall and blades as big so money saved. Don't forget, these blades aren't yet recyclable so less hazardous waste that's a boon to a green environment!

The temporary Union & non-union jobs pale to the long term economic/visual/development impacts this will impart onto the community.

I equate this endeavor as: The horrible neighbor that moved in, made everyone's life around them miserable for a few years while they were making money, then packed up in the middle of the night and left their mess for others to clean up.

I don't believe for a minute the developer is showing/addressing both sides of what the impacts will be and deliberately being misleading. The mere fact they're bypassing the locals and seeking outside

approval is indicative of them hiding some facts/issues they don't want the public to see. That alone is cause for the immediate termination of allowing this to proceed.

**Misleading information or the lack of information in my book is the same as lying and I won't tolerate it, nor should anyone that's reviewing or residing next to this project!**

Dan Deckert  
206 Alma  
Benton City, WA 99320  
509-588-8842/Home  
509-460-8991/Cell



**From:** [Chris wright](#)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Re: Horse Heavens Hills Windfarm  
**Date:** Sunday, March 28, 2021 2:39:12 PM

Public Comment #0245  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I'd also like to add a comment:

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

Chris Wright  
Sent from my iPhone

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

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

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



**From:** [Carl Holder](#)  
**To:** [EFSEC \(UTC\)](#)  
**Cc:** [Carl G Holder](#)  
**Subject:** OPPOSE Scout - EFSEC Docket No. EF-210011  
**Date:** Sunday, March 28, 2021 3:43:35 PM

Public Comment #0246  
Horse Heaven Wind Farm  
Docket #210011

### External Email

Energy Facility Site Evaluation Council

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

COMMENT via email: [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov)

**OPPOSE** – Scout Clean Energy – Horse Heaven Hills (SCOUT) project.

The Northwest and the West Coast face increasing vulnerability in RESOURCE ADEQUACY. (see NW Council, 7<sup>th</sup> Power Plan, Mid-term Assessment, 2019.) I am a proponent for the construction of FIRM or BASELOAD of electricity. I am very concerned that supply is inadequate. Many professionals agree.

SCOUT does NOTHING to alleviate the supply crisis probability. In fact, this HUGE WIND PROJECT can further destabilize the NW grid. RESOURCE ADEQUACY is not improved by SCOUT.

In the Mid-Term Assessment, the BPA is directed to “help mitigate generation over-supply conditions.” SCOUT will exacerbate “generation over-supply conditions.” <https://www.nwcouncil.org/reports/midterm-assessment-seventh-power-plan> p.14

In a recent RESOURCE ADEQUACY seminar, 35% was the number highlighted for 2025. The MAXIMUM supply RESOURCE ADEQUACY limit is 5% for planning. Coal fired power plants are being retired faster than planned. In very cold conditions, hydroelectric generation is constrained and wind is non-existent. (The recent Texas adequacy disaster is a harbinger of climate crisis intersecting with failed renewable resources.) In very hot summers, wind energy is variable, fish require dumping water, and low-flow years are possible.

Variable electricity is not needed, and SCOUT is not wanted.

New study: EU parliament members shows nuclear power to be the best CO2-reducing solution. Advocates for wind and solar electricity ignore integration costs reaching US 5 cents/kWh, even at low 30% penetration. <https://lnkd.in/evQBEXy>

Power Density: “Because wind and solar require so much land and air, they expand the impact of energy production, reversing recent global trends that allow us to use less land for food and energy production in order to leave more for nature. In addition, seasonal variation guarantees that a fossil fuel backbone will always be necessary, as the leading wind and solar countries in the world have long known and prepared for...”

<https://environmentalprogress.org/energy1>

### **OPPOSE SCOUT**

Carl Holder  
1503 Desert Springs Ave  
Richland WA 99352

**From:** [Steve Yerian](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Sunday, March 28, 2021 3:48:52 PM

Public Comment #0247  
Horse Heaven Wind Farm  
Docket #210011

External Email

Visual pollution is an aesthetic issue and refers to the impacts of pollution that impair one's ability to enjoy a pleasant view. Visual pollution disturbs the visual areas of people by creating harmful changes in the natural environment. Visual pollution is you can say anything unattractive or visualization damaging to nearby landscapes.

This type of pollution is an aesthetic issue and refers to impacts of pollution that impair one's ability to see or enjoy a natural view.

Protests are increasingly heard from many countries concerning visual pollution from tall wind turbine towers and it is indeed true that most modern megawatt-size models with tower heights of 50–70 meters certainly stand out in the landscape. "Scout Clean Energy" realizes they only have to win one battle to win this war declared on the Tri Cities. They only need to get the State of Washington's approval one time, and then once they start construction there is no way out for us, the residents of the Tri Cities.

I'm sure I echo a lot of citizens' thoughts when I say I'm more than a little concerned with the visual pollution this proposed windmill project will impose on the Tri Cities.

"Scout Clean Energy" - what a nice wholesome name; they will give us a relative few construction jobs on a short term basis - and we in turn, as residents of the Tri Cities will get up to 244 obnoxious wind turbines, which will stand 500 feet or more tall, and will dominate the landscape from Benton City to Finley. Keep in mind these windmills will be with us for decades if not generations. History shows in many similar cases if you own property near this spectacle, that property will be devalued and difficult to sell.

Raising awareness of the benefits of wind farms and increased public acceptance is half of the battle in getting projects like this approved; and folks "Scout Clean Energy" is trying to play us for a bunch of country

bumpkins. The Tri Cities will get literally nothing positive out of this.

If you think about the stench of a paper mill, or a meat processing plant, and what it does to your sense of smell; then think about what 244 bright white, 500 foot tall windmills will do for your eyes, 24 hours a day, 7 days a week, for the next 50 years, when you look towards what use to be the natural view of the Horse Heaven Hills.

I believe I speak for most Tri City residents when I say, We are all for sustainable energy; but put it where it belongs - about 250 miles west of here.

We don't want it, we don't need it, and we do not want to see it.

Sincerely,

D. Steve Yerian

19503 South Finley Road

Kennewick Washington 99337

**From:** [Jeff Schatz](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heavens Wind Farm Project  
**Date:** Sunday, March 28, 2021 4:02:51 PM

Public Comment #0248  
Horse Heaven Wind Farm  
Docket #210011

### External Email

I have been a resident of Benton County for the past 16 years. We recently bought 5 acres outside of Benton City, and invested all we had to build our dream/forever home here. We purposely bought this property and designed our home for the beautiful view of the Horse Heavens ridgeline. So on a personal note, this project will ruin the beautiful view we enjoy now, if in the future we have to look at the monstrous ugly wind towers and turbines during the daylight hours, and then also at night rather than just enjoying all the stars, we'll have the obnoxious blinking lights to view. The wide open views of the Horse Heavens ridgeline, and other ridges are some of the beautiful landscapes we have in this wide open country. Please don't let them destroy that for us. It would make this area a real eye sore, and take away much of the desire and reason to live here, in my opinion. Our property values can do nothing but drop if this goes through and the wind farm is built.

As I understand it, the energy created by this wind farm project would go to other parts of the country like; Seattle, Portland, California, etc., but not benefit us here locally. We have plenty of power here locally with our renewable energy hydro-electricity produced by our dams, and clean nuclear generated electricity from Energy Northwest. If this wind farm is built here the only things we'll get out of it is the ugly eye sore we have to look at every day & night, and higher energy prices in the end. I know for a fact that Scout Energy would never be allowed to build one of these in Boulder County where they reside. I lived in Boulder County 25 years, before moving here to eastern Washington. The environmentalist and people of Boulder County would never allow it. That's why they're here trying to push this through on us! If places like Seattle, Portland, Olympia, etc., want these wind farms so badly, then put them in their back yard or in the Gorge on the Columbia between OR & WA. There is plenty of wind available there too. The thing is that they don't want them there, because they're too ugly. Well we don't want them here either!

All the research I've done on wind farm power points to a real inefficiency in cost, verses production of energy. I've even talked to craft who have worked on building these wind farms, and even they say they can't possibly be worth what it costs to build and maintain them. The jobs created by this project would mainly be temporary and many of the trades will come from out of state for this. The local trades will not benefit much from this project, and those that do will be short lived. Also these taller towers would be placed in a migratory bird flyway, which will kill waterfowl, hawks and eagles, and many other birds. Contrary to some comments I have read, all the farmers who own land where the wind farms would go don't want them here either, despite the "easy money" either. Some of the farmers are also fighting this and getting strong armed to give in. This is all wrong. You know it's not good when they bypass the permitting process here in Benton County, and go around us to Olympia to try and get the OK without our input. This is as wrong as it gets. Olympia shouldn't be deciding what happens in our county. We don't decide what happens in theirs!

Please keep this wind farm project out of Benton County. It will have a very negative impact

on our area and overall economy in so many ways over the long run.

Sincerely,

Mathew J. Schatz  
51806 N Evert Rd  
Benton City, WA 99320  
509-554-0577

**From:** [jorose331@aol.com](mailto:jorose331@aol.com)  
**To:** [EFSEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Sunday, March 28, 2021 4:41:16 PM

Public Comment #0249  
Horse Heaven Wind Farm  
Docket #210011

External Email

My husband and I first visited the Tri-Cities in Nov. 2012, visiting some friends and escaping our cold and powerless home in NJ just after Superstorm Sandy. We were awed by the spectacular sunrises over the Columbia. We spent the week visiting wineries on Red Mountain and Walla Walla. The following spring we returned and while enjoying the sunrise, we thought, "We should retire here." In 2015, we bought a lot in Richland and began building our retirement home.

When asked why we chose Eastern WA. we highlighted the beautiful sweeping views, cheap, renewable energy, lower cost of living, a governor who believes in green energy...essentially, WA is everything NJ isn't. We made the move in Sept. 2019. Our daughter and her family followed us in June 2020.

We are supporters of renewable energy, including wind farms, when they make sense. Our concerns about the proposed Horse Heaven Hills Wind Farm are:

- If wind energy were not subsidized, would it make economical sense to build this farm? The subsidies are not forever.
- Will Scout be required to bear the cost of dismantling turbines that have reached the end of their operation and pay to have them disposed of properly, or will local and state tax revenue be required? If the latter, that should be considered in the cost assessment of the project.
- Are the financial benefits to WA Scout is proposing realistic?
- Are the 500ft and 600ft giant turbines necessary?
- Are 244 turbines necessary?
- If wind farms are an eye-sore on the west side, why are they acceptable here?
- Is the energy produced serving WA or being exported to other states? If it is exported, why aren't those other states building wind farms in their own state?
- Will the effects on bird migration be considered in the process?

Clearly this is not the EFSEC's first windfarm proposal and there is a clear process to evaluate these proposals. We respectfully request our concerns be considered in that evaluation process.

Thank you,

Joan and Evan Rosenberg

**From:** [Jim Gaston](#)  
**To:** [EESEC \(UTC\)](#)  
**Subject:** Horse Heaven Hills Wind Farm  
**Date:** Sunday, March 28, 2021 5:28:15 PM

Public Comment #0250  
Horse Heaven Wind Farm  
Docket #210011

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External Email

I am against the SCOUT project to develop a wind farm in the Horse Heaven Hills.

Jim Gaston

7 Lavender Ct

Pasco, WA 99301

Sent from [Mail](#) for Windows 10