



June 10, 2021

Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey, WA 98504-3172

RE: Horse Heaven Wind Farm Project, EFSEC Docket No. EF-210011

Submitted electronically to amy.moon@utc.wa.gov and
<https://comments.efsec.wa.gov/PublicComments/CommentForm/0637559988119946762>

To whom it may concern:

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Natural Resources provides these comments in response to the Request for Comments on Scope of Environmental Impact Statement for the Horse Heaven Wind Farm Project (Project). The CTUIR DNR anticipates working with the Department of Ecology (Ecology) through the duration of this project and this letter is intended to provide at least our initial thoughts regarding the initiation of this process.

The potential impacts of the project are enormous, spanning more than 113 square miles and visible over a much larger area. The CTUIR DNR expressed concerns in our April 9 letter which are now in the administrative record so I will not repeat them here, but will note that the Executive Summary of the Traditional Use Study (TUS) of the Horse Heaven Wind Farm Project, Benton County, Washington has been submitted and is also in the record. As noted in that document, the tribes that are now the CTUIR came to the area this project is proposed to “live, camp, gather traditional foods and medicinal plants, fish, hunt, trade, and graze horses, as well as impart traditional knowledge in the form of legend stories derived from the surrounding environment.” Rights reserved for the CTUIR in the Treaty of 1855, 12 Stat. 945, remain attached to lands that will be impacted by this project. We anticipate that the proposed project will have impacts on all these resources and request special emphasis be placed on the analysis on the impacts to:

- State and federally listed, plants and wildlife;
- Cultural food, medicinal and textile plants;
- Big game habitat
- Impacts, including visual and aural to historic properties of religious and cultural significance as identified in the National Historic Preservation Act;
- Impacts to other cultural and historical resources.

The summary of the TUS also contained proposed mitigation measures that the EIS should examine in the Environmental Impact Statement. Those measures included:

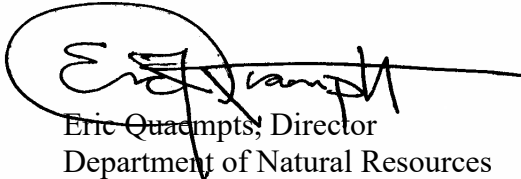
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- Creating access for tribal members to continue traditional practice of procuring First Foods in the project area and create protections for the natural resources located there.
- Due to loss of opportunities to pass on the teaching of legends in-situ in the project area and the resulting effect on the next generations, off-site mitigation could include education and outreach work to assist in the perpetuation of these stories by other means.
- Regarding the impacts to the viewshed, the CRPP supports the eventual removal of the wind farm infrastructure when it is no longer functional. An agreement with the Tribes could be reached in anticipation of a time when the wind farm would be considered for disassembly in future years, in order to remove defunct turbines and restore the landscape and viewshed after the life of the turbines or project as a whole has come to a close.
- Or other forms of mitigation based on the effects of the projects to cultural resources.

Finally, it is notable that at full build out nameplate capacity for this project would exceed the average annual output of the four lower snake dams. While the dams on the Snake River have a nameplate capacity of over 3,000 MW, their average annual output of the dams over the last 50 years is 1004 MW according to a 2016 fact sheet of the Bonneville Power Administration.¹

DNR will remain involved in the review of this project as it progresses and request all notices regarding developments be sent to Teara Farrow Ferman, DNR Cultural Resources Protection Program Manager at TearaFarrowFerman@ctuir.org and Audie Huber, DNR Intergovernmental Affairs Coordinator at AudieHuber@ctuir.org. Regarding the scheduling of meetings to discuss this project, Mr. Huber can be contacted at 541-429-7228.

Respectfully,


Eric Quadmpts, Director
Department of Natural Resources

¹ <https://www.bpa.gov/news/pubs/FactSheets/fs-201603-A-Northwest-energy-solution-Regional-power-benefits-of-the-lower-Snake-River-dams.pdf>