

January 31, 2023

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

Attention: Sonia Bumpus, EFSEC Manager

Subject: Horse Heaven Hills Wind Farm, LLC. – Scout Clean Energy, LLC.
Draft Environmental Impact Statement

We have reviewed the draft environmental impact statement (DEIS) and have the following comments regarding the project's impacts on the state highway system.

- The proposed project is in the vicinity of the following four highways entirely under the control and responsibility of the Washington State Department of Transportation (WSDOT). Interstate 82 (I-82), State Route 14 (SR 14), State Route 221 (SR 221), and State Route 397 (SR 397). WSDOT previously reviewed and commented on the proposed project in our letters to EFSEC dated, March 24 and June 9 of 2021. Access restrictions and requirements for each of these highways were outlined in those comments and remain valid.
- We are not opposed to the proposed project; however, we are concerned with the impacts project-generated traffic will have on the state highway system. Specifically, the construction related traffic, which the DEIS considers to be short in duration. As stated in the application for site certification (ASC) documents, construction of the proposed project is anticipated to last a minimum of two calendar years. WSDOT considers impacts with a duration of multiple years to be long-term and significant and must be mitigated.
- The traffic analysis included in the DEIS did not utilize actual traffic counts at affected intersections. Instead, the background level of service (LOS) calculations were derived from historical average annual daily traffic (AADT) volumes with trip distributions and turning movement assignments based on engineering judgement. It is our position that this method is insufficient in accurately establishing both the existing and forecasted LOS of the highway system.
- The DEIS states that all project deliveries are anticipated to originate from the south of the project area; however, SR 14, which serves as a critical link to SR 221 from I-82 to the east and U.S. Highway 97 to the west, was not included as a possible affected route. Similarly, State Route 22 and the I-82 Exit 82 interchange serve as major connections to the project area and region population centers. The scope of the affected transportation system must be revised to include the above routes.
- A review of the intersection crash history along state highways serving the project area shows the SR 221/Sellards Road intersection has experienced one fatal and two serious injury crashes within the last five years. WSDOT is unwilling to risk higher collision rates and serious injury or fatal crashes due to increased traffic volumes created by this project. A more comprehensive transportation safety analysis must be performed. The proponent will be required to implement mitigation for any locations with existing safety performance concerns that are anticipated to receive ten or more peak hour project trips (including, but not limited to, construction traffic and deliveries).

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- WSDOT identifies any proposal where project-generated traffic would degrade a highway's level of service (LOS) to below the established LOS threshold as having a probable significant adverse impact to the state highway system. In the project area, the LOS threshold for all highways is LOS C with the exception of SR 397, which is LOS D.
- Given the above, further analysis of the state highway system is warranted. The proponent is required to prepare a comprehensive traffic impact analysis (TIA), performed by a licensed traffic engineer to be included in the final environmental impact statement. The TIA must address the above concerns and conform with all current WSDOT [traffic analysis](#) and [safety analysis](#) guidelines. The report must analyze the project's impacts to safety and operation of all state highways impacted by this project, as well as recommend mitigation scenarios when WSDOT's threshold.
- All loads transported on WSDOT rights-of-way must be within the legal size and load limits or have a valid oversize and/or overweight permit, if allowed. The applicant is responsible for the safe transportation of materials and adherence to permit conditions. Further, WSDOT requests the proponent consult with the department when performing pre- and post-construction evaluations of the existing highway pavement conditions.
- The project includes two transmission line crossings of I-82. The proponent should be aware, utility crossing permits are required for each location. To coordinate this work and obtain the necessary permits, the proponent is required to contact the WSDOT South Central Region Utilities Engineer, Jamil Anabtawi. He can be reached at (509) 577-1785. No open cutting of the highways will be allowed.
- Surveying, geometric design, or any other activities or work proposed inside WSDOT rights-of-way are required to follow current WSDOT permitting, design documentation, and approval processes. In addition, any proposed modification(s) to I-82 must be reviewed and approved by the Federal Highway Administration (FHWA). In order to avoid any potential project delays, the proponent should coordinate any proposed mitigation or modifications to the state highway system with this office as early as possible and not underestimate the time and effort necessary to satisfy the above requirements. It is anticipated that the proponent will reimburse WSDOT for all direct and indirect-related costs incurred for the project.

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

Sincerely,



Paul Gonseth, P.E.
Region Planning Engineer

PG:jjp

cc: SR82, File #2021_004
Jamil Anabtawi, Region Utilities Engineer
Ahmer Nizam, HQ Environmental Services