

**From:** [Grantham, Andrea \(EFSEC\)](#)  
**To:** [Grantham, Andrea \(EFSEC\)](#)  
**Subject:** FW: Horse Heaven Hills Wind Turbine & Solar Project - DEIS Schedule  
**Date:** Monday, October 17, 2022 4:07:17 PM

---

**From:** Paul Krupin <[Paul@Presari.com](mailto:Paul@Presari.com)>  
**Sent:** Friday, October 14, 2022 9:04:48 AM  
**To:** Bumpus, Sonia (EFSEC) <[sonia.bumpus@efsec.wa.gov](mailto:sonia.bumpus@efsec.wa.gov)>  
**Subject:** Horse Heaven Hills Wind Turbine & Solar Project - DEIS Schedule

External Email

Sonia Bumpus, Director of EFSEC,  
[sonia.bumpus@efsec.wa.gov](mailto:sonia.bumpus@efsec.wa.gov)  
Tel 360-664-1363

I am writing to provide comments and to request that EFSEC re-schedule the release date for the draft Environmental Impact Statement (EIS) from late November 2022 to several weeks after the first of the new year in January, or even to mid to late March of 2023.

This will enable people to get past the holidays and focus adequate time and attention to the review of this immense proposed project, and intelligently and effectively engage the public in the discussion of the proposals.

I am recommending that the EFSEC extend the normal 30-day comment period to 45 days, and even to 60 days, for many important reasons:

- The project is huge. It extends about 25 miles from east to west and is up to 8 miles wide north to south. It encompasses nearly 115 square miles. It takes at least four hours to simply drive the project on a tour to even do a cursory look see of the lands that are affected by the proposals. Even then, only a limited amount of time is available for stops at the various key project locations to observe and grasp the significance of the locations and impacts of the project components. It takes several days to visit and survey the lands and resources in more detail with more time at the numerous locations.

- Three towns (Benton City, Kennewick, and Finley) and numerous sub-divided communities with tens of thousands of people in residence are within 1 to 4 miles of the proposed project boundary. Indeed, the number of homes, businesses, and people who live and work in the Tri-Cities who will be able to see the proposed wind turbines is significant. As of July 1, 2021, the U.S. Census Bureau estimates the population of the metropolitan area to be 308,293, making it the third-largest metropolitan area located entirely in Washington, after the Seattle metropolitan area and the Spokane metropolitan area. The members of these communities will need time to read, review, and digest the voluminous quantity of information in the draft EIS since they will be forced to look at the intrusive and long-lasting visual impacts of the decisions made in the draft EIS for many decades to come.
- The project documentation released so far indicates that the draft EIS review will be a formidable undertaking requiring many hours and involving numerous personnel of a wide range of disciplines. The project will result in significant biological, socioeconomic, physical and cultural impacts. Significant time will be needed to read, review, and digest the voluminous quantity of information in the draft EIS. The nature and magnitude of the diverse impacts are such that a broad spectrum of numerous technical, professional and community groups and associations will need to be notified, educated, and coordinated with in order to assure adequate and meaningful public engagement.

It is critical that a proper and comprehensive review be conducted to ensure that significant issues are not left out or that the advice and expertise of cooperating agencies are not ignored. The permit application documentation on the EFSEC website is voluminous and is not easy to use. Individual chapters and sections must be downloaded and printed in color in order to read, review and understand the specific technical and financial information and then conduct a reasonable and proper review and assessment of the project and the affected environments.

The locations, scope, magnitude and the nature and severity of the social, economic and environmental impacts of this project affects numerous interest

groups in the region and a coordinated public comment outreach will be needed in order to achieve adequate notice and engagement and to ensure informed decision-making. It is critically important that the public be adequately informed and that it is absolutely clear what the company is planning to actually do on the ground at specific locations or how they will limit environmental impact.

To this end I recommend and encourage the Washington State Energy Facility Siting Evaluation Council 1. Make improvements to the Internet website to make the posted documentation and graphical information easier to access, download and utilize; and 2. expedite the creation of social media profiles on Facebook and Twitter and then actively operate, integrate, maintain and improve the operations of those sites. These actions will ensure and maximize efficient communication and effective outreach of all pending council issues, events, engagement activities, and pending regulatory business to the public in real time.

Numerous federal and state agencies in the Pacific Northwest are doing an exemplary job using these social media technologies and integrating them with Internet web sites that houses and stores significant content and helpful resources. EFSEC and the public would greatly benefit from improving how it communicates and coordinates with the public if it were do so in a similar and complimentary manner.

For the reasons stated above, I highly recommend the following:

- Reschedule the release of the draft EIS to mid-to late January 2023 and maybe even to mid to late March 2023.
- Extend the public comment period of the draft EIS to 45 and even to 60 days due to the size and magnitude of the project and associated documentation.
- Schedule and conduct a series of public open house meetings in each of the directly impacted towns (Benton City, Kennewick and Finley). to brief the

public and allow them to receive information on the project and environmental impacts. These open house meeting should be scheduled early in the public comment period to allow people time to digest the information that they receive at the meetings.

- Create and operate social media sites on Facebook and Twitter to integrate with Internet resources to help inform, educate and coordinate with the public.

Additionally, please recognize and consider that even with this new schedule, taking road tours of the project area during the winter time will be problematic for many people due to snow and ice on the roads. Many of the roads are gravel and will require high clearance vehicles in order to access and see the lands where turbines are proposed. The onsite visits are important because people need see and understand the scope and magnitude of the project and the lands and resources that are being impacted. Only by getting out on the ground to see it with their own eyes will they be able to offer the best public comments.

Because of the immensity of the project and the difficulties in accessing the site during the winter, pushing the schedule for the release of the draft EIS out to March may be even better for all involved.

One last item for your consideration. Before you trigger the public review of the draft EIS, can you please verify that the company has identified sufficient sources of water for construction and dust abatement and control requirements. The local cities and irrigation districts have indicated that they cannot provide the company with the water it needs.

It would therefore be prudent to not release the draft EIS and cause a massive investment of time on the part of the public and all the local government agencies unless the company can confirm it has an adequate source and quantity of water needed to actually build the project.

Please feel free to contact me if you have any questions at all. I would

appreciate receiving an email reply letting me know you received this input.

Appreciatively,

Paul Krupin, BA MS JD  
2404 South Lyle St.  
Kennewick WA 99337

509-531-8390 cell 509-582-5174 landline [Paul@Presari.com](mailto:Paul@Presari.com)