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BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITING EVALUATION COUNCIL

In the Matter of the Application of:
Scout Clean Energy, LLC, for Horse Heaven
Wind Farm, LLC,
Applicant.

DOCKET NO. EF-210011
DIRECT TESTIMONY AND
ATTACHMENTS OF BRYNN GUTHRIE
ON BEHALF OF SCOUT CLEAN
ENERGY

**DIRECT TESTIMONY AND ATTACHMENTS OF BRYNN GUTHRIE
ON BEHALF OF
SCOUT CLEAN ENERGY
EXH-1000_T**

STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000, Portland, OR 97205
Main 503.224.3380 Fax 503.220.2480

JUNE 12, 2023

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I. INTRODUCTION AND QUALIFICATIONS:

Q. Please state your name, occupation, and business address.

A. My name is Brynn Guthrie. I am the Landscape Architect / Visual Resources Specialist. My business address is 1750 S Harbor Way Ste. 400 Portland OR 97201.

Q. What are your job duties and responsibilities in that role?

A. Managing visual resources tasks for state, federal and local permitting for renewable energy and other infrastructure projects across the U.S.; conducting visual resource assessments; identifying critical viewpoints for small to large energy developments, coordinating field photography, managing visualization staff and reviewing visualization work products.

Q. What is your educational and professional background?

A. A summary of my education and professional experience is included as Attachment A.

Q. When were you engaged in this matter?

A. I was first engaged in the Horse Heaven project around November 2021.

II. PURPOSE AND SUBJECT MATTER OF TESTIMONY:

Q. For whom are you testifying and what is the purpose of your testimony?

A. My testimony is offered on behalf of Scout Clean Energy. The purpose of my testimony is to provide additional explanation and support for the visual/aesthetic related sections of the Horse Heaven Wind Farm Application for Site Certification.

Q. Are you sponsoring any portions of the Application for Site Certification for the Horse Heaven Wind Farm? Please describe the sections of the application you contributed to.

A. Yes. I am sponsoring Section 4.2.3 concerning visual resources and effects.

///

1 Q. Are you sponsoring any appendices or other documents that are part of the
2 Application for Site Certification?

3 A. Yes. I am sponsoring Appendix Q including as revised in December 2022.

4 Q. Are you familiar with those portions of the identified sections and appendices of the
5 Application for Site Certification?

6 A. Yes.

7 Q. Did you prepare these portions of those sections and appendices of the Application
8 for Site Certification, or, if not, did you direct and/or supervise their preparation?

9 A. The initial sections and appendices, including visual simulations, were prepared by
10 other Tetra Tech staff before I joined the company in September 2021. Since that
11 time, in my role as the Visual Resources Lead for Tetra Tech, I have supported, led
12 and coordinated post-application materials prepared to assess visual effects. I am
13 familiar with the content of the Sections and Appendices indicated and find them to
14 be sound and sufficient.

15 Q. Is the information in these portions of those sections and appendices of the
16 Application for Site Certification within your area of authority and/or expertise?

17 A. Yes.

18 Q. Are the contents of these portions of those sections and appendices of the Application
19 for Site Certification either based upon your knowledge, or upon evidence, such as
20 studies and reports that reasonably prudent persons in your field are accustomed to
21 rely on in the conduct of their affairs?

22 A. Yes.

23 Q. To the best of your knowledge, are the contents and portions of those sections and
24 appendices of the Application for Site Certification true?

25 A. Yes.

26 ///

1 Q. Do you incorporate the facts and contents of these portions of those sections and
2 appendices of the Application for Site Certification as part of your testimony?

3 A. Yes.

4 Q. Are you able to answer questions under cross-examination regarding these portions of
5 those sections and appendices of the Application for Site Certification?

6 A. Yes.

7 Q. Do you sponsor the admission into evidence of these portions of those sections and
8 appendices of the Application for Site Certification?

9 A. Yes.

10 Q. Are there any modifications or clarifications to be made to these portions of those
11 portions of the Application for Site Certification that you are sponsoring?

12 A. None beyond the modifications and supplementation provided in the Updated ASC.
13 In support of the Updated ASC, I oversaw revisions to eight of the Visualizations
14 developed for the Original Appendix Q, which the Applicant voluntarily undertook to
15 represent the most impactful (worst case) visibility conditions, that is, low-haze, clear
16 sky conditions. In addition, I am currently overseeing the development of three new
17 Visualizations from additional viewpoints in response to a Request from EFSEC.

18 Q. How did you develop your contributions to those sections and appendices of the
19 Application for Site Certification?

20 A. I reviewed the materials relevant to the Visual and Aesthetic Analysis and found them
21 to be sound and sufficient. After reviewing the Visual/Aesthetics Section and
22 Appendix in detail, I provided ongoing support of the visual and aesthetics analysis
23 through the post-submittal process, including overseeing revisions to visualizations as
24 described above. I also conducted a site visit to critical view areas discussed in the
25 Visual Section.

26 ///

1 Q. On what resources, data or other references did you rely on in contributing to those
2 sections and appendices of the Application for Site Certification?

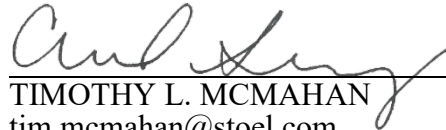
3 A. The methodology is described within Section 4.2.3.2. Key concepts from the Bureau
4 of Land Management’s (BLM) Visual Resource Management program for identifying
5 impacts to visual resources were applied. Specifically, key viewpoints were identified
6 based on an inventory of public resources from which the Project was anticipated to
7 be visible, and the visual contrast introduced by the Project compared to existing
8 conditions was evaluated. The level of visual contrast anticipated for each identified
9 viewpoint is measured and described in the Exhibit.

10 Q. On what topics in the Application for Site Certification are you prepared to testify
11 about?

12 A. Potential effects and impacts to visual resources.

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14 DATED: June 12, 2023.

STOEL RIVES LLP

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1 **CERTIFICATE OF FILING AND SERVICE**

2 I hereby certify that on June 12, 2023, I filed an original and one copy of the
3 foregoing **DIRECT TESTIMONY AND ATTACHMENTS OF BRYNN GUTHRIE ON**
4 **BEHALF OF SCOUT CLEAN ENERGY** with the Washington Energy Facility Site
5 Evaluation Council, through electronic filing via email to adjudication@efsec.wa.gov,
6 together with mailing via U.S. Postal Service, Return receipt requested, with postage prepaid
7 to the following address:

8 Energy Facility Site Evaluation Council
9 ATTN: Horse Heaven Adjudication
10 621 Woodland Square Loop SE
11 P.O. Box 43172
12 Olympia, WA 98504-3172

13 I hereby certify that I have this day served the foregoing document upon all parties
14 of record in this proceeding by first-class U.S. Mail (authorized method of service
15 pursuant to WAC 463-30-120(3)) at the addresses listed below (with a copy sent via email
16 where an email address is indicated).

17 ***Service List Attached***

18 DATED: June 12, 2023.

19 STOEL RIVES LLP

20 
21 _____
22 TIMOTHY L. MCMAHAN
23 tim.mcmahan@stoel.com
24 Telephone: (503) 224-3380
25 *Of Attorneys for Applicant*
26

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