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BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of the Application of:

Scout Clean Energy, LLC, for  
Horse Heaven Wind Farm, LLC,  
Applicant

Docket No. EF-210011

PREFILED REPLY TESTIMONY OF LEON  
GANUELAS

**PREFILED DIRECT TESTIMONY OF LEON GANUELAS**

Q Please state the purpose of your reply testimony.

A I am providing testimony as a reply to Troy Rahmig’s response/rebuttal testimony (“Rahmig’s Testimony”).

Q Mr. Rahmig claims that in Washington, renewable energy projects cannot overwhelm shrub-steppe habitat because over “80% of Washington’s native shrub-steppe habitat has been lost due to conversion to agricultural purposes and urban/exurban development.” Rahmig Testimony, pg. 2. Do you have a response to that?

A I agree with Mr. Rahmig that much of Washington’s native shrub-steppe habitat has already been lost. That is the reason the Washington Department of Fish and Wildlife (“WDFW”) designated shrub-steppe a Priority Habitat requiring special protection. Mr.

1 Rahmig’s attempt to minimize the Horse Heaven Hills Wind and Solar Project’s  
2 (“HHWS”) impact on shrub-steppe by highlighting that a majority of HHWS is sited on  
3 dryland agriculture overlooks the fact that the proposed plan will still have an impact on  
4 shrub-steppe. Mr. Rahmig correctly points out that HHWS proposes to remove more than  
5 719 acres of shrub-steppe. Moreover, these impacts will only continue to increase and  
6 threaten native shrub-steppe as more renewable energy projects are proposed in central and  
7 eastern Washington to meet growing energy demands in Washington State.  
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10 Q Michael Ritter is the Lead Planner for Solar and Wind Energy Development for WDFW.  
11 In his deposition for this adjudication, Mr. Ritter stated that Washington State cannot  
12 afford to lose any more shrub-steppe habitat before the species that depend on it are  
13 unable to survive. Michael Ritter Deposition, pg. 112, (May, 31, 2023). Do you agree  
14 with this statement?

15 A Yes, which is why I believe that any threat to shrub-steppe, whether from agricultural  
16 development or urban development or energy development, is serious and poised to  
17 overwhelm this Priority Habitat and its obligate species that depend on it.  
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20 Q Mr. Rahmig criticizes “three studies [you cited] regarding how renewable energy facilities  
21 are displacing shrub-steppe habitat”. Rahmig Testimony, pg. 2. Would you like to clarify  
22 why you referenced those studies even though they were conducted outside the Columbia  
23 Plateau Ecoregion?  
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1 A Yes. While the studies from Wyoming do discuss displacement of shrub-steppe habitat, I  
2 was largely referencing those studies because of their analysis of renewable energy  
3 development on pronghorn antelope. There are no studies that I am aware of within the  
4 Columbia Plateau Ecoregion that have considered the impacts of large-scale renewable  
5 energy development on pronghorn. Yakama Nation is interested in the impacts of  
6 renewable energy on pronghorn because Global Position System (“GPS”) pronghorn collar  
7 data shows that pronghorn use the land in and around the HHWS project area.  
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10 Q Has Yakama Nation conducted any studies using the GPS collar data?

11 A Not yet. Unfortunately, due to resources restrictions, staff turnover, and past management  
12 goals and objectives, it was not made a priority at the time. However, since new staff and  
13 management have been hired, we hope to do an in-depth analysis using this data soon. As  
14 more renewable energy project applications emerge, this has become a top priority.  
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17 Q Mr. Rahmig states that “removing access to 719 acres of rabbitbrush shrubland and 321  
18 acres of primarily planted grassland habitat would not, in [his] professional opinion, reduce  
19 the fecundity of pronghorn. . . .” Rahmig Testimony, pg. 3. Do you have a response to that?

20 A While I don’t outright disagree with Mr. Rahmig, in my professional opinion, there has not  
21 been enough analysis done to conclusively say there will be no reduction in fecundity. GPS  
22 collar data shows, by observation, pronghorn use the HHWS area. However, that  
23 observational data does not analyze many factors such as the pronghorn’s fidelity of  
24 established routes, stop-overs, and foraging areas. We know the pronghorns are observed  
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1 in the area during traditional rearing seasons; however, we don't know if the pronghorn  
2 actually use the area for rearing.

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4 Q Can you think of a reason why pronghorn have been using areas within HHWS project  
5 boundaries which Mr. Rahmig characterizes as "clearly not routinely selected by the  
6 species", and "are at best low-quality habitat for pronghorn"?

7  
8 A It's possible that the pronghorn have been using the HHWS territory because the  
9 reservation is plagued with a high population of feral horses that severely degrade the  
10 landscape and outcompete big game species for the same available forage based on animal  
11 unit months. We also have cattle that graze in that area. Though competition for forage is  
12 just one possibility. More analysis needs to be done to better understand the pronghorn's  
13 use of the area and potential impacts from the HHWS project. This is something that the  
14 Applicant should have analyzed in the HHWS application, yet failed to do.

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17 Q To the best of your knowledge, did the Applicant approach Yakama Nation regarding the  
18 pronghorn reintroduction program prior to this adjudicative proceeding?

19 A To the best of my knowledge, the Applicant did not. The Yakama Nation Wildlife Resource  
20 Management Program only recently turned over GPS collar data to the Applicant during  
21 the course of this adjudicative proceeding.

1 Q Mr. Rahmig claims that if the Applicant had Yakama Nation’s pronghorn GPS collar data  
2 prior to submitting the HHWS application, “it would not have change[d] determinations of  
3 whether [HHWS] would have impacts on the pronghorn”. Rahmig Testimony, pg. 10. Do  
4 you agree with that statement?

5 A Not necessarily because models created in a controlled environment are speculative. Mr.  
6 Rahmig discusses a suitability assessment done by Tsukamoto (2006) which explored  
7 possible areas for the establishment of self-sustaining populations of pronghorn in the  
8 Columbia Basin Plateau. *Id.* pg. 7-8. Mr. Rahmig notes that the HHWS project area was  
9 not even considered or mentioned likely due to “the degraded and fragmented habitat that  
10 consists primarily of monocrop agriculture.” *Id.* And yet, when reintroduced, GPS collar  
11 data shows that pronghorn do exist in the HHWS area. In my professional opinion, more  
12 studies and information are required to understand what the true impacts may be on  
13 pronghorn in the HHWS area.  
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17 Q Mr. Rahmig claims that habitat mitigation plans typically focus on Priority Species and  
18 Habitats or species of “local importance”. Rahmig Testimony, pg. 9. Would you consider  
19 pronghorn of “local importance” to Yakama Nation?

20 A Yes, pronghorn are extremely important to the Yakama Nation based on their historical  
21 presence in the region. In fact, it was due to their high cultural value that Yakama Nation  
22 choose to reintroduce them, and why we are invested in the success of the repopulation of  
23 this keystone species that had been extirpated from this region for many decades.  
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Q Should the Applicant amend the mitigation plan to specifically address concerns about impacts to pronghorn?

A Yes, the Applicant should specifically address project impacts on pronghorn.

I declare under penalty of perjury that the above testimony is true and correct to the best of my knowledge.

Leon Ganuelas

7-14-23

Leon Ganuelas

Date


**CERTIFICATE OF SERVICE**

I, Jessica Houston, certify that on July 14, 2023 I electronically filed the foregoing document with the Energy Facility Site Evaluation Council (“EFSEC”) at Adjudication@efsec.wa.gov.

I further certify that on July 14, 2023 I served the same upon all parties of record and identified EFSEC staff in this proceeding by electronic mail as follows:

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Dated this 14th day of July, 2023.

  
\_\_\_\_\_  
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