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Memo: Dean Apostol response to Brynn Guthrie testimony on Horse Heaven Wind Project  
07/05/2023

RE Exhibit-1000-T  
June 12, 2023

This memo is in response to Brynn Guthrie’s testimony in the matter of the application of Scout Clean Energy for the Horse Heaven Wind Farm (Exh-1000\_T)

On Page 4, beginning line 10, Ms Guthrie discusses “modifications and supplemental information provided in the updated ASC.” She oversaw revisions to eight of the Visualizations. She does not identify which eight were updated, but says they were done so to “represent the most impactful (worst case) visibility conditions, that is low-haze, clear sky.” It’s not clear if these revisions were included in materials available to the public, thus I am unable to confirm that I have been able to review them.

She also says “I am currently overseeing the development of three new Visualizations from additional viewpoints in response to a request from EFSEC”. She does not say where these viewpoints are, or where the public can view them. This makes it impossible to verify that they exist, or whether they are sufficient to satisfy concerns previously identified with respect to the simulations (Visualizations).

On page 5 Ms. Guthrie describes the methodology used as “Bureau of Land Management’s (BLM) Visual Resource Management program.” I am familiar with this methodology, and at best, Ms Guthrie’s team only partially applied it on this project. I have not seen an inventory of public resources from which visibility was anticipated. I did see a “viewshed analysis,” which shows where the project may be visible from, but saw no inventory of public places (parks, scenic roads, trails, historic sites, etc.) from which there are views of the project. There is some discussion of “visual contrast” in the assessment, but it is inadequate to arrive at reliable conclusions with respect to impacts.