

August 23, 2023

RE: Horse Heaven Adjudication Public Hearing

Dear EFSEC officials, please see below for a copy of my comments provided at the public hearing for Horse Heaven Wind on August 23, 2023.

Good Evening,

My name is Dr. Trina Bayard and I am the Director of Bird Conservation at Audubon Washington, a state office of the National Audubon Society.

Climate change poses a severe threat to birds and people, and Audubon supports the build out of renewable energy in a way that is compatible with birds, wildlife, tribal rights, and cultural heritage.

Unfortunately, the proposed design for the Horse Heaven Wind project indicates that up to 69 turbines may be sited within the 2-mile core area buffer for Ferruginous Hawk, which will cause high magnitude, constant, unavoidable, negative environmental impacts to this state endangered species. As currently proposed, the environmental review documents do not provide assurance that the builder will mitigate these impacts to the extent that is possible.

The project also creates barriers to wildlife movement and habitat connectivity, in a landscape that is already heavily fragmented.

Wildlife and habitat experts have already weighed in on the record with specific, reasonable and achievable measures that can help avoid, minimize and mitigate negative impacts to imperiled wildlife. These common-sense measures would help maintain landscape connectivity, and mitigate appropriately for habitat loss. These recommendations, if adopted, provide a pathway for EFSEC to support a more environmentally responsible build out of the project, which would be better aligned with the state's other investments shrub-steppe ecosystem conservation.

Audubon requests that EFSEC adopt a project decision that incorporates the wildlife and habitat mitigation measures recommended by WDFW and the Yakama Nation and described in our January 31 DEIS comment letter.

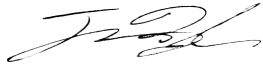
These measures include, among other things:

- Committing to micrositing decisions that eliminate turbines within 2 miles of Ferruginous Hawk nest locations and between Sheep and Webber Canyons,
- Mitigating appropriately for habitat loss across the entire Project Lease Boundary area.
- Reducing the density of turbines in the Fourmile Canyon linkage area.
- Assessing the need for a curtailment plan.
- Designing the East Solar Field to eliminate the creation of a pinch point for wildlife connectivity.
- Conducting habitat restoration within the Fourmile Canyon linkage area.

- And affirming the scope and role of the Project's Technical Advisory Committee as post-construction adaptive management.

Thank you for your hard work on this project and for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trina Bayard', with a stylized flourish at the end.

Trina Bayard, Ph.D.
Director of Bird Conservation