



1/24/2023

Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey, WA 98504-3172

EFSEC Members,

Benton County Public Works staff have reviewed the materials provided for the Horse Heaven Wind Farm Draft Environmental Impact Statement (Draft EIS) and submit the following input for consideration during project review. Comments are listed by topic, though may be applicable to more than one element (section/chapter) of the Draft EIS materials provided. Should there be any questions related to the input provided, please do not hesitate to contact our department at (509) 786-5611 or via email to publicworks@co.benton.wa.us.

Location/Proximity to Urban Area

Throughout the Draft EIS materials, reference is made to the cities that comprise the greater "Tri-City" urban area. Notably absent are mention of the City of West Richland and the unincorporated areas of Benton County, which comprise significant portions of the Tri-City urban area. As such, applicant materials do not provide an accurate portrayal of where urban densities exist nor do they support statements related to proximity of the proposed project and its' distance to the urban area.

FHWA Urban Area boundaries are defined at the conclusion of each decennial Census, through a collaborative effort with state, federal, and local officials. Benton County Public Works - as do all entities within Washington State - plan, operate, and manage their transportation systems based on designations of urban or rural as established through the Federal Highways Administration (FHWA) process. Benton County suggests and requests that applicant materials include reference to federally approved urban boundaries, so that project reviewers and others will have the ability to accurately discern between rural and urban developed areas. The county also suggests that references of proximity be based upon the geography of the FHWA Urban Area, as opposed to the comparatively distant Urban Growth Area limits of Richland and Kennewick.

Air Quality – Fugitive Dust

Regional Air Quality issues have historically been limited to fugitive dust (PM10), with known exceedances occurring in the eastern Horse Heaven Hills & Wallula Gap. The Wallula, WA, area was first designated nonattainment for PM10 (moderate) and later redesignated (serious) on February 9, 2001. On May 29, 2005, the US Environmental Protection Agency (EPA) approved the Wallula PM10 attainment plan and requested a redesignation to attainment for the Wallula PM10 nonattainment area. EPA approved the maintenance plan in 2005 and submitted a second 10-year update in 2019, which was approved on May 1, 2020.

The attainment plans prepared by EPA indicate that only approximately 1% of the overall PM10 inventory was attributable to on-road sources. According to EPA, agricultural dust and point sources contribute the bulk of impact within the area and, as a result, EPA was able to exclude high wind event-influenced data. Logically, with the proposed project introducing an extensive network of access roads and nearly 34 miles of 36' wide crane paths throughout the Horse Heaven Hills, there is concern that increased fugitive dust levels may have implications for EPA Air Quality designations or increase requirements for transportation conformity evaluations.

Benton County requests that the applicant be required to demonstrate that fugitive dust levels will not increase beyond levels that allow for an EPA PM10 attainment designation during the construction, operation, or decommissioning of the proposed project.

Air Quality – Ozone

Periods of high ozone in the Tri-City region have been documented by federal agencies, with the area listed in Federal Register as an area to be monitored for further exceedances, and potential designation. The conditions known to create elevated ozone levels include higher temperatures, in the presence of certain Volatile Organic Compounds (VOCs) and Oxides of Nitrogen (NOx) during periods of low wind. At this time, federal monitoring of ozone levels has resulted in rolling averages slightly below federal thresholds requiring designation. According to federal sources, designation as a high-ozone area can result in development limitations within the area of designation.

Benton County suggests that the solar (reflective) nature and vast expanse of the proposed project holds potential to increase air temperatures in the project vicinity. The county believes the potential for elevated temperatures should be evaluated and provided within applicant materials. Benton County requests the applicant be required to demonstrate the project holds no potential to increase air temperatures during the construction, operation, or decommissioning phases nor that the project will contribute to other known factors that contribute to ozone creation.

Transportation - Level of Service

Applicant materials indicate that traffic volumes are anticipated to increase measurably during construction and that Level of Service *are* anticipated to be impacted. Documents indicate that impacts are expected to be "medium", however there is no evidence that existing or forecasted levels of service have been evaluated, nor a clear indication to the degree level of service would decrease.

Benton County Public Works holds concern that impacts to the state highway network and county system will be significant during periods of construction, and decommissioning. Given the scale of project components, the vast number of proposed locations, and low speeds associated with larger loads, there is concern that level of service will fall below tolerable levels along project delivery routes. Delays upon the state highway system can have dramatic economic impacts to freight and commodity deliveries. In areas with limited access to the state and federal system, delays of the nature anticipated can be very concerning and impactful to both shippers and the general public. Delays can impact routine daily lives, delivery of products and services, as well as the ability to respond to public safety concerns.

Benton County suggests that limitations be imposed as to "time-of-day" presence on the state highway and county road networks, so that existing and forecasted levels of service can be maintained for the traveling and resident public. Benton County Public Works desires that the project applicant be required to demonstrate and ensure that highway and county road levels of service will not degrade beyond

acceptable levels. Mitigation techniques suggested in applicant materials – such as “Daily transport communication” - will not remedy the reduced level of service anticipated on area roadways. Benton County Public Works suggests that select periods of the day (such as, peak commute periods) should be prohibited periods of transport and requests the applicant be required to coordinate with Benton County, WSDOT, and other pertinent area agencies to determine suitable periods of the day for project component deliveries.

Transportation - Safety

Safety concerns are primarily related to the size of components being shipped, their speed of transport causing congestion and network blockages, and the sheer number (frequency) of components required for a project of this scale. Concerns center on the safe, and effective, operation of the road network – recognizing that components of the scale necessary for this project will cause hazardous back-ups and need for residents to be re-routed when project component deliveries are occurring. Delays will be exacerbated, when paired with the shipments of water indicated necessary to wash solar components.

Benton County Public Works suggests that road network blockages be prohibited and that, where necessary, alternate access corridors be identified and provided to ensure safe and efficient access to residents, shippers, recreationalists, and the public. Temporary or partial closures of state and/or county facilities will not be supported by Benton County. The county requests that partial closures or blockages of the state or county road system be specifically prohibited.

Transportation - Road Impacts

Impact to road conditions are anticipated related to the increased volumes on area roadways, heavy shipping weights of project components, and the need for water delivery for maintenance needs. Farm-to-market movements are a high priority upon Benton County roadways. Throughout the applicant materials provided, reference is made of the need to have water delivered for on-site washing of the solar systems, however no mention is evident of any impacts associated with water-hauling vessels and their impact to the road network. Given the volume of water indicated necessary, it is reasonable to assume there will be impacts to level of service, road conditions, or impacts to the roadways themselves. Benton County anticipates the degradation of area highways and county roads will require an emphasis and frequency of road maintenance efforts that would otherwise not be anticipated upon the affected routes.

Benton County Public Works requests the applicant be required to coordinate with WSDOT, applicable regional planning agencies (MPO/RTPO), and Benton County to ensure road conditions and acceptable level of service are retained on area highways and to surrounding property owners. The county requests that the applicant be required to obtain the services of a qualified engineering firm who is required to prepare a list of road improvements and maintenance schedules to serve the project development, as well as any alternative routes determined necessary to retain access and service levels. The county believes that the increased expense of greater frequency of maintenance efforts and any expenses tied to alternate routings, or other required access(es), should be the financial responsibility of the project applicant. The county suggests that a required engineering evaluation be based upon pavement structure, widths, geometry, traffic volumes, and delays on public-owned roadways throughout the construction, operation, and demolition periods.

Transportation - Route limitations

Significant portions of the project area produce agricultural products that require farm-to-market shipping at varying times of the year. As with many commodities, harvest periods can fluctuate and the

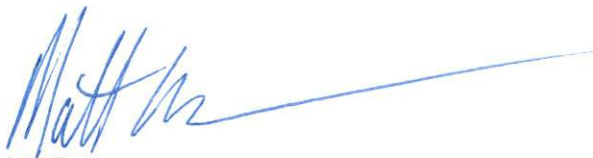
periods of time for shipping can be somewhat variable. Delayed shipments can sometimes result in no market being available – thus, efficient network access during periods of harvest is critical to the economic competitiveness of agricultural interests. Benton County holds great interest in protecting the agricultural interest of area producers and requests that the applicant be required to coordinate with Benton County to establish protected periods (no project component shipments to occur) to select farm-to-market routes, so that agricultural interests have identified dates/times they can rely on efficient and uninterrupted road network access. Benton County suggests the applicant be required to review and adjust protected periods in consultation with Benton County, based on the protected period effectiveness to the agricultural community producers, at the conclusion of years 1, 3, 5, and 10 and every five years thereafter, through the project life.

Other Input

- SR 397 is not reflected accurately, nor is the complete route shown on applicant materials.
- Benton County questions why Washington Dept. of Transportation did not self-designate an appointee to participate upon EFSEC.
- The distribution listing does not appear to include Benton-Franklin Council of Governments, which is the responsible Metropolitan Planning Organization (MPO) tasked with transportation planning in the region.
- Reference materials are suggested to include:
[Summary of Wallula Particulate Matter \(PM-10\) Maintenance Plan | US EPA](#)

Benton County Public Works Department appreciates the opportunity to comment upon the Horse Heaven Wind Farm Draft Environmental Impact Statement (Draft EIS) and appreciates the review efforts of participating EFSEC members. The department provides these comments with the intent of coordinating with appropriate regulating and reviewing agencies to determine suitable mitigation measures and to address any questions as the project is further considered through environmental and permitting review. Please do not hesitate to contact Benton County staff with any questions.

Sincerely,



Matt Rasmussen
Benton County Engineer