

Via Email to EFSEC and the EFSEC SEPA Comment Page Web Form

***TC Cares Comments on the DEIS for the Horse Heaven Hills Wind Farm Project
Draft Environmental Impact Statement***

On behalf of TC Cares and Save Our Ridges, and numerous individual reviewers, we are submitting the attached comments on the Horse Heaven Hills Wind Farm Project Draft Environmental Impact Statement.

We do not believe this project should move forward in its current condition. The SEPA process is flawed and the DEIS is filled with errors, omissions, and misrepresentations regarding the Project's purpose and need, premise, financial feasibility and viability, proposed action, lack of feasible reasonable alternatives, lack of mitigation measures, and the significance of environmental and community impacts that cannot be avoided.

Even in spite of these flaws and issues, the DEIS clearly demonstrates that the Project will bring about more harm than good. It is imperative that EFSEC search, develop, analyze and present alternative solutions that actually meet the need for power generation and do not impose such damage on the environment and the communities of Benton City, Richland, Kennewick, and Finley, as well as the rest of Benton County and the Tri-Cities and beyond.

The following summarizes the list of contestable issues describing the many flaws of the project, the DEIS, and EFSEC's review of the project:

The EIS is Poorly Done

- The DEIS is lengthy, complex, piecemeal, filled with obfuscation, and contains a plethora of would's and may's vs wills.
- The DEIS fails to describe the project, impacts, and mitigations with any certainty which makes a mockery of the SEPA process and abuses the SEPA process and the public.
- The developer appears to be using the SEPA process to push a foregone conclusion without proper rationale and justification.
- There are repeated and re-iterated errors, omissions, and misrepresentations. The DEIS contains cascading errors and omissions that render the document unusable for rational decision-making.

- The DEIS is poorly done and uses out-of-date publishing technology. It contains poor maps that are too small and fuzzy with misleading coloration and not enough detail. It is very difficult to see the project component locations which means the public is unable to identify exact turbine locations in order to complete an accurate analysis of the impacts. We needed to create our own turbine location maps.
- The DEIS fails to make use of digital GIS mapping tools to help the agencies explore and fully understand the environment and the impacts of proposed actions and alternatives.
- The DEIS does not contain maps of the project that identify micro-siting corridors and turbine locations suitable for a reasonably accurate analysis of the impacts.

Integrity of the SEPA Process Is Questionable

- The ASC was updated on December 1 without proper public notice. The scope and magnitude of the changes in the ASC Update on December 1, 2022, makes the entire SEPA Process questionable. The ASC should be revoked and reissued and the DEIS should be reissued with a new comment period.
- EFSEC did not perform independent validation of the data contained in the many SEPA Elements of the Environment. Any proof of quality validation by EFSEC is lacking and there are a myriad of errors, omissions, and misrepresentations throughout the DEIS that should not be there if a validation had been properly performed.
- The EFSEC consultant repeatedly just incorporated the developer's consultant's work verbatim using copy and paste. This raises serious conflict of interest issues since work done for the Applicant carries a risk of inherent bias in favor of the Applicant's project.
- The DEIS lacks "impartial discussion" and is plagued from beginning to end by a noteworthy lack of detail and a verifiable lack of commitment to WAC requirements and mitigation.

Purpose and Need for the Project

- The DEIS fails to adequately establish a feasible purpose and need for this project. The project's funding and high price tag, as much as \$1.7 billion, is not described and renders the project impracticable.

- The DEIS does not contain a reasonably detailed description of how this project is being funded. Who is going to pay for this project and how? Who paid for the consultants and how much did they get paid?
- No off-taker for the power has been identified at all.
- The DEIS fails to explain the purpose and need for a 19-mile transmission line.
- The DEIS fails to identify and analyze the impact the project will have on climate change.
 - o The DEIS fails to identify, document, and demonstrate that the project does anything at all to mitigate the cited near-term and long-term impacts from climate change.
 - o The DEIS fails to establish a pressing need for the energy that will be produced by this project.

Proposed Action and Alternatives

- The history of the power generation requests (BPA LGIP) are not consistent with the Project's nameplate power generation claims. They claim to have the necessary authorizations to provide 1150 MW, but the documentation only indicates 850 MW.
- The project nameplate capacity of 1,150 MW is not supported by the record. The DEIS and the Updated Redlined ASC repeatedly describe the nameplate capacity in error.
- Fails to justify the need for the proposed action at 1150 with interconnection capability, is only supported at 850 (LGIP requests), and fails to clarify the Boffer Canyon Substation limit of 350 MW.
- The DEIS fails to identify and analyze the impacts the project will have on the Nine Canyon project.
 - o There has been no identification or analysis of the effects and impacts of a phenomenon known as blocking, which decreases turbine performance when an upwind wind project is too close to a downwind project.
- The DEIS dismisses consideration of alternatives other than the proposed action without a rational basis and justification.
- The DEIS fails to identify and evaluate the costs and benefits of any reasonable alternatives that can be demonstrated to feasibly attain or approximate the project's objectives, but at a lower environmental cost or decreased level of environmental damage.

Impacts on People in the Affected Environment

Visual

- The DEIS fails to adequately identify and evaluate the visual impacts of the project on people in the Tri-Cities.
- The DEIS Visual Assessment Report contains numerous errors, omissions and misrepresentations which render the document ineffective as a basis for decision-making under SEPA.
- The DEIS fails to describe and evaluate the project based on the CESA Guidance 2021 regarding “Unreasonable or Undue Visual Impacts”.
- The DEIS visual simulations contain numerous errors and omissions and misrepresentations.
- The DEIS fails to accurately describe the visual impacts of Option 1 and Option 2 on people.
- The Applicant’s commitments to mitigation of visual impacts in the DEIS are minimal, ineffective, and unacceptable.
- The DEIS fails to recognize that visual impacts on Benton County are significant and disproportionate when compared to every other wind project in the State of Washington.
- The DEIS visual assessment fails to apply the BLM and CESA Guidance adequately to describe and evaluate the impacts on people in proximity to the project. An area of analysis of 25 miles will be more appropriate in midwestern and western landscapes, open terrain, drier air, and larger wind projects (hundreds vs. dozens of turbines) creating a larger mass visible over greater distances.
- The Applicant’s, and therefore the DEIS’s, visual assessment did not select Key Observation Points and Representative Viewpoints adequately.
- The DEIS fails to describe and evaluate the value of the dark skies at night on the Horse Heaven Hills project.
- The DEIS fails to describe and commit to commonly used, FAA-approved light mitigation technology utilizing aircraft detection lighting systems to mitigate light pollution.

Population

- The DEIS fails to characterize, analyze, or provide enough information to allow reviewers to quantify the level of impact to population.

- The DEIS fails to accurately identify and quantify that a large number of mid-range viewers, in particular, are impacted. There is no substantive mitigation offered.
- The DEIS fails to identify and evaluate the Benton County policy goals meaningfully and then fails to recognize the importance that the features hold for the County and its residents.
- The DEIS fails to describe and evaluate the visual impacts on wineries.
- The DEIS fails to accurately describe and evaluate the scenic resource attributes and sensitivity levels.
- The DEIS does not accurately describe and evaluate the location, proximity, and impact on people who live in close proximity to the project. The distances described in the DEIS are in error and misrepresent the real conditions found at the present time.
- The ASC and the DEIS fail to identify and evaluate the impact of the project and feasible alternatives using a suitable analysis of population within the affected environment.

Fugitive Dust Emissions

- The DEIS fails adequately identify, describe, and evaluate the significant and unhealthy adverse impacts fugitive dust emissions that will be caused by the project.
- The DEIS fails to identify, describe, and evaluate feasible alternatives that can reasonably control and mitigate the health hazards from the fugitive dust emissions caused by the project.
- The DEIS fails to adequately identify, describe, and evaluate that unacceptable conditions will occur from the road construction disturbance and cause significant environmental impacts that will affect over 100,000 people in the Tri-Cities. Project monitoring of PM_{2.5} and PM₁₀ is inadequate.
- The DEIS does not provide for adequate project air monitoring and mitigation plans do not identify and commit to any increased monitoring of PM₁₀ and PM_{2.5}.

Wildlife

- The DEIS fails to describe and evaluate special status wildlife and their habitats.

- The DEIS contains numerous errors, omissions, and misrepresentations regarding the project wildlife resources and the impacts on wildlife and their habitats.
- The DEIS assessment of wildlife is shallow and fails to adequately describe and evaluate the significant near-term and cumulative impacts the project will have on 20 special status wildlife species (two are endangered) and on their habitat and prey.
- The DEIS ignores and disregards the mitigation recommendations in the several Washington Department of Fish and Wildlife letters.
- The DEIS fails to identify and evaluate specific turbine locations that are known to cause significant impacts.
- The DEIS fails to propose or even contemplate any remedy if that remedy entails turbine elimination or relocation.
- The DEIS makes no mention of the elimination or relocation of turbines located in essential wildlife corridors that preserve connectivity of wildlife habitat and foraging areas.
- The DEIS does not identify, describe, and evaluate wildlife resources, in particular special species, outside the boundary area even though they are clearly in the affected environment under the WAC.
- The DEIS fails to evaluate impacts the project will have on wildlife outside the project boundary.
- The DEIS contains no analysis of cumulative effects to habitat, especially the east/west wildlife corridor along the ridgeline of the Horse Heaven Hills.

Inadequate Mitigation

- The DEIS avoids mitigation commitments and defers the development and selection of mitigation measures to the FEIS and a Technical Advisory Committee selected by the Applicant.
- The DEIS does not include an adequate planning horizon that considers mitigation.
- The DEIS fails to provide adequate information about the indirect and cumulative impacts from the proposed action, and any reasonable feasible alternatives.
- The DEIS fails to identify and describe reasonable measures that can be taken to mitigate and minimize the visual impacts on the environment.
- The DEIS fails to adequately identify and describe effective mitigations for wildlife habitat and special species.

The Horse Heaven Hills Project isn't green at all. The project need for the project is unproven and will force dependence on giant, mechanical monsters which have very little impact on climate change at all.

This project has nothing to do with protecting the earth from the impacts of climate change and power. Instead, it is dedicated to corporate profits at the expense of the public and the impact on the local environment. Spending \$1.7 billion dollars on this project, much of it is taxpayer money, is irresponsible, unnecessary, unacceptably damaging and wasteful.

The complete version of the comments are provided in the attached pdf file. This file is also being transmitted to EFSEC via email with attachment. The file can also be downloaded here:

<https://presari.com/s/T92230000463680>

If you have any problems receiving and opening the file successfully please let me know.

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Appreciatively,

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