

Jerome Delvin, *District 1*
Shon Small, *District 2*
Will McKay, *District 3*



Jerrod MacPherson
County Administrator
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Deputy County Administrator

Board of County Commissioners

May 25, 2021

Energy Facility Site Evaluation Council
Attn: Amy Moon
621 Woodland Square Loop SE
Lacey, WA 98504-3172
amy.moon@utc.wa.gov

RE: Horse Heaven Wind Farm Project – Scope of EIS Comments

Dear Ms. Moon:

The Benton County Board of Commissioners approved the submission of the following scoping comments to the Energy Facility Site Evaluation Council (EFSEC) on May 25, 2021. The comments are submitted to you for consideration in determining the scope of the Environmental Impact Statement (EIS) for the proposed Horse Heaven Wind Farm Project in Benton County.

The Horse Heaven Wind Farm Project, as proposed, includes the construction of a renewable energy generation facility that combines wind and solar facilities, and battery energy storage systems, with an energy generating capacity of up to 1,150 megawatts. With this, the applicant is requesting the permitting authorization for up to 244 wind turbine locations, along with a solar and battery component to the project.

EFSEC issued a Determination of Significance (DS) and a request for comments on the scope of the EIS for this project on May 11, 2021 to provide further analysis and discussion on numerous environmental elements associated with the project, including wildlife/habitat, visual/aesthetics, and land use. In the DS, EFSEC identified a number of areas which require additional information before determining the level of review in the EIS, including air, water, plants, energy and natural resources, environmental health, noise, light and glare, historic resources and cultural resources.

Benton County requests all the above identified probable significant environmental impacts and the above identified environmental elements be considered for not only the 244 wind turbines, but the solar and battery components as well.

The 26-mile project, consisting of a total project area of approximate 72,000 acres, is situated in an area of the Horse Heaven Hills with geological features comprised of naturally vegetated steep slopes, native habitat, commercially significant agricultural land, and unique views. The Horse Heaven Hills is one of the County's primary areas for dryland wheat production and in turn one the County's most valuable areas designated for long term commercially significant agriculture. The Comprehensive Plan policies direct the County to conserve and maintain agricultural land of long-term commercial significance, sustain the County's agricultural economy while discouraging incompatible uses, reduce the inappropriate conversation of agricultural lands, and protect critical areas, and visually prominent naturally vegetated steep slopes and elevated ridges that define the Columbia Basin landscape.

While Benton County is not in support of this project as proposed, the County encourages EFSEC to require a comprehensive analysis of the probable significant adverse environmental impacts of the entire project. The County requests that all direct, indirect, or cumulative impacts be considered. In many instances the impacts should be evaluated on a site-specific basis for each turbine, solar array, and/or battery facility, taking into account the road, infrastructure, construction, and facility impact of each.

The overall potential impacts of the project that should be reviewed in the EIS should include those impacts to long-term commercially significant agricultural lands, birds, wildlife, plants, habitat, water supply, public health, property values, tourism, emergency services, roads, and views/ aesthetics.

Please consider the following significant adverse impacts for further analysis and study in the EIS:

1. Consistency/compliance with RCW 36.70A, the Washington State Growth Management Act.
2. Consistency/compliance with the Benton County Comprehensive Plan.
3. Consistency/compliance with the Benton County Zoning Ordinance.
4. Consistency/compliance with the Benton County Critical Area Regulations.
5. Loss and impact to the County's long-term commercially significant agricultural lands.
6. Compatibility/incompatibility and impact to the County's agricultural lands.
7. Loss and impact to the County's open space and natural resources.
8. Loss and impact to the County's natural resources, including, but not limited to, habitat and plants, habitat connectivity, corridors, along with the County's locally significant habitat species and areas.
9. Loss, alteration, degradation and impact to the County's functions and values (quantitative and qualitative) of habitat.
10. Impact to ephemeral and intermittent stream channels and associated Fish and Wildlife Conservation Areas.

11. Impact to Critical Aquifer Recharge Areas, impacts to hydrology and groundwater contamination.
12. Impact to the County road system. A complete, independent, site specific analysis for each portion of the County road system that will be impacted by the project.
13. Individual site impacts of shadow flicker and compliance with industry standards.
14. Fire risks including, impact to public safety, emergency services and fire suppression. An analysis of the project's impact to local emergency responders, the need for on-site fire flow for each facility, and a study of the equipment needed to provide emergency services.
15. Impact to visual and aesthetic resources. The project will cover approximately 43% of the entire Horse Heaven Hill ridgeline which is an iconic geological feature that visually defines Benton County. The project will be seen by 83% of the area within 10 miles of the project; Impacts to urban areas; Impacts to rural residential areas.
16. Impact to the economy, including the wine and agricultural industries, and tourism.
17. Impacts and setbacks for solar array proposals including screening, traffic impacts, glare, and specific site locations.
18. Impact and analysis related to public health, noise, and vibrations. The public benefits of open spaces for health, well-being and overall sustainability and quality of human habitat.

Benton County appreciates the opportunity to provide comments on the scope of the project's EIS. The County encourages a comprehensive analysis of the probable significant adverse environmental impacts including a site- specific evaluation for each facility site in the proposed project.

Sincerely,

BOARD OF BENTON COUNTY COMMISSIONERS

Jerome Delvin
Approved Telephonically

Jerome Delvin, Chairman

Shon Small
Approved Telephonically

Shon Small, Member

Will McKay
Approved Telephonically

Will McKay, Member