



Lower
Columbia
Basin
Audubon
Society

Lower Columbia Basin Audubon Society

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

P.O. Box 1900

Richland, WA 99352

(509) 545-6115

June 1, 2023

Tri-Cities C.A.R.E.S.
Board of Directors
1360 N. Louisiana Street #A-175
Kennewick, WA 99336

Re: The Horse Heaven Hills Wind and Solar Project

Attention Board of Directors:

The Lower Columbia Basin Audubon Society (LCBAS) of the Tri-Cities is an organization that advocates wise stewardship of the land which includes protection of native habitat and the birds, plants and animals that are supported by that habitat. The Horse Heaven Hills project area contains disappearing native habitat that needs to be conserved along with the birds and animals that rely on that habitat for subsistence and protection. The area, mostly the ravines, and adjacent areas are migratory corridors that are critical for species vigor and vitality. It is critical that the siting of wind turbines and solar fields be located so as not to impact critical habitat and migratory corridors.

LCBAS supports community representation by Tri-Cities C.A.R.E.S. In discussions with C.A.R.E.S.'s representatives, many of the concerns about the siting of wind turbines and solar fields parallels LCBAS's concerns. LCBAS along with C.A.R.E.S. is extremely concerned about Ferruginous Hawks and wildlife corridors.

The Ferruginous Hawk is fast disappearing in Washington State as well as the Pacific Northwest. Historic records and recent observations indicate that the hawk traditionally used, and is still present, in the Horse Heaven Hills. It is the recommendation of LCBAS that access roads and wind turbines should not be sited within a **two mile radius** of active and traditional Ferruginous Hawk nesting sites. This distance may appear to be conservative but the extreme sensitivity of this hawk to human intrusions warrants this protective distance.

Native habitat and migratory corridors are extremely important for the health of native birds, animals and plants in the Horse Heaven Hills. Construction of wind turbines and solar fields as well as the customary support utilities must be placed away from migratory corridors and should not impact native habitat.

Mitigation is an action that both C.A.R.E.S. and LCBAS agree needs to be fully enacted. In destruction of native habitat a ratio of 5:1 is appropriate to offset what has been lost. Mitigation must be conducted in the Horse Heaven Hills ecoregion to be fully responsive to what has been lost to construction. Mitigation

EDUCATION

CONSERVATION

APPRECIATION

Recipient of the Chevron Times Mirror Award, 1996

can also be in different forms such as monetary compensation or funding to organizations or institutions that study impacts to raptors such as Ferruginous Hawks or eagles from wind turbines.

LCBAS supports C.A.R.E.S. role as a local intervenor in the adjudication process.

Sincerely,

A handwritten signature in blue ink that reads "Dana C. Ward". The signature is written in a cursive style with a large, looped initial "D".

Dana C. Ward
Conservation Chair, LCBAS