

PROJECT NAME: **VANTAGE WIND POWER PROJECT COMMENTS RECEIVED**

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Joanna F. Valencia

From: Mandy Weed on behalf of CDS User
Sent: Monday, November 19, 2007 3:40 PM
To: Joanna F. Valencia
Subject: FW: Invenergy Vantage Wind Power Project SEPA Review Commnets

Mandy Weed

From: Williams, Scott (DAHP) [mailto:Scott.Williams@dahp.wa.gov]
Sent: Monday, November 19, 2007 3:05 PM
To: CDS User
Cc: sjscott91@hotmail.com; scott.williams@dahp.wa.gov
Subject: Invenergy Vantage Wind Power Project SEPA Review Commnets

Joanna, here are DAHP's SEPA review comments on the Vantage Wind Power Project. We do not concur with the archaeological survey report as written, and additional work needs to be done to ensure that sites are protected under RCW27.53.



STATE OF WASHINGTON
DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

November 19, 2007

Ms. Joanna Valencia
Planner
Kittitas County Community Development Services
411 N. Ruby, Ste. 2
Ellensburg, WA 98926

In future correspondence please refer to:

Log: 111907-12-KT
Property: Invenergy Vantage Wind Power Project
Re: Archaeological Review and Comment

Dear Ms. Valencia:

Thank you for contacting our office. We have reviewed the materials you provided for this project. We offer the following comments and concerns:

1. The report indicates that additional areas of effect such as staging areas, access roads, and turnarounds have not yet been surveyed. These areas will need to be surveyed prior to any ground disturbing activities, and we will need time to review the findings in these areas.
2. Is there Federal involvement or permitting required for this project, and if so, by what agency? The archaeological survey

26/2007

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- report discusses the sites in terms of their eligibility to the National Register of Historic Places (NRHP), but this only applies if there is Federal involvement. If not, under RCW27.53 all the archaeological sites are granted equal protection.
3. Five archaeological sites and 19 isolates have been located in the project footprint. Those sites should be avoided. If they cannot safely be avoided, then testing and possibly data recovery will be required prior to any ground disturbing actions within the boundaries of the archaeological sites, regardless of the sites' eligibility to the NRHP. This testing will require an excavation permit from this office per RCW 27.53 and WAC 25-48.
 4. We do not concur that sites 45-KT-2762 through 2764 require no further work or are not eligible to the NRHP, as no subsurface testing was conducted at these sites.
 5. We recommend a professional archaeologist monitor ground disturbing activities, including road building, turbine pad preparation, and utility line trenching. The monitor can assist in insuring the archaeological sites are avoided. General exclusion zones for both pedestrians and equipment should be established as part of this process.
 6. Due to the large scale of this project, we recommend a written monitoring plan be developed to outline monitoring methods, expectations and procedures to follow in the event of a discovery. The monitor should attend pre-construction meetings and inform the contractors of this protocol and archaeological rules.
 7. We also recommend close consultation with the Yakama Nation cultural committees and staff regarding the project and cultural landscape and other cultural resource issues.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation. Please feel free to contact me should you have any specific questions about our request and we look forward to receiving this material. Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

[ELECTRONIC COPY]

Scott Williams
Assistant State Archaeologist
(360) 586-3088
scott.williams@dahp.wa.gov

CC: Johnson Meninick, YIN

Joanna F. Valencia

From: Mandy Weed on behalf of CDS User
Sent: Monday, November 26, 2007 8:19 AM
To: Joanna F. Valencia
Subject: FW: Vantage Wind Power Project
Attachments: vantage_windpower_dnr.doc

Mandy Weed

From: MOODY, SANDRA (DNR) [mailto:SANDRA.MOODY@dnr.wa.gov]
Sent: Tuesday, November 20, 2007 3:13 PM
To: CDS User
Cc: DNR RE SEPACENTER
Subject: Vantage Wind Power Project

Attached is a comment letter on the Notice of Application – Vantage Wind Power Project. Thank you for your consideration of these comments.

Sandy Swope Moody

Environmental and Grants Coordinator

Washington Natural Heritage Program

PO Box 47014

Olympia WA 98504-7014

phone 360-902-1697

<<vantage_windpower_dnr.doc>>



November 20, 2007

Joanna Valencia
Kittitas County Community Development Services
411 N Ruby Street Suite 2
Ellensburg WA 98926

SUBJECT: Vantage Wind Power Project – Notice of Application

Thank you for the opportunity to provide comments on the Vantage Wind Power Project – Notice of Application. The Washington Natural Heritage Program (WNHP) is responsible for maintaining information on rare plant species and high quality native wetland and terrestrial ecosystems that occur within the state. Therefore our comments address potential impacts to rare plant species and high quality ecosystems.

The SEPA checklist that was submitted by Invenergy Wind of North America did not include information sufficient to determine how thoroughly the rare plant surveys were done, and consequently, whether the impacts to rare plants are accurately evaluated.

The checklist does not mention whether Washington Natural Heritage Program data was reviewed prior to surveys and, most importantly from a rare plant perspective, does not discuss the occurrences of Hoover's tauschia (*Tauschia hooveri*) that are known from within the project area boundary. This species is designated as Threatened in Washington and as a Species of Concern by the U.S. Fish and Wildlife Service, and is documented in WNHP records as occurring at several locations within the project boundary and other locations immediately north and south of the project area.

The checklist does not say specifically where the surveys were conducted, and it seems to indicate that the access roads, collector lines, substation, O&M facilities, and laydown areas were not known at the time of the survey and may not have been included in the survey corridors.

Another concern is the relocation of hedgehog cactus (*Pediocactus nigrispinus*), also known as snowball cactus, as mitigation. Relocation of individual hedgehog cactus plants has been successful in the Wild Horse Wind Power Project, but generally the transplanting of native plant species is not successful. The Natural Heritage Program does not support the relocation of rare plant species as an adequate mitigation measure.

In regard to high quality native ecosystems, shrubsteppe is a dwindling natural resource – nearly half of its original extent has been converted to other land uses. The windfarm is imbedded in one of the larger shrubsteppe landscapes remaining in the state. The actual take of shrubsteppe and related natural, native vegetation is small but is yet another cumulative loss not stated in the environmental checklist.

Joanna Valencia
November 20, 2007
Page 2

The project area has a very low cover of exotic, invasive species particularly on northerly aspects and lithosol habitats. While the direct impact of construction and operation of the wind farm is small compared to the total project area, associated soil disturbance will increase the abundance of exotic species. Experience indicates that the more weeds present, the greater the chance of invasion into less disturbed vegetation. There should be a weed control plan for the project. Also, as a matter of correction, species identified as Idaho fescue in the bunchgrass grasslands section are likely Cusick's bluegrass (*Poa cusickii*).

Please feel free to call me at (360) 902-1697 if you have any questions, or by e-mail at sandra.moody@dnr.wa.gov. For more information, you can visit our internet website at <http://www.dnr.wa.gov/nhp>. Thank you for your consideration of these comments.

Sincerely,

Sandy Swope Moody, Environmental Review Coordinator
Washington Natural Heritage Program
Asset Management & Protection Division
PO Box 47014
Olympia WA 98504-7014

Enclosures

C: DNR SEPA Center

2

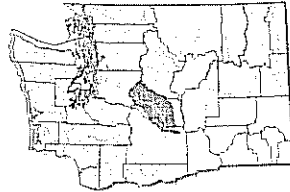


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

RECEIVED
NOV 20 2007
KITITAS COUNTY
CDS

November 19, 2007



Your address
is in the
Upper
Yakima
watershed

Joanna Valencia
Kittitas County Community Development Services
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

Dear Ms. Valencia:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the Vantage Wind project, proposed by Invenergy Wind North American, LLC [WSA 07-01]. We have reviewed the documents and have the following comments.

Water Quality

Operation of rock crusher or concrete batch plant requires coverage under the Sand & Gravel General permit for each portable unit; an application for coverage under the Sand & Gravel General Permit needs to be submitted before quarrying or gravel mining, a site review may be needed to determine whether permit coverage is required. Applications for new permits are due 180 days prior to proposed start of operations. If portable units already have permit coverage, filing a Notice of Intent to Operate ten days prior to the start of operations is required. If you have any questions, please contact Phelps Freeborn at (509) 454-7277.

Project Greater-Than 1 Acre With Potential To Discharge Off-Site

An NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with more than one acre of disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit is a minimum of a 38 day process and may take up to 60 days if the original SEPA does not disclose all proposed activities.

Ms. Valencia
November 19, 2007
Page 2 of 2

The permit requires that Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) is prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water (this includes storm drains) by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/> . Please submit an application or contact Cory Hixon at the Dept. of Ecology, (509) 454-4103, with questions about this permit.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012

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(3)

Joanna F. Valencia

From: Mandy Weed on behalf of CDS User
Sent: Thursday, November 15, 2007 9:32 AM
To: Joanna F. Valencia
Subject: FW: Comments on Wind Farm

Mandy Weed

From: Angela Thomassen [mailto:thomassen.a@charter.net]
Sent: Wednesday, November 14, 2007 9:43 PM
To: CDS User
Subject: Comments on Wind Farm

I have lived in the valley for four short years and just began to have a family with the intention of making this my home for many more. Currently, I am attending CWU to get my teaching degree and am writing a paper on global warming. I have been doing extensive research on the wind farm controversies in this county as well as the benefits of having the farms. The benefits of using renewable energy is better than the possibility of people's property values decreasing or disrupting their views. I know this does not have to do with the environmental impacts of the site location but I felt that all you read about is how many people do not agree with the wind farms in Kittitas County. The group that has formed an advocacy against the turbines is all you hear about in the news. One survey said that 78% of residents support the wind farms. Where are their comments to help the wind farms pass? I found it very ironic that the article in the daily record, to submit comments about wind farms, was located just above the article about how the wind cut power on the Westside Monday. In support of the wind farms being located in our county, I think we need to start thinking about the future for our children and grandchildren. With all the current problems with oil and where it is located, our Governor is doing a wonderful job at trying to have alternative energy options for our state.

Thank you for your time.

Angela Thomassen

Joanna F. Valencia

From: Tammy Swanberg on behalf of CDS User
Sent: Wednesday, November 14, 2007 3:51 PM
To: Joanna F. Valencia
Subject: FW: Wind Farm Comments on Invenergy Proposed New Wind Farm

-----Original Message-----

From: lee bates [mailto:bateslee@eburg.com]
Sent: Wednesday, November 14, 2007 12:04 PM
To: CDS User
Subject: Wind Farm Comments on Invenergy Proposed New Wind Farm

The set back issue to me is a moot point. I feel that we should not
> build any wind farms in the Kittitas Valley because they are not cost
> effective. A wind turbine is a dismal 26 percent efficient if the wind
> is blowing exactly 33 miles an hour. Also these wind turbines have to
> be backed up by water turbines in our dams in case the wind dies or
> blows too hard. In comparison, an airplane propeller is 90 percent efficient.
> In my opinion no unsubsidized private company could make a profit if
> they had to pay for the construction of the wind farms unless they
> charged the power users a ridiculously high rate. My opinion is the
> only reason they are built is the government subsidies are paying for
> the wind farm construction. I would like those who think they are
> saving the world by building wind farms to show me their calculations
> on the cost effectiveness of the wind farms. Also I would like to see
> the
> following: 1. The actual annual power output from the Wild Horse Wind
> Farm we have built already, . 2. The cost of generating this power
> including the total cost of construction of the Wild Horse Wind Farm 3.
> The revenues generated in a year 4. The pay back period when this
> Wild Horse Wind Farm will pay for itself.

>
>
> Lee Bates
> P O Box 1666
> Ellensburg WA 98926
> bateslee@eburg.com
> (509) 925 5055
>

Community Development Services Dept.
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

November 14, 2007

Re: Invenergy wind farm

Attn: Joanna Valencia

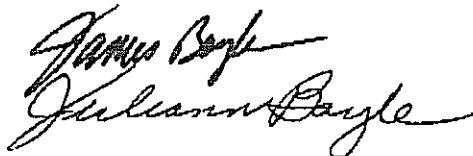
The article in the Daily Record of Tuesday, November 13, 2007 said that the county wants to hear from citizens that have concerns about the proposed wind farm planned for the area west of Vantage. We have no concerns but hope you will accept this comment anyway.

We believe the County Commissioners and the CDS Dept. were correct in designating a area for wind farms (wind farm overlay) in the eastern part of the county. We also commend Invenergy Wind North America, LLC for applying to the county for a project within the overlay area and not following the example of Horizon who do not seem to care a whit for the citizens of Kittitas County. If we must have wind turbines in the county then this is the place to site them.

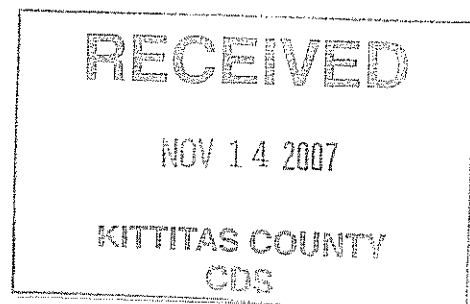
Not having seen the proposed development agreement submitted by Invenergy we cannot comment on the actions they propose to protect the environment and wildlife, etc. We will depend on the CDS Dept. and the County Commissioners to oversee these issues, making sure that the county is protected.

Again, if we must have wind farms then the eastern end of the county is the right place for them. We support the county in it's decision to use this area (which is otherwise near useless for any other purpose) for wind farms.

Thank You,



Mr. and Mrs. James Boyle
P.O. Box 39
Ronald, WA 98940



Joanna F. Valencia

From: Hal & Gloria Lindstrom [woodlind@charter.net]
Sent: Wednesday, November 21, 2007 2:29 PM
To: Joanna F. Valencia
Subject: Inverergy Wind North America

Joanna Valencia, Kittitas County Planner
Community Development Service Office
411 N Ruby Street
Ellensburg, WA 98926

November 21, 2007

RE: Inverergy Wind North America's Project

Dear Joanna,

I am very concerned that (1) another wind farm is being planned on undeveloped land where little critters live that attract overhead flying raptors, (2) that one is again being located on high ridges where raptors and songbirds have migration routes, (3) that no or very little bird studies have been done, and (4) once again cumulative effects seem to be ignored.

Wind farms are best placed on flat, plowed ground where there is little wildlife to attract raptors. There is also less migration conflicts.

Bird studies should be for a minimum of 2 years with night time radar tracking for both birds and bats. Habits and migration routes vary from year to year necessitating longer studies.

So much is being heard around the nation now of the cumulative effects of wind farms. The Columbia Gorge is now threatened with a multitude of wind farms and cumulative effects is a big concern there. It should be here too in the Kittitas Valley.

Sincerely,

Gloria Lindstrom
1831 Hanson Rd.
Ellensburg, WA 98926
woodlind@charter.net

Joanna F. Valencia

From: Gruber, John [GruberJ@wsdot.wa.gov]
Sent: Wednesday, November 21, 2007 12:43 PM
To: Joanna F. Valencia
Cc: Holmstrom, Rick
Subject: WSDOT Comments on Vantage Wind Power Project/Invenergy
Attachments: KittCo_Vantage Wind Power_Invenergy.doc

Hi Joanna,

Here are our comments regarding Invenergy's Vantage Wind Power Project. A signed original is going out in today's mail. Please let Rick or myself know if you have any questions.

Have a wonderful Thanksgiving!

-John
(509) 577-1636

11/26/2007

④

November 21, 2007

Community Development Services
Kittitas County
411 N. Ruby, Suite 2
Ellensburg, Washington 98926-6300

Attention: Joanna Valencia, Staff Planner

Subject: WSA-07-01, Vantage Wind Power Project (69 Wind Turbines, 103.5 MW)
Invenergy Wind North America LLC (4,750 Acres)
I-90, MP 125.00 – 131.30 Left (Ryegrass Rest Area 125.9 Left)
I-90, Exit 115 (Kittitas interchange – Badger Pocket Rd/Cleman Rd) vicinity
I-90, Exit 136 (Vantage interchange – Huntzinger Road) greater vicinity

We have reviewed the proposed project and have the following comments.

1. The project site is adjacent to Interstate 90. I-90, including the ramps, is a fully-controlled limited access highway with a posted speed limit of 70 miles per hour. No direct access to I-90 or from the Ryegrass Rest Area will be allowed. If viewing areas are considered, access will need to be via Vantage Highway.
2. All loads transported on WSDOT rights-of-way must be within the legal size and load limits, or have a valid oversize and/or overweight permit, if allowed. The application indicates that the haul route will include I-90 and Exit 136 (Vantage). We are concerned with how the oversize items are transported. As the County is aware, recently the crossover bridge at Exit 71 (Easton) was destroyed due to an overheight load. The applicant is responsible for the safe transportation of materials and adherence to permit conditions.

Also, there is an overheight restriction on eastbound I-90 at Exit 62. All loads over the legal height (14'0") are required to exit at the eastbound ramp and reenter the interstate via the eastbound on ramp, due to the vertical height restriction. In addition, we are concerned that Exit 136 may not be able to accommodate the turning radius of these vehicles. The applicant must notify the Department regarding the length, turning radius, and overheight dimensions.

3. All traffic control requests affecting state highways must be coordinated and approved through the WSDOT South Central Region's Traffic Engineer. The proponent must submit a traffic control plan to the Traffic Office for review and approval. Please contact Rick Gifford at (509) 577-1985 for specifics.

Once approved, traffic control implementation on must be coordinated with our Area Maintenance Superintendent, Terry Kukes. He can be reached at (509) 577-1907.



Ms. Joanna Valencia, Kittitas County – Vantage Wind Power Project/Invenergy

November 21, 2007

Page 2

4. The applicant indicates they will prepare a Traffic Management Plan. Please submit the plan prior to implementation to this office for review and comment as it pertains to our highways.
5. We expect the County will require adequate setbacks from adjacent land owners, including WSDOT, to maintain sufficient distance from WSDOT rights-of-way as a safety buffer.
6. In addition to the WSDOT projects listed on page 6 of the Traffic Analysis Report, WSDOT has the following projects that will impact the transport and/or operations of the proposed wind power project:
 - a) I-90: Asahel Curtis to Easton (milepost 46.93 to 70.00). Delineation upgrade. Install recessed pavement markers and inset lane and edge stripe. Scheduled ad date: Fall 2007.
 - b) I-90: Hansen Creek Road Bridge (milepost 47.71 to 47.72). Seismic retrofit. Scheduled ad date: March 2012.
 - c) I-90: Snoqualmie Pass East – Hyak to Keechelus Dam (milepost 55.10 to 59.50). Construct new roadway. Scheduled ad date: October 2009.
 - d) I-90: Slide curve vicinity to Cabin Creek eastbound (milepost 59.55 to 64.23). Pavement restoration. Scheduled ad date: Spring 2008.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding our comments, please contact Rick Holmstrom at (509) 577-1633.

Sincerely,

Bill Preston, P.E.
Regional Planning Engineer

BP: rh/jjg

cc: File #23, SR 90
Rick Gifford, Traffic Engineer
Terry Kukes, South Central Area 1 Maintenance Supervisor

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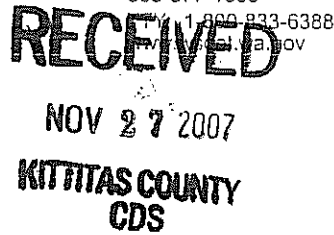


Washington State
Department of Transportation
Douglas B. MacDonald
Secretary of Transportation

South Central Region
2809 Rudkin Road, Union Gap
P.O. Box 12560
Yakima, WA 98909-2560

November 21, 2007

Community Development Services
Kittitas County
411 N. Ruby, Suite 2
Ellensburg, Washington 98926-6300



Attention: Joanna Valencia, Staff Planner

Subject: WSA-07-01, Vantage Wind Power Project (69 Wind Turbines, 103.5 MW)
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Ms. Joanna Valencia, Kittitas County – Vantage Wind Power Project/Invenergy

November 21, 2007

Page 2

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Sincerely,



Bill Preston, P.E.
Regional Planning Engineer

BP: rh/jjg

cc: File #23, SR 90
Rick Gifford, Traffic Engineer
Terry Kukes, South Central Area 1 Maintenance Supervisor

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Joanna F. Valencia

From: deidre [linkdal@televar.com]
Sent: Wednesday, November 21, 2007 10:25 AM
To: Joanna F. Valencia
Subject: Wind Farm Comments

Deidre Link
560 Hawk Haven Rd.
Cle Elum, WA 98922

November 21, 2007

RE: Notice of Application
Vantage Wind Project
Invenergy Wind North America LLC

Staff Planner: Joanna Valencia

To Whom I May Concern,

I do not know all the environmental impacts associated with a wind farm but I believe a source of electrical energy production that does not burn fossil fuels is a very good thing.

I further believe that most if not all impacts can be mitigated and will be short term and any impacts would be offset by the clean production of electricity.

Current scientific studies show human produced gases from the burning of fossil fuels are contributing to climatic changes being experienced around the world.

I feel this proposed wind farm would be very beneficial for not only Kittitas County but on a global level.

Thank you for giving me this opportunity to comment.

Regards,
Deidre Link

11/26/2007

(9)

Joanna F. Valencia

From: Tammy Swanberg on behalf of CDS User
Sent: Wednesday, November 21, 2007 9:47 AM
To: Joanna F. Valencia
Subject: FW: Recommend Approval of Invenergy Vantage Windfarm Application

From: WPWOODS@aol.com [mailto:WPWOODS@aol.com]
Sent: Wednesday, November 21, 2007 9:38 AM
To: Joanna F. Valencia; CDS User
Subject: Recommend Approval of Invenergy Vantage Windfarm Application

Kittitas County Community Development Service (Attn Joanna Valencia) -- I am writing to recommend that Kittitas County approve the application by Invenergy to establish the Vantage Wind Project. After reviewing the application material on the CDS website, having an opportunity to review the "hard copy" of the report and resolve my questions with CDS staff (Joanna Valencia) and then visiting the site on both I-90 and Vantage Highway since reading the article in the Ellensburg Daily Record on 11/13/07, I am satisfied that the project meets the appropriate goals and objectives for long term growth in Kittitas County and is consistent with the standards established in the county's new "preidentified wind farm siting ordinance."

From having worked with the Kittitas County Economic Development Group on wind farm projects over the last five years, it appears to me that the Vantage Wind Project has been intelligently conceived to meet the combined requirements for good wind resource, proximity to existing electric transmission lines and limited impact on the viewscape. I believe that it can be a broadly supported asset to the residents of the county, much like the Puget Sound Energy Wild Horse Wind Farm. Both can contribute renewable power, jobs, tax revenues and land use characteristics consistent with the wishes of their neighbors.

It is disappointing to me that the other two proposed wind farms north and west of Ellensburg (Horizon's Kittitas Valley Power Project and EnXco's Desert Claim Wind Power Project) could not have been developed with similarly well-balanced approaches that meet their commercial and the community's viewscape needs. Whereas I do support the Wild Horse and Vantage projects because they are the right projects in the right place at the right time, I do not support the Horizon and EnXco projects as they are perceived to be "in the wrong places" by many Kittitas County residents.

I would like to compliment the Community Development Service staff (especially "Tammy" and Joanna Valencia) for their timely and effective assistance in helping me access information about the Vantage project. They are both strong resources for the County.

William P. Woods, Jr., 350 Bar 14 Road, Ellensburg, WA 98926, 509 925 5508, email wpwoods@aol.com

Check out AOL Money & Finance's list of the [hottest products](#) and [top money wasters](#) of 2007.

RECEIVED

NOV 21 2007

Kittitas County
CDS

November 20, 2007

To: Joanna Valencia, Kittitas County Planner
Community Development Service Office
411 N Ruby Street
Ellensburg, WA 98926

Dear Ms. Valencia,

The following is Kittitas Audubon's response to the proposed Invenergy's wind project.

In the past Kittitas Audubon has requested denial of all the wind projects in Kittitas County because of the potential killing of avian species, i.e., the birds and the bats. Our concern stems from recently released research by Audubon Washington indicating approximately one-third of the species of birds that migrate through or nest in Washington State are in steep decline in numbers. Of the 365 species that nest or migrate through Washington, 247 of those species are found in Kittitas County, a bird migration route. Additionally dead bats are being collected at wind projects, both in Washington and throughout the United States, at a greater rate than predicted.

The first concern of bird-kill is the fact we do not know what birds or bats migrate or travel at the 300 to 400 foot level in the skies. No adequate studies have ever been done, and no studies have been done at night when flocks of songbirds migrate at high altitudes. The protocol in the past has been to do minimal point studies on the ground for a year, or less. Many bird experts are stating this is not enough. With the proliferation of wind towers throughout the nation, it is being discovered that towers are killing birds and large numbers of bats, some designated in the threatened and endangered categories. Equipment is available to determine the height and night activity, and it should be a standard requirement for a minimum of two years to gather those statistics. With the knowledge, the company can regulate the problem towers when needed, decreasing the negative aspect of bird and bat kills. **Kittitas Audubon strongly urges altitude day and night studies be performed, especially during the spring and fall migrations.**

The second concern is that no one has determined the cumulative effects of avian kills of all the industrial wind projects in this county. In our county alone, there is one project which will have approximately 250 towers, and three other projects proposed erecting another possible 200 towers, all in addition to Invenergy's. What is the predicted total of bird and bat kills for all these projects? The towers have the potential to eradicate avian species as the dams have done to the salmon. **This is another reason for full studies of species in the skies at 300 to 400 feet.**

Enclosed is an article from the Oregonian published on October 29th of this year which expresses the same concerns as Kittitas Audubon.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Gloria Baldi".

Gloria Baldi
Kittitas Audubon
P.O. Box 1443
Ellensburg, WA 98926

So far, developers have found three dead ferruginous hawks at operating wind farms, two in Washington and one in Oregon.

Wind farms generate bird worries

<http://www.oregonlive.com/news/oregonian/index.ssf7/base/news/1193622908249580.xml&coll=7>

Power - As more turbines churn in the gorge, wildlife biologists fear the blades will threaten raptor numbers

Monday, October 29, 2007

GAIL KINSEY HILL

The Oregonian

The rapid expansion of wind energy farms in the Columbia River Gorge's shrub steppes could put hawks, eagles and other raptors on a collision course with fields of giant turbines and their 150-foot blades.

By year's end, more than 1,500 turbines will be churning out electricity in the gorge, a windy corridor at the forefront of a nationwide effort to produce cleaner energy. Until now, most of the projects have gone up in wheat fields -- cultivated land that long ago drove away the rodents that raptors hunt.

But as wind energy developers move into wilder areas along the gorge's ridge lines, near canyons and amid shrub-covered rangeland, the potential for conflict rises. **If bird studies confirm the fears of Oregon and Washington state wildlife biologists, the green-minded Northwest might be forced to weigh its pursuit of pollution-free energy against the toll on raptors and other birds.**

The numbers sound small: Nationwide, collisions kill about 2.3 birds of all varieties per turbine per year, studies show. In the Northwest, it's about 1.9 birds per turbine. That could mean more than 3,000 bird deaths a year in the gorge.

But birders say those numbers are meaningless because the totals make no distinction between abundant and rare species. Golden eagles and ferruginous hawks -- a threatened species in Washington -- already are few in number, said Michael Denny of the Blue Mountain Audubon Society, and even a few fatalities could prove devastating.

"We'll have certain species in sharp local decline," Denny said. "If you lose breeding populations like the ferruginous hawk, you're not going to see them recover."

Raptors generally fly 300 to 400 feet above the ground -- about the height of most wind turbines. Hawks and eagles ride the thermals off the high windy ridges above the Columbia River as they search for ground squirrels and pocket gophers. Some are migratory and others are resident birds.

Raptors are known for their keen eyesight and might learn to negotiate the turbines

and their spinning blades, studies suggest. But hunting and migrating instincts are so ingrained and so intense that the birds might not see the obstacles until it's too late, biologists say.

The shrub steppes and grasslands that cover large swaths along the river east of the Cascades are classic raptor habitat, said David Anderson, a district biologist with the Washington Department of Fish and Wildlife. "We have concerns we're losing that habitat."

But even the cultivated areas with wind farms have bird experts worried. In Oregon's Sherman County, several hundred turbines stretch through wheat fields outside the small town of Wasco, creating one of the highest concentrations of wind farms in the gorge.

"They're going up so fast, we're worried about the cumulative effects," said Keith Kohl, a wildlife biologist for the Oregon Department of Fish and Wildlife's mid-Columbia district.

Energy companies conduct wildlife studies before pegging a specific site for development. They submit their findings to state or county authorities, who decide whether projects will go forward.

In some cases, regulators have required developers to shift turbine locations, establish buffer zones or set aside acreage exclusively for wildlife.

Often, developers must patrol their wind farms and record bird kills.

"We pride ourselves on building projects that adhere to the requirements," said Darin Huseby, Northwest regional director for developer enXco Inc., a California-based company with several projects in Klickitat County. "We want to be a net benefit to the environment."

Bird experts don't know how many raptors fly above the steppes, but it's a well-documented and well-traveled migratory route. It's also known breeding territory for golden eagles. At least one pair nest within two miles of a wind project under construction in south-central Klickitat County, and birders fear the worst.

"They're going to get whacked," said Denny, the Blue Mountain Audubon Society representative, who tried to stop the 97-turbine project, called Windy Point. "They'll fly right into those turbines."

A report by the federal Bonneville Power Administration suggests that annual bird fatalities in the gorge would be similar to the Northwest rate. The BPA reviews wind projects before hooking them into its transmission network. The report concluded that "cumulative mortalities in the Pacific Northwest region are relatively insignificant" compared with total bird populations in the area.

So far, developers have found three dead ferruginous hawks at operating wind farms, two in Washington and one in Oregon.

Portland-based PPM Energy recorded one of those kills at Big Horn, its 133-turbine

project in Klickitat County. To compensate, the company agreed to help pay for a study that will tag several ferruginous hawks with radio transmitters and chart their movements.

During the permit process, PPM also agreed to exceed requirements for setbacks from a canyon frequented by raptors, and it bought 455 acres for a turbine-free conservation area, said Jan Johnson, a PPM Energy spokeswoman. "We know it's a community that loves its birds, and we take that seriously."

Washington biologists already have placed radio collars on golden eagles, red-tailed hawks and Swainson's hawks to track the birds in Klickitat County.

Preliminary mapping of wind turbines and tagged raptors has yielded "compelling results," said Bill Weiler, a habitat biologist with the Washington Department of Fish and Wildlife. "It shows high concentrations of raptors in areas where turbines are proposed."

Other birds also could be in danger. Some of the turbines under construction at Goodnoe Hills in Klickitat County skirt an oak grove. One will rise less than 100 feet from the tree line, despite biologists' request for a 300-foot setback.

Lewis's woodpeckers, ash-throated flycatchers and owls are among the birds that perch and nest in the oaks, Weiler said. "Oak woodlands are magnets for birds. It's habitat that should be buffered."

Huseby of enXco, a partner in developing Goodnoe Hills, said the close-in turbine was a mistake. To compensate, he said, the company has agreed to pay for further bird studies and to fence the base of the turbine so animals that attract birds stay away.

The company has acted responsibly, Huseby said, but the public must be the final arbiter.

"The reality of our economy, our way of life is that we need to build certain facilities to provide electricity," and they will have certain effects on the environment, he said. "It's a societal question: What degree of (bird) mortality are they willing to accept?"

Gail Kinsey Hill: 503-221-8590, gailhill@news.oregonian.com For environment news, go to <http://blog.oregonlive.com/pdxgreen>

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RECEIVED

NOV 26 2007

KITTITAS COUNTY
CDS



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

OFFICE OF DRINKING WATER

PO Box 47822 • Olympia, Washington 98504-7822

Tel: (360) 236-3100 • FAX: (360) 236-2253 • TDD Relay Service: 1-800-833-6388

November 14, 2007

Subject: New Department of Health Contact for Growth Management and
Environmental Review Documents

Dear Agency Contact:

Please change the contact information for the Department of Health to:

Kelly Cooper
Department of Health
Environmental Health Division
Post Office Box 47820
Olympia, WA 98504-7820
(360) 236-3012

Sincerely,

A handwritten signature in black ink that reads "John Aden".

John Aden
Office of Drinking Water
(360) 236-3157



12

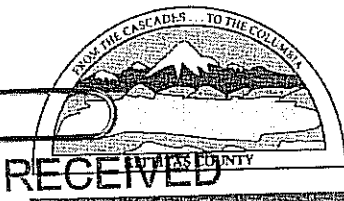
KITTITAS COUNTY COMMUNITY DEVELOPMENT SERVICES

411 N. Ruby St., Suite 2, Ellensburg, WA 98926

CDS@CO.KITTITAS.WA.US

Office (509) 962-7506

Fax (509) 962-7682



NOV 13 2007

NOTICE OF APPLICATION

DEPARTMENT OF HEALTH
OFFICE OF DRINKING WATER

TO:

Federal Aviation Administration
Bonneville Power Administration
Federal Communication Commission
Kittitas Reclamation District
Wa St Dept. Ecology – SEPA Registrar
City of Ellensburg
WA St Dept. Ecology - Yakima
City of Cle Elum
WA State Dept. of Fish and Wildlife
City of Roslyn
WA St Dept. Natural Resources
City of Kittitas
Kittitas Co. Enforcement & Investigation
Kittitas Co. Environmental Health
KITTCOM
Kittitas Co. Prosecuting Attorney
Yakama Nation

Kittitas Co. Public Works
Kittitas County Sheriff's Dept.
Puget Sound Energy
Kittitas County Commissioners Office
Kittitas County Fire Dist. No. 2
Kittitas County Fire Dist. No. 4
Kittitas County PUD
Yakima Firing Center
Adjacent Property Owners
CTED
Interested Parties
Town of South Cle Elum
Applicant

FROM:

Joanna Valencia, Staff Planner JV

DATE:

November 2, 2007

SUBJECT:

NOTICE OF APPLICATION: Vantage Wind Power Project

Wind Farm Siting Application: Pre-Identified Areas pursuant to Kittitas County Code 17.61A.035. (File No. WSA-07-01)

Pursuant to RCW 36.70B and KCC 15A.03, notice is hereby given that Kittitas County did receive an application on October 17, 2007 and on November 2, 2007 deemed complete said application from Invenergy Wind North America LLC (IWNA) for a wind farm consisting of a maximum of 69 wind turbines located on approximately 4,750 acres with a maximum height of 389 feet (Ground to Blade Tip). Location: north of I-90 and south of Vantage Highway between Kittitas and Vantage and is approximately 7 miles west of the Columbia River and approximately 3 miles southeast of the Wild Horse Wind Power Project.

The application is for a Development Agreement/Development Permit pursuant to Kittitas County Code 17.61A.035: Pre-Identified Areas for Siting of wind farms. Wind farms proposed to be sited in the pre-identified areas are subject to a process separate from the requirement for a wind farm resource overlay zone as identified in Kittitas County Code 17.61A.40.

Enclosed please find a Notice of Application, a CD containing electronic copies of the submitted Application and other related documents. Paper copies of the application are available to interested parties by contacting Kittitas County Community Development Services. Please retain these items for future reference. Information is also available online at <http://www.co.kittitas.wa.us/cds/current/>.

DARRYL PIERCY, DIRECTOR

ALLISON KIMBALL, ASSISTANT DIRECTOR

COMMUNITY PLANNING • BUILDING INSPECTION • PLAN REVIEW • ADMINISTRATION • PERMIT SERVICES • CODE ENFORCEMENT • FIRE INVESTIGATION

(12)

Joanna F. Valencia

From: Joanna F. Valencia
Sent: Monday, December 10, 2007 1:55 PM
To: 'David Iadarola'
Cc: Darryl Piercy; Allison Kimball
Subject: FW: Vantage Wind Energy Center
Attachments: vantage-wind_PATH OVERLAY.PDF

Dave,

Here's some additional information from the Washington State Patrol.

Thanks,

Joanna

Joanna Valencia

Planner II
 Kittitas County Community Development Services
 [P] 509.962.7046
 [F] 509.962.7682
www.co.kittitas.wa.us/cds

From: John.Woodcock@wsp.wa.gov [mailto:John.Woodcock@wsp.wa.gov]
Sent: Thursday, December 06, 2007 11:49 AM
To: Joanna F. Valencia
Cc: Robert.Schwent@wsp.wa.gov
Subject: RE: Vantage Wind Energy Center

Joanna,

Here is a first approximation of the problem. We plan to migrate from this site in the near future but I do not have a time line at present.

John Woodcock
 Washington State Patrol
 Electronic Services Division
 425-649-4657

From: Joanna F. Valencia [mailto:joanna.valencia@co.kittitas.wa.us]
Sent: Wednesday, December 05, 2007 1:26 PM
To: Woodcock, John (WSP)
Cc: Schwent, Robert (WSP); johnson@kittcom.org; CDS User
Subject: RE: Vantage Wind Energy Center

Hi John,

Thank you for your comments. We've included them in the record. I've forwarded to the applicant for them to address. Let me know if you're able to find additional information.

Joanna

Joanna Valencia

12/12/2007

(13)

Planner II
Kittitas County Community Development Services
[P] 509.962.7046
[F] 509.962.7682
www.co.kittitas.wa.us/cds

From: John.Woodcock@wsp.wa.gov [mailto:John.Woodcock@wsp.wa.gov]
Sent: Tuesday, December 04, 2007 3:41 PM
To: Joanna F. Valencia
Cc: Robert.Schwent@wsp.wa.gov; johnson@kittcom.org; CDS User
Subject: Vantage Wind Energy Center

Joanna,

Thank you for the assistance today in navigating your web site. After review of the application WSA-07-01, we have serious reservations as to the impact of a number of the turbines on one of our existing public safety microwave paths. Our facility, ¼ mile WSW of the proposed substation, has a beam path at 123 degrees which crosses directly through the center of the west end of the planned wind farm. As we became aware of this situation only yesterday, I have not had time to analyze the exact path through the array of towers but it does not look favorable. Please consider this as a formal comment and statement of concern from the Washington State Patrol. Your immediate reply and recommendations will be greatly appreciated.

Regards,

John Woodcock
Washington State Patrol
Electronic Services Division
425-649-4657

(13)

12/12/2007



VANTAGE WIND ENERGY CENTER
 VANTAGE, WASHINGTON : OCTOBER 12, 2007



13

Joanna F. Valencia

From: Joanna F. Valencia
Sent: Monday, December 10, 2007 1:53 PM
To: 'David Iadarola'
Cc: Darryl Piercy; Allison Kimball
Subject: FW: Vantage Wind Project.doc
Attachments: image002.jpg

Dave,

Please find comments in the email below.

Thanks,

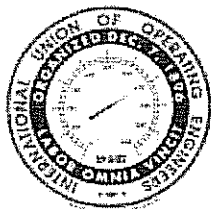
Joanna

Joanna Valencia
Planner II
Kittitas County Community Development Services
[P] 509.962.7046
[F] 509.962.7682
www.co.kittitas.wa.us/cds

From: Mandy Weed **On Behalf Of** CDS User
Sent: Wednesday, December 05, 2007 4:19 PM
To: Joanna F. Valencia
Subject: FW: Vantage Wind Project.doc

Mandy Weed

From: Sean Jeffries [mailto:Sjeffries@iuoe302.org]
Sent: Wednesday, December 05, 2007 3:45 PM
To: CDS User
Cc: David Preston
Subject: Vantage Wind Project.doc



International Union of Operating Engineers LOCAL 302 •
Washington and Alaska • AFL-CIO
Allan B. Darr, Business Manager and General Vice President

Malcolm J. Auble, *Financial Secretary* • Charles T. Jurgens, *President* • Amir Gadiwalla, *Vice President*
18701 120th Avenue NE • Bothell, Washington 98011-9514
Telephone: (425) 806-0302 • Toll-free: 1-800-521-8882 • Fax: (425) 806-0030
Washington Districts: Bellingham • Silverdale • Wenatchee • Yakima Alaska Districts: Anchorage • Fairbanks • Juneau

12/12/2007



Kittitas County Community Development Services
Ellensburg, Washington
December 4, 2007

Hello, my name is Sean Jeffries, and I am writing this letter on behalf of the International Union of Operating Engineers, Local 302.

I appreciate this opportunity to add my comments and concerns on the development of the Vantage Wind Farm in Kittitas County. I am not here to talk for or against future wind farm projects. I do know we must continue to provide alternative ways to generate energy for the growing demands of our state and the country.

The Operating Engineers are landowners in close proximity to the project. We own 1600 hundred acres of land upon which our Training Center is located. At that site, we provide state registered apprentices with training they will need to become the next generation of Operating Engineers. We contribute to the area in many ways. Those include generating business from our training center and district office located in down town Ellensburg. Additionally, approximately 160 members of Local 302 live in Kittitas County and contribute to our local economy.

Our concerns are centered on the economic impact of these wind farms. The developers of these large projects, constructed in our county, should make a commitment to pay prevailing wages to those employed on the project. Doing so insures that contractors who are awarded the bids do not undercut the local contractors by paying less then the area standard. Kittitas County maintains the area standard at a prevailed rate. Secondly, they should commit to a percentage of local hire for the project. Doing so, will result in a highly skilled, highly trained workforce for the future of all projects. Lastly, the developer should adhere to the use of apprenticeship through a state approved program. By doing so, the younger generation will have the opportunity to learn a trade, while working and raising their families in their home community.

It should be noted that as of January, 2008 public work contracts in the state of Washington will be a required to a standard of 10% apprenticeship utilization for all hours worked on projects over 3 million.

I urge the County and Invenergy Wind North America LLC to review these matters. With these issues addressed, the project would be beneficial for our county.

Thank you,

Sean Jeffries
IUOE Local 302
District Representative
403 S Water Street
Ellensburg, WA 98926
509-933-3028

SJ/er opeiu8

(14)



State of Washington

Department of Fish and Wildlife

South Central Region – Ellensburg District Office, 201 North Pearl, Ellensburg, WA 98926

Phone: (509) 925-1013, Fax (509) 925-4702

November 30, 2007

Darryl Piercy, Director
Kittitas County Community Development Services
411 North Ruby, Suite 2
Ellensburg, Washington 98926

Subject: Additional Comments regarding Notice of Application for Vantage Wind Project,
Invenergy Wind North America LLC project proponent

Dear Mr. Piercy:

I have enclosed some additional comments regarding the Notice of Application for the Vantage Wind Project. Because comment period for this proposal was short relative to the complexity of the proposal, it was not possible to provide these comments with our November 21, 2007 letter.

WDFW would appreciate the opportunity to discuss specifics of project impacts and mitigation with the proponent and Kittitas County Community Development staff. Such a meeting would help clarify how project environmental documentation and mitigation commitments can best be incorporated into a Development Agreement/Development Permit for the project.

Please keep us apprised of the status of this application and discussions related to SEPA review and the Development Agreement/Development Permit. If you have questions or need additional information, please call me at (509) 925-1013.

Sincerely,

Brent D. Renfrow
District Habitat Biologist

Enclosure: WDFW Supplemental Comments

Cc: Perry Harvester, WDFW Yakima
Ted Clausing, WDFW Yakima
Curt Leigh, WDFW Olympia

(15)

WDFW Supplemental Comments And Concerns Regarding Notice of Application - Vantage Wind Project

General Comments About Documents Provided With Notice of Application

Baseline Wildlife and Vegetation Studies

The background studies and information collected on wildlife, vegetation and habitat types, are similar to those conducted for other wind power projects in Kittitas County. The studies are generally consistent with the WDFW wind power guidelines and our discussions with the proponent's consultants. We offer the following comments.

- **Eagles – Potential for Turbine Mortality and Need for Conservation Measures:** The proposal should include conservation measures for reducing the potential for golden and bald eagle mortality at the project. The baseline wildlife studies provide an explanation why the risk to eagles is not expected to be high, but a level risk remains. After years of being an ESA listed “Threatened Species”, bald eagles are gradually repopulating eastern Washington. As noted in the documents provided, there is a new bald eagle nesting territory on the Columbia River not far from the wind project. We note also that bald eagles are commonly seen in the Kittitas Valley during winter.
- **Clarification of Grassland Vegetation Type:** The term “grassland” is used in the documents to describe shrub steppe sites where the shrub canopy has been temporarily removed by fire or other temporal disturbance. The project area does not include “true grasslands” such as found in the eastern and northeastern portions of Washington or nor does it contain CRP “managed grasslands”. (Please refer to Daubenmire, Steppe Vegetation of Washington, 1970 for detailed discussion of vegetation applicable to the project site). In the context of the mitigation ratios negotiated with the wind power industry and described in the WDFW wind power guidelines, a lower ratio was established for true grasslands and CRP grass plantings because of the relative difference in restoration success and length of time to maturity. Any mitigation for impacts to vegetation on the Vantage Wind Project site should be at the 2:1 ratio for shrub steppe vegetation.
- **Habitat Mapping:** The vegetation/habitat map units and manner of presentation of the field information reflects our discussions with WEST, Inc. and associated consultants several years ago regarding other wind projects in Kittitas County. The habitat classifications were an adaptation of range site descriptions. Since that time, aerial photography and soil survey information have become more readily available over the internet. For future projects, or where more detailed vegetation work is needed on the Vantage Wind Project, it would facilitate analysis if vegetation groups and mapping were keyed to the soils and “Ecological Sites” as mapped on the soil survey.

- **Rare Plant Surveys:** Hoover's tauschia (*Tauschia hooveri*) is not mentioned in the document and appears to have been overlooked in surveys. Hoover's tauschia occurs on basalt lithosols within shrub-steppe habitats. It is a state listed Threatened Species and a USFWS species of concern. The plant is known to be present on lands immediately adjacent to the project, on soils and in plant communities that also occur within the project site. In the absence of conclusive information to the contrary, it shall be presumed to be present within the project on the typical sites. The project proponent shall consult with the Washington Natural Heritage Program to identify an appropriate conservation strategy for this project. (Contact information can be found on the following link: <http://www.dnr.wa.gov/nhp/index.html>)
- **Project Footprint at Higher Resolution.** It would be helpful to the reviewers if the footprint of the project (including location of turbines, roads, overhead transmission lines and underground cable trenches) could be superimposed over current color aerial photography at a level of resolution sufficient to identify probable habitat impacts. Existing GIS data layers are likely available to create a base compatible with work done by the applicant to date.

Road and Utility Stream Crossings: The application notes a number of road and utility crossings of watercourses. All of these crossings will require construction techniques that minimize channel impacts, prevent erosion and maintain water quality when flow is present in the channels. The use of "low water crossings" or fords is encouraged as a technique for crossings of ephemeral streams in lieu of culvert crossings. Ford crossings can reduce road cut/fill (thus reducing vegetation impacts) and reduce modification of watercourses (reducing both channel and vegetation impacts). A Hydraulic Project Approval (Chapter 77.55 RCW, WAC 220-110) from WDFW will be required for the anticipated work in Schnebly Coulee.

Discussion of Project Mitigation in the Documents is Substantially Inadequate

The documents do not provide enough specific information regarding how adverse environmental impacts will be avoided and mitigated. The documents must unequivocally describe, for reviewers and decision makers, what mitigation measures will be included in the project and the net effect of the project on the environment. The documents need to clearly identify and describe each of the mitigation elements of the project. Where specific mitigation elements have not yet been developed, it is necessary to identify plans and processes to ensure mitigation measures are developed in a timely fashion, that they adequately address the impacts and that they are correctly implemented to be effective.

Importance of the Vantage Wind Project site for Wildlife

The project area is a mosaic of shrub steppe plant communities used by native wildlife including birds of prey, song birds, bats, small mammals, herptiles and large animals

15

including deer and elk. It is situated in a strategic location in the landscape of eastern Washington.

Shrub steppe habitat. The project is to be developed in shrub steppe habitat on the west shoulder of the Columbia River. The river corridor provides a natural migration pathway for wildlife. Shrub steppe is a State of Washington Priority Habitat because of the assemblage of wildlife dependent upon it. Over 60% of the original shrub steppe habitat in Washington has been developed. Additional loss or fragmentation of shrub steppe is of concern, particularly if it affects ecological connectivity or unique sites. While even small areas of shrub steppe are used by song birds, small animals and herptiles, many shrub steppe-associated wildlife species require large areas of land, and thus perpetuation of shrub steppe wildlife is most likely to be successful on large tracts.

This project site warrants special consideration for wildlife as it lies within the largest remaining block of shrub steppe lands in Washington. The project occupies an east-west strip that essentially bisects this habitat block. Over the long term, the ability to sustain the full array of shrub steppe wildlife and plant species in Washington depends upon keeping such large blocks of shrub steppe habitat in good condition and ecologically connected.

Sage Grouse. We note that the project lies with the state's Sage Grouse Recovery Area. Sage grouse are a state Threatened Species and have been proposed for listing under the federal Endangered Species Act. Sage grouse are present in the project vicinity (they have been repeatedly seen north and south of the project, including observations in 2007) and should be presumed to use the site at least as a connecting corridor between lands north and south of the project. The potential for sage grouse to breed, nest, rear broods or winter on or adjacent to the project should not be ruled out.

IBAs. The project lies adjacent to two areas designated by Washington Audubon as "Important Bird Areas" (Quilomene-Colockum Wildlife Areas IBA and Yakima Training Center IBA). The Important Bird Areas program is Washington Audubon's effort to scientifically identify places in the state that are essential to maintaining healthy populations of birds. As indicated above, the Vantage Wind Project lies in the corridor that maintains the "ecological connection" between these sites.

Columbia River Corridor. The project lies on the west shoulder of the Columbia River. The river corridor forms a natural north-south travel path for wildlife, including waterfowl and other migratory birds, and the habitat associated with the river adds diversity to the bird life passing through the general vicinity of the project. Bald eagles use the lands along the river during the winter, and a nesting pair has established a territory not far from the project.

Adverse Impacts to Wildlife and Wildlife Habitat from Wind Projects

Adverse Impacts to Wildlife and Wildlife Habitat - General

Wind power projects, including the proposed Vantage Wind Project, have adverse impacts to wildlife and wildlife habitat. Careful design and construction coupled with a conscientious mitigation plan can greatly reduce impacts. Adverse impacts to wildlife include:

- a) Loss of habitat from construction of turbines, meteorological towers, roads, parking areas, buildings, substation, overhead transmission lines, and underground utilities.
- b) Degradation of adjacent plant communities due to construction-related impacts and subsequent increase of noxious weeds, and
- c) Direct wildlife mortality from collisions with turbines, meteorological towers and overhead transmission lines. Construction impacts, operation impacts and cumulative impacts for the project are all of concern.

Temporary Construction Impacts: In addition to the general disturbance (noise, activity, light, etc.) created by construction of the project, there will be temporary ground disturbance of the site substantially greater than the permanent project footprint. Work will occur primarily in sensitive, shrub steppe plant communities. If work is done carefully and integrated with a conscientious revegetation plan, these temporarily disturbed areas can be restored. Although construction will be completed in one year, impacts to habitat will persist until site revegetation is complete and the habitat is restored to natural-like conditions. Because of the shallow soils and near-desert environment, revegetation to a stable plant community will require five years or longer depending upon the plant community affected and the care exercised during construction and site restoration. Sensitive, shallow soil sites are difficult to revegetate. Project elements such as construction of cable trenches through bedrock create impacts such that restoration to natural-like conditions may not be successful within the initial life of the project.

Permanent Impacts to Habitat: The permanent footprint of the project (roads, crane pads, turbines, O&M facility, etc.) will both fragment and eliminate wildlife habitat in shrub steppe plant communities.

Project Operation Impacts to Wildlife: Operation of the facility will have direct impacts on wildlife due to collisions.

- **Turbine Mortality:** Wind turbines have the potential to result in the death of significant numbers of resident and migrating birds and bats over the life of the project. The wind industry has improved siting and design standards such that on average, turbine mortality is expected to be in the range of four birds/bats per turbine per year. Mortality studies from other projects in the northwest have found that turbine mortality can be expected for a few species of bats and most of

the avian species present in the area, ranging from large species such as hawks, eagles, game birds, great blue heron, and waterfowl to small species such as horned larks and bats.

- **Overhead Utility Lines:** The project includes a 230kv overhead transmission line to connect the project substation to the PSE substation. Collisions with overhead transmission lines are expected to result in some bird mortality each year.
- **Tower and Turbine Lighting:** Tower lighting is occasionally responsible for dramatic nighttime mortality of migrating songbirds during adverse weather conditions. Large events have primarily been associated with tall, guyed communication towers. This lighting phenomenon is poorly understood, however it is clear that tower lighting creates an increased risk for night-migrating birds.

Cumulative impacts: The operational impacts of the project (annual mortality and loss of habitat) will affect wildlife throughout the life of the project. While these impacts are relatively small when viewed at a single moment in time, the cumulative impacts over the 20+ year life of the project are significant. Moreover, this wind power project is only one of many proposals in eastern Washington. It is important that cumulative impacts be addressed for each project in order to avoid substantial public costs to correct the aggregate of impacts from many projects.

Mitigation Measures Needed for this Project

Based on the limited information provided in the application documents, we request the following mitigation measures be incorporated in the project.

Measures to Avoid or Minimize Impacts – Design

- **Standards for Power Facility Construction:** Permittee shall ensure spacing of all overhead power line conductors minimize the potential for raptor electrocution. Overhead transmission lines and the substation shall incorporate the design guidance in the APLIC guidelines ([http://www.aplic.org/SuggestedPractices2006\(LR-2watermark\).pdf](http://www.aplic.org/SuggestedPractices2006(LR-2watermark).pdf)) to minimize the risk of electrocution of birds. Permittee shall equip all overhead power lines with raptor perch guards where needed to reduce risk of predation on sage grouse or minimize risks to raptors.
- **Free-Standing Meteorological Towers Required:** Only free-standing towers shall be used on the project site. (The project currently proposes the installation of three free-standing meteorological towers. Free standing towers are demonstrably less likely to result in bird mortality than guyed towers.)

Measures to Avoid or Mitigate Construction-related Impacts

- **Independent Environmental Compliance Monitor.** An independent environmental firm with appropriate expertise shall be hired by the project to: a) advise the project manager, Kittitas County and regulatory agencies on minimizing environmental impacts during construction, and b) Monitor environmental permit compliance during construction. The environmental monitor shall report to Kittitas County and have authority to stop work on project elements that are not in compliance with permits and mitigation requirements. Selection of the firm shall be subject to approval of Kittitas County in consultation with WDFW and WDOE.
- **Environmental Expertise for Project Construction Manager.** The Contractor's Construction Manager shall have an on-site environmental manager with expertise in managing construction in sensitive, arid environments. The on-site environmental manager shall a) advise the Construction Manager to ensure work is scheduled and performed in a manner that minimizes adverse environmental impacts, b) ensure that work is scheduled with consideration of site conditions including temperatures, soil moisture, precipitation, etc., and c) ensure construction is in compliance with all environmental permits and mitigation requirements.
- **Construction timing:** Construction activities outside of the hardened footprint of the project (i.e. "temporary disturbance areas") shall be done during the late spring, summer and fall when soil moisture is very low.

For most of the project area, the time of year of construction will greatly influence the amount of long-term damage to soils and plants. Shrub steppe communities are very fragile when soils are wet. Even a single day of driving equipment on these sites when wet can result in substantial permanent damage. In contrast, during summer when soils are dry these sites can withstand traffic with minimal soil displacement and breakage of plant roots. Vegetation is more tolerant of damage during the dry period as the period of rapid growth has ended, many plants have completed flowering and setting of seed, and many are dormant.

- **Disturbance limits and clearing.** Construction work limits shall be staked prior to any clearing or construction. Staking shall be clearly visible to equipment operators. Since revegetation of the project site is difficult (shallow soils, arid conditions), vegetation clearing shall be limited to the actual construction footprint within the project limits to the greatest extent possible. Vegetation

(shrub) removal for temporary disturbances such as laydown areas, etc. shall be done with minimal ground disturbance (e.g. mowing, cutting or shallow scalping of site). Grubbing or grading of temporary disturbance areas shall be avoided.

- **Construction Soil Management and Project Revegetation Plan:** Prior to ground disturbance on the site, the proponent shall submit, for approval by Kittitas County and WDFW, a detailed construction soil management and site revegetation plan(s). The plan(s) shall be prepared by a firm with expertise in restoration of shrub steppe. The plan shall identify how soils will be conserved and protected from loss and erosion during construction and used to restore the site. Temporary erosion controls such as application of mulch, PAM, BMPs, etc. shall be prescribed as needed to ensure soil protection and revegetation success. The revegetation plan shall include seed mixes adapted to each site (e.g. habitat type or ecological site) and the timing and manner of application. Seed mixes shall be comprised of locally adapted biotypes to the greatest extent possible. An aggressive weed control program shall be part of this plan. Weed control shall include application of pre-emergent herbicides for control of cheatgrass and weeds, late winter control of cheatgrass with glyphosate as needed and spot herbicide applications where needed during the growing season. Personnel on site implementing the revegetation plan shall have expertise in successful restoration of Eastern Washington native plant communities. Site restoration and reseeded shall be done during weather conditions and a time of year when establishment can be successful.

Post-construction restoration of disturbed areas shall be sufficient to achieve a robust stand of native vegetation sufficient to achieve site stability, weed control and agreed-upon similarity to suitable reference standards. The project shall identify reference standards (or a process to establish standards) within the project area for use in evaluation of site restoration success. Selection of reference standards shall be done in consultation with WDFW and the Technical Advisory Committee.

- **Restoration of Trenches for Underground Cables.** Trenches for underground cables shall be placed into the roadway to the greatest extent possible. If trenches must be widely spaced to accommodate circuits, at least two circuits shall be placed in the roadway and additional circuits shall be placed in the road shoulder or along previously disturbed alignments. If installation of trenches and cables in rocky substrate results yields an unnaturally rocky surface which cannot be revegetated, soil conserved from facilities construction shall be applied over the rocky trench spoil to provide a seed bed.
- **Construction-related Site Protection Plans.** The proponent shall be required to prepare the following plans and submit them to Kittitas County for approval. Kittitas County's review and approval shall be done in collaboration with WDFW and WDOE.

- Fire Protection Plan which includes measures for minimizing the likelihood of fire starts and measures to detect and quickly suppress wildfire.
- Construction Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall be reviewed by the project's revegetation contractor with expertise with shrub steppe restoration.
- Construction Spill Prevention, Control and Countermeasures Plan to address spills of fuel, lubricants and other harmful materials on hardened areas of the facility and in shrub steppe areas in a manner which minimizes long-term impacts to vegetation and wildlife habitat.

Measures to mitigate for loss of wildlife and shrub steppe wildlife habitat

- **Mitigation Plan:** Proponent shall prepare a wildlife and habitat mitigation plan and subject to approval by Kittitas County in collaboration with WDFW.

We recommend the plan's primary focus be protection and restoration of shrub steppe habitat and maintaining ecological connectivity of shrub steppe within the landscape that incorporates the project. Such a plan might include acquisition of conservation easements, development rights or lands, and management of those lands in a manner that ensures ecological connectivity and perpetuation of shrub steppe-dependent wildlife.

Measures to Mitigate Operation and Maintenance of the Project

- **Conservation Measures to Reduce Risk to Avian Scavengers.** Project operation shall include conservation measures for managing risk to scavaging birds of prey including eagles, vultures and ravens. Such measures shall include removal of big game and livestock carcasses within the project boundary which could attract eagles and other avian scavengers to the project. Since bald eagles are attracted to Kittitas Valley pastures during calving because of the opportunity to scavenge afterbirth, conservation measures should also include a prohibition on using pastures on the project site for livestock caving operations.
- **Management of Deer and Elk in Collaboration with WDFW.** Permittee shall collaborate with WDFW regarding management of deer and elk and prevent wildlife damage to lands surrounding Vantage Wind Project. Vantage Wind Project shall allow public hunting to control big game numbers on the project or provide acceptable alternative control of big game so as to prevent animal damage to adjacent properties. The measures used to address big game damage concerns shall be reviewed by the Technical Advisory Committee.

There is potential for deer and elk to use project lands as a refuge from which to foray out to adjacent agricultural and residential lands and cause damage to landscaping, crops and irrigated pasture. WDFW is liable for damages caused by deer and elk. Public hunting is the primary tool available to WDFW to minimize damage caused by game animals. WDFW requests that as a condition of project approval, the Permittee not preclude public hunting as a means of dispersing animals or reducing herd size. Hunting can be prescribed to be compatible with the Vantage Wind Project objectives. For example, access control can ensure hunters are conscientious in their use of project lands, and choice of weapons can minimize risk to project facilities.

- **Post-construction wildlife monitoring plan.** The permittee shall develop a post-construction monitoring plan for the project to quantify impacts to avian species and assess the adequacy of mitigation measures implemented. The plan shall be subject to review and approval by WDFW. The monitoring plan will include the following components: 1) fatality monitoring involving standardized carcass searches, scavenger removal trials, searcher efficiency trials, and reporting of incidental fatalities by maintenance personnel and others, for a period of two years after the beginning of Project operation; and 2) a minimum of one breeding season raptor nest survey of the study area and a one-mile buffer in order to locate and monitor active raptor nests potentially affected by the construction and operation of the Project. The protocol for the fatality monitoring study will be similar to protocols used at the Wild Horse Wind Project.
- **Technical Advisory Committee.** Permittee shall convene, a Technical Advisory Committee (TAC) to review pertinent monitoring and scientific data and to develop appropriate responses to impacts that exceed projections for avian mortality and habitat impacts made in the Application. The TAC will monitor all mitigation measures and efforts and examine information relevant to assessing Project impacts to habitat, birds, bats and other wildlife. The TAC will determine whether further mitigation measures would be appropriate, considering factors such as the species involved, the nature of the impact, monitoring trends, and new scientific findings regionally or at a nearby wind power facility. The TAC shall recommend mitigation measures to Kittitas County which shall retain the authority to require additional mitigation measures as part of the development agreement, including any recommended by the TAC.

The purpose of the Technical Advisory Committee(TAC) shall be to ensure that monitoring data is considered in a forum in which independent and informed parties can collaborate with the Permittee, and make recommendations to Kittitas County if the TAC deems additional studies or mitigation are warranted to address impacts that were either not foreseen in the Application or exceed impacts that were projected. In order to make recommendations, the TAC will review and consider: results of Project monitoring studies, including post-construction avian

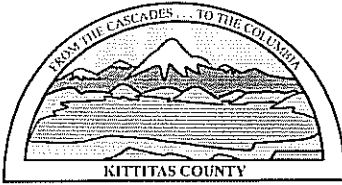
and bat mortality surveys, to evaluate impacts to habitat and wildlife, including avian and bat species; new scientific findings made at wind generation facilities with respect to the impacts on habitat and wildlife, as they may relate to the VantageWind Power Project; assess whether the post construction restoration and mitigation and monitoring programs for wildlife that have been identified and implemented merit further studies or additional mitigation, taking into consideration factors such as the species involved, the nature of the impact, monitoring trends, and new scientific findings. The TAC will coordinate with the Permittee to review drafts of the following plans: the Post-Construction Rangeland Management and Grazing Plan, the Hunting Plan for the Project Area and the Post-Construction Avian Monitoring Plan. The TAC will also review the Permittee's implementation of the Post-Construction Restoration Plan.

The TAC may include, but need not be limited to, representatives from WDFW, U.S. Fish and Wildlife Service, Kittitas County, DNR, the Kittitas Field and Stream Club, the Audubon Society, the Kittitas County Farm Bureau and the Permittee. Kittitas County, at its discretion, may add additional representatives with appropriate expertise to the TAC. No individual representative to the TAC may be party to a turbine lease agreement, or any other contractual obligation with the Permittee. All TAC members shall be approved by Kittitas County.

No later than sixty (60) days after the beginning of Construction, the Permittee shall submit to Kittitas County proposed Rules of Procedure describing how the TAC shall operate, including but not limited to a schedule for meetings, a meeting procedure, a process for recording meeting discussions, a process for making, and presenting timely TAC recommendations to the Council, and other procedures that will assist the TAC to function properly and efficiently. No later than sixty (60) days prior to the beginning of Commercial Operation, the Permittee shall convene the first meeting of the TAC. The Permittee will provide a copy of the proposed Rules of Procedure to the TAC at their first meeting for their review and comment. The TAC may suggest modifications of the plan to be approved by Kittitas County. The TAC will be convened for the life of the Project, except that Kittitas County may terminate the TAC if: the TAC has ceased to meet due to member attrition; or, the TAC determines that all of the pre-permitting and post operational monitoring has been completed and further monitoring is not necessary; or the TAC members recommend that it be terminated. The failure of the TAC to meet and/or members to participate at any meeting shall not be deemed a violation of the Development Agreement, any condition of approval, or any mitigation measure. If the TAC is terminated or dissolved, Kittitas County may reconvene and reconstitute the TAC at its discretion.

Mitigation for Project Implemented at Decommissioning

- **Restoration Plan for Decommissioning:** As part of the decommissioning plan, Permittee shall submit for approval by Kittitas County in collaboration with WDFW and WDOE, a final site restoration plan to ensure proper revegetation of the site when the project ceases operations. The plan shall be prepared by a firm with proven expertise in restoration of shrub steppe lands. The final site restoration plan shall provide for the return of the project site to pre-project, native shrub steppe habitat in good condition, following removal of turbines and infrastructure.



KITTITAS COUNTY DEPARTMENT OF PUBLIC WORKS

MEMORANDUM

TO: Joanna Valencia, Community Development Services
FROM: Christina Wollman, Planner II
DATE: November 27, 2007
SUBJECT: Vantage Wind Power Project WSA-07-01

RECEIVED
NOV 27 2007
KITTTITAS COUNTY
CDS

The following shall be SEPA mitigation:

1. The applicant shall prepare a Traffic Management Plan with the construction contractor outlining steps for minimizing construction traffic impacts. The Traffic Management Plan shall be submitted to the Department of Public Works and WSDOT prior to construction for review.
2. The applicant shall prepare a road signage plan for the Vantage Highway that conforms to the most recent edition of the Manual on Uniform Traffic Control Devices. The road signage plan shall be submitted to the Department of Public Works prior to construction for review.
3. The applicant shall provide notice to adjacent landowners when construction takes place to help minimize access disruptions.
4. When slow or oversized wide loads are being hauled, appropriate vehicle and roadside signing and warning devices shall be deployed per the Traffic Management Plan. Pilot cars shall be used as WSDOT dictates, depending on load size and weight.
5. The applicant shall construct necessary site access roads and an entrance driveway that will be able to service truck movements of legal weight and provide adequate sight distance. The site access roads shall be constructed to Kittitas County Road Standards, Table 12-1, Low Density Private Roads. The entrance driveway shall be constructed to commercial access standards as specified in WSDOT Design Manual Figure 920-5 and intersect with the Vantage Highway at no more than 10 degrees from perpendicular.
6. The applicant shall encourage carpooling for the construction workforce to reduce traffic volume.
7. The applicant shall provide detour and warning sign plans to the Department of Public Works in advance of any traffic disturbances. When temporary road closures cannot be

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avoided the applicant shall post "To Be Closed" signs and place a legal notice in the newspaper a minimum of five working days prior to the closing. The types and locations of the signs shall be shown on a detour plan. A detour plan must be prepared and submitted to the Department of Public Works at least ten working days in advance of the proposed closure, and approved prior to closing any County roadway. In addition, the contractor must notify, in writing, local fire, school, law enforcement authorities, postal service and any other affected persons as directed by the Department of Public Works at least five working days prior to the closing.

8. The applicant shall maintain one travel lane at all times when construction occurs near the roadway.
9. The applicant shall employ flaggers as necessary to direct traffic when large equipment is exiting or entering public roads to minimize risk of accidents.
10. The applicant shall provide a roadway pavement analysis and visually inspect the condition of pavement and the quantity and severity of pavement distresses utilizing an accepted rating system. The analysis shall document roadway and shoulder conditions before and after construction and shall include the Vantage Highway from the I-90 Vantage Interchange to the City of Ellensburg and the route along Main Street, Patrick Avenue, and No 81 Road from the I-90 Kittitas Interchange to the Vantage Highway. The applicant shall be responsible for restorative work made necessary by the project.



Joanna F. Valencia

From: Joanna F. Valencia
Sent: Tuesday, December 04, 2007 11:22 AM
To: 'David Iadarola'
Cc: Darryl Piercy; Allison Kimball
Subject: FW: wind project development agreement comments
Attachments: development agreement-dpw.pdf

Hi Dave,

Please find attached from Public Works.

Also, to follow up on my voicemails--- in reviewing the timelines, noticing requirements with the Board and reviewing and addressing the comments recently received, we thought it would be best to reschedule the public hearings in January. We would like to address all the comments received, especially recent ones received by WDFW, prior to public hearings in order to ensure that all impacts have been addressed. Depending on everyone's schedules, we're going to work on setting up meetings with the agency to discuss comments.

Let me know your thoughts on this. As mentioned, I'll be out of the office December 17th to January 11th, so Darryl will be primary contact and attending meetings.

In regards to the Met Towers, you can go ahead and submit an updated site map for our building permit file.

Thanks,

Joanna

Joanna Valencia

Planner II
Kittitas County Community Development Services
[P] 509.962.7046
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www.co.kittitas.wa.us/cds

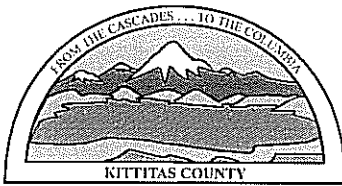
From: Christina Wollman
Sent: Monday, December 03, 2007 11:25 AM
To: Joanna F. Valencia
Subject: wind project development agreement comments

Christina Wollman

Planner II
Kittitas County Department of Public Works
411 N Ruby Suite 1
Ellensburg WA 98926
509.962.7051

12/12/2007

(16)



KITTTITAS COUNTY DEPARTMENT OF PUBLIC WORKS

MEMORANDUM

TO: Joanna Valencia, Community Development Services

FROM: Christina Wollman, Planner II

DATE: December 3, 2007

SUBJECT: Vantage Wind Power Project WSA-07-01

RECEIVED
DEC 03 2007
KITTTITAS COUNTY
CDS

The Department of Public Works requests the following changes to the Development Agreement between Kittitas County and Invenergy Wind North America:

5.7. Project Access Roads. The main Project access road entrance from Vantage Highway shall be on the ~~south~~^{north} side along the Old Vantage Highway roadbed. The access point will be located at the current property access point. The access point will be approximately 10 miles west of the Vantage Exit on I-90, and shall be constructed to commercial access standards as ~~specified~~^{contained} in the WSDOT Design Manual Figure 920-5. Project site roads shall be designed in accordance with Table 12-1 of the Kittitas County Road Standards for Low Density Private Roads with Low Density Traffic and have a maximum grade of 12%. ~~In areas where Project roads exceed a 12% grade, the roads shall be designed to ensure that fire vehicles can gain access to the site as necessary to provide emergency services.~~ If variances from the above referenced standards are required, they shall be reviewed for approval by the Road Variance Committee~~Public Works Director and the Fire Marshal~~ prior to construction, which approval shall not be unreasonably withheld. In the event of denial of a variance request, Applicant may seek review and approval by the Board of County Commissioners~~Road Variance Committee~~ pursuant to Chapter 12.01.130 of the Kittitas County Road Standards.

5.8. Road Degradation Monitoring and Mitigation. The applicant shall provide a roadway pavement analysis and visually inspect the condition of pavement and the quantity and severity of pavement distresses utilizing an accepted rating system. The analysis shall document roadway and shoulder conditions before and after construction and shall include the Vantage Highway from the I-90 Vantage Interchange to the City of Ellensburg and the route along Main Street, Patrick Avenue, and No 81 Road from the I-90 Kittitas Interchange to the Vantage Highway. ~~County and City of Kittitas highway and shoulder pavement shall be video monitored before and after construction of the Project.~~ If construction of the Project results in the degradation of the existing pavement and/or shoulders Applicant shall reinstate these facilities to equal or better condition than they were prior to construction.

5.10. **Traffic Monitoring.** Applicant shall monitor traffic levels following construction of the Project for a period of three years. After that time, Applicant shall continue monitoring of traffic to the Project upon written request from the County. Should operations related traffic to and from the Project site exceed WSDOT warrants, as contained in Chapter 910 of the WSDOT Design Manual, the Applicant shall construct right and/or left turn lanes on Vantage Highway. Said improvements shall be designed and constructed in accordance with WSDOT guidelines. The monitoring program shall be developed in conjunction with the Department of Public Works. Reports should be submitted to the Department of Public Works at least annually