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BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of the Application of:  
  
Scout Clean Energy, LLC, for Horse Heaven  
Wind Farm, LLC, Applicant

DOCKET NO. EF-210011  
  
PREFILED TESTIMONY OF  
GREG WENDT

**Please state your full name and job title.**

My name is Greg Wendt and I am Director of Community Development for Benton County. I have worked in county government as a fulltime professional land use planner for the past 26 years in Maryland, Oregon, and Washington. I have worked for Benton County for the past six and a half years. I attended Eastern Washington University and graduated with a degree in Urban and Regional Planning. I also attended Washington State University and received a Masters in Regional Planning.

**Are you familiar with the proposed Horse Heaven Wind Farm Project?**

Yes. I am familiar with the proposed Horse Heaven Wind Farm (“HHWF”) Project.

**Does the Horse Heaven Wind Farm Project require a conditional use permit?**

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3 Yes. As the project is a proposed wind farm within the County's Growth  
4 Management Act Agricultural District ("GMAAD") under the Benton County Code in effect  
5 at the time of project application, it is required to obtain a conditional use permit ("CUP").

6 **What are Benton County's conditional use permit criteria for approval?**  
7

8 Benton County provides the criteria for conditional use permit approval in Benton  
9 County Code ("BCC") 11.50.040. A CUP shall only be granted if there is sufficient evidence  
10 presented to allow the decision maker, who I understand in this case to be the Energy Facility  
11 Site Evaluation Council ("EFSEC"), to conclude that, as conditioned, the proposed use:

- 12 (1) Is compatible with other uses in the surrounding area or is no more  
13 incompatible than are any other outright permitted uses in the  
14 applicable zoning district;
- 15 (2) Will not materially endanger the health, safety, and welfare of the  
16 surrounding community to an extent greater than that associated  
17 with any other permitted uses in the applicable zoning district;
- 18 (3) Would not cause the pedestrian and vehicular traffic associated with  
19 the use to conflict with existing and anticipated traffic in the  
20 neighborhood to an extent greater than that associated with any  
21 other permitted uses in the applicable zoning district;
- 22 (4) Will be supported by adequate service facilities and would not  
23 adversely affect public services to the surrounding area; and
- 24 (5) Would not hinder or discourage the development of permitted uses  
25 on neighboring properties in the applicable zoning district as a  
26 result of the location, size or height of the buildings, structures,  
27 walls, or required fences or screening vegetation to a greater extent  
28 than other permitted uses in the applicable zoning district.

29 It is the applicant's burden to present sufficient evidence to allow the above conclusions to be  
30 made. If such evidence is not presented or all necessary reasonable conditions are not  
identified by the applicant so as to allow the decision maker to make the conclusions required  
above, the conditional use application shall be denied.

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3 **Are there any limitations to your testimony that the Energy Facility Site Evaluation**  
4 **Council should be aware of?**

5 Yes. My testimony is limited by the fact that a final environmental impact statement  
6 (“FEIS”) has not yet been issued. In my role as Director of Community Development, I  
7 would almost never review a project for compliance with CUP criteria until such time as a  
8 required FEIS has been issued. This is because I, and by extension the decision maker,  
9 cannot know the actual features and impacts of a project until the FEIS is issued. Without  
10 knowing the features and impacts of the project, I cannot evaluate whether the project  
11 complies with the CUP criteria. Benton County submitted substantive comments on the  
12 HHWF draft environmental impact statement (“DEIS”) that directly related to CUP criteria.  
13 It is possible that my analysis below would change based upon the response to Benton  
14 County’s comments.  
15

16 With that caveat, I applied the CUP criteria to the HHWF as described in its  
17 application and DEIS as I would if the HHWF were to come before the County.  
18

19 **Is the Horse Heaven Wind Farm project compatible with the GMAAD?**

20 No. Even outside of the question of whether the HHWF is compatible with other  
21 permitted uses in the GMAAD, the HHWF is incompatible with the GMAAD itself. The  
22 impacted land has been designated to have long-term commercial significance for the  
23 commercial production of food or other agricultural products in accordance with RCW  
24 36.70A.170. The County’s zoning ordinance does allow flexibility in the GMAAD for  
25 landowners to conduct both farm and supportive non-farm activities on a small scale. In my  
26 experience, Benton County has never authorized a use that has impacted or removed an  
27 equivalent or larger area (6,869 acres) from agricultural production in the GMAAD. The  
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3 scope of the proposed project is not consistent nor compatible with the Growth Management  
4 Act, RCW 36.70A, the County's land use plans, the purpose of the GMAAD, and the  
5 required conclusions for a conditional use permit.

6 The purpose of the GMAAD:

7  
8 is to meet the minimum requirements of the State Growth Management  
9 Act (Chapter 36.70A RCW) that mandates the designation and  
10 protection of agricultural lands of long term commercial significance.  
11 The chapter protects the GMA Agricultural District (GMAAD) and the  
12 activities therein by limiting non-agricultural uses in the district to those  
13 compatible with agriculture and by establishing minimum lot sizes in  
14 areas where soils, water, and climate are suitable for agriculture  
15 purposes. This chapter is intended to work in conjunction with Chapter  
16 14.05 BCC entitled "Right to Farm" which protects normal agricultural  
17 activities from nuisance complaints.

18 BCC 11.17.010.

19 The HHWF is not compatible with the purpose of the GMAAD because, rather than  
20 protecting ALLTCS, it results in the conversion of agricultural lands of long term  
21 commercial significance, which is an important term in state planning law defined at RCW  
22 36.70A.170 ("ALLTCS"). Instead of restating her testimony, I would point EFSEC to the  
23 testimony of my colleague Michelle Cooke as to the impact of the project on ALLTCS. As a  
24 summary, the overall project would permanently impact 6,869 acres which is equivalent to  
25 1% of the GMAAD in Benton County, and will temporarily impact 2,957 acres which would  
26 create a total of 9,826 acres directly impacted by the proposed project or 1.5% of Benton  
27 County's total GMAAD. Indirect and cumulative impacts are also likely, as Ms. Cooke  
28 explains. While the applicant may propose mitigation measures that would lessen the  
29 impacts the project may have on birds and wildlife, mapped critical areas, and other  
30 environmental concerns, there are no mitigation measures that are sufficient for the

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3 permanent loss of such a large percentage of the County’s agricultural land which is the  
4 dominant land.

5           The Benton County Comprehensive Plan states that only uses related or ancillary to,  
6 supportive of, complementary to, and/or not in conflict with agricultural activities are  
7 appropriate in areas designated GMAAD. Benton County Comprehensive Plan, p. 17 (Goal  
8 1, Policy 3). The Benton County Comprehensive Plan is attached as Exhibit A. The HHWF  
9 is not ancillary to, supporting of, or complementary to and is in conflict with agricultural  
10 activities in the GMAAD.  
11

12           The applicant claims that the solar component of the project “would be no more  
13 incompatible (i.e., would be equally compatible) on surrounding areas compared to a minor  
14 solar power generating facility or utility substation, which are allowable uses in the  
15 GMAAD.” The size and scope of the solar component is not similar in compatibility with a  
16 minor solar facility. A minor solar facility per BCC 11.03.010(168) is a use that may be sited  
17 on a parcel for the owner’s own power consumption/benefit and which would generate power  
18 as a secondary or accessory use to the owner’s primary use of the land. The intent of a minor  
19 solar facility is solely for the generation of power for an individual such as a few solar panels  
20 on the roof of a dwelling or a small ground mounted array. The applicant’s proposal, which  
21 seeks to establish two 3,050- to 4,450-acre sites over multiple property boundaries, far  
22 exceeds the scope of a minor solar facility. The applicant’s proposal includes 6,570 acres  
23 that will be permanently disturbed by the solar component alone. Solar sites do not allow for  
24 the compatible siting of other agricultural practices and, if approved, the project would have  
25 a significant direct impact by wholly changing the use of the land.  
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3 Despite any proposed mitigation measures, the size and scope of the proposed solar  
4 component of the project would be incompatible with the Benton County zoning regulations  
5 as the proposal would “preclude over 6,000 acres from agricultural practices” and thus would  
6 not be a secondary use of the land, but rather would wholly occupy and remove from  
7 production large tracts of agricultural land of long-term commercial significance.  
8

9 **Is the Horse Heaven Wind Farm Project compatible with other uses in the surrounding**  
10 **area or no more incompatible than any other outright permitted uses in the GMAAD**  
11 **zoning district?**

12 No, the project is not compatible with the surrounding area and is more incompatible  
13 than the outright permitted uses in the GMAAD.

14 BCC 11.03.010(53) defines “compatibility” as the congruent arrangement of land  
15 uses and/or project elements to avoid, mitigate, or minimize (to the greatest extent  
16 reasonable) conflicts. It does not evaluate the impact on surrounding landowners to maintain  
17 their ability to farm or the increase in cost to agricultural uses and practices. The County’s  
18 definition highlights the necessity that all proposed uses within the zoning district shall not  
19 create a greater conflict than the allowed uses in that zone. The County assesses  
20 compatibility by examining whether the proposed use is the same or complementary to  
21 surrounding uses in scale, traffic impact and/or operational impact. If the proposed use  
22 deviates significantly in density, intensity, scale, form, or activity causing negative impact  
23 on, or being negatively impacted by, surrounding land uses, the project would be deemed  
24 incompatible.  
25

26 The starting point for any CUP analysis is comparing the size, scale, and scope of the  
27 proposed project with the outright permitted uses in the zone. The permitted uses in the  
28 GMAAD consist of: agricultural activities (usually limited to one parcel); agricultural related  
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3 industries (usually limited to one parcel); agricultural stands (usually limited to one parcel);  
4 bakeries associated with agriculture (usually limited to one parcel); single-family homes  
5 (limited to one parcel); manufactured homes (limited to one parcel); commercial  
6 specialty/exotic animal raising (usually limited to one parcel); aquaculture (usually limited to  
7 one parcel); adult family homes (limited to one parcel); club houses, grange halls associated  
8 with agriculture (usually limited to one parcel); custom agricultural services (usually limited  
9 to one parcel); personal airstrips (usually limited to one parcel); public or quasi public  
10 buildings (limited to one parcel); schools/churches (limited to one parcel); dog kennels  
11 (limited to one parcel); cell towers (no greater in height than 150') (usually limited to one  
12 parcel); personal use wind turbines (no greater in height than 60') (usually limited to one  
13 parcel); meteorological towers (usually limited to one parcel); and commercial horse stables  
14 (usually limited to one parcel).  
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17 To summarize, most permitted uses in the GMAAD zone are agricultural-related and  
18 limited to one parcel, with the agricultural activities sometimes encompassing around a  
19 thousand or so acres. Most permitted uses include anywhere from one to three structures. A  
20 typical parcel in the GMAAD ranges from 150 to 640 acres. In my professional opinion,  
21 these are small-scale agricultural activities or they tend to support and enhance agriculture.  
22

23 The size, scale, and scope of the HHWF is enormous compared to the permitted  
24 activities within the GMAAD. The HHWF's entire project boundary is 72,428 acres or,  
25 assuming the largest typical parcel size, approximately 113 times larger than a typical project  
26 in the GMAAD. Even just considering the Wind Energy Micrositing Corridor, which  
27 encompasses 11,850 acres, it is approximately 18 times larger than a typical project in the  
28 GMAAD. This does not count the solar arrays, which will take up 10,755 acres and are  
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3 approximately 16 times larger than a typical project in the GMAAD. Within this large lease  
4 boundary, the HHWF proposes up to either 244 turbines with a height of 499 feet or 150  
5 turbines with a height of 657 feet. Currently, the only wind turbines permitted in the  
6 GMAAD are for personal use, with a maximum height of 60 feet.  
7

8 I acknowledge that at the time of the HHWF application, wind turbine farms were  
9 allowed, subject to a CUP. However, as someone who participated in the amendment  
10 process to change the County’s zoning code in December of 2021, which removed large  
11 scale commercial and industrial wind and solar farms as a CUP option in the GMAAD, the  
12 intent of the zoning code is to provide for uses that are compatible and ancillary with the  
13 other permitted uses in the zoning chapter. In this case, an appropriate example would be a  
14 60-foot wind turbine for personal use on a farm.  
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16 Recognizing that continuing to allow wind and solar farms as a CUP in the GMAAD  
17 failed to comply with the Growth Management Act (“GMA”) and the goals and policies of  
18 the Benton County Comprehensive Plan, and further recognizing that these facilities do not  
19 protect ALLTCS, and do not conserve critical areas and habitat, visual resources, and the  
20 County’s rural character, the County took the necessary steps to amend BCC 11.17.070 and  
21 ensure compliance with the County’s Comprehensive Plan goal to “[c]onserve and maintain  
22 agricultural land of long-term commercial significance as the local natural resource most  
23 essential for sustaining the County’s agricultural economy” and the policies associated with  
24 that goal. Benton County Comprehensive Plan, p. 17.  
25

26 BCC 11.17.070 was amended to remove subsection (t), “wind turbine farm,” which  
27 was defined as “two or more wind turbines on one parcel,” BCC 11.03.010(191), as an  
28 allowed conditional use in the GMAAD. It was under this section, BCC 11.17.070(t), that  
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3 the HHWF was deemed to be consistent with Benton County’s land use regulations as a  
4 “wind turbine farm” was a permitted conditional use in the GMAAD at the time of  
5 application. The amendment was intended to encourage industrial uses to occur with similar  
6 uses on non-GMAAD land and limit incompatible and non-agricultural uses in the GMAAD.  
7  
8 The removal of large-scale industrial wind and solar farms from the GMAAD also enhances  
9 and preserves the County’s rural character and open space, while further protecting the  
10 County’s ridges, bluffs, and wildlife habitat. A massive wind turbine farm such as the  
11 HHWF is not compatible with permitted uses in the GMAAD.

12 **What is your response to the applicant’s contention that the project is compatible with**  
13 **other uses in the GMAAD zoning district?**

14 As I understand, the applicant argues that the test of compatibility is judged by  
15 whether the project would have a substantial negative impact on the ability of surrounding  
16 landowners to maintain their existing use of the land, including the ongoing use for  
17 agricultural activities and residential uses. The applicant further asserts that the focus of the  
18 compatibility test should be on whether the project would undermine existing uses or cause  
19 any increase in the costs of agricultural uses and practices of the land. As I explained in  
20 detail in my answer to the previous question, that is not the code’s actual test for  
21 compatibility. The test for compatibility is whether the proposed use is the same or  
22 complementary to surrounding uses in the zoning district based upon project scale, traffic  
23 impacts, and/or operational impacts and conflicts.  
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26 The application states that “the wind, solar and battery storage uses would be benign  
27 in impacts to these existing uses of surrounding lands, enable a highly beneficial use for  
28 clean energy, and in no way force changes of uses on surrounding lands.” As previously  
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3 stated, the argument that the impact of the project would not affect adjacent land does not  
4 meet the County's test for compatibility.

5           Furthermore, the HHWF is not compatible with the fundamental purpose of the  
6 County's zoning code. The overall purpose of the County's zoning code is found in BCC  
7 11.02.010(b) and states:  
8

9           [t]he purpose of this title is to further the goals and policies of the  
10 comprehensive plan for the physical development of the county. The  
11 objectives of this ordinance are to protect the public health, safety and  
12 welfare; encourage the orderly growth of the county; promote compatible  
13 uses of land; provide desired levels of population density and intensity of  
land use; facilitate adequate levels of community services and utilities;  
and to provide workable relationships between land uses, the  
transportation system, and the environment.

14 The application and the DEIS do not describe a project that meets the overall intent or the  
15 purposes of the zoning code. The project as proposed and sited does not protect the health,  
16 safety, and welfare of the area and does not promote orderly and compatible development  
17 compared to other uses permitted in the zoning district.  
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19           When discussing orderly and compatible development, the first step must be to look  
20 at the permitted uses in a zone. Permitted uses in a zone are uses that Benton County have  
21 determined are orderly and compatible with one another—i.e., a single-family home in a  
22 rural area may be compatible with a horse stable as they have similar intensity of use. With  
23 an unpermitted use, or even a potential conditional use, there is a higher likelihood for  
24 conflict in the intensity of uses. This results in incompatible uses. In order to determine the  
25 likelihood of conflict, one must compare and contrast the intensity of a proposed use with the  
26 intensity of permitted uses.  
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3 As I testified above, most permitted uses in the GMAAD zone are agricultural-related  
4 and limited to one parcel, with anywhere from one to three structures, and with the  
5 agricultural activities sometimes encompassing around a thousand or so acres. However, a  
6 typical parcel in the GMAAD ranges from 150 to 640 acres. In order for a CUP proposed  
7 within the GMAAD to be orderly and compatible with outright permitted uses, the proposal  
8 must also be similar to the intensity of the permitted uses.  
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10 The HHWF micrositing corridor, which consists of the area in which the turbines and  
11 supporting facilities would be sited during final design, encompasses 11,850 acres and will  
12 house 244 turbines. Taking the average parcel size of 650 acres, the micrositing corridor can  
13 be assumed to cover 18 parcels. 244 turbines across 18 parcels average out to approximately  
14 13 turbines per parcel. This is not including the necessary haul routes associated with each  
15 turbine. As I stated above, dryland farming can encompass thousands of acres, but usually  
16 only has about two or three structures on the entire parcel. Permitted uses in the GMAAD  
17 are similar, encompassing large areas but including few structures and roads. Permitted uses  
18 are low intensity activities when it comes to their use of the land. The intensity of the  
19 HHWF is significantly greater than the intensity of permitted uses within the GMAAD, as it  
20 covers a larger land area, involves more ground disturbance, and is not ancillary to existing  
21 agricultural uses, rendering the HHWF incompatible with development as compared to  
22 permitted uses.  
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25 The application is also not consistent with the purpose of a conditional use permit.  
26 As I explain throughout my testimony, the HHWF does not comply with the CUP criteria in  
27 BCC 11.50.040 as the location, design, configuration, and impacts to the surroundings are  
28 not protecting the integrity of the zoning district. The purpose of the GMAAD is to meet the  
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3 minimum requirements of the GMA, Ch. 36.70A RCW, which mandates the designation and  
4 protection of ALLTCS. The CUP chapter of the Benton County Code protects the GMAAD  
5 and the activities therein by limiting non-agricultural uses in the district to those compatible  
6 with agriculture and by establishing minimum lot sizes in areas where soils, water, and  
7 climate are suitable for agricultural purposes. An industrial project with the proposed use,  
8 size, scope, and impacts as discussed in the HHWF application and DEIS does not meet the  
9 criteria of BCC 11.50.040 and the purpose of the GMAAD found in BCC 11.17.010.

11 **Will the Horse Heaven Wind Farm Project materially endanger the health, safety, and**  
12 **welfare of the surrounding community to an extent greater than that associated with**  
13 **any other permitted uses in the GMAAD zoning district?**

14 Yes. The construction and continued operation of the HHWF, with its size and scope,  
15 will materially endanger the health, safety, and welfare of the surrounding community to an  
16 extent greater than that associated with any other permitted uses in the GMAAD. The  
17 GMAAD consists of farming operations and rural homesites. The HHWF is further adjoined  
18 by the Rural Lands 5 zoning district, which allows rural homesites and agricultural uses with  
19 a 5-acre minimum lot size. The construction and operation of a large-scale industrial project  
20 is not only inconsistent with the rural character of the area, but will also materially endanger  
21 the health, safety, and welfare of the area.

22  
23 The lack of any city and/or urban area fire and emergency response resources poses  
24 an increased fire risk. The HHWF is currently served by Benton County Fire District 1,  
25 which is a rural fire district made up almost entirely of volunteer firefighters. Typically,  
26 large-scale industrial projects are located in urban areas, which have more resources  
27 available to support large scale projects. Those resources are simply not available along the  
28 Horse Heaven Hills. The fact that the industrial machinery and support systems for the  
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3 HHWF are dispersed over the landscape makes fire risk even greater, because any given  
4 component of the project may be in a particularly isolated or remote area. By comparison,  
5 the fire risk associated with a single-family home in the GMAAD is moderate because homes  
6 are usually located along a road that allows for ingress and egress. Because the GMAAD  
7 does not promote residential development as an appropriate use, firefighters are likely to  
8 encounter only a single structure that will require routine fire suppression practices.  
9

10 In the event of a fast-moving, wind-driven fire, where multiple residential structures  
11 are at risk, the accessibility of the established road network is even more important to a  
12 resource-limited rural fire district. However, if the HHWF is constructed, the resources of  
13 rural Fire District 1 will be diverted to additional complex structures that may present  
14 firefighting considerations far beyond other permitted uses. The net effect is that fire  
15 suppression to protect the HHWF reduces the resources available to others within the  
16 GMAAD and therefore impacts the public, health, and safety in a manner greater than  
17 outright permitted uses in the GMAAD.  
18

19 Additionally, as the DEIS itself discloses, the turbines themselves present a fire risk.  
20 DEIS, 4-457, 460. This is not a speculative risk, as “[a] fire that burned approximately 250  
21 acres in Klickitat County, Washington, occurred in 2019 when a wind turbine’s generator  
22 caught fire, causing sections of the turbine to melt and then fall to the ground.” DEIS 4-460-  
23 61. There would now be an additional 244 structures within the Fire District’s boundary,  
24 presenting an increased and documented fire risk that Fire District 1 must manage, when  
25 traditional permitted uses add only one or two structures to Fire District 1. Adding an  
26 industrial project the size and scale of the HHWF in a remote agricultural area with limited  
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3 access will cause a strain on the already limited fire and emergency resources, increasing  
4 response time for permitted uses.

5           As I noted in my testimony above, any review of CUP criteria must look at the size,  
6 scale, scope, and conflict of a proposed project in comparison to the permitted uses in the  
7 zone. The permitted uses in the GMAAD are small scale agricultural and some residential  
8 uses that do not require a high level of emergency or public services. Adding a large scale  
9 industrial project to this area will place a strain on public resources by adding at least 244  
10 structures and 16-20 employees related to the operation of the HHWF to Fire District 1,  
11 which will divert those resources from others in the surrounding community, endangering the  
12 public health, safety, and welfare. The same impact would not be felt if the proposed project  
13 was for a dryland wheat farm or even an airstrip—outright permitted uses in the GMAAD.  
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16 **Will the Horse Heaven Wind Farm Project cause the pedestrian and vehicular traffic**  
17 **associated with the use to conflict with existing and anticipated traffic in the**  
18 **neighborhood to an extent greater than associated with any other permitted uses in the**  
19 **applicable zoning districts?**

20           If Benton County were processing the CUP application, I would rely upon an FEIS or  
21 other underlying documentation to make a determination as to the impacts of the project on  
22 traffic. The applicant's materials indicate that traffic volumes are anticipated to increase  
23 measurably during construction and that levels of service are anticipated to be impacted.  
24 However, as Benton County noted in its comments on the DEIS, there is no evidence that the  
25 applicant evaluated existing or forecasted levels of service, nor is there even a clear  
26 indication of the degree that levels of service will decrease. Without this updated  
27 information from the applicant, the actual traffic impacts associated with the HHWF are  
28 unknown and could range anywhere from a worst-case scenario to more benign effects.  
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3 Benton County's main area of concern is traffic during build out and construction.  
4 The County acknowledges that there is likely to be low operational traffic once the project is  
5 actually complete. However, the application and supporting DEIS is void of any information  
6 as to how the HHWF will handle the impacts from construction. Based on the application  
7 and DEIS, the County anticipates the degradation of area highways and county roads from  
8 the project will be of a greater impact than other uses allowed outright in the GMAAD due to  
9 the much larger size, scale, and scope of the HHWF. As I've noted throughout my  
10 testimony, permitted uses in the GMAAD are typically confined to one parcel ranging from  
11 150 to 640 acres. The traffic associated with these uses is typically confined to the parcel,  
12 with some uses potentially requiring a few trips a day. I would not expect typical farm  
13 operations to require any heavy construction equipment. However, if the projects did require  
14 heavy construction equipment, once again it would likely be limited to one or two trucks and  
15 associated trips. The HHWF proposes to construct 244 wind turbines on almost just over  
16 72,000 acres. The traffic associated with the construction will include heavy construction  
17 equipment requiring 375 trips. DEIS, p. 4-476-77. The lowest anticipated average daily  
18 traffic during project construction is 412 trips, with 41 peak hour trips. DEIS, p.4-480. The  
19 ITE Trip Generation Manual places single-family homes around one peak hour trip per  
20 house. The large volume of trips for the HHWF will conflict with the relatively small  
21 number of trips that permitted uses within the GMAAD generate.  
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25 Additionally, Benton County has safety concerns primarily related to the size of  
26 components being shipped, their speed of transport causing congestion and network  
27 blockages, and the sheer number (frequency) of component deliveries required for a project  
28 of this scale. My concerns center on the safe and effective operation of the road network.  
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3 Components of the scale necessary for the HHWF will cause hazardous back-ups and need  
4 for residents to be re-routed when project component deliveries are occurring. Delays will be  
5 exacerbated when paired with the shipments of water indicated necessary for construction,  
6 dust control, and operational maintenance. The HHWF will conflict with and impact existing  
7 and anticipated traffic to an extent greater than any other outright permitted use in the  
8  
9 GMAAD.

10 **Will the Horse Heaven Wind Farm Project be supported by adequate service facilities**  
11 **and not adversely affect public services to the surrounding area?**

12 No. The HHWF will not be supported by adequate service facilities, and it will  
13 adversely affect public services in the surrounding area. When I talk about service facilities,  
14 I am really focusing on fire and water service. As I detailed in my testimony above regarding  
15 safety concerns, due to the rural nature of Fire District 1, the HHWF will not be supported by  
16 adequate fire service facilities related to personnel and response time. Additionally, due to  
17 the proposed 244 wind turbines, in the event of a fire, these facilities will place a strain on the  
18 already limited fire and emergency resources, increasing response time for those permitted  
19 uses in need.  
20

21 In my experience, industrial projects the size and scale of the HHWF are located in  
22 urban areas, including urban fire districts, as those areas have more resources available to  
23 support large scale projects. Rural areas, on the other hand, are characterized by their low  
24 intensity nature. Benton County Comprehensive Plan, p. 39. This low intensity expectation  
25 is reflected in the volunteer nature of Fire District 1.  
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27 Furthermore, it is actually unknown how fires will be fought in the HHWF. To my  
28 knowledge, there are no fire hydrants or associated urban level services associated with the  
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3 project. It is my understanding that the applicant will be trucking in water during the  
4 construction of the project because there are no water systems near the project. Therefore,  
5 the fire fighters will not be able to connect to a water system as they likely would with most  
6 other intense industrial type uses in the cities or the County. As such, the HHWF is not  
7 supported by adequate water services to allow for adequate fire service.  
8

9 **Will the Horse Heaven Wind Farm Project hinder or discourage the development of**  
10 **permitted uses on neighboring properties in the GMAAD as a result of the location, size**  
11 **or height of the buildings, structures, walls, or required fences or screening vegetation**  
12 **to a greater extent than other permitted uses in the GMAAD?**

13 Yes. The proposed project would hinder the development of permitted uses due to  
14 the location, size (72,428 acres; 150 to 244 turbines), and height (499 to 671 feet) of the  
15 overall project. For example, as this is an agricultural area, personal and commercial crop-  
16 dusting airstrips are often sited in this area of the GMAAD. The scale of the wind  
17 component of the HHWF would greatly hinder the ability for a property owner to site an  
18 airstrip on their property if the HHWF were approved as the turbines would present a  
19 significant safety risk to the pilots. Additionally, as Ms. Cooke testified, it is expected that  
20 we will see ALLTCS land in the Horse Heaven Hills turned into a patchwork of semi-  
21 industrial sites devoted to short- and medium-term transitional uses. These new industrial  
22 uses, roads, and loss of habitat will make it extremely difficult to sustain economically viable  
23 agricultural activities in this region, said activities encompassing most of the permitted uses  
24 in the GMAAD. Furthermore, these industrial uses will hinder the development of permitted  
25 uses as they will take GMAAD land out of agricultural production and are incompatible with  
26 other agricultural uses. It is unlikely that the permitted uses in the GMAAD would want to  
27 be sited next to industrial uses due to the environmental risks associated with industrial uses.  
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3 Siting the HHWF in an agricultural area will also negatively impact the rural  
4 character of the area and further discourage permitted uses from developing in the area,  
5 whether they are agricultural home sites, expanding agricultural operations, agricultural air  
6 strips, or agricultural accessory uses. Additionally, the construction and maintenance of  
7 wind-energy facilities may alter the ecosystem structure in ways not yet fully understood,  
8 through the cumulate effects of clearing of vegetation, soil disruption, and potential for  
9 erosion. This is particularly problematic in areas that are difficult to reclaim, such as shrub  
10 steppe habitat, which the HHWF will impact. When incompatible uses are allowed, other  
11 incompatible uses tend to follow suit with siting inquiries.  
12

13 As I've reiterated numerous times in my testimony, the size, scope, and scale of the  
14 HHWF is not compatible with the permitted uses in the GMAAD. As such, it will hinder and  
15 discourage the development of outright permitted uses to a greater extent than other  
16 permitted uses in the GMAAD. This is because the uses permitted in the GMAAD are  
17 permitted because they are complementary to one another and will not hinder or discourage  
18 development. A large scale industrial project is not compatible with the permitted uses in the  
19 GMAAD and as such will hinder their development.  
20

21  
22 I, GREG WENDT, declare under penalty of perjury under the laws of the State of  
23 Washington that the foregoing PREFILED TESTIMONY OF GREG WENDT is true and  
24 correct to the best of my knowledge.

25 DATED this 12 day of June, 2023, at Kennewick, Washington.  
26

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28    
Community Development Department Director

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GREG WENDT

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3 **CERTIFICATE OF SERVICE**

4 I certify under penalty of perjury under the laws of the State of Washington that I  
5 served, in the manner indicated below, a true and correct copy of the foregoing document as  
6 follows:  
7

8 Energy Facility Site Evaluation Council 9 PO Box 43172 Olympia, WA 98504-3172	[ ] By United States Mail [x] By Email: <a href="mailto:adjudication@efsec.wa.gov">adjudication@efsec.wa.gov</a>
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Toppenish, WA 98948 <i>Counsel for Yakama Nation</i>	
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DATED THIS \_\_\_\_ day of June, 2023, at Yakima, Washington.

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JULIE KIHN