



February 8, 2021

Chair Kathleen Drew
Washington Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Olympia, WA 98504-3172

Re: Application for Site Certification, Horse Heaven Wind Project

Dear Kathleen:

Horse Heaven Wind Farm, LLC (Applicant) is pleased to submit this Application for Site Certification (ASC) for the Horse Heaven Wind Farm (Project) to the Washington Energy Facility Site Evaluation Council (EFSEC). The proposed Project is a wind and solar energy generation facility to be located in unincorporated Benton County, with a nameplate energy generating capacity of up to 1,150 megawatts. This ASC has been prepared in compliance with all applicable Washington Administrative Codes (WAC) and addresses the widest range of possible Project design options currently being considered in order to aid in siting flexibility during the final design process while allowing consideration of the full range of potential Project impacts. The Applicant's intent with this approach is to allow the selection of the most appropriate system for generating and storing energy available at the time all Project equipment is acquired, so long as the system selected does not result in greater impact than allowed for in EFSEC's Site Certification Agreement and satisfies all pre-construction conditions of the Site Certification Agreement.

The Applicant is requesting expedited processing of this ASC by EFSEC. Per Revised Code of Washington (RCW) 80.50.075(1), EFSEC can grant expedited processing of an ASC upon a finding that: 1) the proposed energy facility's environmental impact is not significant or can be mitigated to a non-significant level under the State Environmental Policy Act (SEPA), and 2) the project "is found under RCW 80.50.090(2) to be consistent and in compliance with city, county, or regional land use plans or zoning ordinances." Section 1.16 of the ASC demonstrates how the Project is eligible for expedited processing per the definitions outlined in RCW 80.50.075 as well as how it complies with WAC 463-60 and WAC 463-62. In addition, WAC 463-43 further outlines and defines the eligibility and processing requirements for expedited processing of applications pursuant to RCW 80.50.075; the following demonstrates the Project's compliance with the applicable codes found in WAC 463-43 that apply to the Applicant:

- **WAC 463-43-020:** *An applicant seeking expedited processing shall submit an application for site certification, fees, and a request for expedited processing as required by RCW 80.50.075.*

Response: The Applicant hereby submits its ASC, along with the associated fees to EFSEC, and requests expedited processing of the application. The Applicant has demonstrated the Project's compliance with the expedited processing requirements set forth in RCW 80.50.075, WAC 463-60, and WAC 463-62 in Section 1.16 of this ASC.

- **WAC 463-43-025:** *An applicant seeking expedited processing shall submit a completed SEPA environmental checklist with an application for site certification unless the council finds the proposal is categorically exempt.*

Response: The Project is not categorically exempt from SEPA. The Applicant hereby submits a complete SEPA checklist along with the ASC (see Appendix C to the ASC).

- **WAC 463-43-030:** *An application may be expedited when the council finds: (1) The environmental impact of the proposed energy facility will be mitigated to a nonsignificant level under the State Environmental Policy Act; and (2) The project is found to be consistent and in compliance with city, county, or regional land use plans.*

Response: Section 1.16.1.1 of the ASC demonstrates that the environmental impact of the Project will be mitigated to a nonsignificant level; while Section 1.16.1.2 demonstrates that the Project is in compliance with city, county, or regional land use plans.

We look forward to working with you during this application review process. If you have any questions, or require further information, please contact Dave Kobus at:

dave@scoutcleanenergy.com

Sincerely,



Michael Rucker
Manager, Horse Heaven Wind Farm LLC

Enclosures

cc:

Sonia Bumpus, EFSEC
Dave Kobus, Scout Clean Energy
Timothy L. McMahan, Stoel Rives LLP
Linnea Fossum, Tetra Tech