

**SEPA Addendum
Windy Flats Mitigated Determination of Non-Significance
(Klickitat County - September 2007)**

**Windy Flats West Wind Energy Project
Klickitat County, Washington**

Summary

The Windy Flats West Wind Energy Project (“Windy Flats West Project”) will occupy a project area the County previously reviewed under SEPA for development of 43 wind turbines. This review was completed in 2007, for the Windy Flats project. However, the originally proposed turbines were never built, as they were relocated to the east. The area now being proposed for development is for a reduced number of turbines (29), as the Windy Flats West Project.

To review the 29-turbine proposal, the Klickitat County Planning Department is adopting the SEPA review completed in 2007, along with the Energy Overlay Zone EIS, and is also incorporating three EIS’s issued in 2009. This Addendum provides additional information relating to the Mitigated Determination of Non-Significance (“MDNS”) the County issued in 2007. Conditions would be incorporated into the EOZ permit which are substantially similar to those on file with the County, which are based on this environmental review.

Project Description

The proposed Windy Flats West Project includes 29 turbine locations, approximately 10 miles of associated gravel roads, two five-acre staging areas, and a meteorological tower along the northern slopes of the Columbia Hills, west of the existing Windy Flats Wind Energy Project. The Project would generate approximately 67 megawatts of additional renewable energy. As part of the Project, approximately 12 miles of new 34.5kV overhead power line would transmit power from the Project to the existing Windy Flats substation located to the east. Energy from the Project would then be transmitted over existing 230kV transmission lines to the Bonneville Power Administration Rock Creek Substation, and from there onto the regional electrical grid.

As described in the attached notice of adoption, the SEPA responsible official for Klickitat County is adopting the Windy Flats Environmental Documents and the EOZ FEIS to evaluate the Windy Flats West Project a proposed wind energy generation project located in the Columbia Hills, approximately four miles southwest of Centerville, Washington. This Addendum is prepared under SEPA to add information to the adopted documents relating them to the Windy Flats West Project.

The documents being adopted are described in the attached notice. The Windy Flats Environmental Documents include the SEPA determination made by Klickitat County for the Windy Flats Wind Energy Project and the environmental reports and technical studies prepared to inform that determination. The Windy Flats West Project will occupy lands evaluated and permitted for the Windy Flats Project, but where project facilities were not constructed. The EOZ FEIS was issued by Klickitat County in 2004. It is a programmatic EIS that was prepared to examine environmental impacts, alternatives, and mitigation measures for development of energy project, including wind energy project, at various locations within Klickitat County and under various permitting procedures.

This Addendum includes the studies conducted to confirm the applicability of the Windy Flats Environmental Documents to the Windy Flats West Project and to address new affected areas in the

limited instances where the Windy Flats West Project layout departs from the previously permitted Windy Flats layout. Please contact this office to request a copy of any of these documents.

Windy Flats Environmental Documents and Their Application to the Windy Flats West Project

The parcels to be developed as part of the Windy Flats West Project were previously permitted for wind energy facility development as part of the Windy Flats Project. During the build out of Windy Flats, land in the central portion of Windy Flats became available for development. Because of the efficiencies created, the Windy Flats developers incorporated that land into the construction process, by shifting turbines (with all necessary approvals) from the western part of Windy Flats to the newly available land in the center.

Windy Flats West is proposed for the area that became available after that eastward shift of turbines. There are fewer turbines proposed for the Windy Flats West Project than were permitted in the same area in 2007 (29 instead of 43), and the turbines are configured in strings located almost entirely within corridors studied and permitted in 2007. Eight turbines originally permitted on the highest ground, that is, furthest south and closest to the Columbia Gorge National Scenic Area, are not proposed in this application. Omission of these turbine sites reduces visibility of Project turbines from key viewing areas within the National Scenic Area.

In addition, the Project's footprint will be reduced by use of certain infrastructure already constructed to serve the adjacent Windy Flats project. The electrical substation previously permitted is not included in Windy Flats West. As a result, Windy Flats West will construct a 34kV transmission line instead of a larger 230kV line. Because Windy Flats West will be operated in coordination with Windy Flats, it will not require a separate administration or O&M building, thus no new buildings are proposed.

Due to the similarities between Windy Flats West and the layout described in the 2007 Environmental Documents, the environmental impacts and mitigation measures identified there remain generally accurate for the current proposal. The applicant commissioned follow-up studies to confirm the applicability of the previous work, and to address newly affected areas in the limited instances where the current layout departs from the previously-permitted one. These documents listed below are described together as the "2010 Environmental Documents". The 2010 Environmental Documents are incorporated as part of this Addendum.

- Letter and attachments from Windy Flats Phase III, LLC to Klickitat County Planning Department dated April 16, 2010 regarding the Windy Flats West EOZ Permit Application.
- Critical Areas, Habitats, and Plant Survey for the Windy Flats Wind Energy Project, Klickitat County, Washington, Shannon & Wilson, Inc., (April 16, 2010).
- Technical Memorandum regarding Windy Flats West, WEST, Inc. (April 5, 2010).
- Windy Flats West Wind Energy Farm, Klickitat County Washington, Supplemental Visual Analysis, Ecology & Environment (April, 2010).
- Archaeological And Historical Resource Survey For The Windy Flats West Wind Farm Project, Report No. 2493, Klickitat County, Washington (May, 2010 - This document is confidential to protect against disclosure of archaeological site locations, pursuant to state law.)

The 2010 Environmental Documents supplement the 2007 Windy Flats Environmental Documents that were used to review and ultimately permit the Windy Flats Project. These materials document that the environmental impacts of the Windy Flats West Project do not substantially change the analysis of impacts discussed in the 2007 Windy Flats Environmental Documents. Because the Windy Flats West Project uses the same area and is a similar development, the Windy Flats Environmental Documents, as supplemented by the 2010 Environmental Documents, provide adequate environmental analysis of the Windy Flats West Project.

EOZ FEIS

The 2004 EOZ FEIS addresses the impacts of energy facility siting within the County, including wind energy facilities, at a programmatic level. It evaluates impacts, alternatives and mitigation to be considered in the County's determination of where wind energy projects could be sited (alternative locations), what regulatory process to be used in making permit decisions and the cumulative environmental impacts that could result from development of multiple wind energy projects.

Based on the EOZ FEIS, Klickitat County enacted the EOZ. The EOZ designates an area of the County within which wind energy development is a land use allowed outright, subject to other applicable laws and permit conditions tailored to address site-specific issues. The EOZ requires preparation of site-specific studies in addition to an expanded SEPA checklist, and it imposes standards applicable to development and operation of wind facilities.

Since EOZ FEIS issuance, the County has issued three EIS's for certain wind development projects within the County. The three EIS's are incorporated by reference into this Addendum. They include:

- Windy Point II Wind Energy Project EIS (March – 2009)
- Harvest Wind Project EIS (March - 2009)
- Imrie Wind Project EIS (June – 2009).

These three projects are located in south Klickitat County, east of SR-97. Windy Point II is a 130 megawatt project southeast of Goldendale and just east of SR-97. Harvest Wind is a 100 megawatt project located the furthest to the east – approximately 21 miles east of Goldendale. The Imrie Wind Project (also known as Goodnoe II) is a 34 megawatt project located roughly between the two other projects. The three EIS's (including both the Draft and Final EIS documents) were all issued in spring of 2009, and not appealed. All are on file with the Klickitat County Planning Department at the address below.

The County's environmental review is consistent with the "planned action" approach outlined in RCW 36.70C.130 for wind development within a County renewable energy overlay zone. The Windy Flats West Project is within the designated overlay zone where such wind energy facilities are allowed outright and the project level review under SEPA is focused on the appropriate conditions to address the Windy Flats West Project's potential environmental impacts.

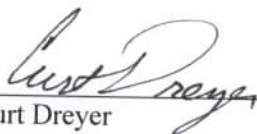
Availability of Addendum

In addition, an addendum to the Windy Flats MDNS has been prepared to add specific information about the proposal and its impacts, and to discuss the differences in the analysis between the existing MDNS and the current proposal. The addendum does not substantially change the analysis of the significant impacts or alternatives in the Windy Flats MDNS or Checklist, rather it provides detailed information on the current proposal. The addendum should be read with and added to the Windy Flats MDNS.

The Windy Flats 2007 Environmental Documents, including the MDNS, SEPA Environmental Checklist, Environmental Report, as well as the addendum are available to be read during regular business hours at the Klickitat County Planning Department, 228 W Main St, Goldendale, WA 98620.

Written Comments:

Written Comments on the MDNS Addendum may be submitted will be accepted until 5:00 p.m. June 11, 2010. Comments shall be submitted to the Klickitat County Planning Department, 228 West Main, MS: CH-17, Goldendale, WA 98620.



Curt Dreyer
Klickitat County Planning Director
SEPA Responsible Official

May 21, 2010

Date