



KLICKITAT COUNTY PLANNING DEPARTMENT

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February 11 2010

The Klickitat County Planning Department has prepared the attached Second Addendum to the Klickitat County Energy Overlay Zone Environmental Impact Statement. The Department is proposing revisions to the County's Energy Overlay Zone (EOZ), Chapter 19.39 KCC, to clarify and improve existing EOZ permit processes. This Second Addendum documents the SEPA review completed for the proposal.

The County is also taking comment on the EOZ, including the development regulations, and comprehensive plan policies. This comment process is required by a settlement agreement, which ended litigation on the EOZ EIS. The comment process is to occur following construction of 1,000 megawatts of wind development within the County. The County is not required to take any action as a result of this comment process. Consequently, SEPA review is not required unless the County proposes action following the comment process. However, the County has determined to prepare this Second Addendum to inform the County and the public.

For additional information, please contact the Klickitat County Planning Department at (509) 773-5703.

Sincerely,

A handwritten signature in black ink, appearing to read "Curt Dreyer".

Curt Dreyer
Planning Director and SEPA Responsible Official

Enclosure

Second Addendum to Klickitat County Energy Overlay Zone Final Environmental Impact Statement

February – 2010

1. Proposal

1.1 Energy Overlay Zone Clarifications

The Klickitat County Planning Department is proposing revisions to the County's Energy Overlay Zone (EOZ), Chapter KCC 19.39. Most revisions are procedural, and are designed to clarify EOZ review procedures and mitigation practices. The revisions would not expand EOZ boundaries, do not expand the EOZ to cover other forms of energy development, and do not amend the County's comprehensive plan. Rather, the revisions are designed to clarify and improve the existing EOZ permit process.

1.2 Public Comment

A Settlement Agreement from 2005, which resolved appeals to the EOZ Environmental Impact Statement (EIS), requires Klickitat County to take public comment at hearings before the Planning Commission and Board of County Commissioners on the EOZ. The County is not required to take any action as a result of comment. Should the County elect to re-evaluate and act on the EOZ, further SEPA review may be required.

The Planning Department is nevertheless providing the Planning Commission and Board with this Second Addendum and the latest environmental review documentation available. This includes three EIS's on projects within the County, an EIS from outside the County, and two avian/bat cumulative impacts assessments. These documents are described below.

2. Environmental Document Supplemented

2.1 EOZ EIS

Klickitat County issued the Klickitat County Energy Overlay Final Environmental Impact Statement in September 2004 ("EIS"). The EIS assesses impacts associated with adopting EOZ comprehensive plan amendments and implementing development regulations in which renewable energy projects (if appropriately mitigated) are permitted outright. Following EIS issuance, the County adopted EOZ regulations and plan policies.

Additional review has since been completed for wind development within the County, including avian/bat cumulative impacts analysis and three project-specific EISs. These documents are discussed below.

2.2 First Addendum to EOZ EIS

The County issued an Addendum to Klickitat County's Energy Overlay Zone Final Environmental Impact Statement on December 4, 2008. The First Addendum adds a report prepared by Western EcoSystems Technology, Inc. (WEST) titled Avian and Bat Cumulative Impacts Associated With Wind Energy Development in the Columbia Plateau Ecoregion of Eastern Washington and Oregon. The WEST Report assesses cumulative impacts of wind development on avian and bat populations not only in Klickitat County, but throughout the Columbia Plateau Ecoregion. The WEST Report was updated this year. This Second Addendum incorporates the updated WEST Report by reference.

2.3 EISs Issued Subsequent to EOZ EIS

Since EIS issuance, the County has issued three EISs for certain wind energy development projects within the County. The three EISs are incorporated by reference into this Second Addendum. They include:

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

The 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 EISs (which include both the Draft and Final EIS documents) were all issued in March 2009 and not appealed. All are on file with the Klickitat County Planning Department at the address below.

Since EOZ EIS issuance, in addition to wind energy development in the County, there has been development in other areas of the state, including Kittitas County. An EIS was issued in February 2007 for the Kittitas Valley Wind Power Project and upheld by the Washington State Supreme Court.¹ The Kittitas Valley Wind Power Project EIS is incorporated here by reference and is on file with the Klickitat County Planning Department at the address below.

3. Legislative Support for the EOZ EIS

Klickitat County is the first and only county in the State of Washington to comprehensively assess wind development potential through an EIS and enact an energy overlay zone. The Washington State Legislature has recognized the value of Klickitat County's process for up-front environmental review through the EOZ EIS by effectively recognizing a renewable energy "planned action" process for counties.² The legislature passed this bill with a **unanimous** vote. This legislative enactment reinforces the County's decision to invest in planning for clean energy development.

¹ *Residents Opposed To Kittitas Turbines v State Energy Facility Site Evaluation Council*, 165 Wn.2d 275, 197 P.3d 1153 (2008).

² Ch. 419, Laws of 2009 (Senate Bill 5107).

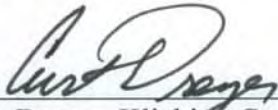
In addition, in 2006, voters approved the Energy Independence Act, Chapter 19.285 RCW.³ And, in 2008, the legislature adopted state-wide greenhouse gas emission reduction requirements.⁴ This legislation, and related enactments, recognize wind development as key to reducing emissions and securing energy independence.⁵ These measures will also contribute to the State's economic recovery, as well as its ability to compete in global economy, in which economic prosperity is increasingly dependent on efficient, clean energy supplies.⁶ Washington's rural counties play an important role in providing these supplies.

The County's EOZ EIS and implementing legislation are consistent with these new developments. The Planning Department's proposed EOZ clarifications simply improve a process already reviewed in four EISs and sanctioned by the Washington State Legislature and Governor.

4. Environmental Analysis

This Second Addendum is prepared under the State Environmental Policy Act, Chapter 43.21C RCW (SEPA). The Second Addendum provides additional information regarding environmental impacts associated with revisions to the EOZ review procedures, and in certain circumstances, increasing mitigation. Procedural amendments are exempt from SEPA review.⁷ The proposed EOZ amendments provide clarity to existing review and mitigation practices. However, whether exempt or not, the amendments do not substantially change the SEPA analysis of significant impacts and alternatives already completed in the EOZ EIS, First Addendum, and documents incorporated by reference.

The Second Addendum supplements the EOZ EIS and incorporates the additional review which has occurred since EOZ EIS issuance. The proposed revisions are within the scope of this review.



Curt Dreyer, Klickitat County Planning Director
SEPA Responsible Official
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Date 2/11/10

³ RCW 19.285.010 ("This chapter requires large utilities to obtain fifteen percent of their electricity from new renewable resources such as solar and wind by 2020")

⁴ RCW 70.235.020 ("The state shall limit emissions of greenhouse gases to achieve the following emission reductions for Washington state: ... By 2020, reduce overall emissions of greenhouse gases in the state to 1990 levels...."); RCW 80.80.005(1)(d) ("Washington has been a leader in actions to slow the increase of greenhouse gases emissions, such as [by] ... increasing renewable energy sources by electric utilities....").

⁵ While there are emissions associated with wind development construction, over a project's life cycle, these "embedded emissions" are a fraction of the emissions associated with more traditional sources. In addition, adding economic value to the rural ranching and agricultural uses cities rely upon, is critical for retaining a sustainable food supply.

⁶ See e.g. Executive Order 09-05 (May 2009).

⁷ WAC 197-11-800(19).