

LEWIS COUNTY HEARING EXAMINER

299 N.W. CENTER STREET
P.O. BOX 939
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December 30, 2010



Lewis County Commissioners
360 N.W. North Street
Chehalis, Washington 98532

Re: Pe Ell North, LLC - Coyote Crest Wind Park - Special Use Permit
Hearing No. 10-6-002

Dear Sirs:

Enclosed herewith please find copies of the Findings of Fact and Conclusions of Law and Special Use Permit with regard to the above matter. Should you have any questions, certainly feel free to call.

Very truly yours,

Mark C. Scheibmeir
Lewis County Hearing Examiner

MCS:klf
Encl.

cc: Mr. Lynn Deitrick, w/encl.
Mr. Glenn Carter, w/encl.
Mr. William T. Lynn, w/encl.

BEFORE THE LEWIS COUNTY HEARINGS EXAMINER

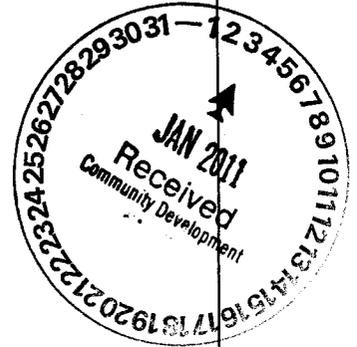
IN RE:

HEARING NO. 10-6-002

PE ELL NORTH, LLC - COYOTE
CREST WIND PARK,

SPECIAL USE PERMIT

Applicant.



The Hearing Examiner having previously entered his Findings of Fact and Conclusions of Law, now, therefore, the Applicant's request for a Special Use Permit to establish a wind turbine park on Tax Parcel Nos. 022931000000, 022947000000, 022957000000, 022965000000, 022967000000, 022983000000, 023077000000, 023093000000, 023125000000, 023227000000, 024498000000, 024499000000, 024516000000, 023074001000 (State Lands), 015062434000 (Weyerhaeuser-Pacific County), 015062500000 (Weyerhaeuser-Pacific County), is **approved** subject to the following conditions:

1. All work shall substantially conform to the plans and specifications submitted with the special use request. Any substantial change to the submitted site plan may require further special use approval.

2. The following must be accomplished prior to the issuance of any construction permits:

A. The Applicant shall enter into written fire services agreements with Lewis County Fire Districts 11 and 16 and provide copies of the same to the Lewis County Department of Community Development (DCD).

B. The Applicant shall comply with all FEIS/DEIS pre-construction mitigation measures.

C. The Applicant shall secure necessary approval to drill and operate and well to supply water to the operations and maintenance facility.

D. The Applicant shall secure necessary approval for the design and construction of a septic system for the operations and maintenance facility.

Special Use Permit - 1

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1 E. The Applicant shall submit engineered Storm Drainage Plans consistent
2 with LCC 15.45 to the Lewis County Public Works for review and approval.

3 F. The Applicant shall obtain all necessary right-of-way permits and all route
4 agreements and provide proof of the same to the Lewis County DCD.

5 G. The Applicant shall obtain written approval from DNR prior to any use of
6 its property.

7 H. The Applicant shall establish a written safety plan satisfactory to Lewis
8 County DCD.

9 2. The following must be accomplished prior to final construction approval:

10 A. The Applicant shall construct all improvements on the site in substantial
11 conformance with plans and specifications submitted with the special use request.

12 B. The Applicant shall construct all improvements on the site consistent with
13 the conditions of development identified in the Critical Areas and Resource Lands review issued
14 November 5, 2010.

15 C. The Applicant shall construct all improvements and meet all construction
16 and post-construction mitigation measures consistent with the FEIS/DEIS, including all
17 mitigation measures set forth in the Avian and Bat Protection Plan (ABPP).

18 D. The Applicant shall implement a three-hour "Curtalement Plan" unless it
19 can demonstrate to the Lewis County Department of Community Development staff that there is
20 scientific evidence supporting the change to a two-hour period as called for by the ABPP
21 attached to the FEIS.

22 E. The Applicant shall establish the Technical Advisory Committee (TAC) in
23 conformance with the terms set forth in the FEIS/DEIS.

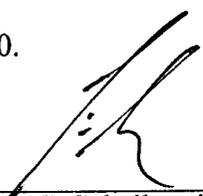
24 3. All lighting (except FAA required lighting) shall be hooded and/or shielded so
25 that no light shall be allowed to trespass on neighboring properties.

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4. The Applicant shall comply with all terms and conditions of:

- A. The fire services agreements entered into with Lewis County Fire Districts 11 and 16.
- B. The safety plan approved by DCD.
- C. All standard operating procedures specified by Weyerhaeuser for road travel, construction, operations and wildlife.
- D. The DNR Industrial Fire Precaution Levels (IFPL).

DATED this 30th day of December, 2010.



Mark C. Scheibmeir
Lewis County Hearing Examiner

BEFORE THE LEWIS COUNTY HEARINGS EXAMINER

IN RE:

HEARING NO. 10-6-002

PE ELL NORTH, LLC - COYOTE
CREST WIND PARK,

FINDINGS OF FACT AND
CONCLUSIONS OF LAW

Applicant.



BACKGROUND

The Applicant, Pe Ell North, LLC ("Pe Ell North"), requests a special use permit to establish a wind turbine park and associated facilities (collectively referred to as "Coyote Crest Wind Park"). The project includes up to 47 wind turbine generators (WTGs). Power generated by these WTGs will be sent through 17 miles of mostly underground cables to an on-site substation where the power will be transformed to 115 kV for delivery to the regional power grid. From the on-site substation 12.6 miles of overhead transmission line will be constructed or upgraded to deliver the generated power to an existing 115 kV substation at Cedarville in Grays Harbor County.

In total the project affects more than 3,500 acres including 3,240 acre located within the Weyerhaeuser McDonald tree farm and, if approved, an additional 320 acres of public land managed by the Department of Natural Resources (DNR).

Most of the project improvements, including 44 of the 47 WTGs, are located within Lewis County. The remaining 3 WTGs are located within Pacific County. Approximately one-half of the transmission line is be located in Grays Harbor County. Approval for the 3 WTGs in Pacific County and the transmission line in Grays Harbor County must be made by those counties.

There will be a number of other project improvements in addition to the WTGs, substation and transmission lines. 17 miles of logging roads will be improved and new roadways constructed where needed. A significant portion of these roads will be temporarily widened to

*Findings of Fact and Conclusions
of Law - 1*

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1 allow a large construction crane to be driven from one WTG site to the next. An operations and
2 maintenance building will be constructed to store equipment and provide office space, kitchen
3 and restroom facilities, and parking. Several permanent meteorological towers will also be
4 constructed.

5 The Applicant does not yet have a lease with DNR for the use of public lands. By letter
6 dated December 20, 2010, DNR has indicated its willingness to have its lands considered as part
7 of the application subject to approval of a lease before any of its lands are utilized.

8 The Applicant requests a height variance for Turbines No. 33 and 43 so that these
9 turbines may be sited within 430 feet of the common boundary between Weyerhaeuser and
10 DNR. The Applicant requests these variances in order to place these two turbines in their
11 optimal locations. DNR does not object to the requested variance.

12 The project will have two access routes. From the south the project can be reached from
13 Highway 6 by travelling on Stevens Road to Elk Creek Road and then onto private
14 Weyerhaeuser Road 7010, eventually reaching the first turbine site on Road 9200. From the
15 north the project can be reached from Highway 12 via South Bank Road to Garrard Creek Road
16 and then onto Weyerhaeuser's private C-Line Road, continuing to the project's northern-most
17 wind turbine site on Road 723. All internal roads are located within Weyerhaeuser property (or
18 possibly DNR property). Public access to these roads is generally prohibited except during
19 hunting season.

20 Wastewater generated by the operations building will be treated by an on-site septic
21 system to be constructed. Water for this facility will be supplied by an on-site well. No public
22 utilities will be required for the project with the exception of transmission lines for power.

23 The project site is located within two fire districts: Lewis County Fire Districts No. 16
24 and No. 11. The Applicant has not yet established fire service plans with either District.

1 The property is zoned Forest Resource Lands-Industrial. Current use of the property is
2 industrial timberlands. The entire area is a mosaic of timber stands ranging from zero to
3 approximately fifty years in age with no stands of old growth timber. The entire site is an
4 industrial forest subject to systematic timber harvesting or replanting. Although the project
5 encompasses more than 3,500 acres, only 100 acres will be permanently removed from industrial
6 forestry. These 100 acres will be used for the WTG sites, the operations facility and the
7 substation. Portions of the WTG sites removed from forestry will still be available for low
8 growth timber such as Christmas trees.

9 Following receipt of this application County Staff determined that an Environmental
10 Impact Statement (EIS) would be required. A Draft EIS (DEIS) was prepared by County Staff in
11 accordance with SEPA. Comments were received on the DEIS by various agencies and other
12 parties. These comments were addressed and a Final EIS (FEIS) published November 10, 2010.
13 The FEIS has not been appealed. An addendum to the FEIS was issued December 23, 2010 and
14 addresses comments received from the Washington State Department of Fish and Wildlife. The
15 addendum does not substantially change the analysis contained in the FEIS or find any new
16 significant impacts.

17 The FEIS devotes special attention to concerns that wind turbines may pose a threat to
18 birds and bats. As set forth in the FEIS, it has been determined that the only federally
19 threatened, endangered or candidate bird or bat species found within the site is the Marbled
20 Murrelet. To provide greater protection to the Marbled Murrelet, as well as other bird and bat
21 species, the FEIS incorporates an "Avian and Bat Protection Plan" (ABPP). The ABPP is
22 intended to minimize avian fatalities and provide continued monitoring. The ABPP further
23 provides mechanisms to adapt its management strategy consistent with the results of its post
24 construction monitoring. The ABPP incorporates a "Curtailment Plan" that calls for a shutdown
25 of the WTGs in the early morning hours during the months of June and July.

1 The FEIS also gives special attention to the visual impact of the WTGs. This can often
2 be one of the most controversial aspects of a wind turbine park. In this instance, however, the
3 visual impact of the proposed WTGs is largely a nonissue. The project site is steep, remote and
4 located several miles from the nearest residences or public viewing areas. The only residential
5 area having any appreciable view of the WTGs is the small community of Doty, and even then
6 the closest WTG is three to four miles away. And although the ridgeline of the Doty Hills is
7 visible from Chehalis and Centralia, the distance from the WTGs to these cities is so great that
8 the WTGs will be virtually invisible. It is worth noting that there has been no public concern
9 about the visual impact of these facilities. Additionally, the WTGs will be painted a nonglare
10 neutral color and outdoor lighting will be kept to the minimum needed for security and safety.

11 Once constructed the project will generate almost no daily traffic. During construction,
12 however, an estimated 4,800 heavy duty truck trips are expected, averaging 50 to 100 truck trips
13 per day. These heavy trucks will access the site via the north entrance (Garrard Creek/C-Line).
14 Construction traffic is not expected to reduce levels of service on affected public roads.

15 The Lewis County Planner, Lynn Deitrick, has prepared a comprehensive planning Staff
16 Report that recommends approval of the project subject to a number of conditions. Mr. Deitrick
17 also recommends approval of the requested variances.

18 The public hearing commenced at 1:30 p.m. on December 20, 2010, in the
19 Commissioner's Hearing Room. The hearing lasted several hours. Testimony was received from
20 Lynn Deitrick from the Lewis County Planning Department. Also present on behalf of Lewis
21 County was Glenn Carter of the Prosecuting Attorney's Office. Testimony was also received
22 from representatives of Pe Ell North including Megan Peddef-Yates and David McClain. The
23 Applicant was represented by its attorney, William Lynn. Various miscellaneous exhibits were
24 presented during the hearing as set forth in the attached Exhibit List.

1 During his testimony Mr. Deitrick from the Planning Staff reiterated the County's support
2 of the project. Mr. Deitrick and Mr. Carter also reaffirmed the County's position that the project
3 complies with the special requirements of LCC 17.115.030(7) applicable to special uses located
4 within resource lands. More specifically, the County concludes that the proposed use does not
5 adversely affect the overall productivity of the total resource parcel as the number of affected
6 acres (100) is a small fraction of the site (3,500 acres) and that the overall productivity of these
7 industrial forest lands is unaffected.

8 Following Mr. Deitrick's presentation Ms. Peddef-Yates and Mr. McClain provided
9 further support for the application. Their testimony was followed by various questions posed to
10 the Applicant about the project. During this discussion the Applicant acknowledged that it has
11 not yet obtained fire services agreements with Lewis County Fire Districts 11 and 16 although it
12 recognizes that such agreements are necessary, particularly since special equipment will be
13 required for "high angle rescue" on the WTGs.

14 Another point of discussion with the Applicant was the ABPP and, in particular, the
15 proposal to curtail operations during the early hours in June and July for the benefit of the
16 Marbled Murrelet. The DEIS and its supporting research indicates that a three-hour curtailment
17 period is necessary in order to ensure maximum protection to the Marbled Murrelet. In the FEIS,
18 however, a two-hour curtailment period is proposed (with the support of the U.S. Fish and
19 Wildlife Service). The Applicant has agreed to reinstate the three-hour curtailment period unless
20 it "can demonstrate to the Lewis County Department of Community Development staff that there
21 is scientific evidence supporting the change to a two-hour period as called for by the ABPP
22 attached to the FEIS."

23 Following the Applicant's presentation the hearing was opened for public comment.
24 Although there were a large number of individuals in attendance only a handful testified. All of
25

1 those who testified expressed their full support of the project. There was no testimony in
2 opposition to the project and there has been no written opposition to the project.

3 ANALYSIS

4 The requested special use is a massive project with a proposed 47 WTGs extending
5 approximately 8 miles along the top of the ridgeline through the Doty Hills and Coyote Crest.
6 The project will have 94 acres of permanent WTG site improvements; 17 miles of buried utility
7 lines; 17 miles of existing and improved access roads (30% of which will require adjustment as
8 to alignment, grading and widening); 6.3 miles of aboveground power transmission lines in
9 Lewis County and an additional 6.3 miles of aboveground transmission lines in Grays Harbor
10 County; 2.5 acres of substation and equipment yards; and an operations and maintenance
11 building containing 5,500 square feet. Despite the size and complexity of this project it has
12 gathered the full support of federal, state and local officials and has no public opposition.

13 The project has a few lingering issues:

- 14 ● The Applicant must still enter into fire services agreements with Lewis County
15 Fire Districts 11 and 16 to ensure that these Districts can adequately address fire and rescue
16 needs.
- 17 ● There remains a concern that, despite the massive size of the WTGs and FAA-
18 approved warning lights, prevalent fog and low cloud conditions will make them nearly invisible
19 to low flying aircraft, particularly aircraft involved in local search and rescue. It is hoped that
20 the fire service plans will address the need to properly educate all those involved in search and
21 rescue efforts.
- 22 ● The Applicant has agreed to establish a Technical Advisory Committee (TAC) to
23 ensure that avian and bat monitoring data is reviewed by an independent forum, but it is not clear
24 whether the TAC's recommendations can be enforced.

1 5. A small portion of the project, including 3 WTGs and some connecting roadways,
2 are proposed to be located on lands owned by the State of Washington and maintained by the
3 Department of Natural Resources (DNR). This portion of the project, containing 320 acres, has
4 not yet been approved by DNR. Any use of this property remains subject to DNR's approval.

5 6. With the exception of the portions of the project located outside of Lewis County,
6 and the small portion located on DNR property, the remainder of the project is located within the
7 Weyerhaeuser McDonald tree farm in Lewis County. The project extends over 3,240 acres of
8 Weyerhaeuser property and includes the following Tax Parcel Nos. 022931000000,
9 022947000000, 022957000000, 022965000000, 022967000000, 022983000000, 023077000000,
10 023093000000, 023125000000, 023227000000, 024498000000, 024499000000, 024516000000,
11 023074001000 (State Lands), 015062434000 (Weyerhaeuser-Pacific County), 015062500000
12 (Weyerhaeuser-Pacific County). Coyote Crest is located in Township 15 North, Range 6 West,
13 Sections 24 and 25; Township 15 North, Range 5 West, Sections 29, 30, 31 and 32; and
14 Township 14 North, Range 5 West, Sections 5, 6, 8, 9, 16, 17, 18, 20, and 27. The transmission
15 line will be located in Township 15 North, Range 5 West, Sections 15, 20, 21, 22, and 30.

16 7. Lewis County has acted as lead agency for SEPA review of the entire project
17 including those portions located in other counties. Lewis County determined that an EIS was
18 required. A Draft EIS (DEIS) was prepared pursuant to SEPA. The DEIS was mailed to parties
19 of interest on July 12, 2010. Comments were received on the DEIS and addressed in the Final
20 Environmental Impact Statement (FEIS) published November 10, 2010 and mailed to parties of
21 interest on November 8, 2010. The FEIS has not been appealed. An addendum to the FEIS was
22 issued December 23, 2010 and addresses comments received from the Washington State
23 Department of Fish and Wildlife. The addendum does not substantially change the analysis
24 contained in the FEIS or find any new significant impacts.

25 8. The property is zoned Forest Resource Lands-Industrial.

1 9. The Applicant requests a height variance for WTGs No. 33 and 43 as Lewis
2 County Code 17.145.030(3) would otherwise require these turbines to be set back at least 430
3 feet from the boundary of the project area.

4 10. The proposed locations of WTGs 33 and 43 have been determined by site
5 topography, wind speed and direction, and geotechnical factors. The adjoining landowner, DNR,
6 has not objected to the requested variance.

7 11. The requested variance would not constitute a grant of special privilege, would
8 not be based upon reasons of hardship caused by previous actions of the Applicant or property
9 owner, and would not be granted for pecuniary reasons alone.

10 12. Because of the special circumstances applicable to the subject property, including
11 size, shape, topography, location or surroundings, the strict application of LCC 17.145.030(3)
12 would cause a hardship and deprive the Applicant of a reasonable use or improvement generally
13 allowed in the zone classification.

14 13. The requested variance will not be detrimental to the public welfare or injurious
15 to other property in the vicinity.

16 14. Although the project extends over approximately 3,500 acres, only 100 acres will
17 be permanently disturbed for WTGs, transmission line, roads and support facilities. The
18 remainder of the project site will continue to be used as industrial forest lands and the project
19 will not impair this continued use. In fact, the project will benefit the ongoing forestry activities
20 by creating storage and staging areas and by improving logging roads.

21 15. As set forth in the Background and Analysis, the proposed use will not adversely
22 affect the overall productivity of the total resource parcel for the intended resource use by reason
23 of the nonresource activity, and the project complies with LCC 17.115.030(7).

24 16. The project site is designated as Forest Resource Lands under the Lewis County
25 Comprehensive Plan.

1 17. The proposed use is consistent with the Comprehensive Plan:

2 (A) The proposed use encourages adequate deliver of electric services to
3 residents of Lewis County.

4 (B) The proposed use encourages development of alternative energy
5 generation facilities.

6 (C) The proposed use provides a positive economic climate to retain or allow
7 expansion of existing businesses and actual investment.

8 (D) The proposed use provides for and encourages renewable energy
9 generation facilities.

10 (E) The proposed use will facilitate the continued operation of resource based
11 industries including forest products.

12 18. The proposed use is consistent with the State's legislative goal, expressed in
13 Chapter 82.16 RCW, of encouraging renewable energy resource facilities.

14 19. The proposed use will require the construction of an on-site septic system for an
15 operations and maintenance facility having approximately 5,500 square feet.

16 20. The proposed use will require the construction of an on-site well to supply water
17 to the operations and maintenance facility.

18 21. The proposed use lies within the jurisdictions of Lewis County Fire Districts 16
19 and 11. The Applicant has not yet entered into fire services agreements with either Fire District.
20 It will be necessary for the Applicant to enter into such agreements with both Districts before the
21 construction of WTGs and other buildings.

22 22. The proposed use will have access from the north and the south. Both accesses
23 will be via private Weyerhaeuser road systems. All heavy truck traffic will access the site by
24 way of the north entrance.

1 23. The County Staff Report contains Findings as to the notification of the public
2 hearing. The Hearing Examiner has reviewed those Findings and adopts Section V of the
3 County Staff Report as his own Findings of Fact.

4 24. The County Staff Report contains Findings as to all agencies that have been
5 contacted in reference to the application. The Hearing Examiner has reviewed those Findings
6 and adopts Section VI of the County Staff Report as his own Findings of Fact.

7 25. The County Staff Report contains Findings relating to the natural environment
8 and the effect of the proposed use on the environment. These Findings incorporate by reference
9 a more detailed analysis found in the FEIS/DEIS. The Hearing Examiner has reviewed those
10 Findings and adopts Section VII of the County Staff Report as his own Findings of Fact.

11 26. The County Staff Report contains Findings relating to transportation including the
12 generation of traffic during construction and during subsequent operation. These Findings
13 incorporate by reference a more detailed traffic study found in the DEIS/FEIS. The Hearing
14 Examiner has reviewed those Findings and adopts Section VIII of the County Staff Report as his
15 own Findings of Fact.

16 27. The County Staff Report contains Findings regarding utilities, including
17 stormwater, water and septic utilities. These Findings incorporate by reference a more detailed
18 analysis found in the DEIS/FEIS. The Hearing Examiner has reviewed those Findings relating to
19 utilities and adopts Section IX of the County Staff Report as his own Findings of Fact.

20 28. The Applicant will install "obstruction lighting" on the WTGs as required by the
21 Federal Aviation Administration (FAA).

22 29. The project will be staffed 24 hours per day, 365 days per year.

23 30. The Applicant will implement standard safety plans tailored to the specifics of the
24 project site requirements, including special requirements for wind energy facilities such as fire
25 safety and emergency tower rescue.

1 31. The Applicant will also incorporate into its safety plans the standard operating
2 procedures specified by Weyerhaeuser for road travel, construction, operations, and wildfire.

3 32. The Applicant will comply with all DNR Industrial Fire Precaution Levels
4 (IFPL).

5 33. The Applicant will establish a Technical Advisory Committee (TAC) pursuant to
6 the WDFW wind power guidelines. The TAC will ensure that monitoring data is considered in a
7 form in which independent and informed policies can collaborate with the Applicant. The TAC
8 will consist of up to six members and will be composed of one representative each from U.S.
9 Fish and Wildlife Service, the Washington Department of Fish and Wildlife, the Washington
10 Department of Natural Resources, Lewis County, the Applicant/Project Owner, and
11 Weyerhaeuser.

12 34. The proposed use will operate consistently with the regulations and enforcement
13 policies of the Noise Control Act of 1974.

14 35. As conditioned, the proposed use will operate in compliance with all requirements
15 imposed by the Southwest Washington Clean Air Agency.

16 36. As conditioned, the proposed use will comply with the terms of all permits issued
17 for the project by state or local agencies.

18 37. The proposed use shall be required to comply with all mitigation conditions found
19 in the FEIS.

20 38. Adequate provision has been made for potable water, waste disposal, parking,
21 transportation and stormwater control.

22 39. As conditioned the proposed use complies with both the general and specific
23 requirements of Lewis County Code 17.115.

24 40. The proposed use does not require urban services.

25 41. All requirements of the Lewis County Critical Areas Regulations have been met.

1 42. The Applicant does not seek variance from any critical areas requirements.

2 43. The proposed use provides adequate mitigation for parking, noise, lighting, fumes
3 and dust.

4 44. County Staff recommends approval of the requested use subject to several
5 conditions set forth in the Staff Report.

6 Based upon the foregoing Findings of Fact the Hearing Examiner makes the following:

7 **CONCLUSIONS OF LAW**

8 1. The Hearing Examiner has jurisdiction over the parties and the subject matter.

9 2. The proposed use is a permitted use by a special use permit in the Forest Resource
10 Lands-Industrial Zone if it complies with the general and specific criteria of LCC 17.115.

11 3. For the reasons set forth in the Findings, and subject to the conditions imposed,
12 the proposed use meets all of the general and specific requirements of LCC 17.115.

13 4. The proposed use is consistent with and promotes the goals of the Lewis County
14 Comprehensive Plan.

15 5. Adequate provision is made for public services and facilities concurrent with the
16 development.

17 6. Adequate protection is given to adjacent properties from the impacts of safety,
18 noise, fugitive dust, odor and runoff.

19 7. Adequate protection is given to critical areas including surface and groundwater,
20 consistent with the Lewis County Critical Areas Requirements.

21 8. Access to public streets is consistent with County standards.

22 9. The supplemental provisions of LCC Chapter 17.145 have been met.

23 10. The proposed use is consistent with the County's environmental policies and
24 SEPA.

EXHIBIT LIST

1. Staff Report
2. FEIS
3. DEIS (with attachment)
4. Climate Solutions
5. December 20 DNR Letter
6. Mitigation Measures List
7. Sign-up Sheet
8. Guenther Letter
9. December 23 FEIS Supplement