



To: Whitman County Planning Commission
PO Box 430
Colfax, WA 99111

Date: December 15th, 2025

RE: Whitman County Planning Commission Recommended Amendments to the Commercial Wind Energy Facilities Ordinance

Chair Gibney and Members of the Whitman County Planning Commission:

Renewable Northwest (RNW) greatly appreciates the opportunity to provide comments about the recommended amendments to Whitman Counties Commercial Wind Energy Facilities Ordinance. RNW is a 501(c)3 nonprofit organization that advocates for affordable, reliable, and clean energy infrastructure across Washington, Oregon, Idaho, and Montana. Our membership includes clean energy developers, manufacturers, consultants, law firms, and other nonprofit organizations including ratepayer advocates and environmental NGOs.

It is our understanding that Whitman County wants to encourage developers to use the county permitting process, as outlined in the Commercial Wind Energy Facilities Ordinance. This makes sense to RNW and we know wind developers share this goal: everyone benefits when a county government provides local input and helps guide development of any large project. Unfortunately, RNW believes this ordinance as drafted encourages the opposite. Specifically, several of the restrictive proposals we address below will push projects to the Energy Facility Siting Evaluation Council (EFSEC) and trigger requests to pre-empt county rules.

This proposed language represents a sharp change in county policy. Whitman County is one of a handful of counties across Washington that proactively implemented a wind ordinance more than a decade ago. As a result, the county has benefited from a wind project that has generated \$10,128,000 in property tax revenue as well as payments to land owners and local businesses. Additional projects will yield millions of dollars in additional county revenue, benefiting residents in myriad ways.

In our work across the region, RNW has gained experience crafting ordinances that recognize residents' appreciation for certain open spaces, while balancing the interest of private property rights, communities' desire to fund schools, infrastructure and healthcare, and the region's demand for energy to power homes and businesses. We are confident there are options to ensure Whitman County achieves this balance, and that the county will benefit from this balance, rather than encouraging these investments to be made elsewhere.

The following list is not comprehensive, but it highlights some of the **provisions of highest concern**:

- **Excessive Setback Requirements:** As the length of setbacks increase, available land for wind projects decreases dramatically. Standard setbacks for wind projects in county ordinances drafted in the Pacific Northwest and across the country over the past 20 years are typically 1x - 2x turbine height. Whitman county's existing wind ordinance fits within this norm. The proposal to increase this to 6x height from non-participating property lines and non-participating dwellings (19.61.60 (A)) is prohibitive and far outside any established norms.
- **Unreasonable Transmission Requirement:** Putting transmission lines underground is extremely expensive, which is why it is rarely done. Because of this cost, Section 19.61.030 (D) requiring undergrounding of all transmission lines from and to the wind energy facility could be functionally equivalent to a ban on wind facilities, depending on how the provision is interpreted.
- **Overly Complex Rules Guiding Decommissioning:** Whitman County's existing rules guiding decommissioning are reasonable and reflect standard language used successfully in many other counties. RNW is not aware of any issues in Whitman County with these rules, but if there are concerns, we are confident they could easily be addressed using best practices drawn from decades of experience around the region. Proposed edits have yielded nearly six pages of unnecessary complexity, administrative burden and expense for all involved.
- **Very Large Exclusion Areas:** The proposed 7-mile setbacks from Kamiak Butte County Park, Steptoe State Park, and Palouse Falls State Park are unusually large; nearly half the distance of the drive between Colfax and Pullman. When 7-mile setback lines are drawn on a map around the exclusion areas it equates to tens of thousands of acres of land – including private property – being prohibited from hosting wind turbines.

As a general comment, it should be noted that **additional cost burdens placed on energy development are ultimately recovered by increasing electricity prices**. Rising electricity rates are a hot topic right now, but the reality of permitting costs adding to electricity prices is not new. The fact is that unnecessary undergrounding of transmission lines, massive exclusion areas and complex rules are expensive, as are delayed timelines from EFSEC processes. In addition to supporting new tax revenue and protection of property rights, we urge Commissioners to keep affordability of electricity in mind when evaluating this draft ordinance.

RNW, our membership, and broader networks have deep benches of expertise in siting, permitting, safety, environmental impacts, and more. **We are happy to share additional connections to technical experts who could contribute to this draft.**

Again, RNW appreciates the opportunity to provide inputs on the draft ordinance under consideration. We stand ready to offer support to the county as needed.

Sincerely,

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