



# United States Department of the Interior

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IN REPLY REFER TO:  
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October 25, 2024

Mark Daniel  
Clean Energy Coordination  
Department of Ecology  
P.O. Box 47709  
Olympia, Washington  
mark.daniel@ecy.wa.gov

Subject: PEIS Utility-Scale Solar Energy Programmatic Environmental Impact  
Statement, Washington State

Dear Mr. Daniel,

The Department of the Interior (Department) has reviewed the PEIS Utility-Scale Solar Energy Programmatic Environmental Impact Statement, Washington State. The Department offers the attached specific comments for use in developing the final environmental impact statement for this project.

We appreciate the opportunity to comment. If you have any questions or concerns, please don't hesitate to contact me at (503) 720-1212.

Sincerely,

T. Allison Hall  
Regional Environmental Officer

INTERIOR REGION 9 • COLUMBIA-PACIFIC NORTHWEST

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IDAHO, MONTANA\*, OREGON\*, WASHINGTON

\*PARTIAL

<b>Document</b>	<b>Section</b>	<b>Page/para/ line</b>	<b>Comment</b>
<b>Draft Solar PEIS</b>	2.5.3	Pg. 25	Appreciate description of water use for cleaning - given the aridity of the PEIS coverage area, suggest recommending manual/robot cleaning of panels for water conservation wherever practicable.
	4.6.2	Pg. 81	Under terrestrial species and/or special status species included for analysis, recommend adding Birds of Conservation Concern (FWS designated at-risk species).
	4.6.3.1	Pg. 85	Include bats in Migratory Species.
	4.6.3.1	Pg. 86	Description of operation impacts is missing potential collision mortality with panels themselves. Water-dependent avian species, such as grebes and loons, are known to collide with panels, presumably mistaking it for a water body. Recommend including this potential impact in the list of adverse effects.
	4.6.3.1	Pg. 86	Insects and bats may mistake panels for a water body due to their smooth acoustic surface (bats) and/or reflection (bats/insects), see comment above. Recommend including these impacts in the list of adverse effects.
	7.1	Pg. 182	Recommend revising first bullet on the Eagle Act as follows - "Bald and Golden Eagle Protection Act (USFWS): Prohibits the take of bald and golden eagles without prior authorization from USFWS. An Eagle Disturbance Take Permit may be needed for construction activities near nesting sites. A Power Line Incidental Take Permit may be recommended for collision and electrocution take associated with operation of a facility's power lines."
	7.1	Pg. 182	Recommend revising fifth bullet on MBTA as follows - "Migratory Bird Treaty Act (USFWS): Prohibits the take of protected migratory birds without prior authorization from USFWS. There are currently few permitting options to authorize take at a facility. It is recommended that facilities consult with USFWS early in the development process to ensure take is avoided or minimized to the extent practicable." Note that this act is not included in the list of potentially required permits list in Appendix E: Biological Resources Report.
<b>Draft Solar PEIS App. E Biological Resources Report</b>	1.1.1	Pg. 1	Under terrestrial species and/or priority species included for analysis, recommend adding Birds of Conservation Concern (FWS designated at-risk species).
	3.2.1.3	Pg. 18	Why is waterfowl habitat handled separately from bird habitat? Much of the description in the waterfowl habitat could be used for many nongame wetland birds, some of which are of higher conservation concern than waterfowl.

	3.2.1.3	Pg. 18	Suggested edit in bold: Bats utilize snags, trees, crevices in rocks, <b>talus</b> , tunnels, buildings, bridges, caves, and mine shafts for roosting or hibernation.
	3.2.2.2	Pp. 25-29	Recommend revising the species groupings to reflect the 4 recognized bird initiatives (waterfowl, waterbirds, shorebirds, and landbirds: see Bird Conservation Initiatives on flyway website ( <a href="https://www.pacificflyway.gov/Links.asp">https://www.pacificflyway.gov/Links.asp</a> )).
	3.2.2.2.2	Pg. 26	Recommend reviewing the waterfowl, shorebird and waterbird plans (links on <a href="https://www.pacificflyway.gov/Links.asp">https://www.pacificflyway.gov/Links.asp</a> ) for correct groupings of these species. The current list in this section has some of the species in the wrong group (e.g. gulls, terns, skuas, jaegers, auks, murre, and puffins are not considered shorebirds). Description of wading birds, with the species identified, is also problematic as most of the species included (rails, cranes, bitterns, and coots) do not nest or roost in trees, nor in colonies. The wading birds term is one that over the years has been used to describe both shorebirds and the group of herons, ibis, egrets, and cranes. Suggest removing this term from the document.
	3.2.2.2.4	Pg. 27	This section is confusing, for similar reason as the prior bird sections. All species listed in this section are considered raptors (including vultures and owls - see McClure et al. 2019 Journal of Raptor Research). Recommend renaming this section "Raptors", and revising this section to reflect current nomenclature. For example, where the word "raptors" is mentioned in the section, change to "diurnal raptors".
	3.2.2.2.5	Pg. 28	This section could be merged with the passerine section and renamed "Landbirds" to reflect the corresponding bird initiative.
	3.4.1.2.2	Pp. 53-54	Appreciate recognition of panel collision risk. Although likely a better fit for the operations section (3.4.2). This section appears to be missing mention of collision risk with facility infrastructure - particularly power lines and fences.
	3.4.2.2.2	Pp. 58-59	Suggest moving discussion of solar panel collisions and Lake Effect to this section. Also recommend adding collisions with lines and fences to the second to last paragraph regarding injury and mortality.
	3.4.2.2.2	Pp. 58-59	Please include panels suggested to alter bat behavior (Barre et al 2023), as the smooth surface may act as a sensory trap to bats with similar echolocation effect as water (Grief et al 2017). <a href="https://www.science.org/doi/10.1126/science.aam7817">https://www.science.org/doi/10.1126/science.aam7817</a> <a href="https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.14555">https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.14555</a>
	3.4.2.2.3	Pg. 59	Recommend adding collision with solar panels to second bullet.
	3.4.4.1.1	Pg. 66	Consider adding a bullet regarding implementing latest recommendations for reducing solar panel collision risk for migratory birds. There is research currently underway regarding this

			issue and ways to mitigate (e.g., tipping up panels at night to break up the visual field). We don't currently have solid recommendations, but likely will in the coming years.
	3.4.4.1.1	Pg. 66	Consider adding a bullet for use of panels with visual/light and acoustic-scattering surfaces to reduce bat attraction, sensory traps, or other water-confusion effects.
	3.4.4.2.1	Pg. 68	Include BMP to use panels with visual/light and acoustic-scattering surfaces to reduce insect and bat attraction, sensory traps, or other water-confusion effects.
	3.4.4.2.1	Pg. 70	Avian Protection Plans are typically power company-specific plans, related to collisions and electrocutions. Suggest changing this to Bird and Bat Conservation Strategy. And great to see mention of Birds of Conservation Concern here. Recommend adding this group of species to the list of priority species in section 4.6.2 in the PEIS.
	3.4.4.2.1	Pg. 70	See comment above, and consider adding all Washington bat species to include all local and migratory species that may be affected by solar projects to the list of priority species in section 4.6.2 in the PEIS.
	3.5.1.1	Pg.72	Recommend including discussion of likely higher risk of Lake Effect collision issues with larger facilities.
	3.5.1.1	Pg. 72	Recommend including with the Lake Effect for birds, including more internal area to edge ratio that may increase risk of sensory traps for bats.
	3.7.1.1	Pg. 75	Consider adding verbiage regarding potentially lower migratory bird collision risk if panels are more dispersed through the site.
	Attachment 1	N/A	Recommend running the IPaC analysis again to capture list of Birds of Conservation Concern. This is a relatively new addition to the IPaC output.
	N/A	N/A	Consider using NABat to query nearby bat survey data to inform risk to bats. NABat can also provide survey methods and shielded data repository for documentation of bat species presence at a project location.