

Conservation Committee of the Blue Mt
Audubon Society

Please see the attached BMAS Conservation Committee comments. Thank you.

We appreciate Washington State, the Department of Ecology, and all parties involved in compiling this helpful SEPA draft PEIS for utility-scale solar development. Utility-scale solar is needed in WA, and we fully support development of solar energy development, where appropriate. This PEIS is very much needed to help guide solar development to sites that have the least conflicts with high value farmland, rangeland, and areas that have moderate or high value for conservation of native species and ecosystems. Thank you very much for your work.

There are two significant deficiencies in this PEIS because it minimizes the value of the results of the WSU Least-Conflict Solar Siting report and interactive mapping for the Columbia Plateau, and it tends to ignore or minimize the adverse effects of land use changes on native species and functioning natural ecosystems, open space, recreation, etc.

The Washington State legislature directed and funded the Washington State University (WSU) Energy Program to produce the Least-Conflict Solar Siting (Least Conflict) pilot project with the goal of identifying areas where there would be the least amount of potential conflict in the siting of utility-scale solar photovoltaics (solar PV) developments. A summary from the resulting report states that with bipartisan support, the project was included in the 2021 biennium budget, and completed by June 30, 2023. This was a collaborative effort with WDFW, DNR, Audubon Washington, and many others, over the course of about a year. The Proviso deliverables include a report and mapping system highlighting areas with the least amount of potential conflict between potential solar development sites, farmlands, rangelands, and conservation lands in the Columbia Plateau.

That report found suitable solar development areas were mapped based on good terrain (aspect, slopes up to 8%, and substrate type), low hazards (earthquake and fire risk), close proximity to infrastructure (power grid and substations within 10 miles, and roads within 5 miles), plus exclusions for cities, protected areas, etc. Approximately 83% of the mapped Columbia Basin was considered moderately high to very high for solar development, when not accounting for areas of potential conflict with moderate and high value farmland, rangeland, and conservation lands.

The Columbia Plateau region study area has approximately 14,242,020 acres (not including Tribal reservations). Over 6,777,000 acres were deemed to have high suitability for solar development, and even more were deemed moderately suitable. Of the total study area acreage, just under 212,000 acres – approximately 1.5% of the study area – were deemed low conflict for environmental conservation, farmland, and rangeland, and ranked “*very high*,” “*high*,” and “*moderately high*” for solar development suitability. Low-conflict environmental conservation lands and moderate-conflict rangelands and farmlands with the same level of solar suitability as the previous example, yields 1,561,700 acres, or 11% of the total study area. More combinations with different suitability and conflict levels can be produced in the mapping programs.

The PEIS for utility-scale solar development mostly ignores or minimizes the value and usefulness of the Least-Conflict report and its associated interactive mapping program. In the PEIS for Utility-scale Solar, it states under 4.6.3.2 on page 88, “**Consider** use of the WSU Least-conflict Solar Siting maps and avoid areas identified as having high conservation values.” This statement, which is repeated elsewhere in the draft PEIS, diminishes the high value of the Least Conflict report and mapping to help developers appropriately site utility-scale solar projects. The final PEIS should be recommending or strongly encouraging developers to use these very useful products early in their project siting and planning within the Columbia Plateau to help expedite solar development by minimizing conflicts. These comments also apply to the Appendix for Biological Resources.

This Least Conflict solar program and its potential usefulness for siting utility-scale solar in the Columbia Plateau should be emphasized and promoted in the PEIS. We urge you to emphasize and make the Least-conflict document and mapping a high priority for solar developer siting and planning within the Columbia Plateau.

Our concerns and comments regarding the lack of content on the adverse impacts of land use changes and land use construction on anything other than commercial uses of the lands are covered below under the subheading Land use. The PEIS currently mostly ignores the potential adverse effects on native species and habitats in the Land Use section and Land Use Appendix.

Our specific comments regarding various sections of the PEIS are shown below.

Figure 3-1 south of Highway 12, in Asotin County seems to be missing solar development potential between the town of Asotin and Anatone, WA. Please check that and explain why that area is not included on this map. It seems very odd that solar radiation north of the Snake River is included in the mapped area, but not south of the Snake River, south of the towns of Clarkston and Asotin towards Anatone.

4.6.1.1, page 78, first sentence – please add forbs to the list of examples of terrestrial plants because forbs are very important to maintain pollinators and many wildlife species.

4.6.1.2, page 81, second sentence – please include reptiles such as garter snakes, which are semi-aquatic.

4.6.3.2 Actions to avoid and reduce impacts, page 88, move to bullet 2, language such as “use the WSU least conflict report and mapping for planning solar projects within the Columbia Plateau” or “If considering or planning a solar development within the Columbia Plateau, it is advisable to use the WSU Least-Conflict Solar Siting Study and its maps to avoid areas identified as having moderate or higher conservation values.” – either of which incorporates the existing bullet 7 here. Bullet 2, with the new language suggested, should be the second priority on the list for developers.

4.13 Recreation, Pg 138, second bullet

- “Informal recreation on public or private lands includes dispersed camping, wildlife viewing, backcountry driving, off-trail hiking, and shooting.” This statement is missing foraging, wildflower viewing, biking, enjoying the view, etc. – and this is as common east of the cascades as in the cascades, although less concentrated. The previous statement about especially in the cascades shows a west-side bias and diminishes the high value of those activities east of the cascades.

Also, the bullet • “Water-based recreation is prevalent in rivers, reservoirs, and lakes. Wild and scenic rivers within the study area include the White Salmon River and Klickitat River, both located in the southern portion of the state.” This statement should also point out the extremely popular Yakima River, and Snake and Columbia rivers, as other highly valued rivers in the area for water recreation.

4.10 Land Use – in the blue box findings – the last item - for potentially significant and unavoidable adverse impacts on natural resources **of long-term commercial significance** or rural character. This should clearly point out that significant and unavoidable adverse impacts for rural character include those associated with high value areas for natural landscapes and vegetation, open space, and fish and wildlife habitats, as well as undeveloped recreation. These comments also apply to the Appendix I for Land Use.

4.10.3.1 Impacts of Conversion of Existing Land use has a statement that is incomplete and seriously lacking. “Removing these lands, particularly those of high quality, from their resource uses would reduce the area available to continue producing agricultural, forestry and mining.” This statement has a glaring lack of inclusion for concerns about land use changes reducing high value lands that currently serve as important wildlife habitat, and for maintaining native species and functioning natural ecosystems and open space, etc. Please include these natural or semi-natural lands as a significant concern about land use change adverse impacts, instead on solely focusing on commercial impacts.

Page 121 Findings. The statement that construction would have potential significant adverse impacts again only addresses resource lands of commercial significance that would be converted and ignores conversion of natural habitats and adverse effects on maintaining the natural environment (e.g. wildlife species and habitats, etc.). Without adding the impacts to natural habitats and species this statement has a glaring omission that must be fixed.

4.10.3.1 - Similarly, the construction and conversion of land uses ignored the adverse effects on rural character, which is only discussed for impacts of solar operations. Please include the adverse effects on rural character under construction and conversion of land uses, and point out that includes adverse impacts on native species and functioning ecosystems, and open space under rural character.

4.10.3.2 – Again, under siting and design considerations, the document has “consider” using the WSU least-conflict solar mapping. See our comments above and please modify this section to encourage use of the WSU Least-conflict report and maps, not just consider use.

Appendix E – Biological Resources

1.1.1, end of first paragraph, Terrestrial plants should include grasses, but please replace the term “herbs” with forbs, as herbs can be misleading to the general public.

3.2.1.2 – first sentence – should include shrublands or shrub-steppe and riparian vegetation.

3.2.1.3 – waterfowl habitat also includes small grain crops and grasses (e.g. think of geese feeding areas)

3.2.5.2.2 – Resident freshwater fish, page 40 – note that suckers have been documented migrating annually for long distances in WA and OR (e.g. Colden Baxter PhD Dissertation, Oregon State Univ.)

3.4.1.1 – last paragraph – Timing of construction can permanently deter some species from returning – such as disturbance during nesting season – and cause permanent site abandonment by some species of wildlife.

3.4.2.1 – Terrestrial Habitats, second paragraph, third sentence – is very speculative about greater effect on forested areas compared to grasslands and shrub-steppe. It is very difficult to return shrub-steppe and grasslands once they are disturbed because highly invasive weeds rapidly convert the vegetation, which is highly conducive to repeated fires, plus disturbed shrub-steppe is often converted to a different land use, and sagebrush does not naturally reestablish on a site readily.

3.4.4.1.1, page 66, 5th bullet – again, please change the word “consider” to Use the WSU Least Conflict maps to avoid areas identified as having moderate or higher conservation value in the Columbia Plateau. Shrub-steppe is a vegetative type and ecosystem that is highly imperiled and should be protected wherever possible. Or, we suggest that you change the sentence to: “If considering or planning a solar development within the Columbia Plateau, it is advisable to use the WSU Least-Conflict Solar Siting Study and its maps to avoid areas identified as having moderate or higher conservation values.”

3.4.4.2.1 -page 68, fencing, second bullet – raise fencing from 4-6” that is shown in the document to at least 6 inches, or reference where less than 6” clearance under the fence is proven to be effective for allowing many or most small to medium mammals (e.g. foxes, jackrabbits, raccoons, etc.) adequate passage.

This appendix really needs a page that describes the results from the Least Conflict Solar Study lead by WSU, similar to the Least Conflict Solar description and table in Appendix I for Land Use; except this addition in Appendix E should focus on the results of that study regarding conservation lands of moderate and higher importance. Shrub-steppe is a habitat type/ecosystem of concern that is limited, diminishing, and imperiled.

Appendix I Land Use Resource Report

2.3 Impact Assessment, page 12, states that “significant impacts would occur if a facility would result in the following”:

- “Actions would cause permanent conversion or changes to existing low-intensity uses (rural, agricultural or resource lands) and result in conflicts.” It is important to clearly specify here what is included in rural and resource lands. Leaving that information until later (pages 23 and 30) is likely to cause some confusion and lack of understanding with this statement.

Page 15, USFS lands should include the WA portion of the Umatilla National Forest in the Blue Mts of southeastern WA, otherwise it is incomplete.

3.4.1.1 Land Use Conflicts

Page 34 - Conversion of Existing land use, end of first paragraph: “The study area excludes existing cities and UGAs, so it is likely that facilities would be located on lands currently zoned and used for low-density residential or designated as natural resource lands (agriculture, forestry, or mining).” This statement has a very important omission. It ignores the impacts to rural character and conservation lands (wildlife habitat, natural areas, open space, recreation areas, etc. – some of these may be designated by the County or the State/Federal government, and many may not be designated). This is an important omission that needs to be addressed.

This entire Appendix tends to focus mostly (almost entirely) on commercially important natural resource lands (agriculture, forestry, and mining) while mostly ignoring the importance of maintaining rural lands for conservation of wildlife, native vegetation, open space, recreation, etc. This Appendix has a serious bias because of its lack of thorough consideration and discussion of lands that are important to maintaining rural character (e.g. native vegetation and wildlife, etc.) that are likely to be converted by solar development. This aspect must be more fully included and discussed in this Appendix, as well as in the main body of the report, or this PEIS will be seriously incomplete and lacking.

3.4.2 Impacts from Operation

3.4.2.1 - This section mentions impacts to rural character, but impacts to rural character is completely missing above in the document under construction and conversion of lands.

3.4.4.1 Siting and design considerations, the first bullet statement on page 37 is:

- “**Consider** the WSU Least-Conflict Solar Siting Study maps, as well as local, state, and federal agricultural lands mapping, to avoid areas identified as having highest ranchland and farmland values.” This statement ignores conservation lands (such as wildlife habitat and open space), which is a land use that may be converted.

The use of the word “consider” is very weak and unhelpful in the above bullet. That statement does not encourage or promote using this useful study that was required by the WA legislature to help developers planning solar projects on the Columbia Plateau. A suggested more helpful statement would be “If considering or planning a solar development within the Columbia Plateau, it is advisable to use the WSU Least-Conflict Solar Siting Study and its maps to avoid areas identified as having high or very high ranchland, farmland, and conservation values.”

Thank you for the opportunity to review and comment on this draft PEIS. We believe this PEIS will be more complete and more useful with inclusion of the suggestions that we have made.