

Land use # 19

--Submitted by;

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- 1 year has 8760 hours (365 days X 24 hours)
- Iron Horse Solar Farm annual output 10.4 GWh.
- Therefore average hourly output of Iron Horse Solar Farm is 1.18 MW (10.4 GWh ÷ 8760 hours).
- Wild Horse Wind Facility has 127 1.8 MW turbines and 22 2.0 MW turbines)

C*onclusion : 1 wind turbine has capacity of producing more electricity than the entire Iron Horse Solar Farm.

- Bonneville Dam generates annually 4,466 GWh of electricity.
- It would take 429 Iron Horse Farms to replace Bonneville Dam.
- It would take 20,163 acres of solar panel-covered land to replace Bonneville Dam. (429 X 47 acres)
- Kittitas County lands in farm – 183,124 acres (2012)

Conclusion : It would take 9.08% of the farmland in Kittitas county to replace electricity output of Boneville Dam with solar panels. (183,124 ÷ 20,163)

% OF AGRA

DENSITY.

AS THE COUNTY EXPLAINED
TO THE COUNCIL

THIS IS NOT A PETITION FOR
EXPEDITED REVIEW - IT IS AN
ATTEMPT TO SET A PRECEDENT
ALLOWING NUMEROUS OTHER APPLICATIONS
TO CIRCUMVENT LOCAL REGULATIONS.

THIS COUNCIL
YOU ARE NOT ASKED FOR
EXPEDITED PROCESS

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1 Under WAC 197-11-340(1), the Responsible Official can issue a
2 determination of nonsignificance ("DNS") only if he determines that
3 there will be "no probable significant adverse environmental impacts"
4 from the proposed solar farms. If the proposed solar farms are likely to
5 have probable significant adverse environmental impacts, the
6 Responsible Official has no choice. he "shall issue a determination of
7 significance." WAC 197-11-360(1). A "probable significant adverse
8 impact" exists "whenever more than a moderate effect on the quality of
9 the environment is a reasonable probability." *Norway Hill Preserv. &*
10 *Prot. Ass'n v. King County Council*, 87 Wash.2d 267, 278, 552 P.2d
11 674 (1976). The SEPA rules use a similar approach. Under WAC 197-
12 11-794 the term "significant" is defined to mean: "reasonable likelihood
13 of more than a moderate adverse impact on environmental quality."
14 Also, the concept of significance "involves context and intensity and
15 does not lend itself to a formula or quantifiable test." *Id.* The context
16 of an environmental impact requires the lead agency to consider the
17 physical setting being impacted. *Id.* The intensity of an environmental
18 impact required the lead agency to consider the magnitude and
19 duration of the impact. *Id.* Also, the severity of an environmental
20 impact should be weighed along with the likelihood of its occurrence.
21 *Id.* "An impact may be significant if its chance of occurrence is not
22 great, but the resulting environmental impact would be severe if it
23 occurred." *Id.* A determination of whether an environmental impact is
24 significant requires: "the examination of at least two relevant factors:
25 (1) the extent to which the action will cause adverse environmental
26 effects in excess of those created by existing uses in the area, and (2)
the absolute quantitative adverse environmental effects of the action
itself, including the cumulative harm that results from its contribution
to existing adverse conditions or uses in the affected area." *Norway*
Hill, supra at 277. See also WAC 197-11-330(3)(a) and (b). Under WAC
197-11-330(3)(c), if the project will produce several environmental
impacts that, when considered separately, are marginal, those

1 marginal impacts should be considered together, and when so
2 combined, may result in a significant adverse impact. In considering
3 the environmental impacts of the proposed project, the lead agency is
4 required to "consider more than what might be the narrow, limited
5 environmental impact of the immediate, pending action." *Cheney v.*
6 *Montlake Terrace*, 87 Wn.2d 338, 344, 552 P.2d 184 (1976).
7 Furthermore, the lead agency "cannot close its eyes to the ultimate
8 probable environmental consequences of its current action." *Id.* For
9 example, in *City of Federal Way v. Town & Country Real Estate, LLC*,
10 161 Wn.App. 17, 252 P.3d 382 (2011) the court held it improper to
11 consider only the traffic generated by a specific project. Rather, the
12 increased traffic from "projected population growth" needed also to be
13 considered. *Id.* at 55. See also *Cougar Mountain Associates v. King*
14 *County*, 111 Wn.2d 742, 765 P.2d 264 (Wash. 1988) where the court
15 stated: "In the past we have found significant impacts in cases wherein
16 there was . . . the perceived beginning of accelerating development."
17 Also, significant impacts have been found where "there was major
18 opposition to a project. *Cougar Mountain, supra.*
19 Finally, the policy of SEPA is to make sure that the DNS threshold
20 determination is properly made: "The policy of the act . . . is thwarted
21 whenever an incorrect 'threshold determination' is made." *Norway Hill,*
22 *supra* at 273
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