Submitted by:

Stan Blazynski
1811 E 3rd Ave
Ellensburg, WA 98926

- 1 year has 8760 hours (356 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

Conclusion: 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 Bonneville Dam with solar panels. (183,124 ÷ 20,163)
% OF ACRE

DENSITY:

AS THE COUNCIL 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
Under WAC 197-11-340(1), the Responsible Official can issue a
determination of nonsignificance ("DNS") only if he determines that
there will be "no probable significant adverse environmental impacts"
from the proposed solar farms. If the proposed solar farms are likely to
have probable significant adverse environmental impacts, the
Responsible Official has no choice, he "shall issue a determination of
significance." WAC 197-11-360(1). A "probable significant adverse
impact" exists "whenever more than a moderate effect on the quality of
the environment is a reasonable probability." *Norway Hill Preserv. &
Prot. Ass'n v. King County Council*, 87 Wash.2d 267, 278, 552 P.2d
674 (1976). The SEPA rules use a similar approach. Under WAC 197-
11-794 the term "significant" is defined to mean: "reasonable likelihood
of more than a moderate adverse impact on environmental quality."
Also, the concept of significance "involves context and intensity and
does not lend itself to a formula or quantifiable test." *Id.* The context
of an environmental impact requires the lead agency to consider the
physical setting being impacted. *Id.* The intensity of an environmental
impact required the lead agency to consider the magnitude and
duration of the impact. *Id.* Also, the severity of an environmental
impact should be weighed along with the likelihood of its occurrence.
*Id.* "An impact may be weighed if its chance of occurrence is not
great, but the resulting environmental impact would be severe if it
occurred." *Id.* A determination of whether an environmental impact is
significant requires: "the examination of at least two relevant factors:
(1) the extent to which the action will cause adverse environmental
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
marginal impacts should be considered together, and when so combined, may result in a significant adverse impact. In considering the environmental impacts of the proposed project, the lead agency is required to "consider more than what might be the narrow, limited environmental impact of the immediate, pending action." *Chaney v. Montlake Terrace*, 87 Wn.2d 338, 344, 552 P.2d 184 (1976).

Furthermore, the lead agency "cannot close its eyes to the ultimate probable environmental consequences of its current action." *Id.* For example, in *City of Federal Way v. Town & Country Real Estate, LLC*, 161 Wn.App. 17, 252 P.3d 382 (2011) the court held it improper to consider only the traffic generated by a specific project. Rather, the increased traffic from "projected population growth" needed also to be considered. *Id.* at 55. See also *Cougar Mountain Associates v. King County*, 111 Wn.2d 742, 765 P.2d 264 (Wash. 1988) where the court stated: "In the past we have found significant impacts in cases wherein there was . . . the perceived beginning of accelerating development."

Also, significant impacts have been found where "there was major opposition to a project. *Cougar Mountain*, supra.

Finally, the policy of SEPA is to make sure that the DNS threshold determination is properly made: "The policy of the act . . . is thwarted whenever an incorrect 'threshold determination' is made." *Norway Hill*, *supra* at 273.