



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Pasco District Office, Habitat Program • 2620 North Commercial Avenue, Pasco, WA 99301

June 10, 2021

Sonia Bumpus, EFSEC Manager
Washington Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
PO Box 43172
Lacey, WA 98504-3172

Subject: Scoping: Horse Heaven Hills Wind, Solar, and Battery Storage Project

Ms. Bumpus,

In April 2021, WDFW provided our initial comments on this project, drawing particular attention to the immense size of the project along the Horse Heaven Hills ridgeline and the subsequent landscape-scale impacts to important habitat and ecological connectivity. The habitat represents some of the last remaining functional and uninterrupted shrub-steppe and natural grasslands in Benton County and has remained largely undeveloped or converted to agriculture due to its shallower soils and steeper gradients. Development within this ridgeline will result in further fragmentation and isolation of shrub-steppe and grassland habitat as well as loss of function and value to wildlife.

While the majority of the project is sited over existing dryland wheat fields, the project's location in the Horse Heaven Hills puts many of the turbines, micro-siting corridors, transmission lines, solar arrays, etc., in close proximity to, and crossing over, many of the draws and canyons that provide some of the only native habitats in the area. These areas, as well as the entire Horse Heaven Hills ridgeline, are used seasonally and year-round by a variety of avian species, some of which are State, Priority, Candidate, and Threatened Species. In fact, the entire Horse Heaven Hills ridgeline is an important area for avian species and other wildlife, including reintroduced Pronghorn antelope. It is a strategic location that provides suitable habitat for a variety of native plant and wildlife species and has been recognized as such through a variety of scientifically validated stakeholder publications: *The Spatial Conservation Priorities in the Columbia Plateau Ecoregion – Methods and data used to identify collaborative conservation priority areas for the Arid Lands Initiative* and *The Washington Connected Landscapes Project: Analysis of the Columbia Plateau Ecoregion*.

Due to the significant landscape-level impact from this project, we offer the following recommendations for further consideration and analysis:

- We would like to reiterate our comments from our April letter that the project focus only on solar development (no wind energy development) on agricultural and grasslands in the southern edge of the lease area and to the southwest. This includes transmission corridors and all

supporting infrastructure. This would help preserve the integrity of the Horse Heaven Hills ridge line as the only documented and scientifically-validated east/west ecological corridor supporting native habitats and wildlife in Benton County.

- The Ferruginous hawk is a State of Washington Threatened Species that has been proposed for uplisting to Endangered. Our Priority Habitats and Species recommendations for this bird are:

Activities	Buffer width^a	Buffer around	Timing	Comments
Avoid all human access & ground-based activities	820'	active nests	1 March – May 30 ^c	Delay construction and development until after young have dispersed, which generally occurs about a month after fledging
Prevent prolonged activities (>0.5 hours)	3280'	active nests	1 March – August 15 ^c	Ferruginous hawk's breeding season
Avoid development, rodenticide and pesticide application.	1300'	major prey concentrations	year round ^b	Prey concentrations include ground squirrel colonies

^a Buffers should be tailored to the individual hawks involved, based on factors such as line-of-sight distance between nest and activity, nest structure security, disturbance history, observed responses, and nest elevation in relation to the activity. ^b Permanent buffer. ^c Seasonal buffer to minimize disturbance during critical periods.

and the project should fully discuss and analyze how the project will not impact this species and its' prey base.

- Any aspect of the project (collector lines, transmission lines, turbines, solar areas, battery storage, new roads, etc.) that could adversely affect this species or its prey base, should be discussed and analyzed.
- Pronghorn antelope utilize the western portion of the proposed project site year-round, especially in the winter. Impacts to this herd should be discussed as it relates to the long-term viability of this reintroduced population across the greater Horse Heaven Hills landscape.
- The project should include a discussion on how the nearly complete loss of connectivity along the Horse Heaven Hills ridgeline will be mitigated.
- Mitigation values should not be calculated until a preferred Alternative is selected and a complete understanding of the impacts can be evaluated.
- In order to maintain some connectivity across the landscape, solar areas be set up in arrays (as opposed to one large development) and not cross any canyons/draws to maintain some connectivity across the landscape.
- If wind energy development is proposed, micrositing should not cross, or otherwise impact, "waters of the state" or canyons/draws. All collector and transmission lines should be set south of the ridgeline and run parallel to it (roughly east/west), with perpendicular collector lines to each turbine.

- All turbine locations, micrositing corridors, and transmission corridors be surveyed to better understand project impacts and that further refinement of the micrositing corridor and turbine locations could occur based on the findings of these surveys.

Please contact me at 509-380-3028 or at Michael.Ritter@dfw.wa.gov with any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael Ritter". The signature is written in a cursive, flowing style.

Michael Ritter
Area Habitat Biologist
Statewide Technical Lead: Wind and Solar