

Date Received	Comment #	ID	First name Last name	Organization	Mailing Address	Email	Subscribed to mailing list
7/8/2021	0016	eNEa1Yi	Eric Bartrand	WDFW	1701 S. 24th Ave Yakima, WA 98902	eric.bartrand@dfw.wa.gov	False

Thank you for accepting the attached comments on this project!

Attachments:

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State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
Telephone: (509) 575-2740 • Fax: (509) 575-2474

July 8, 2021

The Energy Facility Site Evaluation Council
PO Box 47250
Olympia, WA 98504-7250

Subject: **State Environmental Policy Act (SEPA) Document, Washington Department of Fish and Wildlife Comments on MITIGATED DETERMINATION OF NONSIGNIFICANCE, Goose Prairie Solar Project, EFSEC Application No. 2021-01, Yakima County**

Dear Council members,

On behalf of the Habitat Program of the Southcentral Region of Washington Department of Fish and Wildlife, I provide the following comments on the subject Mitigated DNS received 7/24/2021. We concur with the conditions for mitigation of impacts to wildlife and wildlife habitats stated in *Environmental Review and Staff Recommendation for State Environmental Policy Act (SEPA) Review and SEPA Determination for Goose Prairie Solar* and relevant Mitigating Conditions provided in the MDNS. These conditions reflect our extensive recommendations, interactions, and negotiations with both EFSEC staff and the project proponents.

This project will have a serious impact on Sagebrush sparrow, which colonize the site and its surrounds. The species is a shrub-steppe habitat obligate and is in decline in Washington. It is known to only inhabit stands of closed-canopy sagebrush of more than 200 acres. Presence of Sagebrush sparrow at the site indicates the considerable functions of habitat currently present. I am pessimistic that this colony of sparrow will persist following construction of the facility, however.

Long-billed curlew will also lose nesting habitat- as they are documented to use the area for that over decades. The habitat is also typical of that where badger, jackrabbits, and various raptors are present. A Ferruginous hawk (state Threatened) was recorded hunting upon the site in the past. Deer, and elk occasionally, rely on this habitat for foraging. The land in the Conservation Reserve Program (CRP) proposed for development will remove much of the forage available. Fragmentation of the remaining landscape for Sagebrush sparrow and large mammals will result in proximal impacts that are known to occur but are more difficult to measure.

Both aerial photography and soils maps of the site indicate it was historically dominated by closed-canopy sagebrush stands. An alarming amount of the currently undeveloped land in our region that was historically covered by mature sagebrush has been altered by fire. Cattle grazing, to a lesser extent, has also contributed to these alterations. The degradations of habitat characteristics coincide with precipitous declines in shrub-steppe obligate species, which notably include Greater Sage grouse and Ferruginous hawk. Fortunately, wildfire and grazing generally only affect the seral stage of the sagebrush plant community, because of its resilience. Habitat functions are interrupted temporarily, but removal of the stressors allow a return to the normative habitat condition of sagebrush cover.

The Department approaches proposals to develop in shrubsteppe habitat to ultimately arrive at no net loss of habitat functioning. We are particularly concerned for those functions in the most mature seral stages of shrubsteppe, because they require the longest times to develop even in the absence of serious stressors. Thus, habitat resilience is a crucial part of its value to ensure habitat of diverse ecologic seral stages will exist. The current land base of undeveloped "Shrubsteppe Habitat" in Southcentral Washington- which has the resilience to recover from stressors-

is considered necessary to maintain to have enough functional habitat to sustain and possibly recover populations of the native wildlife species in decline. That existing land base and its potential to function would be continually eroded if a reduction in seral stage affected its status as historic shrubsteppe habitat.

Mitigation for development in historic shrubsteppe habitat, which arrives at “no net loss” of function, requires that the cumulative value of the land base remains. So, a proposed subtraction from the base is met by a corresponding addition. Since the offsite habitat proposed to do replacement is often already part of the land base, the discussion of mitigation ratios in those instances begins at 2 to 1. That is on the basis that the habitats involved are comparable. Adjustments higher or lower are made based on specific circumstances and conditions. Discussions for this project are an example of it. Mitigation could be at a ratio of 1 to 1 were a proponent to offer replacement habitat that was no longer part of the undeveloped land base, perhaps due to it being developed and without habitat function, such as an irrigated crop field. In that scenario the restoration to equivalently functioning habitat, and its sustainment as such, would be needed to equitably replace existing, resilient habitat.

The explanation above illustrates how WDFW incorporates habitat functions and values into its mitigation calculations. “Comparable habitats” are mostly comparable in their value. If they have high function they are also likely to have a higher value. If they have low function they may still be of high value, just presently be less desirable for habitat. The way it is incorporated is less rote and more nuanced, which captures habitat value to a much greater extent. This is important given that environmental stressors like fire and grazing are a major variable.

Specific Comments:

- Possible cumulative subtractions from or “Effects” to shrubsteppe habitat must be looked at even more critically in SEPA. Even though one project may not “substantially” or “significantly” affect wildlife, similar proposals in a developing landscape need a more critical eye towards protections.
- The source of fill in the Construction Plans and Specifications should consider possible project sunseting and complete restoration of the site.
- Facility lighting shouldn’t consider background ambient light from Highway 24 since most of the project is an extreme distance from that feature.
- The Yakima County “Upland Wildlife Habitat Conservation Area” (UWHCA) is not a mapped area, but rather is based on a primary association with Wildlife of Countywide Importance. Townsend’s ground squirrel is such a species and present on the Meacham property.
- The removal of posts/pilings should be specified during restoration as part of the mitigated conditions.
- A fire-fighting tanker truck filled with water should be required to be maintained on site during fire season as part of the mitigated conditions.
- I favor overhead collector lines be specified versus those that are buried. Avoiding additional excavation is desirable.
- I don’t believe it is realistic to retain all stormwater entering the site. A means of stabilizing soil entrained in flowing surface waters needs greater consideration.

Thank you for the opportunity to provide these comments. We are optimistic of the compatibility with wildlife the described solar facility might demonstrate. We greatly appreciate the early engagement EFSEC and the Proponent

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provided us. Please feel free to contact me with any questions or clarifications related to this information you may require. My phone number is 509-457-9310 or 509-952-8147.

Sincerely,

A handwritten signature in black ink that reads "Eric Bartrand". The signature is written in a cursive style with a large, looping initial "E".

Eric Bartrand

Department of Fish and Wildlife
Area Habitat Biologist
1701 S 24th Avenue
Yakima, WA 98902

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