Pre-application Comment #P0022 Badger Mountain Project Docket #210747



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South Douglas Conservation District P.O. Box 246 Waterville, WA 98858 (509) 745-9160

ENERGY FACILITY SITE EVALUATION COUNCIL

September 21, 2021

Governor Jay Inslee Office of the Governor Box 40002 Olympia, WA 98504-0002

We would like to let you know our position on Solar Farms currently being planned in Douglas County, on Badger Mountain. While we understand the need for solar development as a renewable energy resource, we cannot accept replacing highly productive farmland, lands that support habitat for critical wildlife species, including the state endangered Sage Grouse, and Native American traditional food gathering lands with huge industrial sized solar farms. With the recent catastrophic fires in Douglas County, even less land is now available for wildlife, farmland and food gathering. The 14,000 acre Batterman fire this past summer and the Pearl Hill fire last year destroyed crucial sage grouse habitat. Badger Mountain has the last remaining leks in Douglas County.

We are aware of property rights for landowners to use their land as they deem appropriate. But are solar farms appropriate on farmland, and wildlife habitat that cannot be replaced or returned to its natural state if the solar farms are abandoned? Land and structures already established would be a much better spot for solar power. That would benefit those landowners instead of the solar companies. This solar power is not going to be used in Douglas County. It is to be sold out of state, with no benefit to the local economy.

It's about locating acceptable locations for this type of solar power generation and Badger Mountain and Douglas County in general are not the places for this to happen. Douglas County is the last remaining strong hold for the endangered Sage Grouse and the more than 6,000 acres being planned for solar development would wipe out one of the only habitat areas they have left in all of Washington. The Douglas County Commissioners recently passed Ordinance No. TLS 21-17-47B stating all primary use energy facilities must go through the Energy Facility Site Evaluation Council (EFSEC) to determine appropriate location and mitigation measures and that facilities shall be located at least 7 miles from and urban growth area boundary, or habitat associated with sensitive, candidate, threatened, or endangered plants or wildlife as identified on state and federal lists.

The message several biologists have told us is that there is no way to produce or protect any habitat of similar value anywhere in Washington to mitigate for the loss of this habitat for the sage grouse. In addition, traditional tribal gathering areas would be lost if solar development is allowed in this area. Scenic values would be devastated, land values would plummet, and extremely value Conservation Reserve Program (CRP) acres planted for wildlife would disappear. Millions of dollars have been invested in maintaining the sage grouse population on Badger Mountain through partnerships with farmers, ranchers, conservation districts,

Joe Sprauer, Chairman Mike Lesky, Vice Chairman Eileen Bone, Auditor Jeff Rock , Member Lindsey Morrison, Member and the Washington Department of Wildlife. The CRP program is critical for this and many other species of importance which would all vanish if solar farms are approved.

Although not immediate, the chemicals and run-off of the solar panels will leach into the soil and ultimately into the water table. Many depend on this water for safe drinking water, both on Badger Mountain and unto the Waterville Plateau. Once the water is polluted, it will not be safe for humans or animals to drink.

We ask that you the Governor and Chair of EFSEC take this into account and not allow this development to proceed, or at a bare minimum to make no decision on this until the solar siting process is in place as determined through the proviso.

Many state government organizations, private citizens, County Commissioners, wildlife experts, farmers, ranchers, conservation organizations, and both the Yakama and Colville Confederated Tribes do not want to see these lands turn into massive solar farms at the expense of natural resources, wildlife, or traditional indigenous culture. Please take our comments into consideration if these applications come before you either as the EFSEC council or the Governor's staff.

Please consider our objections to the solar project in Douglas County. Douglas County is our home. We respect the farmers who protect the land and enhance the shrub steppe for wildlife habitat. The fires of the last few years have taken much of the sage grouse habitat, as well as CRP fields and native plants. The lands need to be protected for now and future generations.

Thank you,

South Douglas Conservation District

Cc: Kathleen Drew, EFSEC Chair WA Senator Brad Hawkins WA Rep Mike Steele WA Rep Keith Goehner Fed Rep Dan Newhouse