

From: [Bayard, Trina](#)
To: [EFSEC \(UTC\)](#)
Subject: copy of oral testimony provided at Badger Mountain public meeting and land use hearing
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External Email

Dear Council members,

Thank you for the opportunity to provide comments on the proposed Badger Mountain solar project. Please see below for a copy of the oral testimony I provided at the Badger Mountain Public Informational Meeting and Land Use Hearing on Nov. 17, 2021.

Hello, my name is Dr. Trina Bayard, I'm director of bird conservation for Audubon Washington, a state office of the National Audubon Society. I'm speaking tonight on behalf of our office as well as the North Central Audubon Society, whose chapter territory includes Badger Mountain.

Audubon's climate science shows that two thirds of N. American birds are at serious risk of extinction if we can't limit warming associated with climate change. We support 100% clean energy and net zero emissions to help our birds. But our birds need habitat and protections to adapt to climate change and ongoing habitat loss.

We and our 50,000+ members and 25 chapters across the state care deeply about Greater Sage-grouse and other birds of the shrub steppe. The Greater Sage-grouse is an Audubon priority species across the West and here in Washington, the status of sage-grouse and the shrub steppe ecosystem is dire. More than 80% of this landscape has been lost, and grouse experts tells us that the population in Douglas County represents the last viable population in Washington, and that they are extremely vulnerable to disturbance, habitat loss and fragmentation.

We have reviewed the publicly available data on Greater Sage-grouse in the Badger Mountain Solar Project Area, including the Applicant's Wildlife and Habitat Survey Report. We find that there are serious and concerning data gaps. For example, the Applicant's field surveys were for just 6 days in early May 2021. However, grouse may use the project area in different ways across seasons, therefore surveys in other seasons should be required. In addition, the WDFW telemetry data from nearby breeding grounds is for males only, and does not include movement data for females or young and their nesting or post-breeding dispersal. In addition, sage-grouse observations by private landowners and individuals may not be documented in official data repositories, creating a gap in the official record for sage-grouse occurrence and habitat use in the project area and vicinity.

Use of grassland and dryland wheat habitat within the project vicinity by sage-grouse has been reported, particularly in areas where there are fingers of sagesteppe vegetation interspersed. Grassland-type habitats could be more important for the Washington population of this species than has been appreciated. In addition to surveys across seasons to detect whether or not the species is

present, an analysis of sage-grouse habitat use in grasslands and agricultural areas adjacent to nearby sagesteppe is needed for this project and other areas going forward.

For these reasons, we find that there is not enough data at this time to find a level of significance to determine environmental review.

We recommend that the Council postpone the decision on significance until the Applicant, using methodologies approved by and in coordination with WDFW, fills the data gaps on year round occurrence at the site and habitat usage of shrub-steppe and adjacent agricultural and grassland habitats. In postponing this decision, the Council can use the best available science to determine significance rather than what we know to be the incomplete and insufficient data that is available today.

Sincerely,
Trina Bayard

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Trina Bayard, Ph.D.

Director of Bird Conservation

Pronouns: she, her, hers

Audubon Washington

5902 Lake Washington Blvd. S.

Seattle, WA 98118

wa.audubon.org