

Comment 20220409-9avs2vR

Comment #009
Badger Mountain Project
Docket #210747

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Organization:

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Conservation Northwest

Attachments

[SEPA BadgerMT Conservation NW.pdf](#) 761.08KB

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Tags:

Responses:

Comment:

Date: April 1, 2022

EFSEC Agency Docket Number: EF-210747

Please accept this comment for the Badger Mountain Solar Energy Project Determination of Significance and Scope of Environmental Impact Statement. The project applicant is Avangrid Renewables who claims to be one of the most ethical corporations in the world. This company is wholly owned by the Spanish corporation Iberdrola. The largest shareholder of Iberdrola is the Qatar Investments and Project Development Holding Company made up entirely of members of Qatar's ruling family

Conservation Northwest is a non-profit organization dedicated to protecting wildlands, connecting habitat, and restoring wildlife. We contend that from the evidence already presented by the Washington Department of Fish and Wildlife (WDFW) to this council, it has clearly been determined that ANY progress on this project WILL affect the wildlife of this region including listed threatened and endangered species. The ecological impact of breaking ground on this project has a significant probability of directly leading to a species becoming extinct in Washington State and this impact is absolutely unmitigable.

Any Environmental Impact Statement for this specific project will need to adhere to the most rigorous process available. It is clear that there is no existing long-term data set to adequately assess the resident and migratory wildlife present. The previous 6-day survey by the applicant that failed to locate any endangered species was conducted out of season. This demonstrates a complete misunderstanding of how different parts of the habitat are used seasonally and throughout a species' life cycle. This survey occurred this May while birds would be mostly sedentary occupying nests. Individuals then spread out throughout the project area for summer and fall. Any survey effort that lasts less than 5 years will not even provide a baseline understanding of this unique habitat.

Even the most stringent environmental review of the proposed project location will be inadequate to assess potential impacts to species, habitats, and tribal interests. Badger Mountain has been identified as critical for the survival of the Greater Sage Grouse in Washington state. The current landscape of agriculture, ranching, and wildlife cohabitation is the result of millions of state and federal dollars spent in successful projects. The Natural Resource Conservation Service (NRCS), the Farm Bill, WDFW, DNR, the Washington Wildlife and Recreation Program, the Sage Grouse Initiative, private donors, and partnerships with landowners have kept this landscape as the basis of the local economy while remaining ecologically vibrant.

NRCS specifically recognizes that development of commercial wind or solar facilities results in habitat fragmentation. The miles of fence surrounding this solar farm will be a barrier to the movement of wildlife and will remove access to critical habitat. Mitigation of this shrub-steppe habitat is impossible as there is no way to produce or protect any habitat of similar value anywhere else in the state. The Douglas County Multiple Species General Conservation Plan also recognizes the value of this region to the endangered Columbia Basin pygmy rabbit, the Washington ground squirrel, the Columbian Sharp-tailed grouse, Golden eagles, and Ferruginous hawks. Any EIS required in this process must clearly dictate the data and analysis needed to specifically determine the scope of potential impact to each ecological element.

Environmental elements for EIS

Wildlife/Habitat

The birds and mammals present use various habitats at different times of the year and for different life cycle functions. The analysis must include the entire range of each species in the area and the effect that the proposed development could have on their food sources, migration corridors, predation, and reproduction.

State Listed Species

Greater Sage-grouse

WDFW determined that the Badger Mountain Plateau provides some of the last remaining habitat and largest breeding display ground (lek) for Greater Sage-grouse in Washington State. Data and models indicate that dryland wheat, shrub-steppe, and CRP lands in the area are used by sage-grouse throughout their annual cycle for rearing, foraging, migration, and movement.

Grouse may use the project area in different ways across seasons with existing data from nearby breeding grounds is for males only. This disregards the importance of females, young, nesting, and post-breeding dispersal. Sage-Grouse use grasslands, dryland wheat, and fingers of shrub-steppe

vegetation. The BMSEP EIS must comprehensively document sage-grouse activity within and surrounding the project area throughout all four seasons and analyze likely adverse impacts to the species based on this determination of existing conditions. Project impacts to sage-grouse must also be considered within the context of past and probable future impacts to the species as required by WAC 197-11-792(2)(c)(iii).

Ferruginous Hawk and Golden Eagle

This project area includes the State Endangered Ferruginous Hawk and State Candidate Golden Eagle foraging habitat, which are experiencing population declines and poor reproductive success due to habitat loss and conversion and declining prey populations. WDFW data indicates two occupied Golden Eagle territories with the potential to be negatively impacted by the project. The EIS must comprehensively document existing populations and habitat conditions for each species and analyze potential immediate and long-term project impacts.

The EIS should also address impacts to other at-risk species and habitats occurring in Douglas County, including state Priority Habitats and Species, Sensitive Species, Candidate Species, and Species of Greatest Conservation Concern. Sagebrush obligate bird species distribution indicate that potential habitat may be present for state candidate species Sage Thrasher and Sagebrush Sparrow within the project footprint. All wildlife surveys should be conducted during the appropriate season to determine potential state priority habitat and species presence.

Earth

This proposed site on the rim of the Badger Mountain plateau includes flatland to nearly vertical cliffs. The EIS must adequately address unstable soils, the effects of proposed filling and grading, and land that is currently entirely pervious being converted to impervious surfaces.

Land Use

The proposed project is inconsistent with the Douglas County code and comprehensive plan zoning for Dryland Agriculture and Rural Resources. This development would permanently alter the character of land use on this plateau disrupting families who have lived in this area for over 100 years.

Water

Water is scarce and precious on Badger Mountain and relies on dry-land agricultural practices. Ground water wells for residences and livestock are generally deep and minimally productive. There will be no source of water for this solar panel facility for cleaning and fire control. Where will any water needed come from and how will it be stored and disposed of?

Plants

The variety of habitats available in this area are a rich resource and repository of native plants. This provided a resource base of food and shelter for pollinators, birds and land animals. WDNR noted the location threatened plant species on cliffs and canyons in the area. Plant communities that would be permanently destroyed by the excavation and solar development must be completely surveyed and documented. This disturbed soil is then readily invaded by noxious weeds such as cheat grass that provides fuel and greater probability of future wildfire.

Environmental Health

Issues resulting from the construction work and operation throughout the life of the project should be investigated. Events such as wildfire, windstorms and snow loading must be adequately planned for.

Public Services

Fire protection is provided by volunteer residents and county agencies. This area has experienced cycles of uncontrollable fires completely overwhelming to available resources.

Historic and cultural preservation

Badger Mountain was an important landscape to indigenous peoples from time immemorial to the present day. This continues to be a location for gathering of native plants as sources of food and medicine.

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Landscape Connectivity and Condition

The arid lands of this region are a significant migration route and are threatened by existing habitat loss and fragmentation. The EIS must evaluate potential direct and cumulative effects of losses of this landscape connectivity zone.

Conclusion

Shrub-steppe habitat in Washington state is already fragmented and continuously threatened or lost due to large wildfires. Many species of plants and animals rely on shrub-steppe habitat. Further loss of thousands of acres to solar development could very well result in the extinction of species, reduce wildlife connectivity, and set back restorative efforts in many places in the state. It is clear from the existing information and uniqueness of this project area that "No Action" will be the only way to insure the successful cohabitation of this rural economy and ecological values. The EIS should evaluate a range of alternative locations to the applicant's proposal that would "feasibly attain or approximate [the] proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation" (WAC 197-11-440(5)(b)). This project is extremely likely to cause significant adverse impacts to wildlife and wildlife habitat. Thank you for considering these comments.

COPY OF COMMENT ATTACHED



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