



STATE OF WASHINGTON

DEPARTMENT OF FISH AND WILDLIFE

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April 12, 2022

Ami Hafkemeyer
Washington Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
PO Box 43172
Olympia, WA 98504-3172

Subject: Badger Mountain Solar Project: Scoping, Environmental Impact Statement.

Dear Ms. Hafkemeyer:

The Washington Department of Fish and Wildlife (WDFW) does not support the current siting of the Badger Mountain Solar Project (BMSP). In our December 2021 letter to EFSEC, we provided our rationale and reasoning that centered around the unique mosaic of habitats of the Badger Mountain Plateau that are utilized by state endangered sage grouse.

Since December 2021, we have provided additional information to EFSEC regarding sage grouse survey methodology. There is an alternate site approximately 15 miles to the northeast of Waterville that covers more than 40,000 acres that would not impact sage grouse but would require screening for impacts to other wildlife species. When we have met, we have clearly stated that providing additional information in no way indicates our support for the current project location. Instead, we are simply providing additional information in our role of technical advisor to EFSEC and in the spirit of cooperation and transparency.

While long-term sage grouse data collection from the proposed BMSP site will be useful in understanding more about their reliance on the Badger Mountain Plateau, the additional data will not result in WDFW supporting the current siting of this project. Instead, that data, along with WDFW data pertaining to sage grouse, sensitive species and landscape connectivity, that includes the proposed project site and the Badger Mountain Plateau, will be used as one of many screening variables in the Least Conflict Solar Siting Program (LCSSP). The LCSSP, scheduled to begin in July, organized and implemented by WA Audubon and Washington State University, will bring together various stakeholder groups such as industry, private landowners, conservation groups, etc., to develop a state-wide strategy to site solar projects in areas of least conflict. Given what is currently known about the importance of the Badger Mountain Plateau to a variety of sensitive species, including state endangered sage grouse and ferruginous hawks, the LCCSP will likely show that solar (and likely other forms of renewable energy) should not be sited in this area.

Thank you for the opportunity to provide these comments. Please contact Michael Ritter, State-wide Technical Lead: Wind and Solar, at 509-380-3028 or at Michael.Ritter@dfw.wa.gov with any questions.

Respectfully,

Brock Hoenes, WDFW North Central Region 2 Director
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