



To: Washington State Energy Facility Site Evaluation Council (EFSEC)

Date: November 29, 2022

RE: Proposed High Top and Ostrea Solar Complexes

Dear Council Members,

These comments are from the Yakima County Farm Bureau (YCFB). YCFB is a grass roots organization with 2700 members consisting of farmers and ranchers with operations both large and small as well as other folks with interest in agriculture affairs in Yakima and Klickitat Counties.

It has come to the attention of our Farm Bureau that a large solar industrial complex called High Top and Ostrea is being planned about 20 miles east of the City of Yakima. Upon review of the associated documents related to this proposal, the YCFB has serious concerns. As a matter of policy, the YCFB still believes that the current practice of naming Solar electric generation a "Solar Farm" is incorrect at the least and deceptive at its worst. Agriculture in all of its outdoor forms is a true representation of a "Solar Farm". Farmers and Ranchers are in the business of marketing sunshine every day of their lives producing food and fiber. An acre or thousands of acres of solar panels constitute no more a "farm" than any other industrial activity not necessarily permitted in "farm country".

As a representative of our member farmers and ranchers, we believe in preserving farm and ranch lands for future generations while respecting property rights of owners of private lands who are currently on the land. The YCFB believes that a land owner has a right to sell or rent their land at a good profit if they chose, which is an integral part of property rights. However, other affected landowners also have a right to enjoy their property and to continue to farm and/or live in comparative harmony.

We also respect and encourage a diverse choice of power sources including renewable alternatives like solar. We believe that energy is very important to our economy. However, the YCFB also believes in the free market approach and disapproves of government mandates.

The YCFB disapproves that the Governor can unilaterally approve these projects without addressing local concerns through EFSEC. We believe this is wrong. Our Farm Bureau believes that local input and decision making is essential in serious matters as in this case.

The available documentation also illustrates that the High Top and Ostrea solar complex would be situated in the middle of the foot print of the proposed Black Rock Reservoir. Though the project may be dormant currently, it never-the-less has much merit. Food is a basic necessity and the recent supply chain disruption has also caused food supply issues. The lands in the general area only lack one key ingredient – water. Black Rock was proposed as storage for excess Columbia River Water and would generate much more economic prosperity and security and help migratory fish far more than a solar complex which should be situated in a much more logical location such as the Hanford Energy Reservation.

The YCFB points out that due to the intermittent nature of electricity generated by solar, a “battery” is necessary. In Klickitat County, EFSEC is presently assessing a project that is a stand-alone hydroelectric project to service just that need. Black Rock would be the ULTIMATE battery with pumps and plumbing if it were built and all that would be required would be the addition of generators back at the Columbia River to re-generate electricity as required during a grid shortfall.

Simply put, water storage locations are much more unique than places where solar complexes can be situated. Further, the YCFB believes that tillable lands are the least desirable to site an industrial sized solar complex upon and the more desirable to retain for agricultural production.

Our understanding is that a cyclone fence would be constructed around the perimeter of this large solar complex. That raises the issue of wildlife concentration around the perimeter and their out of proportion impacts on remaining ag-lands. Further, if these solar complexes are intruding on Critical Areas, with respect to attaining and/or maintaining bench marks under the Voluntary Stewardship Program, that relationship could be seriously jeopardized and should be avoided.

The general area in question has experienced large wild fires and the YCFB believes that solar industrial complexes burning would constitute a dire air quality emergency. Recent wildfires in the greater area have caused serious health hazards with only native vegetation ablaze, imagine several hundred acres of solar panels as well as their attendant supportive batteries also burning. It is important to note that the Yakima Basin is very prone to long periods of air stagnation. If considerable numbers of solar panels were to ignite, large scale evacuations would likely result. One must also understand that the first rule of fire fighter safety is to not venture beyond the “first electric wires” thus the First Responder response would be restricted because of the added unsafe condition caused by the necessary electric cables present to sustain the panels.

Another serious concern is how storm and snow melt runoff would be affected by large-scale solar complexes where the solar panels create un-natural runoff conditions and the proposed vegetation management (soil sterilization) is likely to exacerbate the problem as well.

The nature of the light easily transported soils characteristic in that area are not only prone to erosion by sudden cloud burst but also are quite subject to being displaced by wind when dry. There is a growing likelihood that solar panels in their automated movement to best utilize the sun's energy, will behave like a wind foil and while at an angle to the surrounding land thus redirect, concentrate and multiply the wind force at each panel certain times of the day. The YCFB believes that soil erosion and water quality will be degraded via both water and wind forces given these potential conditions. The YCFB is also concerned by the natural drainage patterns converging through the area to be converted to solar power production and notes that EFSEC does not consider and address these valid concerns or glosses over them at best.

Another issue is the proximity of the project to Highway 24 and the concern for glare which can cause a safety issue. In the Pendleton, Oregon area on Interstate 84, there is signage warning about glare. Given the nature of migration patterns in the area, what will "solar glare" and migrating elk diverted by cyclone fencing produce where it intersects with State Route Highway 24?

Wind turbines that are being updated are said to be equal to 25 acres of solar panels in generating capacity but occupy just ¼ acre each. That is a ratio of 100 to 1 and the area around a turbine is still farmable and grazable. The solar complex proposes to offer no other value other than electrical generation but at a high cost of lost agricultural production relative to wind turbines. The YCFB believes this is unwise and would suggest a series of modifications to these proposals that could mitigate some of our concerns.

The YCFB also opposes the mitigation plan suggested where by the WDFW or surrogates would purchase other private lands on an acre for acre or acre for one and a quarter acre basis. It is a matter of policy that our Farm Bureau opposes more land acquisition by any government entity as it erodes our property tax base which is already in peril. In effect, presently producing agricultural lands are lost at twice the rate as this project would allow generation of electricity from a land use inefficient method such as solar.

The YCFB believes that a better approach would be to break up the solar complexes into smaller acreages, fenced and located on lands of low productivity. The ability to graze livestock can be maintained by elevating the panels which is already being successfully demonstrated here in the United States and other nations such that sheep and cattle are able to graze there. Vegetation management would be enhanced by maintaining grazing potential. The negative effects of soil erosion by wind and water would be spread out and more properly defused. The breaks in the installations would provide opportunities to manage storm water rather than ignore its potential. Wildlife migration would be less frustrated. Further, the mitigation suggested in this current plan would be unnecessary and the loss of Ag land and tax base would be reduced because the purchase of lands by WDFW and others would be negated.

The YCFB believes that Yakima County and its locally affected citizens is the fair and proper arbitrator of this matter. A Fast Track process conducted in the Governor's administration is not appropriate or wise and forces people negatively affected by its unilateral decision making to live with the "fallout" without the decision makers being similarly affected.

The YCFB further believes that if this proposal was to surface with in the area of the Interstate 5 corridor or even more appropriately adjacent to the Capital, it would not even "make it to paper".

The YCFB is not opposed to solar energy but we believe that better planning and layout as well as a change of goals and a better much more thorough environmental review (that of a full EIS) conducted at a local level are crucial to making this proposal more palatable to the residents of Yakima County.

Sincerely,

Mark Herke

President, Yakima County Farm Bureau