

Lower  
Columbia  
Basin  
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Society

## Lower Columbia Basin Audubon Society

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

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ENERGY FACILITY SITE  
EVALUATION COUNCIL

February 21, 2023

Sonia Bumpus, EFSEC Manager and SEPA Responsible Official  
Energy Facility Site Evaluation Council  
621 Woodland Square Loop SE  
Lacey, WA 98504-3172

**Re: SEPA Threshold Determination for Hop Hill Solar Project (EFSEC Docket Number: EF-220356)**

Dear Ms. Bumpus:

The Lower Columbia Basin Audubon Society (LCBAS) would like to take this opportunity to comment on EFSEC's SEPA Threshold Determination for the proposed application for the Hop Hill Solar and Storage Project 500-megawatt solar photovoltaic generation facility with battery storage. The LCBAS supports clean energy projects that are environmentally well sighted to lessen carbon emissions to slow global warming. To reach the levels of atmospheric carbon reduction necessary to slow or stop global warming is an optimistic goal to meet, but with well sighted solar and turbine facilities in Washington State it can be one important element in an international challenge to save the planet.

Recent studies conducted by National Audubon and others have determined that 389 bird species of the 604 known bird species are at risk of extinction due to climate change. It is also a startling fact that only 20% of the shrub-steppe environment remains in eastern Washington State from pre-European settlement levels. The remaining shrub-steppe is a disappearing habitat that supports vanishing bird and mammal species. Such bird species as Greater Sage-grouse, Sagebrush Sparrow, Western Meadow Lark and Sage Thrasher are declining. Such mammal species as Townsend's ground squirrel, Columbia ground squirrels, voles and pocket gophers are losing habitat. These small mammals are species that Ferruginous Hawks, a state Endangered Species, and other raptors rely on as a food source. Losing more habitat, no matter how isolated or small, can be the "straw that broke the camel's back" for this hawk if the prey base is not protected or compensated for.

According to the Hop Hill Application for Site Certification (ASC) the project area is 67% herbaceous grassland and 20% is shrub-steppe. This is a significant amount of foraging and resident habitat for the birds and mammals that rely on these lands to maintain life. Bird species that rely on this area for nesting and foraging, as noted in the ASC, are Ferruginous Hawk, State Endangered, Greater Sage-grouse, State Endangered, Sagebrush Sparrow, State Candidate, Sage Thrasher, State Candidate and Burrowing Owl, State Candidate.

EDUCATION

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Recipient of the Chevron Times Mirror Award, 1996



## **Solar Array and Re-vegetation**

In Appendix L, Section 5.0, Project Impacts and Section 6.0 Scientific Basics, the Applicant builds a case for utilizing non-native but compatible vegetation for restoration under the solar arrays. The LCBAS strongly recommends that the Applicant reconsider using non-native plants. Although the science demonstrates that non-native plants could be beneficial they should be used only as a last result

## **Rare Plants**

According to the maps provided by the applicant, the transmission corridor and the solar array area are adjacent to and near the Arid Lands Ecology Reserve which is part of the Hanford Reach National Monument (HRNM). The HRNM is the only national monument in Washington State and is one of two monuments within the nation that are managed by the US Fish and Wildlife Service. This management agreement between the USFWS and the Department of Energy is unique and was developed because of the valuable ecological and cultural resources found on the monument. One plant in particular, the Umtanum desert buckwheat, a new plant to science with limited range may be found in the transmission corridor. Much care will have to be taken by the applicant, if approved for construction is given, to assure minimal to no damage to this rare plant and to the associated disappearing native habitat.

## **Overhead Powerlines**

Appendix L, Sec. 7.1 see bullet on overhead powerlines. The Applicant will need to construct a length of powerline from the solar array to the Midway Substation near the Columbia River. Overhead powerlines are deadly to water fowl that fly at night or in the fog. They hit the lines and break their necks. If possible, the Applicant should consider installing powerlines underground. Heating may be a limiting factor.

## **Mitigation Ratios**

Appendix L, Sec. 7.3 Table 4 lists the mitigation ratios. LCBAS feels that these ratios although conform to industry standards are too low. The biological resources within the HRNM, much of which is managed by the USFWS, and the 586 square mile Hanford Reservation are managed under the parent document entitled, "Hanford Site Biological Resources Management Plan", originally issued August 2001 and subsequent revisions should be referenced and utilized by the applicant (available electronically at the DOE website). Specifically the mitigation ratios in BRMAP are more conservative than the ratio's recommended by the Washington Department of Fish and Wildlife. The more conservative ratios are more applicable to the region surrounding the Hanford Site since they were developed for the unique and disappearing habitat near the Applicant's project area.

LCBAS recommends that the applicant use the following ratios:

- Mitigation Ratio of 3:1 for permanent shrub-steppe habitat damage.
- Mitigation Ratio of 4:1 for permanent damage to rare habitat such as that habitat where Umtanum desert buckwheat can be found.

A more comprehensive explanation of ratios and how to use them to protect biological resources can be found in the BRMAP and stepdown documents.

## **Landscape Connectivity and PEIS**

Landscape connectivity with the development of more and more solar and turbine projects in Washington State is of primary concern. Movement of wildlife through the state's various ecoregions is critical for a thriving species. Isolation of mammals or birds can lead to degradation and loss of viability of the species. With as many as 40 proposed energy projects for Washington it is recommended that a comprehensive study be conducted to analyze the potential impacts to habitat fragmentation and landscape connectivity. A programmatic Environmental Impact Statement (PEIS) should be conducted by EFSEC to better guide future development.

## **Tribal Rights**

The applicant must consult with the Tribes to determine the project impacts to the view shed from the sacred Rattlesnake Mountain.

## **Conclusion**

EFSEC's evaluation of the Applicant's proposal needs to assure that sufficient attention has been made to the biological resources especially the vanishing shrub-steppe habitat that State Endangered species such as Greater Sage-grouse, Columbia Sharp-tailed Grouse and Ferruginous Hawk; and Candidate species which includes Sagebrush Sparrow and Sage Thrasher. Please consider the following action items:

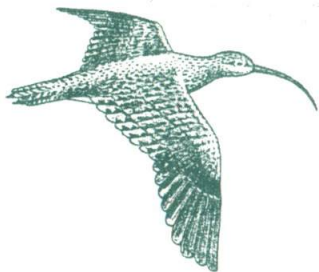
- To protect landscape connectivity a Programmatic EIS must be conducted.
- Special care must be used to assure that no damage to Umtanum Desert Buckwheat and its habitat occurs.
- Overhead powerlines could be placed underground.
- The applicant should be directed to use the BRMAP mitigation ratios, 3:1 & 4:1.
- The Tribes must be apprised of the change to the view shed from Rattlesnake Mountain.
- Revegetation under solar arrays using native plants only.
- EFSEC must assure that the applicant has sufficient protections in place for State listed avian species such as the Ferruginous Hawk, Sagebrush Sparrow, Burrowing Owl and Sage Thrasher.

Thank you for considering the above comments for the SEPA threshold determination.

Dana C. Ward



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