

February 23, 2023

Sonia Bumpus, EFSEC Director
Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey, WA 98504-3172

Re: SEPA Threshold Determination and Land Use Consistency for Hop Hill Solar Project (EFSEC Docket Number: EF-220356)

Dear Ms. Bumpus:

Thank you for the opportunity to comment on EFSEC's SEPA Threshold Determination and Land Use Consistency for the Hop Hill solar project. As somebody who is concerned about the impacts of climate change, I support clean energy alternatives. However, this must occur in a way that considers other environmental concerns like habitat and species losses. With these (and other) concerns in mind, the Least-Conflict Solar Siting process is being coordinated by WSU. I think this process should have a chance to be finalized before approval for additional solar siting is considered in the Columbia Plateau region.

Benton County Code considers "*cumulative impacts as the combined, incremental effects of human activity on ecological or critical area functions or values....It is the combination of these effects, and any resulting environmental degradation, that should be the focus of cumulative impact analysis and changes to policies and permitting decisions.*" The code further requires a report to assess "*the probable cumulative impacts to critical areas resulting from development of the site and the proposed development.*" The cumulative impacts on fish and wildlife habitat conservation areas (FWHCAs) of the numerous proposals for solar energy projects in the Columbia Plateau region (including Benton County) must be considered as part of a SEPA Threshold Determination. To date, this has not been done. As discussed below, the Hop Hill project itself will have significant impacts on FWHCAs on the project site. Taken together with other projects in its vicinity, the landscape scale impact will be even more significant and must be considered. It is imperative that a Programmatic EIS (PEIS) be completed, perhaps with input from the Least-Conflict Solar Siting process, before a determination of non-significance (DNS) or mitigated DNS is made for this or any other specific project.

Benton County Code defines FWHCAs to be "*Areas necessary for maintaining species in suitable habitats within their natural geographic distribution so that isolated subpopulations are not created.... These areas include (i) Areas with which state or federally designated endangered, threatened, and sensitive species have a primary association; (ii) Habitats of local importance, including, but not limited to areas designated as priority habitat by the Washington Department of Fish and Wildlife; ... (x) Land essential for preserving connections between habitat blocks and open spaces.*" The Hop Hill project impacts habitats and species that Benton County code considers as critical habitats or species. The project siting area contains 4,312 acres of shrub steppe habitat, a WDFW priority habitat and a habitat of local importance. The project footprint includes a total of 1,604 acres of shrub steppe habitat. The potential loss of greater than 33% of shrub steppe habitat in the siting area is unacceptable given the rate of destruction of shrub steppe habitat within the Columbia Plateau region (80% has already been lost). Based on WDFW Biodiversity Areas & Corridors data and Arid Lands Initiative data, the siting area is also in the path of significant core areas and corridors that are essential for wildlife connectivity in eastern Washington; these are also a high priority for protection. A number of FWHCA species have been observed on the project site as well. These include the State Endangered Ferruginous Hawk, State Candidate species such as Burrowing Owl, Sagebrush Sparrow, Sage Thrasher, Black-tailed Jackrabbit, White-tailed Jackrabbit, and Townsend's Ground Squirrel. The considerable potential impacts to all these areas and species needs to be considered in the SEPA determination and they need to be considered in the broader context of the cumulative impact of multiple regional solar projects.

Project impacts have been described as temporary, permanent, or altered habitat impacts. For shrub-steppe habitat, there are 1,475 acres of altered habitat impact, 71 acres of temporary impact, and 58 acres of permanent impact. Mitigation of shrub steppe habitat has been proposed at a 1:1 ratio for temporary impacts and a 2:1 ratio for permanent impacts. Given the difficulty of restoring shrub steppe habitat to the same quality as was originally present, I think these ratios should be higher to restore functionality. In addition, only native vegetation should be used in order to restore native functionality and support our native species, especially obligate shrub steppe species (a number of which have been noted above as candidate species).

For shrub steppe habitat, there are 1,475 acres of 'altered habitat impacts,' i.e., those that are within the solar array perimeter fence. The applicant has proposed 'restoring' these areas of shrub steppe habitat with native and non-native low-growing species. In the end, this would result in 'an altered vegetation community compatible with solar arrays and would support an altered wildlife community.' It would be preferable to have native grasses and forbs under the solar panels rather than to have non-native vegetation (non-invasive or invasive); however, this does not compensate for the loss of shrub steppe habitat. The proposed altered vegetation community would mean that this project will result in a permanent loss of 1,475 acres of shrub steppe habitat in these 'altered habitat areas' and a permanent alteration of the wildlife that has used this shrub steppe habitat, including loss of obligate shrub steppe species. This loss of shrub steppe habitat and species alone warrants a full environmental impact statement and considerably more avoidance and in-kind mitigation than has been proposed. The Columbia Plateau cannot continue to lose shrub steppe habitat and have it remain a viable habitat type in Washington State.

As more and more solar and wind projects are proposed, the potential for significant mitigation offsite decreases significantly. As stated previously, a Programmatic EIS needs to be completed before more of our shrub steppe habitat is lost.

Thank you for considering my comments.

Sincerely,

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