Comments on Hop Hill Solar Project Application

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We have read and agree with the comments submitted by Debbie Berkowitz, especially regarding the impacts on shrub-steppe. An environmental impact study must be required for this project if it is to proceed. Our concerns for this project include:

- Priority species and habitats mitigation must be active and specific. The project's habitat report documents multiple habitats and species on the project site. The mitigation plan gives insufficient detail on how impacts to these resources will be avoided and gives no justification for claiming that they've minimized impacts "to the extent feasible".
- Detrimental impacts upon shrubsteppe obligate state (priority) species if siting transmission lines is above ground by creating new perch points. Need to site below ground lines. Transmission lines can follow the highway below ground.
- Preliminary wetlands inventory is not adequate.
- The project is fully located on land designated as GMA AG by the County's Comprehensive Plan. Benton County currently does not allow industrial-scale solar development on land with this designation.
- The proposed transmission corridor fragments a large expanse of shrub steppe and will encourage further solar development in this area. If the project proceeds the transmission corridor should be relocated to the corridor already provided by State Highways 24, 240, and 241

1. Shrubsteppe

The proposed project is in an area of high ecological function and potential (see Figure 1 and Figure 2). Its clear little regard was given to the value of shrub-steppe when this project was sited. 33% of the project footprint consist of shrub-steppe. In addition, the project is in one of the few remaining areas of the lower Columbia with extensive shrubsteppe. If left undisturbed this area could recover to be an extensive area of high-quality shrub steppe, an ecological biosystem that is rapidly disappearing.

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We note that this kind of habitat destruction is not required for solar development. The recently proposed 460 Megawatt Wautoma Solar Project is sited almost completely on land that was previously farmed and heavily grazed and uses existing substations and transmission lines. The Hop Hill Application, on the other hand, seems designed to both destroy shrubsteppe on the site (Figure 3) and to fragment the surrounding shrub-steppe.





Figure 2. WDFW PHS Habitat and Species in Vicinity of Hop Hill Transmission Corridor (WDFW PHS on the Web).



Figure 3. Shrubsteppe - top photo in orange (Habitat Study Report) and solar panel siting from application (bottom).

2. Transmission Corridor and Fragmentation

The proposed transmission corridor unnecessarily fragments valuable shrubsteppe and cuts across cliffs and talus slopes that are valuable habitat for nesting raptors including prairie falcon. Talus slopes and cliffs are designated PHS Habitat Features by WDFW. Fragmentation could be minimized by locating the transmission corridor adjacent to existing highways. This would additionally minimize the disturbance of cliff and talus habitat.

3. Inadequate Mitigations

The proposed mitigation plan states that "avoidance and mitigation measures would be implemented". But Figure 3 clearly shows that solar panels are directly placed on shrubsteppe identified in the habitat study. The developers clearly have *not* considered minimization of impact in their siting plans.

The mitigation plan and description of compensatory mitigation is so vague there is no way to determine if the mitigation will replace the function and values of the habitat lost to this project.