



April 11, 2022

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

Re: Determination of Significance and Request for Comments on Scope of Environmental Impact statement of the Badger Mountain Solar Energy Project (EFSEC Docket Number: EF-210747)

Ms. Bumpus,

On behalf of the Washington Sierra Club, we appreciate the opportunity to submit comments for the Badger Mountain Solar Energy Project Determination of Significance and Scope of Environmental Impact Statement.

The Washington State Chapter of the Sierra Club includes over 100,000 members and supporters, working to protect communities and the planet. With over 3.5 million members nationally, the Sierra Club has the largest membership of all environmental public advocacy groups in the United States. We are the oldest engaged and enduring grassroots organization in the United States. The Sierra Club supports sustainable energy strategies that reduce all forms of pollution, not just greenhouse gases, and promotes species protection, environmental justice and security.

After full consideration of all available documents, as well as evidence presented by the Washington Department of Fish and Wildlife, the Sierra Club cannot support the Badger Mountain Solar Energy Project (BMSEP) as proposed. There are significant impacts to endangered birds and wildlife and their habitat. It is essential that Environmental Impact Statement provide a thorough look and evaluation of all relevant information related to the site as well as impacts from the proposal. The BMSEP will adversely impact the Greater Sage Grouse, an endangered species in Washington State, with known leks near the planned placement of the solar project. The Greater Sage Grouse is already vulnerable to various ecological and environmental risks such as climate change, including wildfires, droughts, floods, and habitat loss. Siting of the BMSEP near known and established leks will risk further harm to an already endangered species on the brink of extinction in Washington State.

The Badger Mountain plateau is also crucial habitat for many other species, including the endangered Columbia Basin pygmy rabbit, Washington ground squirrel, Columbian Sharp-tailed grouse, Golden eagle and Ferruginous hawk. Forage, water access, and mating/breeding habitat are crucial for these species' survival. Potential habitat may also be present for the Sage Thrasher and Sagebrush Sparrow, both state-endangered candidates.

Wildlife surveys conducted by the applicant did not occur using a complete and thorough study of the species' life cycle in the seasonal habitat. Any future wildlife surveys must occur for the appropriate seasons, locations and habitat, and extended time durations.

Plant species provide food and shelter to various birds and mammals on the plateau. Threatened plants species risk damage and degradation due to road construction and BMSEP construction. Habitat flora is a vital forage and shelter resource for pollinators, birds, and wildlife.



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Wildlife connectivity is especially crucial on the Badger Mountain plateau. Both plant and animal species rely on the shrub-steppe habitat for their survival, a habitat already threatened by wildfires, drought and habitat fragmentation. Further, agriculture, ranching, wildlife cohabitation, and exotic annual grass must be considered and evaluated in the Environmental Impact Statement. BMSEP perimeter fencing will disrupt landscape connectivity and should be considered.

The Badger Mountain Plateau holds rich heritage and cultural resource for the Yakama, Wenatchi and Moses-Columbia populations of the Colville Confederated Tribes, who use the area to gather native plants as sources of food and medicine. Tribal treaty rights, cultural resources, uses and interests must be considered and honored based on the full extent of the law, and include consultation with the tribes by the applicant, at the applicant's expense.

Water availability is already an issue on the arid shrub-steppe landscape of the Badger Mountain Plateau. The BMSEP will further strain water supply on the plateau, especially with worsening drought conditions during climate change. Water impacts should be evaluated, especially in regard to possible deleterious impacts to wildlife and threatened plant species.

Thousands of acres of solar development will likely cause significant harm to an already stressed environment, with adverse impacts to wildlife and habitat. While Sierra Club policy supports the development of sustainable energy strategies, promoting solar development should not come at the expense of endangered and threatened species. In addition to the "No Action" alternative the Environmental Impact Statement should evaluate smaller options and configurations that eliminate critical habitat and use areas from the proposed site. It is also important to identify and evaluate a range of alternative locations to the applicant's proposal that would "feasibly attain or approximate (the) proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." (WAC 197-11-440(5)(b)).

Respectfully Submitted,

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