

Jeff Watson

From: Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>
Sent: Monday, June 06, 2016 2:44 PM
To: Jeff Watson
Cc: Harvester, Perry J (DFW); Renfrow, Brent D (DFW)
Subject: RE: Notice of Application: CU-15-00006 Iron Horse-WDFW Comments
Attachments: WDFW comments on Iron Horse Solar Project .pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Jeff,

Attached are WDFW comments on the Iron Horse solar facility proposal. They are in alignment with the WDFW letter sent to One Energy last summer that is included as Appendix D in their application.

If you have any questions over our comments, feel free to give me a call.

Thanks.

Scott

Scott Downes
Fish & Wildlife Habitat Biologist
Washington Department of Fish and Wildlife Region 3 Habitat Program
1701 South 24th Ave
Yakima, WA 98902-5720
Scott.Downes@dfw.wa.gov
Office-509-457-9307
Cell-509-607-3578

-----Original Message-----

From: Jeff Watson [<mailto:jeff.watson@co.kittitas.wa.us>]
Sent: Tuesday, May 24, 2016 6:53 AM
To: Lisa Iammarino; Myers, Holly (DOHi); Lisa Lawrence; Patti Johnson; Kelly Bacon; Candie M. Leader; 'jessica@yakama.com'; 'jmarvin@yakama.com'; 'johnson@yakama.com'; 'enviroreview@yakama.com'; ECY RE SEPA REGISTER; ECY RE SEPA REGISTER; Clear, Gwen (ECY); Reed, Catherine D. (ECY); Renfrow, Brent D (DFW); Downes, Scott G (DFW); Nelson, Jennifer L (DFW); SEPA (DAHP); Kaehler, Gretchen (DAHP); 'Jan Jorgenson (jorgenja@cwu.edu)'; 'nelmsk@cwu.edu'; Michael Flory; Lou Whitford; Amber Green; Steph Mifflin; Mau, Russell E (DOH); Serr, Ben A (DOH); HAZLETT, LINDA (DNR); PRESTON, CINDY (DNR); DNR RE AQ LEASING RIVERS; 'Allison Kimball (brooksideconsulting@gmail.com)'; 'cid@fairpoint.net'; 'Joanna Markell

(jmarkell@kvnews.com); 'Knaub, Deborah J NWS (Deborah.J.Knaub@usace.army.mil)'; RichElliott; Josh Hink; Keli Bender (krd.keli@fairpoint.net); lonnie_allphin@ksd403.org
Cc: Doc Hansen
Subject: Notice of Application: CU-15-00006 Iron Horse

CU-15-00006 Iron Horse<<http://www.co.kittitas.wa.us/cds/land-use/project-details.aspx?title=Conditional%20Use%20Permits&project=CU-15-00006+Iron+Horse>>
(Hyperlink to On-Line file)

CU-15-00006 Iron Horse<<file:///\\fileservers-03\Teams\CDS\Projects\CUP\CU%202015\CU-15-00006%20Iron%20Horse%20Solar\CU-15-00006%20Iron%20Horse%20Master%20File%20Resubmission.pdf>> (Hyperlink to County Network File)

Notice of Application:

Kittitas County Community Development Services has received the above referenced application for a Short Plat NE of Ellensburg on Brick Mill Road in the lower county. See attached documentation for additional information or use one of the hyperlinks above to access the on-line or network file. Comments within the body of an email are encouraged but may be sent as attachment or via USPS as a hard copy.

NOTE: DUE TO THE SIZE OF THE APPLICATION AND ITS NARRATIVE ONLY AN ABBREVIATED EXECUTIVE SUMMARY OF THE PROJECT HAS BEEN INCLUDED WITH THIS EMAIL. THE COMPLETE APPLICATION CAN BE FOUND ON THE COUNTY WEB SITE LINKED ABOVE. THE COMPLETE FILE IS NAMED:

CU-15-00006 Iron Horse Master File Resubmission Compressed 5.18.2016

COMMENTS DUE BY 5/17/2016 AT 5 PM

Jeffrey A. Watson
GIS Technician/Planner II
Community Development Services<<http://www.co.kittitas.wa.us/cds/default.asp>>
411 North Ruby
Ellensburg WA 98926
jeff.watson@co.kittitas.wa.us<<mailto:jeff.watson@co.kittitas.wa.us>>
509-933-8274

Notice: All email sent to this address will be received by the Kittitas County email system and may be subject to public disclosure under Chapter 42.56 RCW and to archiving and review.

message id: 38eb45916c6dcbdac24bb8719d004a14



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
Telephone: (509) 575-2740 • Fax: (509) 575-2474

June 6, 2016

Jeff Watson
Kittitas County Community Development Services, Planner II
411 North Ruby St., Suite 2
Ellensburg, WA 98926

RE: CU-15-00006 Iron Horse Solar Application

Dear Mr. Watson,

Thank you for the opportunity to comment on this proposal. The Washington Department of Fish and Wildlife (WDFW) has reviewed the SEPA checklist and supporting documents for the application to contrast a solar installation on approximately 68 acres of land, located directly adjacent to Caribou Creek approximately one mile east of the city of Kittitas. The subject property is zoned Agriculture 20.

WDFW worked previously with One Energy to assist in their fish and wildlife species review for the site. The subsequent letter from WDFW to One Energy is included as Appendix D of their application. While we are encouraged by the early contact during the summer of 2015 to work on issues related to fish and wildlife habitat concerning this project, the current application suggests that there are still issues that we need to work together on to ensure that this project does not negatively impact fish or wildlife and their associated habitats. These concerns elaborated below are consistent with the previous letter written by WDFW to One Solar and included as Appendix D of this application.

Concerns:

1. Riparian buffer distance

While the application states that the site plan will have a 100' riparian buffer of Caribou Creek, there are no details on what that 100' riparian buffer will consist of. Currently there are almost no riparian shrubs or trees along this stretch of Caribou Creek and the current vegetation of the site consists of hay fields and various grass species within the creek bed. While setting the project site plan back from the creek by a 100' buffer, is a good start, without additional planting of riparian shrubs and trees within the buffer, the riparian area remains highly degraded and subject to impacts from the solar facility such as stormwater runoff and lack of a habitat buffer between the industrial nature of the solar facility and the waters of Caribou Creek. WDFW requests that the project plant native riparian shrubs that are compatible with both the ecosystem of the creek and the function of the solar facility. WDFW can provide recommendations on planting plans. These planting will also have the added benefit of providing an environmental buffer around the facility from any visual or dust effects.

2. Discrepancy between vegetation restoration plans, weed management plan and vegetation maintenance plans

WDFW has some concerns over discrepancies between site restoration plans and weed control plan (Appendix C) and the desire to leave existing vegetation intact through the construction and operations plan (Appendix G). The site is currently comprised almost entirely of farmed Timothy hay. This is a crop that requires watering and management to ensure its continued existence on the site. The application indicates that the current vegetation will be left intact whenever possible to minimize disturbance, while disturbed areas will be planted with a "weed free low growing native seed mix" and further the project outlines in the weed management plan that weeds will be controlled to the extent possible. Without continued irrigation,

Timothy hay will go into dormancy and if not irrigated for long periods will die, resulting in increased weeds at the site. Further, a low growing native seed mix is not designed to co-exist with Timothy hay as they have different moisture regimes. Please have the applicant clarify their vegetation management plans to meet the actual future conditions at the site.

3. Incidental avian monitoring plan

WDFW would like to continue discussions involving the ability to implement an incidental avian monitoring plan at the site. The below excerpt is from the previous WDFW letter sent to One Energy and included as Appendix D of this application. If the monitoring plan is deemed appropriate, it could be included as a condition of approval for the application.

“Potential for Avian Collisions with Solar Panel Facilities: Some wildlife studies in California have documented avian fatalities at solar facilities, including photovoltaic systems. While substantial avian impacts would not be expected at a smaller solar site such as the one proposed here, WDFW would appreciate the opportunity to discuss with One Energy Renewables avian collision risks, whether there are ways to minimize avian fatalities and opportunities for One Energy Renewables to incorporate monitoring for avian impacts into their post-construction operation and maintenance routines. The project’s proximity to the creek may make it susceptible to avian collisions from both songbirds and waterfowl. The area does have some geese migration, and some use by waterfowl and large shorebird species (such as long-billed curlew, a species of conservation concern known to forage in area pastures and hay fields). A well thought out riparian buffer design could help avoid/reduce collision risk for waterfowl, shorebirds and songbirds attracted to creek environments. We would like to be involved in helping to configure the arrays to avoid wildlife collisions as much as possible and would recommend that an incidental avian monitoring program be established that would enable O&M personnel to capture and report observed fatalities and incidental wildlife observations. Ideally such information could be sent to WDFW and Kittitas County CDS in an annual report or letter for the first 5-years post construction. This could potentially provide information and “lessons learned” for designing, siting and managing new solar facilities in the future.”

4. Hydraulic permit from WDFW needed for work affecting Caribou Creek

A reminder that any construction or maintenance work affecting the Caribou Creek, including the construction of bridges or culverts, installation of utilities under the channel (e.g. drilling, boring, jacking or open cut installations), bank or channel modifications, etc. will require a Hydraulic Project Approval from the Department of Fish and Wildlife (WDFW).

Recommendations:

WDFW recommends that Kittitas County and the applicant One Energy meet with WDFW on site to discuss these issues and come to consensus on plans involving vegetation management plans, riparian buffer plans and incidental avian monitoring plans to ensure that this project will not adversely affect fish and wildlife and their habitats in the area. We recommend that this meeting happen before the site plan is finalized as these plans are critical to the construction plans for the project.

Thank you again for the opportunity to provide comments on this application. Please contact me at (509) 457-9307 or Scott.downes@dfw.wa.gov, if you have any questions or concerns regarding these comments.

Sincerely,



Scott Downes
Area Habitat Biologist

Cc: Brent Renfrow, WDFW
Perry Harvester, WDFW