



January 3, 2020

VIA EMAIL [jeremy.johnston@co.kittitas.wa.us]
Jeremy Johnston
Kittitas County Community Development Services
411 N. Ruby Street, Suite 2
Ellensburg, Washington 98926

Re: General Response to Community SEPA Comments on the Westside Solar Project (CU-19-00003)

Dear Mr. Johnston:

Heelstone appreciates the community's engagement and active involvement in the public comment portion of Westside Solar's permitting. We have reviewed the comments received and believe it would be helpful to provide additional detail on solar development in general and the development of this project to date. The information below is indented to supplement our original submission and provided greater context for the community.

The development of Westside Solar began in December 2016. Heelstone was attracted to Kittitas County because of the renewable energy goals of Washington State, willingness of Puget Sound Energy ("PSE") to provide a contract for the sale of electricity, and Kittitas County's abundant sunshine compared to the rest of PSE's service territory.

A land purchase agreement was executed with the Dunn Family Corporation on December 21st, 2016. Heelstone determined the location met the preliminary criteria for solar development through desktop analysis evaluating multiple screening criteria such as the proximity to grid infrastructure, appropriate FEMA flood zones, minimal wetlands identified through the U.S. Fish and Wildlife Service's National Wetlands Inventory, relatively flat terrain, and lack of critical habitats for threatened and endangered species identified by the U.S. Fish and Wildlife Service. The property owners also represented that the property had not been farmed for decades and the owner had been unable to sell the property for the construction of residential homes. Heelstone prefers to develop solar on land that is not actively farmed or considered environmentally sensitive, therefore considered the Dunn Family Corporation's property to be well-suited for solar development.

Existing grid infrastructure plays a large role in the siting of solar energy facilities. Identifying property close to grid infrastructure is important because the farther a project is from a substation or distribution line, the more expensive construction becomes. PSE owns 12 substations in Kittitas County and there are physical limitations for the amount of power allowed onto a line. When viewed in parallel with the other development constraints, there are limited opportunities in the area for cost-effective grid interconnection. Westside Solar has a distribution line on site and is less than a mile from a substation.

A contract for the sale of electricity, Schedule 91, was requested from PSE in December 2016 and fully executed in February 2017. The contract established a project size of 5,000 kilowatts of alternating current capable of producing about 10,000,000 kWh of electricity per year. Washington law does not allow these Schedule 91 contracts to be issued for projects larger than 5,000 kW.

The optimal development area for a project of this size is roughly 35 acres. This allows solar panels to be spaced and angled to maximize solar absorption and reduce shading impacts. Tighter row spacing provides a reduced project area but decreases the amount of electricity generated by the project.



Heelstone monitored the proceedings of Kittitas County as it established a new ordinance for Solar Power Production Facilities, even attending multiple public meetings. Through an extended process with substantial citizen involvement, the Board of Commissioners dutifully considered staff reports, the recommendation of the Planning Commission, public comment, and evidence submitted when determining regulations are consistent with and implement the Comprehensive Plan in accordance with RCW 36.70A.040 and KCC 15B.04.010.

The resulting ordinance, established in October 2018 and amended in April 2019, provides a fair balance of protecting the health, welfare, safety, and quality of life of the general public while providing a suitable path forward for the development of Solar Power Production Facilities. Notably, the ordinance includes a “solar overlay” map; Westside Solar is on land mapped by the Board of Commissioners as “Zone 2,” meaning Solar Power Production Facilities are permitted as a conditional use. Neither the mapping nor the ordinance requirements can be contested in this permitting process.

Upon the enactment of the final ordinance, Heelstone diligently prepared an application that meets the requirements of the ordinance. This included performing multiple environmental studies prior to submitting its CUP application to ensure Westside Solar complied with all applicable ordinances, including the Kittitas County Critical Areas Ordinance (KCC Title 17A) and Shoreline Master Program (KCC Title 17B), and the Voluntary Stewardship Program (VSP). Westside Solar also complies with all development standards identified in Kittitas County Code 17.61C.090 and review criteria identified in 17.61C.100.

Transition to a cleaner grid has many benefits to wildlife and habitat on a large-scale, namely reducing pollution and associated climate change. Furthermore, Heelstone is committed to minimizing and mitigating any localized wildlife and habitat impacts associated with land use change. This began with the selection of a project location disturbed by past cultivation and continued through proactive outreach to representatives of Washington Department of Fish and Wildlife (“WDFW”). Heelstone coordinated a site walk with WDFW to begin a dialogue on wildlife protection. WDFW provided a comment letter dated December 18, 2019 in which it made several recommendations. Heelstone will continue to work with WDFW to incorporate the recommendations presented in the agency’s letter.

Westside Solar will have a positive impact on the community. It will bring property tax revenues to the community without requiring significant county resources. No noise is expected past the property boundary. There will be virtually no traffic once the project is constructed. Lighting will not be utilized. A vegetative buffer consisting of more than 5,000 plants will provide a wildlife corridor and visual screen from neighboring properties. KRD water rights will not be lost or transferred, though they may be temporarily assigned in accordance with KRD policies since the project has minimal water requirements for operation. At the end of the project’s life, the property will be restored back to a substantially similar state that existed prior to construction.

Heelstone is committed to developing Westside Solar in a responsible manner and according to the established ordinance. We continue to look forward to working with Kittitas County to bring this project to fruition.

Thank you,

Rachel Donahue
Development Manager