

June 10, 2024



Kittitas County CDS



Kittitas Audubon Society
P.O. Box 1443
Ellensburg, WA 98926

Chace Pederson, Staff Planner
Kittitas County Community Development Services
411 N. Ruby, Suite 2
Ellensburg, WA 98926

Subject: Comments regarding Schnebly Coulee Solar Farm CUP-24-00003

Dear Mr. Pederson,

Thank you for the opportunity to review the Schnebly Coulee Solar Farm Conditional User Permit application. This is the first large-scale solar power production facility proposed for construction within the large block of contiguous shrub steppe habitat in eastern Kittitas County. These working lands have supported livestock grazing but continue to retain the character, plants and habitat features needed by native shrub steppe wildlife.

Kittitas Audubon Society was involved with the review and development of two large wind power projects that were constructed in the shrub steppe lands north and east of this new solar project, and served on Technical Advisory Committees for each of these wind power projects. The Wild Horse project north of the Vantage Highway was developed for Puget Sound Energy and included two construction phases. The project south of the Vantage Highway and east of the currently proposed solar project was developed by Invenergy, which is the same company developing the Schnebly Coulee Solar project.

The Schnebly Coulee Solar Farm project is of special importance, as it is the first Large-Scale solar project to be constructed in a large block of shrub steppe lands in Kittitas County. This project is significantly different than the other operational solar projects in our county and it will be a significant "learning project" for future developments in the county. The lands within the proposed project include complex mosaics of shallow soils within areas of deeper soils. Shallow soils sites commonly have basalt rock within a short distance of the surface. The soil surface of these shallow sites may be comprised of 50% or more of rock. Over the course of the growing season, the soil moisture varies from saturated in the spring to very dry and hardened during the summer and early fall. The plant communities in these sites are comprised of species of grasses, shrubs, and forbs, and these in turn support unique communities of wildlife.

General Comments

There are good conservation measures incorporated in the project, including:

- Consolidating the solar panel arrays to retain larger swaths of intact shrub steppe.
- The use of a “drive-and-crush” method of site preparation for the solar panel arrays, thereby retaining the residual native vegetation, topsoil, and the seedbank in place in the soils.
- Modifications to fencing to accommodate animal movement.
- Incorporating conservation easements on shrub step lands into the project to offset impacts by preserving shrub steppe habitat at the local landscape scale.

The intensity of the project design reduces some important environmental impacts of the project but does present some risks. Achieving a good balance during final design and construction is important.

Concerns

- Two large wind energy construction projects were undertaken in shrub steppe near the currently proposed Schnebly Coulee solar project. (One of these projects was developed by Invenergy – the proponent of the current project. The other was developed by Puget Sound Energy.) The construction of these wind energy projects provided a lot of lessons about construction techniques and about managing construction in rocky and shallow soil shrub steppe lands. There were also important lessons regarding site restoration and revegetation. Experiences from these prior projects improved techniques and practices for minimizing adverse impacts during construction (e.g. clearing, trenching, road construction, handling soils, etc.) and improved site restoration. We are surprised and disappointed that information provided in the Schnebly Coulee project CUP, (including its attachments and SEPA Checklist) does not mention nor specifically incorporate the lessons learned from these nearby energy projects in Kittitas County.
- Greater consideration of the importance of minimizing handling of soil and retaining soil (that must be cleared for construction) at its original location is needed. Clearing limits in shallow soils or soil complexes with shallow elements, should be restricted to the minimum possible for construction. (In shallow soil sites, the high rock component greatly hinders the ability to collect, save and re-apply the soil.) To the greatest extent possible, if soil must be removed, it should be windrowed at the near edge of the clearing limit, and redistributed as soon as possible post-construction.
- Greater recognition of the importance of native soil in restoration is needed. Commercially available quantities of suitable native seed for site restoration is available for only a very few of the plants typical of these shrub steppe sites. To

achieve adequate restoration post construction, a broad complement of native plants is needed. The soil that has been stripped and saved during construction (and which contains the full complement of native plant seeds for the site naturally) is an essential, valuable resource. Care is needed to preserve all native "topsoil" such in a manner that it can be successfully used to restore native plant communities.

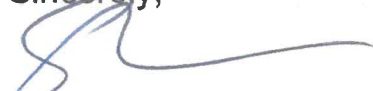
- The CUP application disregards the likelihood that mobile wildlife species of special concern not detected during planning surveys may in fact occasionally use the project lands. For example, sage grouse and Townsend's ground squirrels are known to occur in the large shrub steppe lands adjacent to the project. It would be prudent to recognize that these species may use the project site, perhaps infrequently, and prescribe what actions should be taken for that contingency during construction and operation.

Additional Recommendation

- This project is special in that it is the first Large-Scale solar project to be constructed within a large block of shrub steppe lands in Kittitas County. It would be prudent learn as much as possible from this project and ensure that what is learned can be carried forward into future solar projects. The CUP and SEPA review should require that a technical advisory committee of citizens and technical experts be created to review and advise this project from construction, site restoration through the first year of operation. (Note that the approval of the first wind power projects in Kittitas County included the creation of technical advisory committees to work with each project proponent to provide review and advice to the proponent and the regulating agencies.)

Thank you again for the opportunity to review this conditional use application and for considering our concerns and comments.

Sincerely,



Steve Loitz

President

Kittitas Audubon

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