

Citizen Comments

CU-24-00003 Schnebly Coulee Solar Farm

We own lot 4 of the Sage Hills development which would be immediately contiguous to the proposed commercial solar project labeled Schnebly Coulee Solar Farm. We have lived here over 15 years.

We are not opposed, per se, to the idea of a commercial solar farm if it was installed in such a way as to preserve the shrub steppe - by NOT grading and leveling for the panels, but installing them at height above existing vegetation and grade and burying 100% of transmission.

In the absence of any such plan however, we have the following concerns and questions about this proposal.

- I. **Loss/fragmentation of critical shrubsteppe habitat** - a vanishing ecosystem in the western US. The CUP documents state: "Site preparation will occur in a manner to minimize grading, vegetation removal, and topsoil removal" however the loss of habitat - unless the solar arrays will be installed above existing vegetation - will still be catastrophic for local wildlife and vegetation.
- II. **Why not move this entire project to the County's section at Ryegrass** which is already a degraded habitat due to the presence of two landfill sites? Moving this project would put it closer to the substation for tie-in (cheaper for Invenenergy) while offsetting County loss of income when the LPL closes by leasing the section to applicant. The shrubsteppe in the area has been routinely bladed off by the County and therefore would not present such a catastrophic loss of habitat as this proposal. This could turn a negative into a positive as other communities have discovered.¹
- III. **Wildfire risks.** We are currently in a drought in eastern Kittitas County and it will only get worse. As previous wildfires have demonstrated, out-of-area work crews don't think twice about driving hot catalytic converters over dry vegetation - thus sparking catastrophic fires. Sage Hills is directly downwind of the proposed facility and there is no apparent thought to preventing accidental fires sparked by construction activities (siting water tanks onsite, instructing crews how to combat fires, preventative construction and post-construction measures). Additionally, what fire mitigation will be in place after completion of construction? Poor quality equipment, faulty installation, improperly sealed mechanisms, compromised electrical wiring, and irregular maintenance can all result in a fire. If we missed such documentation regarding mitigating fire risk, please point it out.
- IV. **Construction dust.** Blading off vegetation will result in blowing dust/loess directly across Sage Hills, given the prevailing WNW winds. This will degrade eastern property owners' use of property. Will construction routinely wet down bladed surfaces? Will bladed sections be hydroseeded?

¹ From Trash to Treasure: turning unproductive landfills into solar powered revenue.

- V. **Sheet C-300 mislabels the project boundaries** (and this error is repeated throughout the CUP documents where project boundaries are shown). On this page, to the south of Sage Hills, the map shows C-306, C-307, C-308 a third of the way onto Sage Hills properties, encroaching into private property not a part of this proposal. C-304 and C-302 are shown also overlapping into private property in Sage Hills, but not as far as the south encroachment. This page should be redrawn to correctly reflect boundaries as it affects proposed setbacks. Appendix E, page EX-0 maintains this inaccurate boundary and should be corrected. I am sure there are others with the same inaccuracy.
- VI. **Under general notes**, setbacks, 7.6 is labeled Elk Corridor of Wildlife Migration. Yet the SEPA Filed for this project states there is no wildlife migration present in the area. They can't have it both ways.
- VII. **INADEQUATE SEPA & WILDLIFE SURVEYS**
- A. The proposed project would largely destroy a vanishing shrubsteppe ecosystem, an environment the county's own code strives to protect.
 - B. SEPA page 10, 5.b. erroneously states " no federally listed threatened or endangered species are known or are likely to occur within the Project area due to lack of suitable habitat being present." We have lived here over 15 years and in that time, we have regularly seen the following nesting/hunting/ in the local shrubsteppe: *Phrynosoma douglasii* (pygmy short-horned lizard), *Asio flammeus* (short eared owl - routinely nest on Poison Springs land. Indeed, one year, we observed two nesting pairs raise 18 offspring between them on Poison Springs land), *Taxidea taxus* (American badger - several active burrows in the area), *Aquila chrysaetos* (golden eagle), *Haliaeetus leucocephalus* (bald eagle), *Mustela frenata* (weasel), *Athene cunicularia* (burrowing owl - indeed, the local Audubon society has made trips to the area to observe burrowing owls), townsend ground squirrel (*Urocitellus townsendii*), and with the exception of the lizard and owls, Invenenergy fails to identify these animals in the area, especially the burrowing owl and townsend ground squirrel. We have photos of many of these, if needed.
 - C. We have also seen *Pediocactus nigrispinus* (hedgehog/snowball cactus), and *Astragalus misellus* var. *pauper* (pauper milkvetch) - not identified as present in the CUP.
 - D. SEPA page 10, 5.c. incorrectly states the area is not part of a migratory pathway. The Colockum elk herd² routinely uses the area for winter range - we can provide photos showing this if needed - as well as a key migratory path for horned larks, shrikes, other passerines. Indeed, the SEPA 5.d. goes on to describe project design adjustment to allow for elk migration. How does this not contradict 5.c?
 - E. Hidden risks to wildlife³. We don't know what we don't know. This sort of project is so new, research on wildlife impact both initially and longterm is sorely

² Program Aims to Reduce Conflict between Elk, People in Kittitas County

³ Solar Impacts on Wildlife and Ecosystems

lacking. For this reason, we hope the County will require applicant file a bond to address and mitigate unexpected impacts.

F. For these reasons, we oppose a designation of SEPA nonsignificance.

VIII. **Who will pay for decommissioning this project?** Rural Kittitas County residents are asked to bear the loss of habitat, degradation of property values, loss of views, etc. Will residents also bear decommissioning costs which will not only include removing the panels and other infrastructure, but in rehabilitating the shrub steppe? Will Invenergy be required to post a bond for this project decommissioning? Because it should.

IX. **Electromagnetic Field impact.** Although EMF levels drop with distance and pose little, if any threat to nearby humans, what impact will it have on local wildlife? Particularly on sensitive species?

X. **Solar Glare.** While it is commendable that Invenergy states it will turn off/limit night time lighting to reduce wildlife impact, what impact will solar panel glare have on wildlife - particularly insects, bats, avian passerines and others? The glare of multiple panels can contribute to 'lake effect' making them appear to be water and some waterbirds can be impacted when they misidentify panels for water ⁴.

I am sure we will have additional questions. Thank you for this opportunity to comment on this project.

Nels & Charli Sorenson
1970 Sage Hills Drive
Ellensburg WA 98926
nelscharli1970@gmail.com

⁴ Impact of Solar Energy on Wildlife is an Emerging Environmental Issue.