

## Jeff Watson

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**From:** Jack Clerf <clerfsjs@kvalley.com>  
**Sent:** Tuesday, June 07, 2016 9:41 AM  
**To:** Jeff Watson  
**Subject:** Iron Horse Solar comments  
**Attachments:** John Clerf Comments RE IHSR June 7, 2016.doc

Jeff,

Find attached my written comments on Iron Horse Solar Facility. If attached doesn't meet your requirements for such comments, please let me know.

Thanks,

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These comments are made relative to the proposal by OneEnergy Development LLC for Major Alternative Energy Facility named Iron Horse Solar Farm (IHSF) on 4 parcels in Section 1, T17N, R19E, east of City of Kittitas.

I am managing member of Clerf Family LLC, which owns over 1,000 acres of farm land in Kittitas County, and also president of Clerf Farms, Inc. which operates a farm east of Ellensburg. Some of this land has been owned and farmed by my family since 1885. I'm proud to be the 4<sup>th</sup> generation to still farm and reside on the original homestead. I live and farm on Section 12, T17N, R19E, adjacent to Section 1.

I received formal notice by mail from CDS of this application May 24, 2016. Contained in notice was mention of June 7<sup>th</sup> deadline for written comments on this proposal. Given this time restraint and the fact we have a few things happening on farm this time of year (such things happen on land zoned Ag 20 and designated Rural Working), I am thus limited in the time I could spend on researching and responding to this proposal.

Concerns to this specific site and proposal:

- We have an adjudicated water right to Caribou Creek with a priority date of 1874. That water is conveyed through the irrigation ditch shown in master file pictures (pages 11-18) and erroneously labeled "Caribou Creek" and mentioned in 3. a (1), (2) of CU permit application. How am I to monitor and maintain that irrigation easement? I see it receives some attention in Appendix G of OER construction notes. They evidently believe it is the landowner's ditch. While it is physically located on their property, my easement must be recognized and respected. The survey map included in master file is for 8.73 AC parcel and 10.39 AC parcel. Neither the irrigation easement "I" shown on that map nor the 10' property boundary irrigation easements mentioned in map's notes relate to my easement. Where are survey maps of other parcels included in proposal and where is specific mention of my easement?

- I have questions and doubts about statements relating to vegetative ground cover within project. How is any type of vegetative cover going to be established and maintained with no mention of supplemental water and most of the area shaded? Sowing "weed-free native seed mixture" on disturbed areas and retaining the current vegetation (hay) on the rest is easier said than done without water and sun. Inclusion of the many pages of weed identification and control in Appendix C, Vegetation Management Plan and Weed Management Plan is very impressive and comforting. I hope the vegetation and weeds can read and are sufficiently influenced by its content.

- I have seen flood waters well outside that area shaded as 100 year floodplain on map on page 28 of master file on several occasions. Would elevations and locations of roads, inverter stations, disconnect pads, etc. or the surrounding security fence, prevent that flood water from returning to natural course of Caribou Creek floodplain?

- If developer or their successor/s fails financially or otherwise loses interest somewhere down the road is there a financial assurance bond required so we are not dealing with an abandoned or half-finished mess. I know there is reference to returning site to farm ground and properly disposing of solar equipment at end of project in master file but promises and good intentions don't mean much as "Solyndra", a number of ethanol plants, and other green energy concerns have illustrated by leaving taxpayers and investors "holding the bag".

-Proposed area of development on preliminary site plan is ~ 47.5 acres. Notice of application states a proposal for ~ 68 acres. I know there is a farmstead located next to Caribou Rd. that is excluded from area of development. What about that property NW of Caribou Creek that is shown as part of the total property affected but it is not being developed on preliminary site plan? If CU-15-00006 is approved, can that NW area be developed later, either by OneEnergy or a successor, without further review?

- Unlike wind generators that are very site-specific, am I to believe that the sun or solar panels are more efficient or gain some special properties when placed in a farming neighborhood on prime farm land, bordered or intersected by creeks and irrigation ditches than if placed or constructed in nearby unpopulated areas of scrubland? Does the convenience for the developer take priority over the loss of prime ag land and effect to the rural character and nature of the neighborhood? To me, this would be contrary to the criteria from KCC 17.60A.015 and would set a terrible precedence for Kittitas County. What protection does CU process offer in terms of resource and rural character preservation if placing 18,600 solar panels on 8' piles surrounded by an 8' security fence on prime farmland in Ag 20 gets approved?

It is interesting that in searching for solar panel projects of similar size, I found one solar array after another situated in the unpopulated deserts and scrublands in the lower latitudes of the U.S. If this is to be "the largest facility in the state", I wonder how many others will look and say, "why there"?

I request that I be notified of the determination and all other actions relative to CUP/SEPA for IHSF.

Respectfully submitted,

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