



Lower
Columbia
Basin
Audubon
Society

Lower Columbia Basin Audubon Society

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

P.O. Box 1900

• Richland, WA 99352

• (509) 545-6115

RECEIVED

SEP 22 2022

ENERGY FACILITY SITE
EVALUATION COUNCIL

September 7, 2022

Sonia Bumpus, EFSEC Manager and SEPA Responsible Official

Energy Facility Site Evaluation Council

621 Woodland Square Loop SE

Lacey, WA 98504-3172

Re: SEPA Threshold Determination for Wautoma Solar Project (EFSEC Docket Number: EF-220355)

Dear Ms. Bumpus:

The Lower Columbia Basin Audubon Society (LCBAS), a chapter of the National Audubon Society, would like to make the following comments on EFSEC's SEPA Threshold Determination for the proposed application for the Wautoma Solar Project. The comments contained in this letter parallel comments submitted earlier by Audubon Washington and in no way are contrary to those comments to which LCBAS agreed to and signed on to that letter. There are some new comments that need to be addressed as follows:

LCBAS is particularly concerned about the Wautoma Project's nearness to the Hanford Reach National Monument to the east, which is owned by the Department of Energy, and by agreement, is managed by the US Fish and Wildlife Service. The monument preserves a unique and vanishing landscape in Washington State. It is critical that the biological, geological and cultural resources of the monument are not impacted by nearby solar development.

Tribes consider Rattlesnake Mountain, which is contained within the monument and adjacent to the project area as sacred, and it has been stated verbally and in writing that views from the summit of the mountain need to be maintained in a pristine mode to protect the integrity of the sacred mountain. EFSEC and/or the Wautoma Project staff need to contact the NEPA Compliance Officer for the Department of Energy to confirm this account and gain additional information concerning rights of the Native Americans.

EDUCATION

• CONSERVATION

• APPRECIATION

Recipient of the Chevron Times Mirror Award, 1996

The biological resources of the monument can be severely impacted by nearby industrial actions. Noxious weed seeds can be spread from the project by wind or by animals. The project must be careful not to allow invasive species to take a foothold in the project area spread to the monument. Wautoma Project must have an invasive weed management program during construction and operation.

Wildfires are a constant threat to the monument and nearby lands. The prevailing winds blow from the west – southwest and the potential for careless actions during construction or during operation could burn thousands of acres including the monument. Wautoma Project must have a wildfire prevention and response/suppression plan.

The National Monument is residence for or a foraging area for Washington State avian species of concern such as the Ferruginous hawk, Burrowing owl, Sage thrasher and Sagebrush sparrow. The Wautoma Project must address how they will prevent impact to these species. Also of importance are Greater Sage-grouse and Columbia Sharp-tailed grouse which historically utilized the National Monument and surrounding area. The Wautoma Project needs to address these bird species too.

To the best of our knowledge reflection off of solar panels has not been addressed in the past at solar sites but it would seem that such a large field of panels at the Wautoma Project could impact the air above and the ground below. The potential impact to ground based animals and avian species should be recognized and possibly quantified for mitigation.

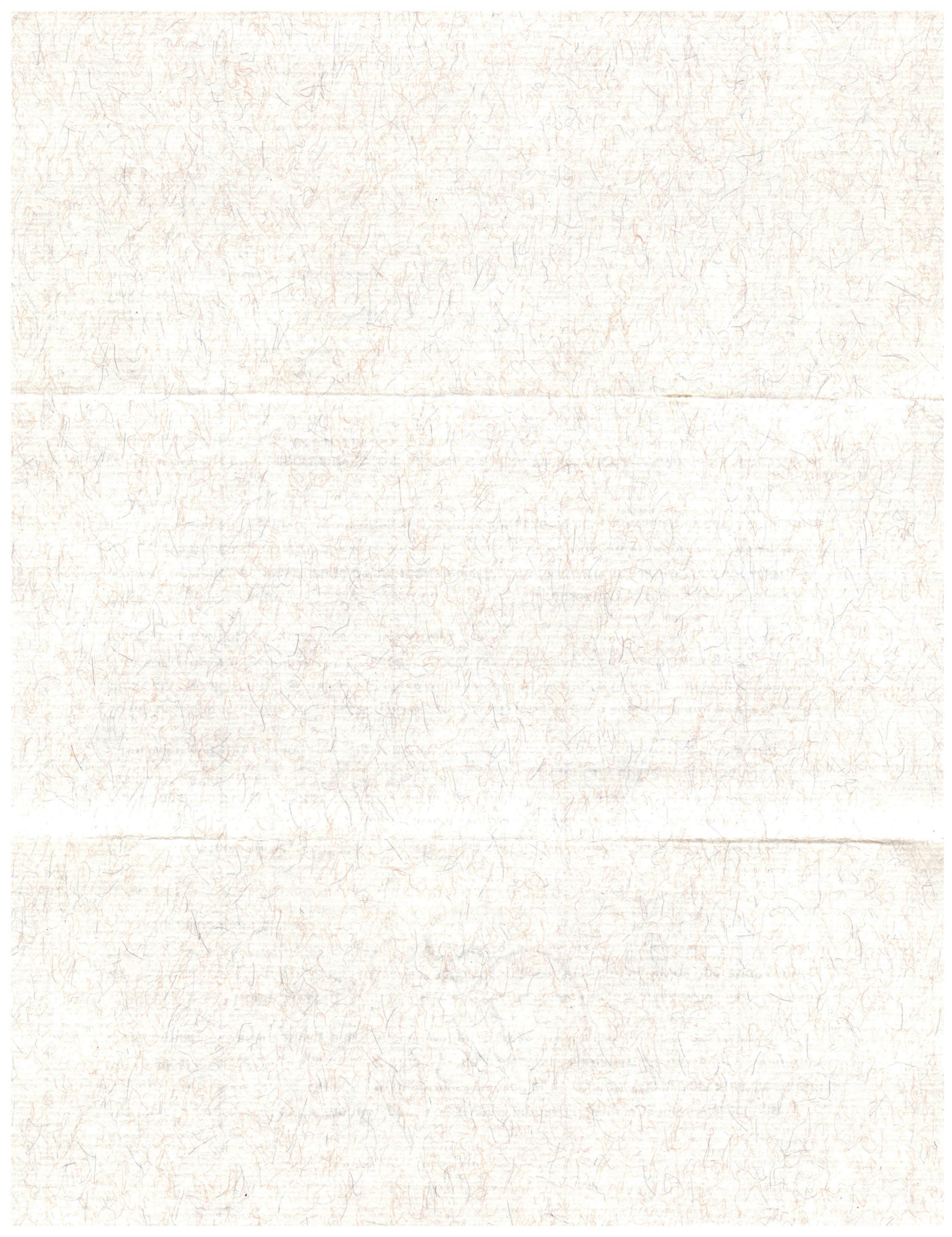
Proper mitigation and the amount of mitigation are important consequences of a large land disturbing project. Mitigation actions need to be appropriately scaled to the size of the project and impact to specific avian species as noted above as well as non-avian species. Mitigation should be followed by monitoring and enforcement. Monitoring and enforcement should be addressed fully and what agency would have continued oversight.

LCBAS appreciates the opportunity to comment on the SEPA Threshold Determination for the proposed application for the Wautoma Solar Project.

Sincerely,



Dana Carl Ward
Conservation Chair
Lower Columbia Basin Audubon Society



Lower Columbia Basin Audubon Society
PO Box 1900
Richland, WA 99352

SPOKANE WA 990

7 SEP 2022 PM 1 L

Thinkin



FOREVER / USA

Sonia Bumpus, EFSEC Manager & SEPA official
Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
LACEY, WA 98501-3172
3

98503-100699



