# Comment 20220331-9ON15E8

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Attachment Count: 0

Tags:

Responses:

## Attachments

Comment:

please reconsider this project. i respectively ask you not to go forward with this project, eastern washington is being used up with little benefit to the people that live here....thank you

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April 1, 2022

Sonia Bumpus, EFSEC Manager and SEPA Responsible Official
Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey, WA 98504-3172

**Re: Determination of Significance and Request for Comments on Scope of Environmental Impact Statement for the Badger Mountain Solar Energy Project (EFSEC Docket Number: EF-210747)**

Dear Ms. Bumpus:

Audubon Washington, a state field office of the National Audubon Society, and North Central Washington Audubon, the local Audubon chapter covering Chelan, Douglas, Ferry, and Okanogan counties, appreciate the opportunity to comment on the scope of the EIS for the Badger Mountain Solar Energy Project (BMSEP). Audubon's climate science shows that two thirds of North American birds are at serious risk of extinction if we can't limit warming associated with climate change (Bateman et al. 2020). We support clean energy and net zero emissions to help our birds but are concerned that the proposed BMSEP development area would contribute to ongoing habitat loss for Greater Sage-Grouse and potentially limit the species' ability to adapt to climate change.

We and our 50,000+ members and 25 chapters across the state care deeply about Greater Sage-grouse and other birds of the shrub-steppe. The Greater Sage-grouse is an Audubon priority species across the West and here in Washington, the status of sage-grouse and the shrub steppe ecosystem is dire. More than 80% of this landscape has been lost, and grouse experts tells us that the population in Douglas County represents the last viable population in Washington.

We recognize that the development of alternative energy is critical to addressing climate change. At the same time, solar and wind energy facilities are typically geographically extensive and can have significant adverse impacts. For this reason, it is essential that any proposal for development of an alternative energy facility be carefully and comprehensively evaluated so that potential impacts are avoided, minimized and adequately mitigated. With a project footprint of 3¾ square miles, encompassing a mix of dryland agriculture, shrub-steppe vegetation, and Conservation Reserve Program (CRP) lands, the BMSEP would adversely impact an extensive area of the Badger Mountain Plateau and the wildlife it supports, particularly State Endangered Greater Sage-grouse. Environmental review of the proposed project should include a rigorous assessment of potential impacts to at-risk species and habitats, as well as potential impairments to landscape connectivity and health, and impacts to Tribal treaty rights and interests.

**State Listed Species**

*Greater Sage-grouse*

According to the Washington Department of Fish and Wildlife, the Badger Mountain Plateau provides some of the last remaining habitat and largest breeding display ground (lek) for Greater Sage-grouse in Washington State. WDFW data and models indicate that dryland wheat, shrub-steppe, and CRP lands in the area are used by sage-grouse throughout their annual cycle for rearing, foraging, migration, and movement.

We have reviewed the publicly available data on sage-grouse in the BMSEP area, including the Applicant's Wildlife and Habitat Survey Report (citation). We find that there are serious and concerning data gaps. For example, the Applicant's field surveys were for just 6 days in early May 2021. However, grouse may use the project area in different ways across seasons, therefore surveys in other seasons should be required. In addition, the WDFW telemetry data from nearby breeding grounds is for males only, and does not include movement data for females or young and their nesting or post-breeding dispersal. In addition, sage-grouse observations by private landowners and individuals may not be documented in official data repositories, creating a gap in the official record for sage-grouse occurrence and habitat use in the project area and vicinity.

Use of grassland and dryland wheat habitat within the project vicinity by sage-grouse has been reported, particularly in areas where there are fingers of shrub-steppe vegetation interspersed. Grassland-type habitats could be more important for the Washington population of this species than has been appreciated. In addition to surveys across seasons to detect whether or not the species is present, an analysis of sage-grouse habitat use in grasslands and agricultural areas adjacent to nearby shrub-steppe is needed for this project and other areas going forward.

The BMSEP EIS must comprehensively document sage-grouse activity within and surrounding the project area throughout all four seasons and analyze likely adverse impacts to the species based on this determination of existing conditions. Project impacts to sage-grouse must also be considered within the context of past and probable future impacts to the species as required by WAC 197-11-792(2)(c)(iii).

*Ferruginous Hawk and Golden Eagle*

The project area supports foraging habitat for two raptor species, the State Endangered Ferruginous Hawk and State Candidate Golden Eagle, which are experiencing population declines and poor reproductive success due to habitat loss and conversion and declining prey populations. According to WDFW raptor nest surveys, two occupied Golden Eagle territories have the potential to be negatively impacted by the project. As with the Greater Sage-grouse, the EIS must comprehensively document existing conditions for both raptor species and conduct an analysis of likely direct and cumulative project impacts.

**Species of Conservation Concern**

In addition to State Endangered and Threatened species, the EIS should also address impacts to other at-risk species and habitats occurring in Douglas County, including state Priority Habitats and Species, Sensitive Species, Candidate Species, and Species of Greatest Conservation Concern. New WDFW models of sagebrush obligate bird species distribution in Washington indicate that potential habitat may be present for state candidate species Sage Thrasher and Sagebrush Sparrow within the project footprint (Figure 1). Avian and other at-risk plant and wildlife surveys should be conducted during the appropriate season to determine potential state priority habitat and species presence.

**Landscape Connectivity and Condition**

The Arid Lands Initiative (ALI) is composed of public, private and tribal entities in eastern Washington. ALI conducted a scientific assessment of priority areas for conservation of shared biological priorities, including broad-scale systems (Shrub-Steppe and Dry Grasslands, Riverine Systems, and Depressional Wetlands), fine-scale systems (Dunes, Transitional Woodlands, Cliffs, Talus and Caves) and a suite of priority species (Greater Sage-grouse, Columbian Sharp-tailed Grouse, Washington's and Townsend's Ground Squirrels. This assessment identified priority core areas and linkages for conservation (Arid Lands Initiative 2014). According to our analysis, the BMSEP intersects with 655 acres of the Rock Island Priority Linkage Area (#90) Channeled Scablands Ecoregion (Figure 2). The EIS must evaluate potential direct and cumulative effects of losses of this landscape connectivity zone.

According to estimates of exotic annual grass cover from Dahal et al. 2021, close to 300 acres of the project site have a relatively low proportion (<23%) of exotic annual grasses. Exotic annual grasses such as cheatgrass are a significant threat to ecosystem health in this landscape, reducing forage and habitat value for grazing and wildlife, and contributing to increased fire risk and severity in eastern Washington. Vegetation surveys in shrub-steppe habitat areas should be conducted and potential impacts to relatively intact shrub-steppe vegetation (i.e., low exotic annual grass cover) should be clearly described, avoided and mitigated for.

**Tribal Treaty Rights and Interests**

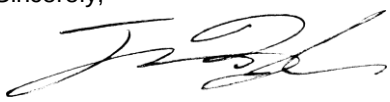
Indian Tribes are leaders in efforts to protect and restore natural and cultural resources in the state. Impacts to tribal treaty rights and interests in the Badger Mountain Plateau should be evaluated in the EIS and honored to the full extent of the law.

**Conclusion**

The scoping notice for the BMSEP states that "[a]t a minimum, the EIS will include a no action alternative and the applicant's proposal." The EIS should also evaluate a range of reasonable alternatives to the applicant's proposal that would "feasibly attain or approximate [the] proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation" (WAC 197-11-440(5)(b). Given the likelihood of the project causing significant adverse impacts to wildlife and wildlife habitat, consideration of less environmentally impacting alternatives, such as areas zoned for industrial development, is necessary for the EIS to adequately comply with SEPA.

Thank you for your consideration of our comments.

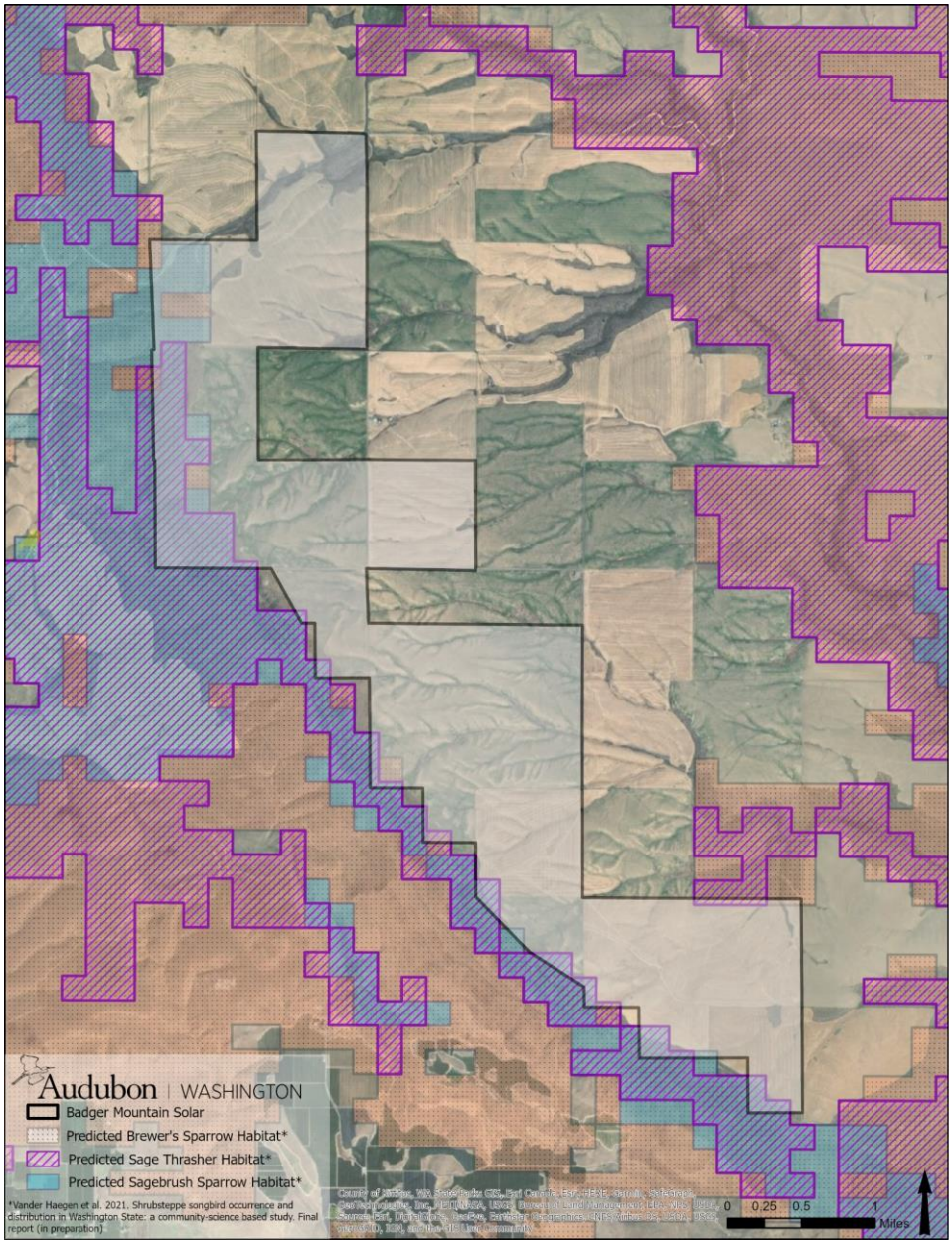
Sincerely,



Trina Bayard, Ph.D.
Director of Bird Conservation
Audubon Washington

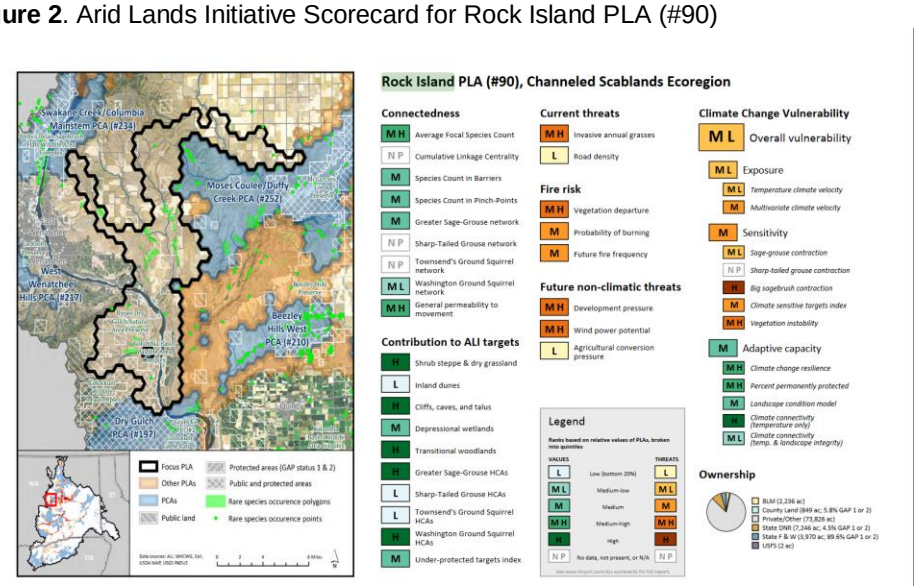
Art Campbell
President
North Central Washington Audubon Society

**Figure 1**. WDFW sagebrush obligate passerine distribution models.




Models of potential species distribution for Brewer's Sparrow, and State Candidate Species Sage Thrasher and Sagebrush Sparrow, were created using an ensemble modeling approach that included 4 statistical models (General Linear, General Additive, Random forest, and Boosted Regression Tree) (Vander Haegen et al 2021). The predicted distribution shown here depicts all raster cells where at least 1 of the 4 models predicted presence of that species.

**Figure 2**. Arid Lands Initiative Scorecard for Rock Island PLA (#90)




Scorecards show how priority areas ranks relative to others in terms of abundance of priority systems and species; how impacted it currently is by factors such as fire and invasive species, the potential for impacts from future activities like development, wind power, or agricultural conversion; and how vulnerable the area is to future changes in climate (USFWS 2015).

## Citations


Arid Lands Initiative. 2014. The Arid Lands Initiative – Shared Priorities for Conservation at a Landscape Scale. Summary Prepared by Sonia A. Hall (SAH Ecologia LLC) and the Arid Lands Initiative Core Team. Wenatchee, Washington. 39 pp. Available at: https://aridlandsinitiative.org/our-shared-priorities/

Bateman, BL, C Wilsey, L Taylor, J Wu, GS LeBaron, G Langham. 2020. North American birds require mitigation and adaptation to reduce vulnerability of birds to climate change. Conservation Science and Practice. Available at: **https://doi.org/10.1111/csp2.242**

Dahal, D, NJ Pastick, SP Boyte, S Parajuli, MJ Oimoen. 2021, Early Estimates of Exotic Annual Grass (EAG) in the Sagebrush Biome, USA, July 2021, (ver 2.0, January 2022): U.S. Geological Survey data release, https://doi.org/10.5066/P9FG6X9Q.

US Fish and Wildlife Service, 2015. Assessing the Condition and Resiliency of Collaborative Conservation Priority Areas in the Columbia Plateau Ecoregion. Available at: https://www.sciencebase.gov/catalog/item/54ee1862e4b02d776a684a11

Vander Haegen et al. 2021. Shrubsteppe songbird occurrence and distribution in Washington State: a community-science based study. Final report (in preparation).