

DAN SUTTON
1ST DISTRICT

KYLE STEINBURG
2ND DISTRICT

MARC S. STRAUB
3RD DISTRICT

DOUGLAS COUNTY COMMISSIONERS

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

March 30, 2022

Re: Scoping comments for Badger Mountain Solar
Agency Docket Number: EF-210747

Enclosure: Douglas County Ordinance TLS 21-17-47B

RECEIVED
APR 15 2022
WASH. UT. & TP. COMM.

RECEIVED

APR 21 2022

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Sonia Bumpus,

Thank you for this opportunity to offer SEPA scoping comments for the above listed project. I offer these comments on behalf of the Douglas County Board of County Commissioners.

The notice dated March 14, 2022, which initiated the scoping period, commits EFSEC and the applicant to the analysis of only two alternatives, namely a no-action alternative and the proposed site. Our following comments will suggest other alternative sites should be considered. The notice identifies wildlife as a subject for discussion in the environmental impact statement. The notice further lists possible items which require further information before determining the level of analysis in the EIS. This list would appear to be derived from the SEPA environmental checklist. Our comments will identify two items from that list which, we believe should be included for a thorough discussion in the EIS, and an additional item found on the SEPA environmental checklist that does not appear in the list in the notice. These items are 1) land use, 2) light and glare, and 3) public services.

Alternatives

EFSEC and the developer have already acknowledged the proposal is not consistent with local land-use regulation. At face value, the only way to bring consistency is to consider alternate sites. It appears a number of other sites with similar characteristics exist in the area. A discussion of alternate sites should be included in the EIS.

Land Use

The project is situated near the largest city in Douglas County. The area around the City of East Wenatchee has received significant investment in infrastructure that lends itself to the expansion of housing stock necessary to provide for the growth needs for the 20-year planning window required of local governments. The project represents large-scale, industrial development in a rural area of Douglas County, which already exhibits a desired mix of residential and agricultural uses that is a foundation of our customs and culture. RCW 36.70A.011, RCW 36.70A.020, and the amendments to WAC 365-196-480 (2) (H) require local comprehensive plans to be cognizant of the need to adopt comprehensive plans

and development regulation that avoids siting incompatible land uses. The cited WAC speaks directly to siting energy facilities. The enclosed Douglas County Code takes a substantial step in complying with that requirement of the State of Washington; which, along with the ongoing evaluation of our comprehensive plan and development regulations, are both subject to review by state agencies. As noted above, the EIS should consider alternate sites to avoid the conversion of the land comprising the site to an incompatible use, and, by extension, rendering the surrounding land incompatible with traditional land-uses in this area. To this point, the EIS should include a discussion of the impacts of the project on existing and future land use in the area.

Light and Glare

The impact to aesthetics, by a proposal of this sort, is often perspective-driven. However, light and glare are measureable in both their intensity and their impacts. Related to the preceding discussion of how the project might render surrounding properties less desirable for other development, a discussion of the impact of light and glare from the project should be included in the EIS.

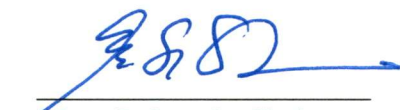
Public Services

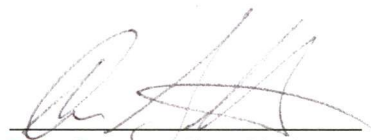
The project proposal includes a 200MW battery energy storage system. Depending on the type of battery system used, and the demand capacity of the system, the risk of fire can be heightened. Fires in a facility of this sort can require specialized training and equipment, and require greater water flow for longer durations, due to the nature of combustion and the chemical fumes that can be emitted. The EIS should discuss the fire-risk associated with this element of the proposal. The capacity of local resources to deal with this type of event, and any specialized equipment or training to enhance local capacity to an acceptable level, should be considered.


The expansion of renewable energy generation is a laudable goal, but all land-uses must be considered in the whole. This is a large-scale project and the impacts must be carefully considered to avoid unintended consequences in the long-term. Douglas County appreciates the opportunity to offer comment on this important project.

Respectfully

Douglas County Board of Commissioners,



Marc S. Straub, Chair

Dan Sutton, Vice Chair

Kyle Steinburg,
Member