State of Washington
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John Barnes
Washington Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
PO Box 43172
Olympia, WA 98504-3172

Subject: Hop Hill Solar: Application for Site Certification (ASC)

Mr. Barnes,

The Washington Department of Fish and Wildlife (WDFW) is committed to working with EFSEC and renewable energy projects to ensure that these projects are sited in a manner that avoid impacts on fish and wildlife resources and that fully support Governor Inslee's goals for decarbonization in Washington State.

In early 2022 WDFW, provided comments to Benton County regarding this project and since then has worked with EFSEC and Hop Hill to address a variety of wildlife and habitat issues related to WDFW Priority Habitats and Species. Our comments are predominantly derived from our review of Attachment L; Draft Habitat Mitigation Plan but also refer to some of our original comments to Benton County.

The ASC describes a Siting Area (22,020 acres), Solar Array Siting Area (11,179), and a Transmission Line Corridor Siting Area (10,841) but it is not clear from Table 3 which of these areas the impact calculations are for. Foot note #3 identifies power poles so we are assuming that Table 3 is for the entire project. We recommend that there be a three tables: one each for the Solar Array Siting Area and Transmission Line Corridor Siting Area and a final table of cumulative impacts.

Statements such as "the majority of the Solar Array Siting Area is herbaceous grassland… and " the majority of the Solar Array Siting Area is currently degraded grassland with minimal native vegetation" along with the percentages shown in Table 1, might lead one to conclude that the project is being proposed in an area where impacts to native species and habitats is minimal. Yet, proportionately, more native shrubsteppe habitat will be impacted than grasslands. For example, overall, 63% (1604 acres/2552 acres) of the shrubsteppe will be impacted and 58% (1475 acres/2552 acres) will be altered (i.e inside the array fencelines). This is in comparison to herbaceous grasslands that will only be impacted 42% (3557 acres/8504 acres) overall and 37% altered (3124 acres/8504 acres). The importance of shrubsteppe in the project area and as part of the overall landscape cannot be

underscored. This is supported by the fact that sage sparrows (a shrubsteppe obligate species) were recorded within the project area providing a strong indication of high ecological function and value of these shrubsteppe habitat areas.

We do not agree with or support the use of non-native seeds or plants for restoration. The project will alter important shrubsteppe habitat and any restoration efforts should target the establishment of native vegetation. The ASC is not clear on how the solar site will be prepared for construction, but the description of reseeding efforts implies that significant ground disturbance will occur across the site. We understand that shrubs will need to be removed and we recommend that they be mowed or individually cut. We recommend no site-wide discing or grading as doing so will cause significant erosion (both wind and water) and significantly disrupt the soil profile and existing native grasses and forbs. Also, this will open the ground for more cheatgrass invasion and establishment.

Based on our experience, we recommend minimal ground disturbances and application of herbicides to control invasive vegetation. Once the invasive vegetation is under control, then limited seeding of native plants could occur but only where a native seed drill can be used.

In early 2022, we provided the project information on Ferruginous Hawk nesting territories and core habitat areas, and also commented on the Benton County SEPA action "…that solar development should not occur in these core areas." Based on our data of these nesting territories and the proposed project layout, core habitat areas in the northeast and northwest will be impacted by solar development. Based on the proposed project layout, there appears to be opportunities within the Solar Array Siting Area to address both the protection of core habitat areas and solar energy production.

We look forward to further discussion on these issues. Please contact me at 509-380-3028 or at Michael.Ritter@dfw.wa.gov with any questions.

Sincerely,

Michael Ritter

Michael Ritter
Lead Planner: Solar and Wind Energy Development