Pre-application Comment #P0008
Badger Mountain Project
Docket #210747

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ENERGY FACILITY SITE
EVALUATION COUNCIL

Kathleen Drew
Chair of the Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

July 22, 2022

We the undersigned, would like to let you know our position on Solar Farms currently being planned in Douglas County, Wa. near our homes on Badger Moutain. While we understand the need for solar development as a renewable energy resource, we cannot accept replacing highly productive farmland, lands that support habitat for critical wildlife species, including the state endangered Sage Grouse, and Native American traditional food gathering lands with huge industrial sized solar farms.

There are plenty of other suitable locations for solar development considering all of the hard surfaced areas (roads, canals, roof tops, parking garages, etc) within our state. If solar must go on shrub steppe habitat, it should first be determined:What is the comparison relative values of the land being considered for wildlife, watersheds, indigenous value, and people's concerns before deciding on a specific location.

It is about locating acceptable locations for this type of solar power generation and Badger Mountain and Douglas County in general are not the places for this to happen. Douglas County is the last remaining strong hold for the endangered Sage Grouse and the more than 4,000 acres being planned for solar development would wipe out one of the only habitat areas they have left in all of Washington. This is not just our position but also the position of our Board of County Commissioners which recently passed Ordinance No. TLS 21-17-47B stating all primary use energy facilities must go through the Energy Facility Site Evaluation Council (EFSEC) to determine appropriate location and mitigation measures and that facilities shall be located at least 7 miles from and urban growth area boundary, or habitat associated with sensitive, candidate, threatened, or endangered plants or wildlife as identified on state and federal lists.

The message several biologists have told us is that there is no way to produce or protect any habitat of similar value anywhere in Washington to mitigate for the loss of this habitat for the sage grouse. In addition, traditional tribal gathering areas would be lost if solar development is allowed in this area.

Scenic values would be devastated, land values would plummet, and extremely valuable Conservation Reserve Program (CRP) acres planted for wildlife would disappear. Millions of dollars have been invested in maintaining the sage grouse population on Badger Mountain just East of wenatchee and near Mansfield, Washington. Through partnerships with farmers, ranchers, conservation districts, and the Washington Department of Wildlife, the CRP program is critical for this and many other species of importance which would all vanish if solar farms are approved.

A recently passed Washington State proviso provides funding for Washington State University to bring a more common sense approach to solar siting. That proviso will work on solutions to understand the best location for solar but will not begin until June of 2022. We are sure that once developed, this solar siting methodology would not ever approve of solar farms on a location such as Badger Mountain considering all that will be lost and with no real true mitigation possible.

We ask that the Governor and Chair of EFSEC take this into account and not allow this development to proceed, or at a bare minimum, to make no decision on this until the solar siting process is in place as determined through the proviso.

Remember, many state government organizations, private citizens, County Commission's, the County Republican Committee, wildlife experts, farmers, ranchers, NGO's, and both the Yakama and Colville Confederated Tribes do not want to see these lands turn into massive solar farms at the expense of natural resources, wildlife, or traditional indigenous culture. Please take our comments into consideration if these applications come before you either as the EFSEC council or the Governor's staff.

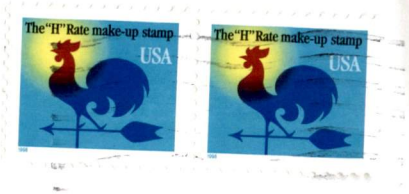
We believe in a government and government process that reacts to and respects the concerns and wishes of citizens who have become educated on the facts of an issue and have made those concerns known. We ask for your sincere considerations of our requests.

Sincerely,

Citizens of Badger Mountain, Chelan and Douglas Counties

Brenda Benoit

Sharon J. Morris



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Chair of the Energy Facility Site Evaluation Council
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