Sonia Bumpus
Washington Energy Facility Site Evaluation Council
PO BOX 47250
Olympia, WA 98504-7250

RE: High Top Solar and Ostrea Solar Projects MDNS

Dear Ms. Bumpus,

Thank you for this opportunity to comment on the Mitigated Determination of Nonsignificance (MDNS) for the High Top Solar and Ostrea Solar projects. Conservation Northwest works to protect, connect, and restore wildlife habitat with a focus on landscape scale linkages. Our Sagelands Heritage Program has been tracking the variety of solar projects being proposed in the Columbia Plateau. We recognize the need for clean, renewable energy, but would like to see it in a sustainable way that does not allow for the further conversion and fragmentation of wildlife habitat or productive agricultural land. This project along with a handful of others are being proposed in this area, and we are worried about the singular and cumulative impacts these projects will have on local and migrating wildlife and the habitat. Because the project layouts are not yet final, as stated in the MDNS memo from EFSEC staff, it seems too soon to determine whether this project would or would not have significant impacts on the environment and whether these can be mitigated. So, our key concerns and resulting comments are based off of the available documentation including the original application and public comments.

Although mitigation is an accepted and calculated option to offset local impacts of these projects, we are fearful that certain shrub-steppe habitat for several species of concern is not replaceable or mitigatable. Washington State has already lost at least 80% of its historic shrub-steppe habitat (WDFW). Even low to moderate quality habitat can be critical for shrub-steppe species. This project is situated along the southern border of the Yakima Training Center which is a key biodiversity area that is home to many state endangered or priority species and sagebrush obligate species (i.e. greater sage-grouse, burrowing owls, sagebrush sparrow, white and black-tailed jackrabbit, Rocky Mountain elk, mule deer, and many more). On the ground wildlife surveys done by the applicant for both project properties took place during eight days with only two people and these days were spaced only one month apart to account for "variation in seasonal activity". This does not account for changes in seasonal or daily species activity or presence. Even during these brief survey windows, species including Rocky Mountain Elk, American Badger, and Sagebrush Sparrow were observed in and around the project area. Breeding burrowing owls are known to be 0.1-1.6 miles west, east, and south of the project areas, and a recently utilized burrowing owl burrow was found on the Ostrea project site. Part of this information was redacted, but feathers, excrement, and cast pellets were found nearby and they "assumed that these burrows were likely abandoned earlier in the spring" (Attachment C – General Wildlife Surveys 4.2.1.1, pg. 19). So, there is suitable habitat, present and once occupied burrows, and prey in these project areas that could be used by a state candidate species and

others. One of the few existing populations of greater sage-grouse is also located about a mile north of these project areas. Greater sage-grouse require large shrub-steppe landscapes and utilize degraded habitat for wintering. This project along with the others proposed in this area would disconnect the suitable habitat on the Yakima training center from the rest of Yakima and Benton Counties.

For decades, shrub-steppe habitat has been converted to agricultural land due to its rich soils, so it comes as no surprise that this land was historically used for farming. Although degraded, this land serves as a heavily used wildlife corridor between the Yakama Ridge and Rattlesnake Hills. Crop production has been absent in the project area for over 25 years, so this land has been mostly undisturbed and used by wildlife without farming pressure. The available native shrub-steppe habitat within these project areas (~623 acres or 36% of the total initial project areas) will be further degraded and fragmented should this project be permitted.

In conclusion, 1) the project layout should be completed, and mitigation calculated before an MDNS is issued. 2) a more thorough environmental review (EIS) should be considered for solar projects that are located near state endangered (like greater sage-grouse and ferruginous hawk) and candidate (like sagebrush sparrow and burrowing owl) species and that are within wildlife connectivity corridors.

Thank you for your considerations of our perspective and input;

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