State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Pasco District Office, Habitat Program • 2620 North Commercial Avenue, Pasco, WA 99301

September 15, 2022

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Washington Energy Facility Site Evaluation Council
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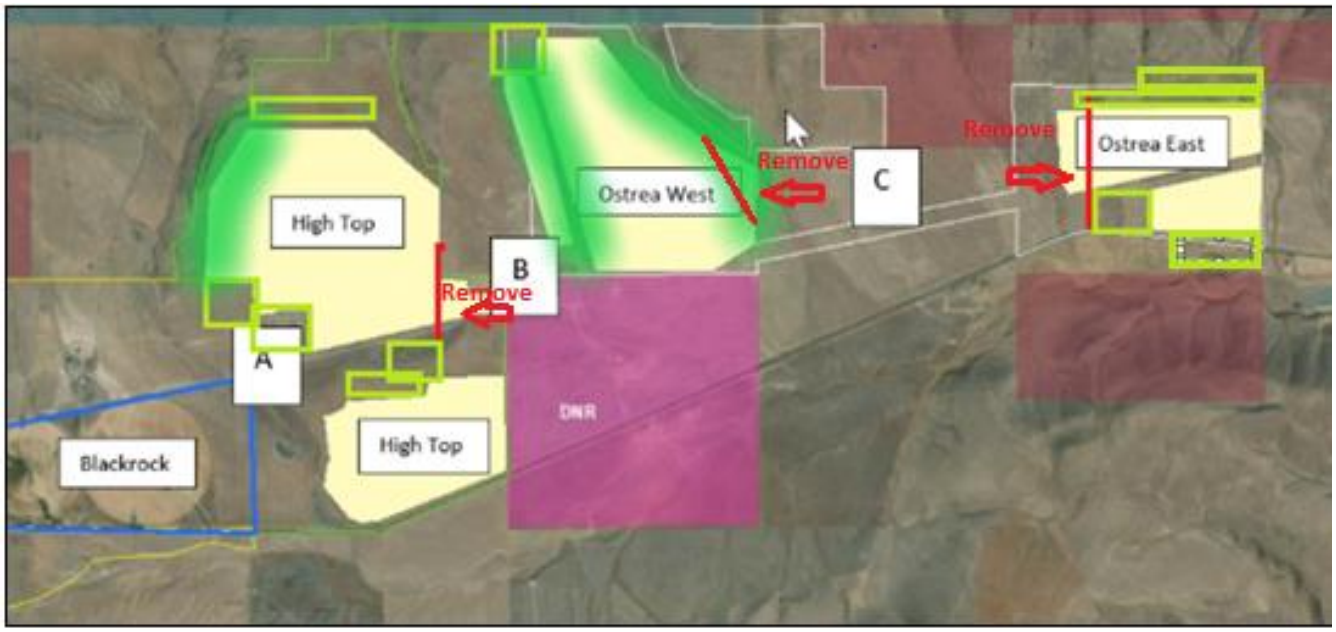
Ms. Hafkemeyer,

Thank you and Cypress Creek Renewables (CCR) for the meeting on September 9 regarding the High Top and Ostrea Solar Projects (Project). In our July letter to the Energy Facility Site Evaluation Council (EFSEC), the Washington Department of Fish and Wildlife (WDFW) recommended a corridor width of 1-2 miles and based on the project layouts presented in the Ostrea Wildlife Connectivity Analysis, a corridor of approximately 1.2 miles (letter C in Figure 1) will occur between Ostrea East and Ostrea West. In addition, a corridor of approximately 0.3 miles (letter B in Figure 1) will occur between Ostrea West and High Top. As the Project layout is further refined, through either a reduction in panels or changes in micro-siting, WDFW recommends that we be consulted to offer additional areas where Project changes could provide functional corridors for wildlife movement suitable for a diversity of wildlife species.

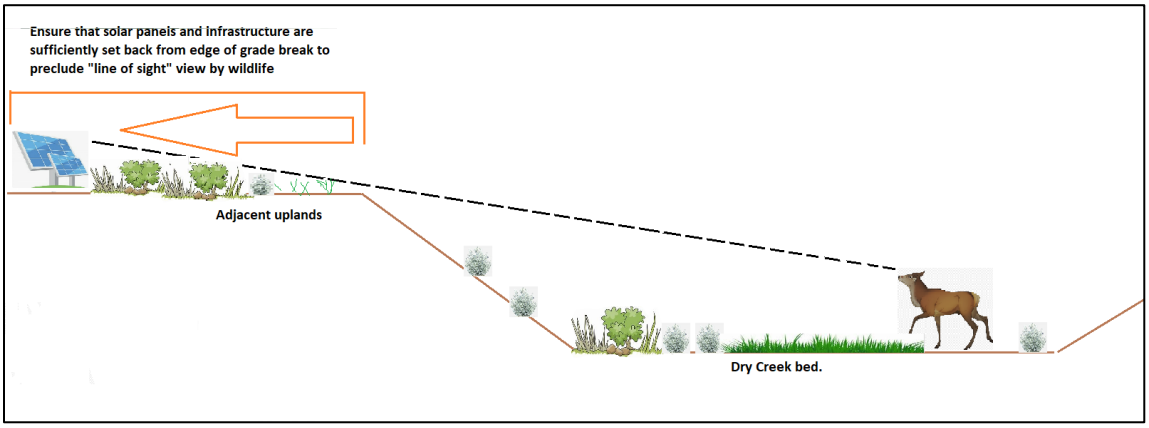
Figure 1 below shows an example of how relatively small changes could be made (red polygons removed) to integrate functional wildlife movement corridors into the Project layout by relocating some panels in more of a north-south orientation(depicted as green polygons). We understand that placing panels within some of these green polygons could result in impacts to shrubsteppe habitat, but the overriding ecological priority is in providing and maintaining wildlife corridors of sufficient width to be functional for wildlife species present. We also understand that the red polygon on the southeastern tip of High Top is where a substation is proposed. It is preferable that the substation location be shifted to the west so as not to intrude on the function of the wildlife movement corridor and be more “centered” between High Top North and High Top South.

Figure 1



Additionally, wherever the Project margins are adjacent to grade breaks such as wildlife movement corridors located within dry creek beds or arroyos (such as the western edge of corridor C in Figure 1), or where two arrays are on opposite sides of a corridor (shaded green in Figure 1), we recommend that consideration be given to setting back the panels a sufficient distance from the edge of the "grade break" to preclude “line of sight” view by wildlife using these creek beds, as shown in the Figure 2 below. Whenever project facilities are out of sight, wildlife exhibit less disturbance.

Figure 2



Corridors are important but if they are not protected there is the possibility of future land use changes that could render them useless. We understand that the larger lease area is currently under Project

control but as operations become imminent, that site control will only include what is inside the fenced area. Thus, all wildlife movement corridors must be protected in perpetuity and cannot be developed. These lands must be held in conservation status by a third party through a permanent conservation easement or some similar instrument.

Since the project will need to mitigate for temporary, permanent, and altered impacts, we look forward to working with EFSEC and the Project in establishing protection for all or part of these the corridors for the duration of the Project operating permit.

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