



**Wautoma Solar Project
Public Informational
Meeting
August 8, 2022**

The Wautoma Solar Project is an alternative energy proposal by Innergex Renewable Development, LLC for a 470-megawatt (MW) solar photovoltaic (PV) generation facility with battery storage located in unincorporated Benton County, Washington.

Commenter Information (Please print)

Name: PATRICK PAULSON Organization: (optional) _____

Street Address: 2253 DAVISY AVE Add to Project mailing list? (If yes please provide mailing address) Yes No patrick@3rivers-ashtanga.org

Apt # _____ City: RICHLAND Yes No

State: WA Zip Code: 99354 Add to Project email list? (If yes please provide email address) Yes No paulson.patrick@gmail.com

Email: →

Comment subject/Issue: cumulative impacts of multiple projects

Comment:
I'm interested in ensuring the protection of ~~the~~ our rapidly diminishing shrub-steppe habitat. The proliferation of solar projects risks making the recent loss of habitat to agriculture and wildfire permanent and beyond restoration.

In order to determine how to preserve habitat connectivity -- as well as to minimize redundant infrastructure -- it is crucial that the council and public have access to all ~~proposed~~ nearby proposed projects. I understand there are currently at least 8 solar projects proposed near the Wautoma project.

Sign Patrick Paulson



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Commenter Information (Please print)

Name:	<u>Rigo Rangel</u>	Organization: (optional)	<u>MID COLUMBIA REALTY LLC</u>
Street Address:	<u>1209 Country Ridge Dr.</u>	Add to Project mailing list? (If yes please provide mailing address)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Apt #	City: <u>RRland</u>		
State:	Zip Code:	Add to Project email list? (If yes please provide email address)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>WA</u>	<u>99352</u>		
Email:	<u>rigo.rangel@gmail.com</u>		

Comment subject/Issue: _____

Comment: _____

This Wautoma Solar Project is a great energy plan. This project will bring more renewable power to the state, and revenue. Fully support this project. I hope it is completed on schedule.

Sign 



Community Development Department
Prosser Office: 620 Market Street, 1st Floor
Kennewick Office: 102206 East Wiser Parkway
www.co.benton.wa.us

Planning Division
(509) 786-5612
P.O. Box 910, Prosser, WA 99350
planning.department@co.benton.wa.us

Wautoma Solar Project
Informational Meeting
Docket #220355
Comment #IM003

August 8, 2022

Energy Facility Site Evaluation Council
Sonia Bumpus, EFSEC Manager
621 Woodland Square Loop, PO Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

Re: Wautoma Solar Project Proposal

Dear Ms. Bumpus,

Thank you for the opportunity to comment on the land use consistency of the Wautoma Solar Project located in Benton County. Please accept this letter as Benton County's public comment and written testimony regarding the Wautoma Solar Project proposal.

As proposed, the Wautoma Solar Project (Project) is located in an area designated as Growth Management Act Agriculture in Benton County's Comprehensive Plan and is further designated as Growth Management Act Agricultural Zoning District (GMAAD) on the Benton County Zoning Map.

After a detailed review of the submitted application, Benton County finds the proposed Project is not consistent with the County's land use plans, specifically, the County's Growth Management Act Agricultural Zoning District (GMAAD) which does not allow or permit commercial solar facilities as an allowable, accessory, or conditional use. The rationale for prohibiting these commercial facilities in the GMAAD Zoning District is supported by both the Benton County Comprehensive Plan goals and policies and the Growth Management Act (GMA).

Benton County Comprehensive Plan

The Project area is designated Growth Management Act Agriculture in the Benton County Comprehensive Land Use Plan. This area is further designated as having an agricultural long-term commercial significance as directed by the Growth Management Act. The County's agricultural lands consist of dry land, irrigated, and rangeland land uses.

The proposed industrial use and location of the Project is not consistent nor compatible with the goals and policies of the County's Comprehensive Plan or its implementing regulations such as the County Zoning Ordinance and/or Critical Area Regulations. With a 4,573-acre project area, the loss of long term commercially significant agricultural land, for a non-agricultural use, is inconsistent with the County's goals and regulations which seek to protect agricultural and natural resource industries in Benton County.

Growth Management Goals:

The Growth Management Planning Goals are adopted to guide the development of comprehensive plans and development regulations¹ which in turn allow communities the ability to implement regulations to determine if a use (location, size and scale) is compatible with an existing area and whether it complies with the associated plans

¹ RCW 36.70A.020 Planning Goals

and documents adopted by the County. Notable GMA Goals, as it relates to the impacts of this Project, include the following:

- Natural Resource Industries - Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, while discouraging incompatible uses².
- Environment - Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

Loss of Long-Term Commercially Significant Agricultural Lands:

Benton County has highly productive agricultural soils with over \$900 million generated by Benton County crops and livestock per year. The land use designation for the proposed project area is Growth Management Act Agricultural. Agriculture, specifically long term commercially significant agriculture, is the cornerstone to Benton County's economy, natural resources industries, and way of life. The Plan states the following as it relates to agriculture and long term commercially significant agriculture in Benton County:

- NR Goal 1: Conserve and maintain agricultural land of long-term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy.²

Policy 1: Conserve areas designated "GMA Agriculture" in the Comprehensive Plan for a broad range of agricultural uses to the maximum extent possible and protect these areas from the encroachment of incompatible uses.

Policy 3: Recognize that only uses related or ancillary to, supportive of, complimentary to, and/or not in conflict with agricultural activities are appropriate in areas designated GMA Agriculture.
- Agricultural land is defined as land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees, finfish in upland hatcheries, or livestock, and that has long-term commercial significance for agricultural production.³
- Long-term commercial significance includes the growing capacity, productivity, and soil composition of the land for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land.⁴ GMA requires each county to designate appropriate agricultural lands that are not already characterized by urban growth and that have long-term significance for the commercial production of food or other agricultural products.⁴
- Growth Management Act Agriculture includes agricultural land (such as dryland, irrigated land, and rangeland) identified by the County based on the criteria established by the GMA. The GMAAD Zoning District conserves agricultural lands by establishing a 20-acre minimum parcel size and (with exceptions e.g., resort destinations, wineries) limits the range of other land uses to those which are dependent upon, supportive of, ancillary to, or compatible with, agricultural production as the principal land use.⁵ Agricultural land constitutes about 59 percent of the total land in Benton County.⁵

² Benton County Comprehensive Plan, Section 2.3 Natural Resource Lands, Page 17 (2021)

³ RCW 36.70A.030 (3) Definitions, Agricultural Land

⁴ RCW 36.70A.030 (15) Definitions, Long Term Commercial Significance

⁵ Benton County Comprehensive Plan, Section 3.3.2.5 Agricultural Land Use Designation, Page 44 (2021)

The Benton County Comprehensive Plan provides guidance for the protection, maintenance, conservation, and enhancement of the County's agricultural lands and their natural resource-based industries while discouraging incompatible uses. It further charges the County to reduce the inappropriate conversion of agricultural lands and assure that rural development is compatible with surrounding rural and agricultural areas.

This Project is not consistent with these directives and the goals and policies of preserving and protecting the County long term commercially significant agricultural lands.

Conservation of Critical Areas:

The Project is in an area designated for agricultural uses⁶ (Growth Management Act Agriculture) and accessory agricultural activities. The Project area further consists of designated critical areas, including wetlands, frequently flooded areas, geologically hazardous areas, and fish and wildlife conservation areas.

The proposed project is not consistent with the County's goals of protecting the critical areas and the County's Critical Area Ordinance. In accordance with BCC Title 15⁷, the County shall require a Critical Area Project Review to determine whether the project is likely to impact the functions and values of a critical area and whether the project adequately addresses the impacts and avoids impacts to critical areas associated with the project.

The Project area is located in a part of the Benton County with known wildlife habitat and habitat corridors. The Plan states the following as it relates to the Critical Area Goal related to sustaining the County's natural environment:

- CA Goal 4: Sustain a diverse, productive, and high-quality natural environment for the use, health, and enjoyment of County residents.⁸
 - Policy 2: Integrate natural resources and critical areas such as rivers, creeks, ridges, and slopes into a linked pattern of open lands where feasible, to serve multiple open space functions such as buffers, visual resources, recreation, and wildlife habitat/corridors.

Based upon the limited information provided, it's clear the project will have a negative impact on the County's critical areas, but additional information will need to be provided to determine the full impact and the minimum mitigation measures, if possible, for each development site.

Protection of Rural Character and Lifestyle:

The protection of rural character and lifestyle is paramount in Benton County. The goals and policies of the Comprehensive Plan seek to ensure that land uses are compatible with surrounding uses that maintain public health, safety, and general welfare. The policies aim to protect surrounding areas from incompatible uses that, if approved, would degrade the existing rural character which residents hold in high regard. The Comprehensive Plan states that Benton County must:

- Preserve rural lifestyles outside UGAs and incorporated areas while accommodating new population growth consistent with the protection of rural character and to encourage low impact recreational uses and protect open spaces that preserve rural character;⁹
- Promote industries that are diverse and support an agriculturally based economy; and

⁶ Benton County Comprehensive Plan, Appendix A, Figure 5 Future Land Use Designations Map (2021)

⁷ Benton County Code, Title 15, Environment, Chapter 15.02, Section 15.02.170

⁸ Benton County Comprehensive Plan, Section 2.5 Critical Areas, Page 23 (2021)

⁹ Benton County Comprehensive Plan, Section 2.2.3 Rural Lands, Page 14 (2021)

- Promote and protect tourism related to viticulture and other agricultural activities

The Benton County Comprehensive Plan discusses the community's priorities¹⁰ for Benton County. These include:

- Preservation of rural character;
- Protection of natural resources, hillsides, and open spaces;
- Limiting sprawl; and
- Protecting farmland.

The size and location of the of the proposed Project fails to preserve and protect the County's rural character and lacks consistency with the community's vision for Benton County as the Project proposes negative impacts to the County's natural resources and preservation of farmland.

Lack of Consistency with the Comprehensive Plan:

The County Comprehensive Plan requires the County to encourage long term conservation and stewardship of natural resources lands for the benefit of current and future residents. With over 59% of the County's total land area being located in the GMA Agricultural designation, these areas provide not only the agricultural land (dryland, irrigated land, and rangeland) which makes up the majority of the County's economy, but it also provides the open spaces and vistas which preserves the County's rural character.

The County Comprehensive Plan provides goals and policies that:

- Prevents the loss of the County's long term commercially significant agricultural land;
- Protects the County's naturally vegetated steep slopes, wildlife, and habitat;
- Supports a robust agricultural economy that focuses on preserving and protecting the rural character in Benton County that so many of its residents care about.

The location, size, and environmental impacts of this industrial scaled proposal are not consistent with the goals and policies of the Benton County Comprehensive Plan.

Benton County Zoning Regulations

To implement the Growth Management Act and the Benton County Comprehensive Plan, Benton County created the Growth Management Act Agricultural Zoning District (GMAAD). The Comprehensive Plan directs the County to conserve and maintain agricultural lands of long-term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy,¹¹ and through this, the County created the Growth Management Act Agricultural Zoning District (GMAAD)¹².

Purpose of the Growth Management Act Agricultural District (GMAAD)

The Benton County Code states the purpose of the GMAAD Zoning District (chapter) is to meet the minimum requirements of the State Growth Management Act (Chapter 36.70A RCW) that mandates the designation and protection of agricultural lands of long-term commercial significance. The chapter protects the GMA Agricultural District (GMAAD) and the activities therein by limiting non-agricultural uses in the district to those compatible with agriculture and by establishing minimum lot sizes in areas where soils, water, and climate are suitable for

¹⁰ Benton County Comprehensive Plan, Section 1.2.3 Community Vision, Page 4 (2021)

¹¹ Benton County Comprehensive Plan, Section 2.3 Natural Resource Lands, Page 17 (2021)

¹² Benton County Zoning Ordinance, Chapter 11.17 Growth Management Act Agricultural District

agricultural purposes. This chapter is intended to work in conjunction with Chapter 14.05 BCC entitled "Right to Farm" which protects normal agricultural activities from nuisance complaints.¹³

Prohibited Use in the GMAAD Zoning District

The application proposes a non-agricultural use that is prohibited in the GMAAD Zoning District. The County's Zoning Code does not allow this Project as an allowed, accessory, or conditional use option¹⁴.

The applicant is requesting the EFSEC Council preempt applicable County land use plans and zoning ordinances, while also stating that the project is consistent with the County's planning provisions. Based upon the proposed location of the proposed project, the proposal does not meet the intent of RCW 36.70, is not consistent with the goals and policies in the County's Comprehensive Plan, and is a prohibited use in the GMAAD Zoning District. The County's land use codes and policies should be held in effect and should not be preempted by this proposal.

Thank you again for the opportunity to comment on this proposed project. We respectfully request that EFSEC deny the applicants request due to the lack of consistency with the local plans, ordinances, and associated environmental impacts.

Sincerely,



Greg Wendt
Director of Community Development
Benton County, Washington

¹³ Benton County Zoning Ordinance, Chapter 11.17, Section 11.17.010 Purpose (2008)

¹⁴ Benton County Zoning Ordinance, Chapter 11.17, Section 11.17.040, Section 11.17.050, and Section 11.17.070

Questions:

1. Will there be a public comment period after tonight's meeting? If so, when?
2. Is an EIS going to be required?
3. If EFSEC can override land use ordinances, why do we need any ordinances?
4. Since Gov. Anslee will approve any "clean" energy project, what is the point of EFSEC involvement?

Thank you,
Karen Brun
105506 Tripple Vista Dr.
Kennewick WA 99338

From: [Jeanie Polehn](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Public comments on the Innergex Proposed Solar Project in Wautoma Valley
Date: Tuesday, August 9, 2022 1:40:53 PM
Attachments: [Comments on the Wautoma Solar Energy Project.doc](#)

External Email

Dear EFSEC: 8/9/22

Listed below and attached for consideration are my comments on the Innergex Proposed Solar Project in Wautoma Valley located in Benton County, Washington.

Thank you for your consideration in this matter.
J. Polehn
Benton County, Washington
jpolehn@yahoo.com

Comments on the Wautoma Solar Energy Project

Public meeting held 8/8/22, Pasco, WA

J. Polehn, Benton County Resident

* The land in question is located in Benton County and planned through the Benton County Board of Commissioners as an **Agricultural District** in the county's **Growth Management Act**. The people of Benton County chose the Commissioners to represent the residents' best interests. The Commissioners are our employees directed to do our will, as are the members of Energy Facility Site Evaluation Council (EFSEC) and both work on the taxpayers' dime. Solar panels are industrial products, not agricultural. Solar panels do not grow from seeds or are produced from living cells. Solar Panels are man-made industrial products. **Benton County passed a county ordinance effectively prohibiting large solar projects in the proposed agricultural district. The EFSEC should honor the will of the people of Benton County.**

* **The fact the EFSEC has the ability to override the will of the people that live in Benton**

County through the Washington State Governor (WSG) is not acceptable. Since most of the EFSEC members, and the WSG, do not have to live in a day-to-day basis with the consequences of their land use decisions, they should have no say in those decisions.

Otherwise, such outside entities can make other counties, etc., literally into garbage dumps. This override ability of the EFSEC should be revoked. Such consequences of this solar panel project include but are not limited to: generation of hazardous waste (e.g., solar panels, batteries, etc.), hazardous waste contamination of land, ruining the scenic view, ruining property values, impact to wild life, water table reduction in an already dry area, etc. This is another "Not-In-My-Backyard" project the people west of the mountains are trying to push on others to get a perceived benefit for themselves but harms others.

* The alleged goal of this project is to adhere to a "green" goal to reduce carbon footprint. Solar panels are made of rare earth materials requiring a huge amount of fossil fuel energy to obtain the rare earth and it disturbs a large amount of land in the mining process. The rare earth material is obtained from China that, again, uses copious amounts of fossil fuels to obtain the rare earths. Those fossil fuels emit carbon into the earth's atmosphere so the carbon is dispersed globally. The point is that solar panel production is causing more carbon to be added to the earth's atmosphere through mining, production, and transport of the solar panels, as well as hazardous waste disposal at the end of the solar panel life. In addition, China uses slave labor to extract these materials. **Solar panels do NOT reduce carbon emission when the process to create, deliver, and decommission the solar panels is fossil fuel intensive and the production is done in an enemy country (i.e., China is a security threat).**

* The proposed area for the solar panels is a dry area that has a lot of wind storms that blows dust. It is **not obvious the project has considered dust removal from the solar panels nor reduction in electrical generation as a result of dust buildup on the solar panels. These issues should be considered for mitigation in the project.**

* **The Hanford Reservation is nearby and should be considered for this proposal** as it already is industrialized and the drawbacks (e.g., disturbance of agricultural land, reduction of electricity through electric lines minimized, etc.) better contained.

* **The U.S. is a Republic. Benton County resident voters should be allowed to vote on whether this solar panel project should be allowed in their county.**

From: [Gladys Rodriguez](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Solar farm comment
Date: Tuesday, August 9, 2022 12:30:10 PM

External Email

Hello,

My name is Gladys. I was at the meeting that took place at CBC yesterday. I know I speak for a large number of IBEW 112 members, we are 100% for this project. It would bring jobs to Washingtonians, energy to farmers, and all around would benefit the state of Washington.

Thank you,
Gladys Rodriguez

From: [Paul Krupin](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Comments on the Wautoma Application
Date: Monday, August 8, 2022 7:01:48 PM

External Email

I only just learned about the public meeting.

I am hoping you can accept these comments since I cannot come to the public meeting. Please reopen the public comments long enough to capture my comments and any others that come in tonight after the meeting.

I am requesting EFSEC not waive the Benton County Zoning Ordinances banning solar and wind projects from agricultural zones.

These projects require great scrutiny and public comment before the projects are approved. To approve a waiver would bypass public engagement, review and comment at the local level.

As a reference, I attach and include the Minutes of the Board of County Commissioners Regular Board Meeting from December 21, 2021, in which this topic is discussed.

<https://www.co.benton.wa.us/files/documents/CommissionersMinutes12-21-21075631010422PM135.pdf>

Appreciatively,

Paul Krupin, BA MS JD

From: [Margaret Hue](#)
To: [EFSEC \(EFSEC\)](#)
Cc: will.mckay@co.benton.wa.us; shon.small@co.benton.wa.us; jerome.delvin@co.benton.wa.us; [Drew, Kathleen \(EFSEC\)](#); [Michelle Cooke](#); greg.wendt@co.benton.wa.us; [Margaret Hue](#); [Gayle Graves](#); [Judy Guse](#)
Subject: Testimony Against WAUTOMA Solar Farm
Date: Monday, August 8, 2022 5:56:05 PM
Attachments: [Against WAUTOMA Solar Project in Benton County Irrigated Aq Ground.pages](#)

External Email

Please accept the attached testimony. Thank you,

Margaret Hue

Margaret Hue
Decide Locally
29204 S 816 PR SE
KENNEWICK, WA 99338
M.HUE39@GMAIL.COM

TO EFSEC

RE: Wautoma Informational Meeting and Land Use Hearing
State of Washington
Energy Facility Site Evaluation Council
Wautoma Solar Project
EFSEC Docket No. EF-220355
INFORMATIONAL PUBLIC MEETING AND LAND USE CONSISTENCY
HEARING
August 8, 2022 5 PM

Dear Member of EFSEC,

I find the timing of notification of these meetings very short and inconvenient for the public to be notified and informed about the projects. I believe these types of projects should be advertised for the public to view for 6 weeks before any type of hearing. Furthermore, when projects go to EFSEC the public on the East side of the mountains hears nothing, which only benefits the company to keep the local residents and county blindsided and then a hearing pops up with no warning but a weekend when families are on vacation. Not good timing for local folks but only benefits the proposing developer.

1) The project being bypassed from local county government is the first thing I am opposed to with this project and want it on the record. Benton County Planning and commissioners are qualified and elected officials that should hear this first and let the public be informed more than a weekend notice. I am sure Olympia or the west side would not want Eastern Washington making decisions for King County, Olympia or any of the western side of the mountains. This is why we have local government.

2) The Benton County ordinance (12-2021) is against large solar farms in this area. Removing land from Ag use for a solar farm is wrong and I support the Benton County Ordinance. There is non-irrigable land in other counties that are not irrigable that would be better choices of land to put this project on that does not impact agricultural land no matter if it is irrigable or dry land farming.

3) This is agricultural farm ground and has 4 circles on it which are critical to raising crops for food or crops to support feed for livestock. That irrigated ground is important to farming and so other non-irrigable lands are better suited and preferably out of Benton County. Let someone else provide power since Benton County already has 40% of Washington states's power. Keep our farm ground...farm ground.

4) If some of this ground is virgin ground that has not been farmed, perhaps it should be determined if any meets the shrub steppe criteria, protected native birds as this is over 7 Sq. miles and close to 4500 acres?

5) Who is benefiting from the power? Who is the end user and recipient?

6) What happens to the power if the storage is for 4 hours, does it disappear and drains away if not used? If not used, it can't store power the following sunny day? If so, is that power counted toward production? How often is it not used and is useless energy? Maybe there is a term for that? It just doesn't seem like 4 hr storage helps much with extreme cold or extreme heat when those times it is needed would be longer than 4 hrs as witnessed across the country and locally.

As a teacher it seems like these Energy Developers put a lot, and this is why they run to EFSEC to bypass local government when they ask questions they can't or don't want to answer. I don't think EFSEC should cater to them, they are not residents of our county and most times not even from our state.

Please consider this as **testimony against the proposed WAUTOMA Solar Farm at the location proposed**. Keep our Farm Ground as Farm Ground. **Please send this Energy Project back to Benton County for Determination and respect our local ordinances.**

Thank you for the opportunity to send in my testimony by email as this was not an opportune time to testify at the hearing.

Sincerely,

Margaret Hue

Margaret Hue

cc: Benton County Planning
Benton County Commissioners
decide.locally@gmail.com
Save-the-Ridges.org
Governor Jay Inslee
Senator Patty Murray
Senator Maria Cantwell
Congressman Dan Newhouse
Senator Perry Dozier
Senator Sharon Brown

Representative Mark Klicker
Representative Rude Skyler
Representative Brad Klippert
Representative Matt Boehnke
Washington Wine Growers
HOA 816 PR SE
HOA Country Meadows
HOA Cottonwood
House Environment and Energy Committee
 Chair Noel Frame; Vice Chair Davina Duerr;
House Rural Development, Agriculture and Natural Resources
 Chair Mike Chapman; Vice Chair Sharon Shewmake
Senate Agriculture, Water, Natural Resources and Parks
 Chair Kevin Van De Wege; Vice Chair Jesse Salomon
Senate Environment, Energy and Technology
 Chair Reuven Carlyle; Vice Chair Liz Lovelett
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jerome.delvin@co.benton.wa.us
kathleen.drew@utc.wa.gov
[Michelle Cooke <Michelle.Cooke@co.benton.wa.us](mailto:Michelle.Cooke@co.benton.wa.us)
greg.wendt@co.benton.wa.us

From: [matt sears](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Wautoma Solar Project
Date: Monday, August 8, 2022 5:30:28 PM

External Email

Good evening , I'm writing in to say that I support the solar project. My names Matt Sears out of Sunnyside, Wa . I am a union wireman out of Kennewick local 112. I think , with the country transitioning from fossil fuels, that renewable energy is great for the environment. With the talk of removing dams and the resistance against the wind farms we as a community need to have a plan to have sustainable energy. It would serve as an income to many people building and assembling the project. Thank you for your time.

Matt Sears LU 112
Kennewick, Wa

From: [scot adams](#)
To: [EFSEC \(EFSEC\)](#)
Cc: [Roni Swan](#); [Chuck Mulkey home](#); [Tom Ashley](#); [andrea_m_hopkins@rl.gov](#); [Beeler, Brook \(ECY\)](#); [Bowen, David \(ECY\)](#); [Lassiter, Katrina \(ECY\)](#); [Deanne Davis](#)
Subject: Comments on Wautoma Solar Project
Date: Monday, August 8, 2022 4:47:24 PM

External Email

Comments on Wautoma Solar Project, submitted to the State of Washington Energy Facility Site Evaluation Council

August 8, 2022

In reviewing the headings on the application, I did not see anything about managing hazardous/toxic waste or demolition. The supporting view graphs briefly cite a “decommissioning plan.”

One of the significant things coming out of the Hanford experience was that provisions and funding waste were not considered. The Department of Energy (DOE) now recognizes that comprehensive planning should be associated with a new project. Thus, the concept of “lifecycle planning” has been Federally recognized. The Washington State Department of Ecology has insisted that DOE employ lifecycle planning.

For over thirty years, environmental professionals have sought to plan ahead to consider inputs and outputs related to new projects. Waste minimization and consideration of input components are now standard for new projects. At the other end of projects, demolition, waste recycling or disposal, and site restoration are part of that lifecycle planning. For many new permits for projects, funding needs to be set aside to ensure environmental closeout of projects. Sometimes this part of planning involves bonds to ensure cleanup.

The US now has thousands of contaminated superfund sites for which no

funding for remediation is available. These orphan sites generally do not permit reuse of the land; essentially these are dead sites. In addition, these sites release contaminants that are a risk to humans, wildlife, water, and in some cases air.

In the case of the Wautoma Solar Project, after the useful life of the solar panels, they need to be removed. Currently, there are no recycling provisions available for solar panels. The panels will constitute a large mass of toxic waste that needs to be dispositioned. Disposal of this large mass will be very expensive.

Restoring the site after the useful life should involve removal of all of the infrastructure and dispositioning it for recycling or other uses. Removal of the infrastructure will need for stabilization of the ground and restoration for other uses.

Planning for the Wautoma Solar Project should include cost estimates for decommissioning of the site, waste disposition, and site restoration. In addition, provisions for funding this work need to be planned.

In the event that lifecycle planning is not conducted, the property owner may abandon the property and leave the unfunded orphan property for a government entity (county, state, or Federal) to inherit the property and liabilities.

The United States already has 500,000 brownfield sites under US and state controls. There are 40,000 Federal Superfund sites and 1300 EPA National Priority sites under the Environmental Protection Agency. The Department of Defense has 24.5 million acres of contaminated land with unexploded ordnance and chemicals. The Department of Energy other sites (probably over 100 legacy sites), but the Hanford site has cleanup estimates ranging up to over 600 billion dollars. Other funds are needed for other Department of Energy sites, some of which are in populated areas. In addition, the Department of Energy has transferred radioactive sites to the Army Corps of Engineers (FUSRAP Sites); many of these sites are in populated eastern areas. Most of these sites likely never will be remediated and made useful. Essentially, most of these millions of acres of land will remain as unfunded, environmental liabilities to government agencies and will be associated with contamination in perpetuity (“sacrificial lands”). If the Wautoma Solar Site is eventually added to the millions of acres of contaminated lands, it may never be restored and will become an environmental liability and probable source of contamination and erosion and dust.

A site “decommissioning plan” should include funding provisions as well as identifying disposition of spent solar panels.

In a past year, the PRF explosion and radioactive releases and exposures at Hanford identified area weaknesses on emergency management. In response, effective communication channels and methods have been established to ensure a high degree of rapid communication and planning by regional emergency management organizations and fire departments. The effectiveness of area emergency management systems has been well demonstrated. The preparers of this Emergency Response/Fire Response Plan should understand how existing systems work and how they will interface with existing systems. The existing systems can ensure a massive response to emergencies as needed. Area emergency management and fire systems will need a full understanding of related battery risks and controls.

Scot Adams, Ph.D., retired Certified Hazardous Material Manager

scadams@hotmail.com

From: [Judy](#)
To: [EFSEC \(EFSEC\)](#)
Cc: pam_minelli@hotmail.com; kmburn@gmail.com
Subject: Wautoma Solar Project for Benton County - Questions & Comments for 8/8/22 Public Hearing
Date: Monday, August 8, 2022 1:52:58 PM

External Email

1. Will EFSEC provide the maximum review time allowed by your laws?
2. Will there be a public comment period after tonight's informational meeting?
3. Any reasonable person would expect that any development in excess of 1 square mile should automatically require an EIS. An EIS should be mandatory. Is an EIS going to be required?
4. Does the developer commit to adhering strictly to international building codes and NFPA regulations for energy storage systems for fire protection?
5. What are the risks to Hanford due to a wild land fire?
6. Where is the closest fire station?
7. What is the response time of that fire station?
8. Who pays for the special training to put out a lithium battery fire?
9. What fire protection systems will be in place?
10. Where is the source of water for the fire protection system going to come from?
11. Will the county and the tribe who claims tribal land rights be an additional named insured on the solar farm's insurance policy?
12. How is the shrub steppe, birds and animals going to be protected? There are 63 acres of shrub steppe included in the solar farm site. Five Ferruginous Hawk nests were spotted within 5 miles of the project as well as Burrowing owls.
13. Is siting this solar farm to avoid damaging or cutting off wildlife access to this shrub-steppe an important goal for environmentalists or doesn't it matter when it comes to wind and solar projects?

Judy Guse
104902 E Tripple Vista Dr
Kennewick, WA 99338
Communications Director TRI-CITY C.A.R.E.S.
Phone: 509-947-1961
Email: Judy@tricitycares.org
Web: www.tricitycares.org

From: [Pam Minelli](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Wautoma Solar Project comment
Date: Monday, August 8, 2022 1:36:45 PM

External Email

To the EFSEC Staff regarding public comment re the Wautoma Solar Project in Benton County:

The Wautoma Solar Farm applications mentions 63 acres of important shrub-steppe in the site and several threatened and endangered species in the site or in the nearby surrounding area that rely on shrub-steppe for survival.

An EIS is a necessary requirement for this project due to its size and the possible negative environmental impact it may present to the area's plants, birds, other wildlife (some threatened or endangered) and their dwindling habitats.

Therefore, an expedited process is not appropriate and must be denied.

A public comment period is also necessary following tonight's informational meeting.

Pam Minelli
Tri-Cities CARES, Secretary

From: 112sparky@gmail.com
To: [EFSEC \(EFSEC\)](#)
Subject: Support for Wautoma Solar Farm
Date: Monday, August 8, 2022 1:03:32 PM

External Email

My name is Frank Turner and I am a Journeyman Electrician with IBEW Local 112 in Kennewick, WA. I support this project because:
I have been working on renewable energy projects for the last few months and I have seen the benefits and the viability that solar plus storage can have.
It will allow me to work closer to home.
I have been working at Lund Hill Solar Farm for the last few Months and would like to get on a Solar project closer to home.

Sincerely,
Frank Turner

From: [Rich Nall](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Wautoma Solar Project EF-220355
Date: Monday, August 8, 2022 11:45:44 AM

External Email

My name is Rich Nall and I'm the owner of High Valley Land LLC which is located at the proposed project site. I have owned this ground for ~18 months but have been close friends with the Robert family and have been on this ground for the last 20+ years.

I want the board to accept my comments as me having an interest in all aspects of the project, specifically, including without limitation, land use consistency.

I 100% support the legal position of Innergex that the project can be consistent with the provisions of the broader set of Benton County land use codes. This project is economically good for Benton County, the area is low traffic with few neighbors so it will affect few people and be of little disturbance and have low visual impacts, the project will help meet Clean Energy Transformation Act goals, the project would make productive use of our unproductive land and have a positive impact on our families who have worked on this ground for many decades.

I can think of no BETTER location than the proposed site and ask for full support of EFSEC, Benton County , and any other parties in approving this project.

Thank you,
Please reach out with any questions.

Rich Nall
509-438-0000

From: [Benjamin Clark](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Wautoma Solar Project
Date: Sunday, August 7, 2022 8:23:13 AM

External Email

My name is Benjamin Clark and I am an Electrician with IBEW Local 112 in Kennewick, WA. I support this project because:
I have been working on renewable energy projects for the last few years and I have seen the benefits and the viability that solar plus storage can have.
It will allow me to work closer to home. I am currently working for IBEW Local 48 at the Lund Hill Solar Project. Ive heard people in our area are concerned with the impact that it will have on the wild life. While working out at the Lund Hill Project ive noticed the birds love the solar panels. They sing and perch up on them while they eat all the bugs that they can. The deer out there hangout in the shade the panels cast. I wont be able to be out there monday to help answer questions, but im a outdoorsmen and i enjoy wildlife. I dont see anything that is affecting our wildlife with the projects we already work, if anything we help them thrive in our desert.

In Solidarity,

Benjamin Clark
IBEW LU 112 Journey Wiremen
Cell: 509-396-8417
Email: Bclark1717@icloud.com

Sent from my iPhone

Wautoma Solar Project
Informational Meeting
Docket #220355
Comment #IM016

From: [Francisco De La Rosa](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Wautoma solar project
Date: Saturday, August 6, 2022 1:15:11 PM

External Email

My name is Francisco Delarosa and I am a Journeyman Wireman with IBEW Local 112 in Kennewick, WA. I support this project because, I have been working on renewable energy projects for the last few years and I have seen the benefits and the viability that solar plus storage can have.

It will allow me to work closer to home.

Also, I have brothers who have been working in Oregon for the last few years and would like to get out from under their extra income tax details.

Sent from my iPhone

From: [Payton Manthei](#)
To: [EFSEC \(EFSEC\)](#)
Date: Friday, August 5, 2022 2:32:06 PM

External Email

My name is payton manthei and I am an journeyman electrician with IBEW Local 112 in Kennewick, WA. I support this project because:

I have been working on renewable energy projects for the last few years and I have seen the benefits and the viability that solar plus storage can have.

It will allow me to work closer to home.

I have been working in Oregon for the last few years and would like to get out from under their income taxes.

Any other reason that you can think of for why this project would be a good thing.