



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

August 7, 2023

Kurt Beckett, Chair
Washington Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98503-3172

RE: Objection to Extension Request for Badger Mountain Solar Project

Dear Mr. Becket:

On behalf of the Yakama Nation, I submit this letter to formally object to the request by Avangrid (dated July 29, 2025) for a one-year extension of the permit application review for the proposed Badger Mountain Solar Project.

Our objection is based on the following substantive concerns, each of which remains unresolved and reflects a lack of meaningful progress toward compliance with EFSEC's permitting requirements:

1. Impacts to Traditional Cultural Properties (TCPs):

The proposed project continues to pose significant risks to Traditional Cultural Properties and other culturally sensitive landscapes in the area. These concerns were clearly outlined in the Yakama Nation Tribal Council Chairman's letter dated October 27, 2023, and have not been adequately addressed. The Yakama Nation's responsibility to protect these resources under the Treaty of 1855 remains paramount and non-negotiable.

2. Lack of Site Control:

According to Avangrid's own extension request, the company does not currently have valid lease agreements in place for key portions of the project area. The expiration of leases and ongoing landowner negotiations indicate a lack of fundamental site control, which undermines the viability of the project and should disqualify it from further consideration until such issues are fully resolved.

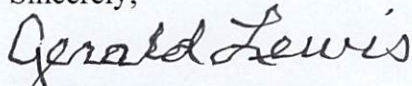
3. Failure to Comply with EFSEC Application Requirements:

The project still lacks a confirmed and secure source of water for construction and/or operation, a critical component of EFSEC's application criteria. This deficiency alone should preclude any extension of the permitting process. Continuing to pause the application without resolution of this issue delays responsible decision-making and sets a

poor precedent for regulatory compliance.

Given these unresolved and foundational issues, we urge EFSEC to deny Avangrid's request for an additional extension. The continued deferral of necessary work toward project feasibility, compliance, and cultural impact avoidance only serves to burden both EFSEC and the affected Tribal and local communities.

Sincerely,

A handwritten signature in black ink that reads "Gerald Lewis". The signature is written in a cursive, flowing style.

Gerald Lewis, Chairman
Yakama Nation Tribal Council