State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Mailing Address: PO Box 43200, Olympia, WA 98504-3200 · 360 902-2200 · TDD 360 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street, Olympia, WA

August 30, 2022

Joseph Wood
Washington Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
PO Box 43172
Olympia, WA 98504-3172

Subject: Wautoma Solar Project

Mr. Wood,

The Washington Department of Fish Wildlife (WDFW) mission is to preserve, protect and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. To achieve this, we engage in land use decision processes, provide technical assistance to local governments, and collaborate with a variety of stakeholders and developers to ensure that land use actions are implemented in a manner that avoids or mitigates expected impacts. For any action that has the potential to impact wildlife and ecosystems, it is imperative that WDFW be considered as early as possible as a partner in site selection and project development.

WDFW is confident that renewable energy projects can generally be sited to avoid impacts to priority habitats and species or be designed and implemented to mitigate the loss of functional habitat and ecological connectivity and provide opportunity for recovery of listed species. We support renewable energy, and the proposed Wautoma solar project (and other future renewable energy projects in surrounding landscape) will need to be sited and oriented in such a way as to maintain functional connectivity across the landscape as well as mitigate for impacts to connectivity and shrubsteppe habitat.

WDFW's input at the earliest stages of project development will provide vital ecological, wildlife, and habitat information and data that can be used to determine site suitability and project feasibility. In conducting this crucial step, developers may reduce and avoid investments in unnecessary surveys, leases, and other aspects of initial project development. This step may provide more certainty regarding project location and layout, impact avoidance and minimization, mitigation (if necessary), and permitting, or result in an alternate site selection.

The Wautoma solar project is in the Black Rock Valley; the landscape on either side of Highway 24 between the Department of Energy lands to the east and the town of Moxee to the west. For at least the last 10 years, WDFW has been actively engaged in working with private landowners and other

agencies to address wildland fires and conserve habitat connectivity across this landscape.

Cumulative Impacts

The Black Rock Valley is situated between the Department of Army Yakima Training Center to the north, the Rattlesnake Hills to the south, and the Department of Energy and Hanford Reach National Monument to the east and southeast. These areas represent some of the largest remaining functional blocks of shrubsteppe habitat in southcentral Washington, and the Black Rock Valley provides the only ecological connectivity between them. We are concerned that the cumulative effects of lineal energy projects paralleling SR24 and SR241 will result in habitat fragmentation and loss of ecological connectivity between these remaining blocks of shrubsteppe. WDFW's long-term goals and objectives are to work with landowners and developers to:

- prevent the fragmentation of habitats and isolation of plant and animal populations,
- maintain connectivity by siting projects in already converted or in active agriculture where impacts to priority habitats and species is minimized, and
- maintain ecological connectivity within the Black Rock Valley where these large functional blocks of native habitats converge.

The Wautoma Solar Project is one of four solar projects currently under EFSEC permitting and we are aware of at least three others in the Black Rock Valley landscape. The cumulative impacts of these projects should be addressed through a separate process or EFSEC should ensure that projects are sited and developed in such a way as to maintain large open corridors between and through projects to maintain habitat connectivity. In a July 15, 2022, letter to EFSEC related to the Ostrea and High Top solar projects, just to the northwest of the Wautoma Solar project, we provided that the literature on widths of connectivity for various species is sparse. Both Shirk et. al. (2015) and Washington Department of Transportation (2022) provide information on ways to better understand connectivity from a wildlife species perspective and both note that anthropogenic changes to landscapes influence habitat use and movement. For example, both Elk and Greater Sage-grouse are very wary of any fencing or restrictions in their movement paths and wildlife connectivity widths for Elk could be needed as wide as 1-2 miles in width and potentially even larger for Greater Sage-grouse (studies for the Vantage to Pomona transmission line concluded that towers even miles away from known movement areas could have a negative effect). The narrow-unfenced corridors that are proposed through many of these solar projects could provide some use to various wildlife, but their narrow widths, through an industrial site, are not ideal to maintain wildlife connectivity across a landscape.

Landscape/Wildlife Connectivity

The Wautoma solar project is proposed to be constructed within an important habitat/wildlife connectivity corridor and will also impact native shrubsteppe habitat. Presently, there is little resistance (i.e. any type of development) on this landscape for animal movement, and the Wautoma solar project, plus other proposed solar projects in the area, will cumulatively result in the loss of priority habitats, dependent species, and negatively impact connectivity, as well as result in short- and long-term behavioral changes and impact wildlife population dynamics across a large landscape.

Specifically, the documents presented in the EFSEC application do not address wildlife habitat connectivity. Figure A-1 (Attachment A – Project Maps) illustrates the project layout with various

fenced-in solar arrays but nowhere in any of the documents does the project address impacts to landscape connectivity and wildlife movement. Figure A-9 (Attachment A – Project Maps) shows information from 3 separate data sets; the Arid Lands Initiative, the Statewide Connectivity Analysis, and the Columbia Plateau Connectivity Analysis. We appreciate that the project illustrated the position of the project in relationship to important elk core areas and linkages (connectivity) but would like to point out that mule deer habitat concentrations areas are also within the project. Additionally, other data sets such as the Statewide Action Plan (WDFW 2015) identify that the proposed Wautoma Solar project is within the observed range of Burrowing Owl, Greater Sage-grouse, and Ferruginous Hawk. We recommend that additional maps be prepared showing that more than just elk are dependent on the area of the proposed project and surrounding landscape.

We appreciate that Attachment G (2021 Wildlife and Habitat Survey Report) and Attachment M (Habitat Management Plan) acknowledges the roll of fire in this landscape and its' impact on shrubsteppe habitat. Attachment M considers burned and recovering shrubsteppe as shrubsteppe habitat, but Attachment G maps these burned areas as Eastside (interior) Grasslands. Attachment G goes so far as to acknowledge "…remnant dead shrubs…" that "…were likely killed in the 2016 Range 12 Fire," and provides a picture (figure 7) of these burned shrubs. WDFW considers this priority shrubsteppe habitat and recommends that the project remap these areas as priority shrubsteppe habitat.

Based on the data in the Wildlife Survey Addendum (August 15, 2022) and our meeting today with the Project and their consultants, it is obvious that we are in agreement that addressing burrowing owl conservation is a priority and may involve some adjustments in micrositing as well as consideration for artificial burrows. Additionally, we understand that the Project is also considering additional roads through the project that could provide some additional passageways for wildlife and that some "deadend" fence lines might be connected, and without roads, to provided additional wildlife passage through the site. Overall, we were pleased by the collaborative atmosphere of the meeting and look forward to further addressing the project layout, siting, and orientation to avoid, minimize, and mitigate impacts.

It is our position that further wildlife and habitat surveys are not needed, and that the preparation of an Environmental Impact Statement is not necessary.

In closing, WDFW is committed to working with Wautoma Solar, and other solar developers, to avoid and minimize impacts to native habitats and connectivity and we welcome other concepts that integrate meaningful landscape connectivity and impact avoidance and minimization with industrial solar development.

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

Literature Cited

Shirk, A.J., M.A. Schroeder, L.A. Robb, and S.A. Cushman. 2015. Empirical validation of landscape resistance models: insights from the Greater Sage-Grouse (*Centrocercus urophasianus*). Landscape Ecol.

Washington Department of Fish and Wildlife. 2015. Washington's State Wildlife Action Plan: 2015 Update. Washington Department of Fish and Wildlife, Olympia, Washington, USA.

Washington State Department of Transportation. 2022. Wildlife Habitat Connectivity Considerations in Fish Barrier Removal Projects.