

November 20, 2024

Sonia Bumpus
EFSEC Director and SEPA Responsible Official
P.O. Box 43172
Olympia, WA 98504-3172
comments@efsec.wa.gov

RE: Support for Wautoma Solar Energy Project – EFSEC Docket EF-220355

Dear Director Bumpus,

On behalf of Audubon Washington, a state office of the National Audubon Society, I am writing to express our support for the Wautoma Solar Energy Project Site Certification Agreement (SCA) as presented by Innergex Renewable Development USA, LLC. We commend the Council's commitment to the project and to integrating effective environmental safeguards within the project framework to meet Washington's clean energy targets while safeguarding critical wildlife habitats.

While we support the Wautoma Solar Project's contribution to the state's clean energy portfolio, we emphasize the importance of rigorously addressing the project's habitat impacts, especially to local bird populations and other sensitive wildlife species. Based on the extensive site assessment and initial mitigation strategies outlined in the SCA, we encourage continued, careful attention to the following measures to ensure the project's success aligns with environmental stewardship goals:

1. **Detailed Habitat Restoration and Mitigation Plan:** We appreciate the planned partnership with the Washington Department of Fish and Wildlife (WDFW) to develop a Habitat Restoration and Mitigation Plan. We urge that this plan include specific, measurable actions to restore disturbed habitats to pre-project conditions or better. This will be essential in supporting displaced or disrupted wildlife and maintaining ecosystem integrity. The plan should include provisions for pre- and post-construction impact assessments to confirm compliance and effectiveness, as well as adaptive management responses in case initial mitigation actions fall short.
2. **Compensatory Mitigation and Supplemental Measures:** Given the sensitivity of the Wautoma site, we strongly support mechanisms for **Supplemental Mitigation**. Should habitat impacts exceed initial estimates, it is vital that additional on-site habitat enhancements or proportionate compensatory fees be directed to WDFW. This flexibility will allow for tailored responses, ensuring that any unexpected impacts to habitat quality or availability are promptly and effectively addressed.
3. **Thorough Site Restoration Planning:** The Initial Site Restoration Plan presents an opportunity to proactively ensure that decommissioning will leave the land as close as possible to its original ecological state. We urge that the final Site Restoration Plan include input from ecological experts to define clear success criteria for soil and vegetation

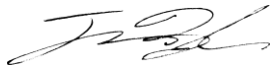
restoration, soil stabilization practices, and ongoing monitoring to verify habitat recovery over time.

4. **Technical Advisory Committee (TAC):** The proposed TAC's role in adaptive management and additional mitigation development is crucial. We recommend that TAC members possess expertise in local wildlife and habitat conservation to provide informed, science-based guidance on achieving successful habitat restoration.

Audubon Washington believes that achieving Washington's clean energy goals and conserving our natural heritage can, and must, go hand in hand. We commend EFSEC for its diligence in balancing these imperatives and ensuring that Washington's clean energy projects protect the biodiversity that is central to our state's identity.

Thank you for considering our comments and for the opportunity to support the Wautoma Solar Project. We look forward to seeing this project advance with strong protections for the local environment and its wildlife.

Sincerely,



Trina Bayard, Ph.D.
Interim Executive Director
Director of Bird Conservation
Audubon Washington