



April 11, 2022

Sonia Bumpus  
EFSEC Manager and SEPA Responsible Official  
Badger Mountain

Re: EFSEC Docket No. EF-210747 Badger Mountain  
Via email: [ami.hafkemeyer@utc.wa.gov](mailto:ami.hafkemeyer@utc.wa.gov)

Thank you for the opportunity to comment on the Scope of Environmental Impact Statement related to this project.

**The Proposed Project is in a Shrub Steppe Conservation Area with Federal and State Focus.**

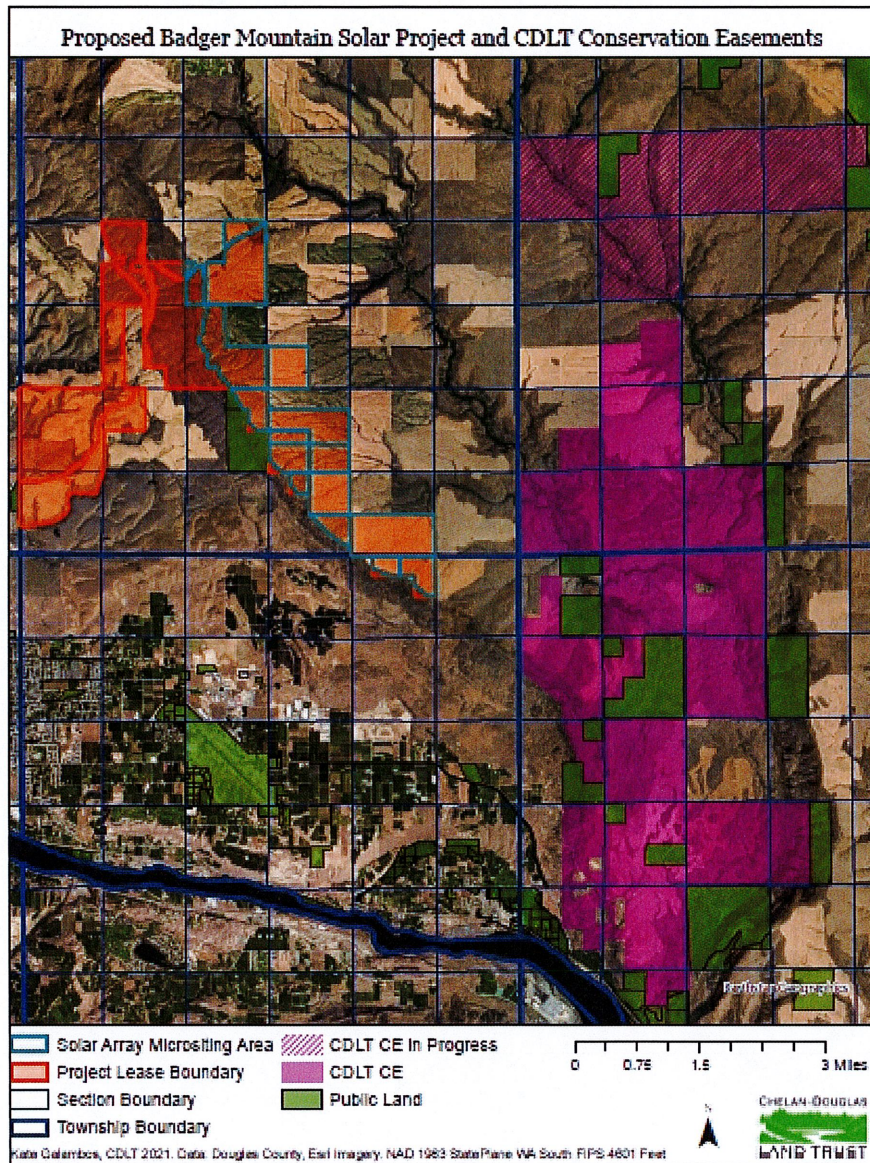
The Chelan-Douglas Land Trust (CDLT) is a nonprofit land conservancy working in Chelan and Douglas Counties since 1985 and accredited by the Land Trust Accreditation Commission since 2013. With significant encouragement and support of county, state and federal agencies, CDLT has been focusing on Douglas County shrub-steppe habitat on Badger Mountain to permanently protect existing agriculture and habitat for wildlife. These purposes are consistent and are functioning symbiotically in the landscape with a combination of dryland agriculture (grain crops every other year) and livestock grazing. As you will hear from wildlife experts, the sage grouse use both shrub steppe and croplands, including for their lek breeding areas. They use different parts of the habitat in different seasons of the year and their life cycle. The best available science is being used by the Natural Resource Conservation Service (NRCS) and the Sage Grouse Initiative, and has identified Badger Mountain as critical for the survival of the Greater Sage Grouse in Washington state. Landowners see them regularly and report this citizen science to enrich the data. Well over \$6,000,000 has been brought to landowners from the Farm Bill, the Washington Wildlife and Recreation Program, and private donors for these initial projects. More funding state and federal funding will follow because of the importance of this area.

NRCS specifies mandatory terms of these conservation easements necessary to achieve their purpose of maintaining grassland and shrub steppe habitat. This includes preventing further fragmentation by requiring that the lands be sold in a single unit, and allowing existing agricultural activities while prohibiting expansion of crop areas. The mandatory terms specifically prohibit development of commercial wind or solar facilities on these lands.

The map below shows the two completed conservation easements on about 10,000 acres and 3,100 acres more funded and due to close in 2022. Other landowners have expressed interest and are not mapped for confidentiality reasons. The proposed industrial solar development is less than a mile of the conserved area at the closet point, and is completely within the 7 mile radius exclusion zone in the Douglas County Interim Controls.



Simply put, Douglas County is the last stand for these creatures, whose habitat is less than 8% of its historic range in Washington State. Human-caused fires in 2020 and 2021 further reduced that habitat. Every bird and every place they use on Badger Mountain is all the more precious and necessary to their survival.



Other wildlife are at risk here too, as stated in the Douglas County Multiple Species General Conservation Plan: the endangered Columbia Basin pigmy rabbit, Washington ground squirrel and the Columbian Sharp-tailed grouse. Golden eagles and Ferruginous hawks also use the proposed development area, as shown with data from E-bird and other sources.

**All Relevant Environmental elements must be considered by the EIS.**

We recommend that the EIS include at least the following elements, and request that EFSEC obtain the best available science to specifically determine the scope of analysis of each element.

*Wildlife/Habitat* – It is our understanding that WDFW is providing input to the applicant on this portion of the scoping. As mentioned above, the birds and mammals move around the area at different times of the year for different life cycle functions. In addition to the use of the specific parcels for which solar panels are proposed, the analysis should include the entire range of each creature in the area and the effect that the proposed development could have on their food sources, migration corridors, predation, and other life cycle factors. The fencing required for the project must also be considered. Unmarked fences are a known hazard for sage grouse.

*Earth* – The proposed panel sites are located on the rim of the Badger Mountain plateau, with electrical connection facilities descending to the next level below. Some of this land is nearly vertical cliffs, the upper edge of the historic Missoula floods' inundation. Geologists need to be consulted about the unstable soils, the effects of proposed filling and grading, and erosion likely to result from extensive impervious surfaces on land that is currently entirely pervious.

*Land Use* – It is conceded that the proposed project is inconsistent with the Douglas County Code and Comprehensive Plan. The entire area is zoned for Dryland Agriculture or Rural Resource 20, and is used for dryland crops interspersed with habitat lands and an occasional rancher residence, with many families who have lived in this area for the last century. This development would permanently alter the character of land use on this plateau between East Wenatchee and Waterville.

*Water* – Water is exceedingly scarce and precious on Badger Mountain. None of the agriculture is irrigated. Water for the few residences and for livestock is provided by with ground water wells. For example, the Breiler Ranch has one well, 315 feet deep, that produces 3 gallons per minute, piped to several watering troughs on the 2,480 acre ranch. It is our understanding that the solar panel facilities need quantities of available water for cleaning and fire control. Where will this water come from, how will it be stored and disposed of? How will it affect the neighbors' water sources?

*Plants* – The habitat lands in this area are a rich resource of native plants, which in turn provide food and shelter for pollinators, birds and a wide variety of land creatures. In a recent communication to CDLT regarding the nearby Kane Ranch, Walter Fertig of the WDNR Natural Heritage Program noted that *Phacelia lenta*, threatened in Washington, is documented on a cliff and likely in other canyons/cliffs in the area, like those on the property proposed for solar panels. He also noted *Penstemon eriantherus* var. *whitedii*, also threatened in Washington, in the vicinity. Plant surveys should check the subject properties for these and other plant communities that would be permanently destroyed by the excavation and solar development. Soil disturbed is readily invaded by noxious weeds, especially cheat grass, an invasive annual grass that greens early and dries off early, providing fuel for the ever-lengthening fire season that has plagued this area. Fire produces more cheat grass, and greater probability of future wildfire. This development will increase this threat.

*Environmental Health* – Issues related to hazardous chemicals and conditions from the construction work, through the life of the project including damage from common events like fire, windstorm and snow should be investigated.

*Public Services* – Fire protection is the most obvious concern. This area has been the subject of repeated fires, usually human caused and very difficult to control.

*Historic and cultural preservation* – Before the white settlers, these areas were lands of indigenous peoples from time immemorial. Badger Mountain was and continues today to be a prime location for gathering of native plants as sources of food and medicine by both the Yakama Tribe and the Wenatchi and Moses-Columbia populations of the Colville Confederated Tribes. This is not just history – it is happening now and must be honored and preserved. These traditions must be respected and provided for regardless of land ownership. Consultation with the tribes and addressing their concerns is paramount.

**Alternative Sites Must be Considered.**

The Washington State Legislature has wisely funded a Least Conflict Siting study that is being led by Washington State University Energy Program, and the Departments of Ecology and Commerce. This stakeholder-driven process will guide utility-scale solar photovoltaics (PV) development towards areas with the least conflicting values. Unfortunately delayed by the pandemic-related budget cuts, this work is now in progress and should provide alternative sites that can be permitted and operated without substantial community opposition or harm to the other important values outlined in this comment.

Thank you again for the opportunity to comment. We appreciate EFSEC's willingness to address these concerns.

Sincerely,



Curt Soper,  
Executive Director