

Date Received	Comment #	ID	First name Last name	Organization	Mailing Address	Email	Subscribed to mailing list
7/4/2021	0009	e5R3SiA	Stan Isley	Yakima Valley Audubon Society	PO Box 2823 Yakima, WA 98907	stanisley@charter.net	False

Dear EFSEC Staff: I'm writing on behalf of the Yakima Valley Audubon Society (YVAS, www.yakimaaudubon.org), as YVAS Conservation Chair, to submit YVAS's comments on the proposed Goose Prairie Solar Project MDNS.

1)YVAS supports the development of renewable energy generation projects, like the Goose Prairie Solar Project, contingent however on those projects being developed in a way that minimizes negative environmental impacts.

2) YVAS supports the development of the Goose Prairie Solar Project, if the project proponents comply with the provisions, limitations, and restrictions outlined in the EFSEC Mitigated Determination of Non-significance (MDNS). YVAS emphasizes the importance of the proponent's compliance with all of the provisions and restrictions in the EFSEC MDNS, but YVAS particularly highlights the importance of the following elements:

- no adverse impacts to special-status plants;
- full implementation of required habitat impact mitigation elements;
- compliance with re-vegetation requirements, and subsequent monitoring to ensure long-term re-vegetation success;
- full compliance with the wildlife habitat mitigation plan;
- compliance with all project area mowing restrictions and limitations;
- compliance with the process and requirements to obtain a legal water supply for the project; and,
- compliance with the mandated requirements to limit impacts to historic and cultural resources.

Stan Isley, YVAS Conservation Chair

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Additional comments on behalf of YVAS from YVAS Program Chair Andy Stepniewski:

1) From the EFSEC homepage website, under 'Recent Documents', YVAS has reviewed the "Revised Application for Site Certification", which the SEPA Checklist refers to in almost its entirety. In 2.A.5., the Mitigation Summary section, I note "If the rare plant survey recognizes special status plants within the Facility Area, the Applicant will work with EFSEC and DNR to minimize impacts to these plants and incorporate mitigation measures into the design and construction of the Facility. These measures will be incorporated into the Vegetation and Weed Management Plan." I do not see in this report a clear

sequence and timing of activities. This rare plant survey and development of impact minimization and mitigation measures MUST be completed prior to the start of construction of this Goose Prairie Solar Project.

2) YVAS agrees with the following statement in the revised application about efforts to preserve intact shrub-steppe: "To minimize impacts to intact shrub-steppe, the proposed facilities north of the sage draw are intentionally located in areas of lower-quality shrub-steppe habitat while avoiding other areas of intact shrub-steppe habitat to the extent practical."

3) YVAS also agrees with the Compensatory Mitigation requirements as set forth in this document: "In order to achieve "no net loss of habitat functions and values" as required by WAC 463-62-040, the Applicant proposes to coordinate with WDFW and EFSEC to determine an appropriate compensatory mitigation payment. The Applicant has prepared a Habitat Mitigation Memo (Attachment R), which provides context for determining the additional mitigation required to achieve "no net loss." The Applicant proposes to begin meeting with WDFW and EFSEC within 15 business days of the submission of this ASC, aimed at conclusion of the discussion within 60 days of the first meeting and prior to conclusion of SEPA review. The compensatory mitigation requirements will be included in the SCA."

4) YVAS also endorses the Habitat Restoration and Mitigation Plan requirements in this document: "The applicant would prepare a Habitat Restoration and Mitigation Plan in consultation with WDFW and EFSEC. The plan would specify the mitigation obligations and implementation plans, including those for construction, operations and decommissioning. Additionally, the plan would include details for revegetation of temporarily disturbed areas, including identification of an appropriate native plant seed mixture for revegetation, the timing of restoration and a plan for monitoring the success of revegetation. The plan would address the requirements of YCC 16C.11.070 and WAC 463-60-332(3). The plan would be finalized following issuance of the SCA and submitted to EFSEC for approval at least sixty days prior to site preparation."

Yakima Valley Audubon Society thanks you for the opportunity to submit comments to this Goose Prairie Solar Project MDNS.

Stan Isley

July 4, 2021

806 South 18th Avenue, Yakima, Washington. 98902-4214

Attachments:

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