

Land use #74

Written Testimony by – Ms. Joanne Chance
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Columbia Solar Project – Tuusso
Project Tracking Code 2017-05-03441

This testimony is provided by Joanne Chance. I am a retired environmental engineer. I possess a B.S. Degree in Forestry and Wildlife Resources, a B.S. Degree in Civil Engineering, and a M.S. Degree in Environmental Sciences and Engineering from Virginia Tech. During my 40-plus year career, I held environmental regulatory, technical, and managerial positions with the U.S. Department of Energy, the Washington State Department of Ecology, and The Boeing Company. I am a resident of Kittitas County where I am part owner of a small U-cut Christmas Tree Plantation business in retirement.

The Potential Adverse Legal Precedent Established by the Approval of the Columbia Solar Project – Tuusso (Project Tracking Code 2017-05-03441)

The rule of law in the United States is based upon the establishment of rules, regulations, and legal precedents that guide the decisions of governmental bodies such as EFSEC. The Columbia Solar Project – Tuusso, which requests installation of five solar panel facilities on prime irrigated lands in Kittitas County, confronts the approving governmental body (EFSEC) with a new, never encountered before dilemma or question. And that question is: Should prime irrigated agricultural lands, representing a considerable public and private investment, be abandoned and converted to five industrial, electrical power generating facilities when alternative sites exist in the County that meet industry siting criteria?

This first-time, new siting dilemma posed by the Tuusso project for EFSEC will have far-reaching geographic and future temporal impacts upon Kittitas County's agricultural economy, our rural character, our land use, and our local government and community. It will also set the tone for other high value agricultural resource areas in the state. Most importantly from the County's perspective, should EFSEC approve the five proposed facilities, the impacts will likely be multiplied since the decision will be precedent setting. EFSEC will essentially be required to give future applicants similar approval treatment for installation of their facilities on irrigated land in Kittitas Valley because of the established precedent. Hence, if EFSEC approves these five ill-advised and misconceived project sites, it may effectively be approving the remaining 13 additional such sites proposed in Kittitas County now under consideration, and many more in the future. Having established the legal precedent, countless other solar panel facilities could be established across the valley, limited only by the desires of the corporations and the amount of irrigated lands to convert in the County. Finally, EFSEC will be giving the green light to the installation of these solar panel industrial facilities on agricultural lands across Washington State regardless of the established State land-use policies in the GMA.

Please take a moment to visualize and imagine the impact of a checker board pattern of industrial solar panel facilities, liberally intermixed within the prime irrigated agricultural lands of Kittitas Valley in 1, 2, 5, 10, 20, and 30 years. Imagine the economic impacts to our local agricultural community and the implications of dismissing the land use policies and decision making processes of the Washington State Growth Management Act and Kittitas County planning regulations. Now imagine those same impacts across the entire state in similar settings. Which irrigated farm lands in other river valleys will be the next target? Won't future generations wonder why our generation wasted our farm lands in such a manner when the solar industrial facilities could have been located on non-irrigated lands that did not generate food? Will they wonder about the environmental justice issue of why rural agricultural communities of lower average wages had to take the economic hit so that large and small tax credit subsidized corporations could make profits?

The land-use incompatibilities, negative impacts to surrounding property values and businesses will likely result in a back lash of future legislative actions and court challenges to halt the installation of solar panel industrial facilities on prime irrigated agricultural lands. The public controversy, resulting from poorly sited renewable energy facilities, will result in a 'black eye' on the 'green' image of solar power. It's happened already in locations such as the United Kingdom and California.

By locating solar panel facilities in more appropriate locations, EFSEC can ensure both the wise use of our statewide natural, agricultural, and economic resources and support for solar panel facilities in the future.

Issues of Incompatibility with Rural Character and a Landscape of Regional Significance

Protecting rural character is an imposed GMA standard that the State has recognized to be of great enough importance to include in statewide land-use policy and project review criteria. Industrial solar complexes are fundamentally urban in character. Once constructed and spread across the Kittitas Valley landscape with 30 acre to 60 acres parcels surrounded with chainlink fence and razor wire, the appearance will be more of prison complexes and the Duwamish Waterway warehouse shipping complex than a farm valley of regional landscape significance. It will fundamentally change the character of the area in a significantly negative way.

The Valley's particular landscape values are unlike anywhere else in Washington state, recognized for over 100 years in writer and public observations as a uniquely beautiful, green and lush valley. Like the Columbia River Gorge, lower Kittitas Valley is a landscape of regional

visual and cultural significance for the state of Washington that deserves the respect of proper rural management for the enjoyment of current and future generations of Washingtonians. Imagine the appearance of the Columbia River Gorge today if land-use placement of renewable energy projects had not been managed in a sensitive manner.

While imperfect from a visual perspective, placement of urban solar complexes on arid lands off the irrigated valley floor offers far less landscape impact than the proposal locations. An appropriate trade-off and balancing of public interests exists that can accommodate solar development without impacting the most critical landscape resources. Thousands of acres exist that meet industry siting criteria, largely on DNR trust lands in the County, that are readily available for solar development.

Issues of Environmental Justice

Washington State has only recently started to recognize and respond to issues of environmental justice where for decades project impacts across the nation, including Washington state, have tended to be concentrated in lower income, rural and urban communities with less political influence and resources. Kittitas County has taken the blunt of the negative impacts of both energy development associated with the greater Seattle Metro Complex and the exempt wells policy reversal without any meaningful benefit. Large scale renewable energy projects that were opposed by the County and its citizens due to the impacts associated with them but forced on the community through EFSEC and the Governor's Office, remain today as a bitter point of contention. The County is now being asked to absorb a new class of numerous small scale energy projects in the wrong land-use location, promoted by Portland and Seattle business interests, with Puget Sound Energy being a foreign owned corporation, in a capacity that would result in significant long-term negative impacts. And it's not necessary.

Kittitas County citizens and our underlying economic base of agriculture will once again face impact without meaningful community-wide benefit if the current project placement is approved. From a rural community perspective, it's particularly disturbing that the environmental trendiness of westside municipal interests are being promoted without regards to the environmental and economic impacts that our rural community is expected to accept. The project as proposed, represents a fundamental disregard and disrespect of rural community values and considerations. Kittitas County can accommodate significant future solar development, and in fact public opinion looks at this point to be generally supportive, but not in our most sensitive resource area that is the foundation of much of the community's economic base.