



To: Washington State Energy Facility Site Evaluation Council (EFSEC)

Date: July 7, 2021

RE: Proposed Goose Prairie Solar Complex

Dear Council Members,

These comments are from the Yakima County Farm Bureau (YCFB). YCFB is a grass roots organization with 2700 members consisting of farmers and ranchers with operations both large and small as well as other folks with interest in agriculture affairs in Yakima and Klickitat Counties.

It has come to the attention of our Farm Bureau that a large solar industrial complex called Goose Prairie is being planned in the proximity of the town of Moxee. Upon review of the associated documents related to this proposal, the YCFB has serious concerns. As a matter of policy, the YCFB believes that the current practice of naming Solar electric generation a "Solar Farm" is incorrect at the least and deceptive at its worst. Agriculture in all of its outdoor forms is a true representation of a "Solar Farm". Farmers and Ranchers are in the business of marketing sunshine every day of their lives producing food and fiber. An acre or thousands of acres of solar panels constitute no more a "farm" than any other industrial activity not necessarily permitted in "farm country".

As a representative of our member farmers and ranchers, we believe in preserving farm and ranch lands for future generations while respecting property rights of owners of private lands who are currently on the land. We also respect and encourage a diverse choice of power sources including renewable alternatives like solar. We believe that energy is very important to our economy.

The YCFB understands that there is a legal mechanism where the Governor can unilaterally approve this project without addressing local concerns through EFSEC. We believe this is wrong. Our Farm Bureau believes that local input and decision making is essential in this case for there are far too many factors that will not be properly weighed under the Governors Fast Track authority.

The available documentation illustrates that the Goose Prairie solar complex would border farms with high value crops in the immediate area. The YCFB believes that a land owner has a right to sell or rent their land at a good profit if they chose, which is an integral part of property rights. However, other affected landowners also have a right to enjoy their property and to

continue to farm and/or live in comparative harmony and a project of this scope, location and nature raises serious concerns. A large scale monolithic installation of hundreds of acres of solar panels close to farms, ranches and homes would undeniably impact property values, most notably their scenic value. The YCFB believes that scenic value loss is only one of our concerns.

Our understanding is that a cyclone fence would be constructed around the perimeter of this large solar complex. That raises the issue of wildlife concentration around the perimeter and their out of proportion impacts on remaining farm lands. Further, if these solar complexes are intruding on Critical Areas, with respect to attaining and/or maintaining bench marks under the Voluntary Stewardship Program, that relationship could be jeopardized.

The general area in question has experienced large wild fires and the YCFB believes that solar panels burning would constitute a dire air quality emergency. Recent wildfires in the greater area have caused serious health hazards with only native vegetation ablaze, imagine several hundred acres of solar panels also burning. It is important to note that the Yakima Basin is very prone to long periods of air stagnation. If considerable numbers of solar panels were to ignite, large scale evacuations would likely result. One must also understand that the first rule of fire fighter safety is to not venture beyond the "first electric wires" thus the First Responder response would be restricted because of the added unsafe condition caused by the necessary electric cables present to sustain the panels.

Another serious concern is how storm and snow melt runoff would be affected by large-scale solar complexes where the solar panels create un-natural runoff conditions and the vegetation management is likely to exacerbate the problem as well. The nature of the light easily transported soils characteristic in that area are not only prone to erosion by sudden cloud burst but also are quite subject to being displaced by wind when dry. There is a growing likely hood that solar panels in their automated movement to best utilize the suns energy, will behave like a wind foil and while at an angle to the surrounding land thus redirect, concentrate and multiply the wind force at each panel certain times of the day. The YCFB believes that soil erosion and water quality will be degraded via both water and wind forces given these potential conditions. The YCFB is also concerned by the natural drainage patterns converging through the area to be converted to solar power production and notes that EFSEC does not consider and address these valid concerns or glosses over them at best.

Another issue is the proximity of the project to Highway 24 and the main landing approach vector to the Yakima Municipal Airport and the concern for glare which can cause a safety issue. In the Pendleton, Oregon area on Interstate 84, there is signage warning about glare. In studying the "Glare Report" prepared for this project, the preparer does not seem to rule out that a significant hazard could exist going forward, just a lot of numbers and interesting graphs but common sense would indicate that a more in depth study on this issue would be in order.

Further, the YCFB believes that tillable lands are the least desirable to site an industrial sized solar complex upon and the more desirable to retain for agricultural production and instead, one should be able to find less agriculturally productive lands with reasonable access to the power grid that solar power generation can be more wisely accomplished upon.

Wind turbines that are being updated are said to be equal to 25 acres of solar panels in generating capacity but occupy just ¼ acre each. That is a ratio of 100 to 1 and the area around a turbine is still farmable and grazable. The solar complex proposes to offer no other value other than electrical generation but at a high cost of lost agricultural production relative to wind turbines. The YCFB believes this is unwise and would suggest a series of modifications to these proposals that could mitigate some of our concerns.

The YCFB also opposes the mitigation plan suggested where by the WDFW or surrogates would purchase other private lands on an acre for acre or acre for one and a quarter acre basis. It is a matter of policy that our Farm Bureau opposes more land acquisition by any government entity as it erodes our property tax base which is already in peril. In effect, presently producing agricultural lands are lost at twice the rate as this project would allow generation of electricity from a land use inefficient method such as solar.

The YCFB believes that a better approach would be to break up the solar complexes into smaller acreages, fenced and located on lands of low productivity. The ability to graze livestock can be maintained by elevating the panels which is already being successfully demonstrated here in the United States and other nations such that sheep and cattle are able to graze there. Vegetation management would be enhanced by maintaining grazing potential. The negative effects of soil erosion by wind and water would be spread out and more properly defused. The breaks in the installations would provide opportunities to manage storm water rather than ignore its potential. Wildlife migration would be less frustrated. Further, the mitigation suggested in this current plan would be unnecessary and the loss of Ag land and tax base would be reduced because the purchase of lands by WDFW and others would be negated.

The YCFB believes that Yakima County and its locally affected citizens is the fair and proper arbitrator of this matter. A Fast Track process conducted in the Governor's administration is not appropriate or wise and forces people negatively affected by its unilateral decision making to live with the "fallout" without the decision makers being similarly affected. The YCFB further believes that if this proposal was to surface with in the area of the Interstate 5 corridor or even more appropriately adjacent to the Capital, it would not even "make it to paper".

The YCFB is not opposed to solar energy but we believe that better planning and layout as well as a change of goals and a better much more thorough environmental review (that of a full EIS) conducted at a local level are crucial to making this proposal more palatable to the residents of Yakima County.

Sincerely,

Mark Herke

President, Yakima County Farm Bureau