

Hannah Elliott

From: Michael O'Casey <mocasey@trcp.org>
Sent: Wednesday, March 17, 2021 4:57 PM
To: Ann Beier; Plan
Subject: TRCP Public Comments on TSR North Solar Application
Attachments: TRCP Comments TSR Solar_Final_03_17_21.pdf

Exhibit 11

**Received by CCCD
3/17/21**

Dear Crook County Planning Commission,

Please accept the attached comments in regards to the TSR North Solar Public Meeting scheduled for this evening. I appreciate the opportunity to comment on this project and would like to be included in any future meetings that take place for this project and other renewable energy developments that take place in Crook County. Don't hesitate to reach out to me with any questions.

Sincerely,

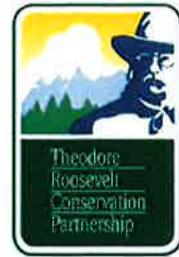
Michael

Michael O'Casey

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March 17th, 2021

Crook County Community Development
300 NE 3rd St. Room 12
Prineville OR 97754



RE: Theodore Roosevelt Conservation Partnership Comments on TSR North Solar

Dear Crook County Planning Commission,

The Theodore Roosevelt Conservation Partnership is a national conservation organization working to guarantee all Americans quality places to hunt and fish. The TRCP works with 60 formal partners and represents over 100,000 individual members nationally and 4,000 throughout the state of Oregon. Given the significant increase in renewable energy development on public and private land throughout the West, the future management and siting decisions for these projects administered by the State of Oregon is of great interest to us, our partners, and all of Oregon's hunters and anglers.

We appreciate this opportunity to provide comments TSR North Solar Project, Application File No. 217-20-000581-PLNG. Your consideration and incorporation of our comments and recommendations into your decision-making process on this project is greatly appreciated.

Pronghorn Winter Range and Habitat Mitigation Planning:

The TRCP recognizes the need for responsible renewable energy development on public and private lands. However, proper siting and review of each proposed project is a critical component to ensure 'no net loss' and in many cases even 'a net benefit' to quality fish and wildlife habitat. This proposed facility location contains 220 acres of ODFW identified pronghorn winter range. The remaining habitat is classified as category 4 by ODFW and should be mitigated for accordingly.

While the TRCP could support the project being developed in this location, the impacts from this proposed project are unavoidable and as such, the planning commission should ensure that any proposed mitigation plan is robust enough to provide not only no net loss, but also provide a net benefit within the pronghorn winter range and no net loss within category 4 habitat. We agree with ODFW that the applicant should apply a 2:1 ratio within all category 2 winter range habitat to ensure a "no net loss, net benefit" and at least a 1:1 ratio across the remainder of acres (excluding the buffer zone).

The TRCP supports ODFW's recommendation letter dated on February 24th, 2021. Specifically, the TRCP agrees that this project is subject to different standards due to the passage of HB 2329 and as such, a certain level of specificity is needed to demonstrate that wildlife habitat mitigation standards have been met. After reviewing the latest version of the applicant's wildlife mitigation plan (v7) we do not believe that enough information is available currently to ensure adequate mitigation is accomplished.

In conclusion, we recommend that as pressure for renewable energy development grows within Central Oregon, the Crook County Planning Commission work towards a solution for the growing effects of cumulative projects across the region as a whole. Currently, projects are reviewed on a case-by-case basis and as such, does not analyze the cumulative effect of renewable energy projects developed over time. As more and more solar and wind projects are sited on public and private lands, the Commission

should consider convening a working group to address the impacts on fish and wildlife habitat from energy development in a proactive manner.

We greatly appreciate the opportunity to provide comments on this solar facility. If you have any questions regarding these comments, please do not hesitate to contact us.

Respectfully,



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Comment submitted via email to the following email addresses; Ann.Beier@co.crook.or.us and plan@co.crook.or.us