



September 17, 2024

Jim Anderson-Cook
Deputy Director
Grant County Development Services
PO Box 37
Ephrata, WA 98823
jcook@grantcountywa.gov

Re: Proposed Unified Development Code Amendment applications submitted for 2024

Dear Mr. Anderson-Cook:

Renewable Northwest (RNW) is a regional, non-profit renewable energy advocacy organization, dedicated to accelerating the transition to renewable electricity. Our members are a combination of renewable energy businesses and environmental and consumer groups. We appreciate the opportunity to submit this comment letter regarding Proposed Unified Development Code Amendment applications submitted for 2024.

RNW virtually attended a Planning Commission meeting August 7th and reviewed notes from a follow-up meeting August 28th. These meetings provided a good sense for how several of the proposed energy-related amendments are being assessed by the Planning Commission, the tenor of comments already received, and the official recommendations the Planning Commission will make to County Commissioners. RNW's comments below reflect this full perspective.

COMMENTS & RECOMMENDATIONS

Grant County Code (GCC) 23.08.165 - Energy Storage Systems

Summary: Working with Grant County Public Utility District, Grant County has identified the need and value of establishing utility-scale energy storage systems. This assessment has resulted in a proposed ordinance guiding development of these systems.

Comments: RNW applauds Grant County for proposing this straightforward ordinance which relies on compliance with existing applicable local, state and federal standards. This proposed ordinance will allow timely development of energy storage systems in the County, improving reliability and resilience of the broader energy system. RNW recommends adopting the Ordinance as proposed.

Grant County Code (GCC) 23.08.357 (b)

Summary: Currently, any non-agricultural development on lands designated as Prime Farmland and those under agricultural production uses is limited to 20% of the parcel area. This size limitation also applies to solar energy facilities per GCC 23.08.357(b). Under current code application, only the portions of the photovoltaic cell array systems which touch the ground are included in the 20% ground coverage calculation under GCC 23.04.560(e). This amendment specifies that the existing 20% coverage limitation for dryland and rangeland properties be expanded to include “surface area of ground-mounted photovoltaic cell (PV) array systems, regardless of mounting angle”.

Comments: RNW objects to this proposed amendment because it would have the unintended effect of requiring more agricultural land be used for approved solar projects. Mr. Anderson-Cook’s presentation to the Planning Commission on August 7th showed the negative impact clearly, with diagrams overlaying existing and proposed projects with the impact of the new proposed rules highlighted. RNW recommends that this proposed amendment not be accepted, a position which aligns with the conclusion reached by the Planning Commission on August 7th.

Grant County Code (GCC) 23.08.357 (e)

Summary: Under the current code, a 100 foot setback is required from any residence. The proposed rule change would modify this provision to say, “in no case shall any component of a solar energy facility be constructed within one thousand (1,000) feet of any non-participating residence.” At a meeting August 28th, the Planning Commission voted to recommend solar projects less than 160 acres maintain the 100 foot setback, and solar projects greater than 160 acres adopt a 250 foot setback.

Comments: RNW objects to the proposed amendment as drafted—this setback requirement would go well beyond what we see in zoning codes for solar projects across the country and in Washington specifically. For example, Adams County requires a solar facility setback of just 100 feet from property lines, equal to Grant County’s current code. (Adams County Code 17.72.030). Additionally, by specifying that “any component of a solar energy facility” be included in the setback, the rule change will increase restrictions on access roads and buried underground cabling on participating parcels. If the intention behind the setback is visual concerns, appropriate screening options should be

considered, and the setback should not apply to buried accessory components of the facility or access roads.

The recommendation of the Planning Commission better aligns with national standards, than original proposed amendment, but RNW recommends maintaining existing setback guidance, which is in keeping with zoning norms across the country and in the state of Washington. In addition, the County should clearly state that this provision includes only above-ground structures and excludes access roads and underground cabling.

Conclusion

Grant County is becoming a regional leader in energy generation by establishing workable, balanced regulations guiding the development of energy projects of all types. This general mode of operation supports economic development in the region and allows thoughtfully planned projects to proceed in a timely way, while still incorporating local residents' interests and land use goals. RNW believes our recommendations to the proposed ordinance changes will help Grant County maintain this regulatory balance.

Thank you for your consideration and your work.

Sincerely,

/s/ Adam Capage

Adam Capage

Outreach and Communications Director

Renewable Northwest