

Expanded version of testimony submitted at the September 17, 2018 Ashland Council Study Session regarding “Request for Proposals for Imperatrice Property Solar Project.”

I am a professional biologist and have frequently written and spoken on the dire implications of climate change. I strongly support increased solar energy development in Ashland. However, the industrial-scale solar array being proposed for the Imperatrice property is a bad idea. It would be extremely expensive, do little or nothing to reduce Ashland’s carbon footprint, and would damage or destroy an area of very high ecological value. Ashland City staff have already documented the first two problems in past Study Sessions, and so I will touch on only the habitat issue here.

As detailed in the Pacific Crest Consulting biological assessment paid for by the City, the Imperatrice is home to 14 populations of roundleaf storks-bill (*California macrophylla*) and five populations of the Southern Oregon buttercup (*Ranunculus austro-oreganus*), both listed as “threatened or endangered throughout their range” by the Oregon Biodiversity Information Center (ORBIC). In addition, the property is home to a large nesting colony of Grasshopper Sparrows, a Federal Species of Concern and ODFW Conservation Strategy Species. This population, perhaps the largest in the state, was documented both by Pacific Crest Consulting and by an independent survey conducted by the Klamath Bird Observatory and commissioned by the Rogue Valley Audubon Society, of which I am conservation co-chair. I attach a 2017 letter from the Rogue Valley Audubon Society opposing industrial solar development of the Imperatrice.

It is very troubling that the City should commission a biological survey, but make no specifications in the RFP to minimize damage to the unique biological resources that the survey identified. The massive disturbance resulting from industrial solar development would destroy most or all of the ecological value of the Imperatrice. The only way that damage could be minimized would be to site all solar development, including roads, in the lower portion of the property. This is the area below the TID ditch that is currently leased for cattle grazing. The special status species identified in the survey are found primarily in the relatively undisturbed habitat above the TID ditch. However, even confining development below the ditch would likely render the entire area unsuitable for Grasshopper Sparrows, a species known to be sensitive to disturbance. For this reason I am opposed to any solar development of the Imperatrice. However, if the Council decides to go forward with the RFP, that document should certainly ask for proposals that restrict all development to the area below the TID ditch.

Respectfully submitted,

Pepper Trail
2011 Crestview Drive
Ashland, OR 97520