Memo to: Board of County Commissioners From: Douglas County Food Policy Council Subject: Savion (KSEC) Stormwater Management Plan, Vegetation Management Plan, and Grazing Management Plan. Date: December 16, 2024



The Douglas County Food Policy Council (DCFPC) supports the Grant Township and the Kaw Drainage District in requesting that the Douglas County Commission allow a 60 day review period for the revised Kansas Sky Energy Center (KSEC) Stormwater Management Plan (SMP), Vegetation Management Plan (VMP), and Grazing Management Plan (GMP).

DCFPC continues to remind the Douglas County Commission of its responsibility to prioritize protection of high quality agricultural lands (Douglas County Food System Plan (FSP) Goal 2, Objective 1) consistent with the Northeast Sector Plan (NESP) and Plan 2040. This includes not just protection from development, but also protection from stormwater, groundwater contamination, etc. It includes protecting agricultural land both within and outside the KSEC site. This includes land currently being used for high-value horticultural crops, crop land, and livestock production.

DCFSP Goal 2, Objective 1, Policy 6 recommends using input from local farmers in planning and zoning matters. Local knowledge of the unique soil and groundwater dynamics where KSEC will be sited and in the surrounding area has not been sufficiently incorporated into the SMP, the VMP, and the GMP. Likewise, the GMP does not reflect sufficient input from area sheep and other livestock producers, who already struggle to find sufficient resources and local markets for their production.

The unspoken purpose of Goal 2, Objective 1, "protecting high value agricultural land", is to increase Douglas County's food security and ensure essential land resources can be available to local farmers. However, as presented in the VMP, there is no actual requirement that any of the land would be used for commercial food production. After the establishment phase, Requests for Proposals (RFPs) would be issued for vegetation management (possibly, but not necessarily, including grazing of sheep) and for small experimental agrivoltaics research projects. But there is no requirement that these RFPs result in actual contracts, or that those contracts result in actual food production for the local community.

While the soil will likely be improved at the end of the project as a result of the proposed VMP, the fact remains that over 1,100 A of prime farmland will be removed from contributing to local food security during KSEC's 25-year life span.

The DCFPC recommends the Douglas County Commission to consider that the KSEC site be managed for actual agricultural production in a manner that:

- Supports the existing local food system;
- Prioritizes land access opportunities and funding to local producers, including underserved populations;
- Minimizes bureaucracy and paperwork for producers to access KSEC land;
- Contributes significantly to the food security of Douglas County residents;
- Ensures that local meat processing and other sheep production infrastructure and resources are developed concurrent with the growth of any grazing operations at KSEC;
- Provides significant financial support for developing processing facilities, expanding markets, establishing a small ruminant vet in the area, etc. for all livestock producers.

The Douglas County Food Policy Council thanks the Board of County Commissioners for the opportunity to provide input on this important matter.

Sincerely,

Tyler J. Lindquist Chair, Douglas County Food Policy Council

## KSEC Memo DCFPC BoCC 12.16.2024

Final Audit Report

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