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1-1	463-60-085; Mitigation measures	The mitigation in Section 1.10 omits the following noise mitigation that was included in Section 4.1.5 (d): • Construction equipment would use noise reduction devices that are no less effective than those originally installed by the manufacturer. • Stationary equipment used during construction would be located as far as practical from sensitive noise receptors. • "Quiet" equipment (i.e., equipment that incorporates noise control elements into the design - compressors have "quiet" models) would be used during construction when reasonably available.	Revise Section 1.10 to include the mitigation measures described throughout the ASC.		These mitigation measures have been added into ASC Section 1.10, Table 1.10-1.
2-1	463-60-135; Legal descriptions and ownership interests	Ownership and lands that lie 1/4 mile either side of the center line for the Fumaria and Typha facilities transmission lines are not described.	Update Section 2.2 to include information on ownership of lands that lie 1/4 mile on either side of the center line for the Fumaria and Typha facilities transmission lines.	X B.8.a	The lists of land owners within 0.25 mile on either side of the center line for the Fumaria and Typha Solar Project generation tie lines have been added to the appropriate subsections of ASC Section 2.2.
2-2	463-60-145; Construction on site	Section 2.3.2.2 states the trenches for the electrical collection system would be 36 to 48 inches deep. Appendix F (Section 3.7) states electrical conduit or cable left in place would be at a minimum depth of 4 feet to allow for future farming activities.	Update Section 2.3.2.2 to state that the trenches for the electrical collection system will be 48 inches deep.		The following statement has been added to ASC Section 2.3.2.2: "In the event that cables are buried less than 48 inches deep, as described in greater detail in Appendix F, the cables will be removed during decommissioning."
2-3	463-60-165; Water supply	Section 2.6.1 indicates TUUSSO has discussed with the City of Ellensburg the availability of municipal water for construction purposes, and that TUUSSO intends to use either on-site water or water trucked in (for Fumaria, specifically) from a municipal source. No documentation of availability of water to meet construction demand from the City was provided in the ASC.	Provide documentation from the City of Ellensburg of the availability of water to meet demand for construction of all 5 proposed facilities and operation of the Fumaria location.	X B.3.a.4	Construction phase water is available from a variety of vendors that routinely provide water for such purposes in rural Kittitas County. TUUSSO will not be procuring water directly from a municipality or other vendor, but will instead rely on its construction contractor to do so. Due to this arrangement and common practices with local municipal and other sources, it is not possible at this time to obtain a water availability/assurance letter from water suppliers for a future procurement. In the Whistling Ridge Wind Energy Project, EFSEC accepted a letter from a likely construction contractor to verify water availability through that contractor. TUUSSO proposes the same approach here, and suggests that the SEPA document state that TUUSSO will, through its contractor (if applicable), procure water from a municipal or other vendor with a valid water right. Consequently, ASC Sections 2.6.1, 2.6.2, and 4.4.22.1 have been revised to state that TUUSSO intends to use water trucked in from municipal water sources or from other off-site vendors with a valid water right for all of the solar projects. In particular, water needs would be procured by TUUSSO's construction contractor (not yet selected) from a municipal water source or other off-

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					site vendor with a valid water right and transported to the site in water trucks. A letter from Morgan & Son Earthmoving Inc. has also been provided to EFSEC as documentation supporting the availability of water for meeting the construction and operation demands of these projects.
			Update water supply description to indicate: 1) how many trucks and trips are anticipated; 2) estimated distance to be traveled by supply trucks; and 3) what type of truck would likely be used.	X B.14.(a or f)	Detailed tables have been added to ASC Sections 2.6.1 and 2.6.2, providing estimates of the number of trips and distances to be traveled by water trucks to each solar project site. The following statement has also been added to ASC Section 2.6.1 indicating: "… requiring 10 continuous hours of water using five 4,000-gallon-capacity water trucks making five roundtrips to get water. A 4,000-gallon water truck, such as a Kenworth T440 with a Ledwell 4,000 Gallon Water Tank, would likely be used."
2-4	463-60-165; Water supply	"TUUSSO is in the process of making a final determination between on-site existing water allocations and municipal water sources, and has not yet submitted any requests to municipal water sources." Per phone call on Dec. 19, Tuusso intends to use existing water allocations for operational uses, and lease agreements provide for this. However, construction water use is intended to be trucked in from municipal water sources. Water supply for operation of the Fumaria site was not discussed and documentation of available supply remains absent.	Update section to reflect current status and documentation of water supply information. Provide documentation from the City of Ellensburg (see also data request 2-3).	X B.3.a.4	More detail has been provided with regards to the sources and uses of water for each site in ASC Section 2.6.2(3)(a). In particular, this section has been amended to clarify that: "[w]ater needs related to construction would be purchased by TUUSSO's construction contractor (not yet selected) from a municipal water source or other off-site vendor with a valid water right and transported to the site in water trucks. Similarly, water needs related to operations (except the irrigation water needs described below) would be procured by TUUSSO's O&M contractor (not yet selected) from a municipal water source or other off-site vendor with a valid water right and transported to the site in water trucks. The irrigation water needs for each of the solar project, except for the Fumaria Solar Project, would be met by existing water rights held by the land lessors." A letter from Morgan & Son Earthmoving Inc. has also been provided to EFSEC as documentation supporting the availability of water for meeting the construction and operation demands of these projects.
3-1	463-60-322; Water (Natural Environment)	Drainage basins were described for each site with figures, but some of the required data under WAC 463-60-322(2) were not located in the ASC.	Describe in Section 3.3.4 the following information: bottom configuration; minimum, average, and maximum water depths and velocities; water temperature and salinity profiles; anticipated effluent distribution, dilution, and plume characteristics under all discharge conditions.		Subpart (2) indicates the information that is needed for "receiving waters within one-half mile of any proposed discharge location." None of the five solar projects would have discharges into surface waters and, thus, the water information requested for this subpart is not applicable to the five solar projects. ASC Section 3.3.4.1 was updated to state that no discharges are proposed for any of the five solar project sites.
3-2	463-60-322; Water (Natural Environment)	No documentation of availability of municipal water supply to meet demand for construction of all 5 proposed facilities and operation of the Fumaria location from the City of Ellensburg was provided in the ASC.	Provide documentation from the City of Ellensburg of the availability of water to meet demand for construction of all 5 proposed facilities and operation of the Fumaria location (see also data requests 2-3, 2-4).	X B.3.a.4	Please see the responses to Items #2-3 and #2-4, above.
3-3	463-60-332; Habitat,	The ASC states that "The five proposed Columbia Solar Projects would not affect any identified big game migratory corridors or migratory flyways,"	Update Section 3.4.1, Section 3.4.3.3, Section 3.4.5, Section 3.4.6.1, and Appendix C with maps and/or spatial		ASC Figure 3.4-2 and Figure 3 in Appendix C have been updated to show that the closest identified big game migratory corridor is more than 5 miles from the closest of the five solar projects, Fumaria.

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	vegetation, fish and wildlife	but then goes on to state "Because all of the sites are near these less-inhabited areas, migratory species (e.g., deer and coyote) forage or hunt on and travel through the sites. From initiation of construction (with its associated human activity and noise) through long-term operation (with the planned fencing of the sites), 223 acres comprising the fenced-in areas of the solar project sites (not the entire 232 leased acres) would no longer be available to migratory species such as deer (coyote may still use the sites)." It is assumed that wildlife will use alternative routes, but it is not known which species use these sites and at what frequency and duration. The Applicant is to provide more information for determination of "no impact" of big game for the project with respect to adjoining property rather than relying on a comparison of available habitat on the landscape-scale analysis area.	data of identified big game migratory corridors and migratory flyways at the project-scale and landscape-scale. Update Section 3.4.1, Section 3.4.3.3, Section 3.4.5, Section 3.4.6.1, Appendix C with evidence/calculations of "no impact" to migratory species based on removal of available habitat from migration corridors. Update Section 3.4.3.3 and Appendix C with evidence/calculations of "no impact" to big game migratory species based on adjoining property habitat available for species at the Project-scale.		Text in ASC Section 3.4.1 (Fish and Wildlife) has been updated to clarify that no big game migratory corridors are located within the project scale analysis areas. The Pacific Flyway was also identified in ASC Section 3.4.1, as the sole migratory flyway crossing over the landscape-scale analysis area. The Pacific Flyway, a major north-south flyway for migratory birds, extends from the arctic regions of Alaska and Canada to South America and is bounded on the west by the Pacific Ocean. Because this flyway covers the entire landscape-scale analysis area, it has not been added to the figure. ASC Section 3.4.3.3(d) has been updated to describe that there will be no effect to migratory routes or flyways because the projects are not located within a big game migratory corridor and less than 0.1% of the landscape-scale analysis area will be temporarily impacted by construction, limiting but not eliminating use by migratory birds utilizing the Pacific Flyway. Because the projects will result in no impacts to migratory corridors or flyways, no changes were made to Section 3.4.5 or Section 3.4.6.1. For a response to big game migratory species, see the above response for all migratory species.
3-4	463-60-332; Habitat, vegetation, fish and wildlife	Additional information is required to determine acres of impact to special status species habitat. Table 3.4-7 states that 2 acres of Bald Eagle habitat will be impacted when 223 acres of long-term disturbance is proposed for other species in Table 3.4-8. No surveys have been conducted for Bald Eagle (3.4.4). There is a discrepancy between the 3 acres of Columbia spotted frog habitat to be impacted in Table 3.4-7 and acreage impacts for surface waters and wetlands (0.01 acres).	Update Section 3.4.2, Section 3.4.4, Section 3.4.6, and Appendix C with plans for completing a Bald Eagle survey, consistent with WDFW guidance.	X B.5.a	ASC Sections 3.4.2, 3.4.4, and 3.4.6, and Appendix C have been updated to state that an Avian Protection Plan (APP) will be developed and that a pre-construction raptor nest survey will be conducted at each solar project site based on WDFW recommendations. Appendix D of the Habitat, Vegetation, Fish, and Wildlife Assessment Report (Appendix C of the ASC) includes guidance provided by WDFW on conducting raptor nest surveys within 0.25 mile of construction activities within the same year that construction is scheduled, to determine whether nests could be occupied during construction. WDFW's 0.25-mile buffer is inclusive of the distance recommended by the National Bald Eagle Management Guidelines (USFWS 2007), which specifies a 660-foot (0.125-mile) buffer from active eagle nests.
			Update Section 3.4.4, Section 3.4.6, and Appendix C with calculations for impacts to Bald Eagle habitat.		ASC Section 3.4.4 was revised to clarify that bald eagle habitat calculations are based on preferred habitat (riparian corridors and wetlands). Within the project-scale analysis areas, bald eagles primarily occupy riparian corridors and wetlands, as shown in ASC Table 3.4-3, limiting impacts to approximately 2 acres of habitat due to fencing and conversion to impervious areas during construction. This information is consistent with the impact calculations provided in ASC Table 3.4-7. Therefore, no further updates to calculations in ASC Section 3.4.6 or Appendix C are required.

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			Update Section 3.4.2, Section 3.4.4 and Appendix C with calculations for impacts to Columbia spotted frog habitat in the context of impacts to wetlands.	X B.5.a	ASC Section 3.4.4 was revised to clarify that Columbia spotted frog habitat calculations are based on preferred habitat (riparian corridors, wetlands, and open water). Within the project-scale analysis areas, Columbia spotted frog primarily occupy riparian corridors, wetlands, and open water habitat as shown in ASC Table 3.4-3, limiting impacts to approximately 3 acres of habitat due to fencing and conversion to impervious areas during construction. This information is consistent with the impact calculations provided in ASC Table 3.4-7. Therefore, no further updates to calculations in ASC Section 3.4.6 or Appendix C are required.
3-5	463-60-332; Habitat, vegetation, fish and wildlife	Additional information is required for long-term habitat removal and detailed determination of cumulative impacts. There is no description of how impacts will be minimized. The Project solar areas will be seeded with native vegetation, but inaccessible for wildlife that do not fly or fit through the fence holes. TUUSSO will be enhancing habitat that is no longer accessible while increasing fragmentation to wildlife habitat. More information is required for a cumulative impact analysis to big game (especially fragmentation of habitat) from the Project combined with other facilities in the area.	Update Section 3.4.6.3 with cumulative effects analysis and detailed determination of impacts for long-term habitat removal at the landscape-scale. Update Section 3.4.6.3 with cumulative effects analysis of "no impacts" to big game due to habitat fragmentation caused by Project and other reasonably foreseeable projects or activities at the landscape-scale.	X	ASC Section 3.4.6.3 was updated to include a cumulative effects analysis of the long-term habitat removal at the landscape scale. The analysis determined that the projects would result in less than a 0.1% impact to total big game and other medium to large sized species habitat in the landscape-scale analysis area and that birds and smaller species would continue to be able to use all solar and wind project sites in the analysis area, and so the overall habitat removal and fragmentation cumulative impacts are not significant. See the above response. ASC Section 3.4.6 was updated to clarify that no big game migratory corridors will be located within the affected by the solar projects, and that the overall habitat removal and fragmentation cumulative impacts are not significant.
3-6	463-60-332(3d); Habitat, vegetation, fish and wildlife	Additional information is required to determine how mitigation measures will achieve equivalent/greater habitat quality, value and function. Table 3.4-8 has long-term impacts (200+ acres for some species) - the areas which will be enhanced are inaccessible for wildlife due to fencing (exception is small mammals and some birds). Planting native species and decreasing noxious weeds is beneficial, but there is no quantification of the levels of enhancement/protection.	Update Section 3.4.6.3 with evidence of how mitigation measures will achieve equivalent/greater habitat quality, value, and function if habitat is no longer accessible by wildlife. Update Section 3.4.6.3 with evidence of how to quantify achieving the equivalent/greater habitat quality based on habitat removal calculations. Update discussion on how buffer improvements along Yakima River will relate to a need for, or lack thereof, erosion control.		ASC Section 3.4.6 (c) was updated to describe that the overall habitat removal and fragmentation cumulative impacts are not significant. Additional updates were made to ASC Section 3.4.6 (d) to describe that equivalent habitat value and function would be maintained in each project-scale analysis area. Habitat would remain accessible to birds, small mammals, and herpetiles that make up the majority of species that currently use the Columbia Solar Project sites. No migratory routes used by medium or large mammals would be affected by the solar projects, and these species are expected to make use of adjacent habitat. All species would benefit from restoration of riparian areas within the Penstemon and Urtica Solar Project sites with native vegetation. See the above response. Because habitat removal would only impact large and medium species that are expected to make use of adjacent areas, habitat removal and fragmentation are not significant. Currently, 3 of the 5 sites have some form of existing fencing which could restrict travel for large and medium-sized mammals. Based on WDFW comments received on 12/5/17, all sites will be fenced with a minimum of 8-foot high fencing to prevent deer and elk from entering the sites and becoming trapped or injured. Because habitat removal will be insignificant and fencing will meet WDFW recommendations, quantification of achieving equivalent or greater habitat quality is not required.

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					TUUSSO is not proposing any buffer or erosion control improvements along the Yakima River near the Typha Solar Project site. The Typha Solar Project has been designed to avoid impacts to the Yakima River. No changes to the ASC or SEPA were needed to address this comment.
3-7	463-60-333; Wetlands	There is a discrepancy between Section 3.5 statements of "minimal impact" to wetlands (specifically 0.01 acre to Typha wetland TW03, which has triggered a JARPA) and "No impacts are proposed to wetlands within the Columbia Solar Project sites" (see page 269). The "no impact" statement should be updated and replaced with statement regarding a change of wetland acreage due to 0.01 acre of permanent wetland fill (as noted in the Vegetation Management Plan and in Section 4.2.2.3). Section 3.5 should also note whether the resulting culvert replacement would affect the wetland's hydrology (the crushed culvert has created wetland conditions, which suggests that fixing the culvert may drain this wetland area). Also, Section 3.5 does not mention potential impacts to the wetlands from project-related spread of noxious weeds, or from herbicides used to manage weeds on site. Text could be repeated or referenced from 3.4.3.3(b) regarding weed issues, and text regarding herbicides could be included in Appendix B. The Applicant may also consider including wetland areas in the monitoring mentioned in Appendix B: 3.5.1 (current text only mentions surveys around	Update section 2.5 (3.5) to include plans for further wetlands review and impact assessment consistent with Ecology guidance.	X B.3	ASC Section 3.5 and SEPA Section B.3 have been updated to address future coordination with Ecology regarding any required mitigation measures for the minor impact to a wetland on the Typha Solar Project site or the negligible encroachment into the wetland protection buffers across all Columbia Solar Project sites.
			Update and replace statement of “no impacts to wetlands within the Columbia Solar Project Sites” (3.5.5.2 (b)) with statement regarding a change of wetland acreage (specifically, 0.01 acre of permanent wetland fill).	X B.3.a.(2 or 3)	ASC Section 3.5.5.2(b) and SEPA Section B.3.a have been updated to include the 0.01 acre (630 square feet) wetland impact from improvements to the access road, instead of a culvert replacement. Other ASC sections that were updated to make them consistent included: 1.16.1, 2.3.3.4, 2.23.1.4, 2.23.2.4, and 4.2.2.3 and Table 1.10-1. Other SEPA sections that were updated to make consistent include: B.1.e and B.8.g.
			Provide information in Section 3.5.4.1 (Typha discussion) and 3.5.5.2 (b) on how the proposed culvert replacement in Wetland TW03 could affect this wetland’s hydrology.	X B.3.a.(2 or 3)	The culvert replacement previously proposed has been altered to general access road improvements that would leave the existing culvert in place. Therefore, this comment no longer applies because the culvert will not be replaced, and the new proposed construction techniques would not likely reduce upslope or downslope wetland areas. ASC Sections 3.5.4.1 and 3.5.5.2(b) and SEPA Section B.3.a(2) have been updated to remove language regarding the culvert replacement. Also, refer to the JARPA application in Appendix J-3 for latest design plans for this access road improvement.
			Update 3.5.5.2 (f) to include or reference weed control text in 3.4.3.3(b). State in 3.5.5.2 (f) whether weed treatments would be applied within wetland buffers on site, and if these treatments would be approved for use within wetlands or near standing water.	X B.3.a.2	ASC Section 3.5.6 [previously 3.5.5.2 (f)] and SEPA Section B.3.a.2 have been updated to address potential herbicide use within wetlands and buffers. Herbicide use would either be conducted with an aquatic safe application or would be avoided entirely. Also, no weed treatment would be conducted outside of the solar projects’ perimeter fencing. The current reference to the Northwest Weed Management Handbook was determined to be sufficient to provide guidance on weed treatment in general. However, Section 3.3 of the Vegetation Management Plan has been updated to include mention of aquatic safe applications in wetland and riparian buffers, or herbicide use would be avoided entirely.

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		revegetation areas), to track whether project-related activities are increasing the spread of weeds in adjacent wetlands.	Consider including wetland areas in the monitoring mentioned in Appendix B: 3.5.1 to track weed spread in the proposed Project site wetlands.	X B.3.a.2	The language in Appendix B: Section 3.5.1 has been updated to address potential monitoring and treatment of weed spread, which would be limited to areas within the sites' perimeter fencing. In addition, ASC Section 3.5.5.2(f) has been updated to clarify that monitoring will include wetlands within the project perimeter fencing.
3-8	463-60-333; Wetlands	This section effectively describes avoidance and minimization of impacts in the wetland buffers. However, it should be revised to include a specific statement that no additional mitigation plan would be required; this would more clearly address the rule requirements.	Update section 3.5.5.1 to include plans for further wetlands review and associated impact assessment and mitigation measures consistent with Ecology guidance.	X B.3.a	ASC Sections 3.5.5.1 and 3.3.3.1 and SEPA Section B.3.a.3 have been updated to address future coordination with Ecology regarding any required mitigation measures for the minor impact to a wetland on the Typha Solar Project site, or the negligible encroachment into the wetland protection buffers across all Columbia Solar Project sites.
3-9	463-60-333; Wetlands	The KCC allows for wetland buffer averaging (KCC 17A.04.030). No variances in the buffer width were proposed in the application. It would be useful to include mention of whether averaging was considered to avoid the 1.52 acres of total buffer encroachment.	Provide information in Section 3.5.5.1 on whether buffer averaging was considered to avoid the 1.52 acres of total buffer encroachment.	X B.3.a	Buffer averaging was not used for the five solar projects because the projects' buffer impacts would not meet the criteria in KCC 17A.04.030 that states "that averaging is necessary to avoid an extraordinary hardship to the applicant caused by circumstances peculiar to the property." However, buffer impacts were over-estimated to include all buffers within perimeter fencing instead of actual project impacts, which were determined to be approximately 0.05 acre of wetland buffer encroachment. Figures and calculations have been updated in ASC Section 3.5.5 to reflect this. Also, figures and calculations for stream buffer impacts were corrected, for the same reasons, in ASC Section 3.3.3.
3-10	463-60-333; Wetlands	There is a discrepancy here where the text states no mitigation/restoration is required because "No impacts are proposed to wetlands within the (project)" (page 269). This does not match the earlier statements that TW03 would have 0.01 acre of impact (page 264), which has triggered a JARPA. The "no impact" statements should be updated to note that there will be 0.01 acre of permanent wetland fill. Also, the SEPA Checklist mentions that no mitigation is required because the fill is less than 1,000 square feet; this rationale is not consistent with Ecology's review.	Review applicability of codes in relation to delineated wetlands per Ecology guidance and update 3.5.5.2(b) accordingly.	X B.3.a.3 B.8.g	ASC Section 3.5.5.2(b)-(g) and SEPA Sections B.3.a.3 and B.8.g have been updated to include current wetland mitigation measures and continued coordination with Ecology to address any future mitigation requirements from the updated wetland impact details.
3-11	463-60-333; Wetlands	Section 1.10 describes how reseeding will occur within wetlands on the Typha and Urtica sites. This is not mentioned Section 3.5, and should be included to comply with code 3f(f) and to be consistent with Section 1.10.	Update 3.5.5.2 (f) to include or reference weed control text in 3.4.3.3(b). State in 3.5.5.2 (f) whether weed treatments would be applied within wetland buffers on site, and if these treatments would be approved for	X B.4.a	ASC Section 3.5.5.2 (f) and SEPA Section B.3.a.2 have been updated to address potential herbicide use within wetlands and buffers. Herbicide use would either be conducted with an aquatic safe application or would be avoided entirely. Also, no weed treatment would be conducted outside of the projects' perimeter fencing. The current reference to the Northwest Weed Management Handbook was determined to be sufficient to provide guidance on weed treatment in general. However, Section 3.3

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		Also, herbicide treatments used throughout the site to treat weeds could affect wetlands; this is not mentioned in Section 3.5. The Vegetation Management Plan covers this but does not specifically list how weeds would be treated if they were in or near the wetland buffers (e.g., would different herbicides be used in these areas, or would hand-pulling be used within wetland buffers?). Consider including these specifics in the management plan.	use within wetlands or near standing water. Consider updating the Vegetation Management Plan with specifics on weed treatments (e.g., protocols or specific herbicides to use) within wetland buffers.		of the Vegetation Management Plan has been updated to be consistent with the updated ASC Section 3.5.5.2(f).
4-1	463-60-352; Environmental health	Basis for assumed baseline of an Ldn of 40 is needed as it does not match any of the categories outlined in Section 4.1-1. An Ldn of 40 is more than likely overly conservative and was not used in the impacts section. Distance and potential noise impacts from Interstate 90 are unclear. The interstate is mentioned as a potential existing noise source but is not quantified. The presence of high density receptor locations in the vicinity of the proposed site is required by rule but not described in the ASC.	Provide the basis of the use of an Ldn of 40 dBA as a baseline noise level in Section 4.1. Update Section 4.1 with the distance from Interstate 90 to the Project and show that the noise from the interstate is consistent with the assumed baseline. Provide the distance to the closest high-density receptor from the Project in Section 4.1.		The baseline noise level was corrected to reflect the appropriate category outlined in ASC Section 4.1.1.1. A brief discussion on the distance and potential noise impacts from I-90 is provided in ASC Section 4.1.1.1. A discussion of the distance to the closest high-density receptor from each of the five solar projects was added in ASC Section 4.1.1.2.
4-2	463-60-352; Environmental health	Operational noise source levels (inverters) are not provided and impact analysis could not be verified. Calculated Lmax is less than Calculated Leq and basis of calculated levels could not be replicated. Assuming the "construction equipment would be operating at the property boundary closest to the considered receptor" is appropriate for an Lmax, but not an Leq. Low frequency noise impacts need to be addressed per the rule.	Provide the noise source level of the inverters used to calculate the noise impacts in Section 4.1.2.2.	X B.7.b	The proposed SGI 500XTM inverters are rated at a noise level of 67 dBA at a distance of 10 meters without controls, as indicated in the manufacturer's data sheet.
			Provide the calculations used to generate the Leq and Lmax noise levels used to generate the results in Tables 4.1-4 through 4.1-13.		Construction noise levels were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). The calculations are provided in the new ASC Appendix N. Lmax were originally based on the maximum sound level for the loudest piece of equipment. Construction noise levels were updated in ASC Tables 4.1-4, 4.1-6, 4.1-8, 4.1-10, and 4.1-12 to reflect Lmax values, estimated on the assumption that the construction equipment would be operating at the property boundary closest to the considered receptor, and Leq values assuming that the construction equipment would be operating at the center of property.

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					Lmax values were removed from ASC Tables 4.1-5, 4.1-7, 4.1-9, 4.1-11, and 4.1-13 because they represented the maximum sound level for the loudest piece of equipment during the operational phase of each of the five solar projects.
			Update the noise impact analysis in Section 4.1 with low frequency noise impacts.		We have added a new Section 4.1.2.3 Low-Frequency Impacts to the ASC to address low-frequency noise impacts.
4-3	463-60-362; Land and shoreline use	Discussion of impacts or mitigation related to spills or wastes for prime farmland or farmland of statewide importance is not included in the ASC.	Provide in Section 4.2.13 a discussion of impacts and mitigation (if needed) from spills, discharges, or wastes to the adjoining agricultural community (including prime farmland or farmland of statewide importance).	X	Detailed discussions about the potential impacts and mitigation (if needed) from spills, discharges, or wastes were provided in ASC Section 4.1.6 Construction Phase Spill Prevention, Control, and Countermeasure Plan and Section 4.1.7 Operational Phase Spill Prevention, Control, and Countermeasure Plan of the October 16 version of the ASC. This narrative was summarized and added to the end of ASC Section 4.2.13.
4-4	463-60-535; Socioeconomic impact	The ASC is unclear about source of water for firefighting. ASC Section 4.4.8.1 states water sources are available on site at all but Fumaria site (consistent with Water Supply section of ASC), but how would that water be accessed in the event of a fire?	Identify in Section 4.4.8 how existing water use allocations will be accessed in the event of a fire at each facility, and that this information will be included in the Fire Protection and Safety Plan developed for each of the Projects.	X B.3.a B.15	A statement had been added to ASC Section 4.4.8.1 stating that the sources of water for fighting fires on each of the five solar project sites would be described in the Fire Protection and Safety Plan, in coordination with the appropriate fire department.
4-5	463-60-535; Socioeconomic impact	The Applicant cites an EFSEC (2007) reference for some of the information for law enforcement services. This information should be updated (and ESFEC 2007 is not included among the references at the end of the chapter). Unclear whether City Police, County Sheriff Department, or Washington State Patrol would have jurisdiction over proposed sites. Applicant did not propose a communication plan, sharing contact information for responsible police service for staff, or contact info for each site's construction or operation managers for police services.	The information for police services must be current in Section 4.4.9, rather than relying on 2007 data. Should TUUSSO desire to retain some information from 2007, include the EFSEC (2007) reference at the end of the chapter. Clarify whether City Police, the County Sheriff Department, or Washington State Patrol would have jurisdiction over each of the proposed Project sites. Provide a communication plan, including contact information for responsible police service and for each Project site's construction and operation managers.		The EFSEC (2007) reference was provided in the October 16 version of the ASC, in Section 4.5 References, on Page 431, and as follows: • Washington Energy Facility Site Evaluation Council (EFSEC). 2007. Kittitas Valley Wind Power Project Final EIS, Section 3.13 Public Services and Utilities. Available at: http://www.efsec.wa.gov/kittitaswind/FEIS/Vol%201%20Text/3.13%20Public%20Services%20final.pdf. February. All five Columbia Solar Projects are located in Kittitas County, and thus they are in the law enforcement service area of the Kittitas County Sheriff's Department. Other law enforcement agencies might provide additional law enforcement support if dispatched by KITTCOM 911 or requested directly by the department. Additional information was inserted into ASC Section 4.4.9, along with the following additional references in Section 4.5: • Kittitas County Sheriff's Office. 2018. Sheriff's Office. Available at: http://www.co.kittitas.wa.us/sheriff/default.aspx. Accessed January 18, 2018. • Washington State Department of Ecology (Ecology). 2018. Spill Preparedness & Response. Available at: https://ecology.wa.gov/Spills-Cleanup/Spills/Spill-preparedness-response. Accessed January 18, 2018. A Draft Communication and Emergency Response Plan has been prepared, and is attached as new Appendix M. This plan will be finalized prior to construction.

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4-6	463-60-535; Socioeconomic impact	No telephone services (or buildings with a telephone) are described in ASC 4.4.19 or in ASC 3.6.2. Section 4.4.19 suggests cellular phone service is available from a variety of providers. It would be helpful to know that cellular service is available at each site, in the event of emergency, as no landlines are proposed.	Confirm in Section 4.4.19 or 4.4.20 that cellular telephone service is available at (and across) each proposed Project site.		Cellular phone service is available at and throughout all five Columbia Solar Project sites. As summarized in ASC Section 2.20 Study Schedules, SWCA staff conducted a variety of natural and cultural resources field studies on each site during April 3 to 17, 2017. Those field studies were conducted throughout each site. During that period, the staff had cell phone reception and were able to coordinate frequently with staff from within Kittitas County and elsewhere in Washington and Oregon from the sites. This information was added to ASC Section 4.4.19.
4-7	463-60-535; Socioeconomic impact	Provide analysis of solid waste generated during construction compared to capacity at area landfills.	Provide in Section 4.4.24 documentation from area landfills that there is sufficient capacity to accept the proposed volume of solid waste generated during Project construction.	X B.15	Text was added to ASC Section 4.4.24 indicating that construction of the five Columbia Solar Project facilities would generate very little solid waste: approximately 12 tons per site during construction. Operation of the five Columbia Solar Project facilities will not generate any regular solid wastes. ASC Section 4.4.24 has also been revised to add the following text: Most of the municipal solid waste is transported to the Greater Wenatchee Regional Landfill, owned by Waste Management of Washington, and located in Douglas County, Washington. Additional waste has been transported to: • Columbia Ridge Landfill - a 2,000-acre regional landfill that is owned and operated by Waste Management, Inc., and located in Arlington, Oregon. • Roosevelt Regional Landfill - the largest private landfill in the state covering 2,545 acres, owned and operated by Regional Disposal Company, with a 120-million ton capacity and sufficient capacity for the County's 2010 – 2030 planning period, and located in Klickitat County, Washington. • Graham Road Limited Purpose Landfill - owned and operated by Waste Management of Washington, Inc.; that accepts construction, demolition, and other debris; and is located in Spokane County, Washington. • Anderson Limited Purpose Landfill - a privately-owned facility located in Yakima, Washington. • Caton Limited Purpose Landfill - a privately-owned facility; that accepts construction, demolition, and other debris; and is located in Naches, Washington. (Kittitas County 2011) As stated in the plan, "For now, the Greater Wenatchee Landfill has capacity well beyond the timeframe addressed by this plan." (Kittitas County 2011) The associated following new reference was added to ASC Section 4.5: Kittitas County Solid Waste Department. 2011. Final Draft, Kittitas County 2010 Solid Waste and Moderate Risk Waste Management Plan Update. Available at: http://www.co.kittitas.wa.us/solid-waste/documents/kittitas-county-solid-waste-management-plan.pdf

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4-8	463-60-535; Socioeconomic impact	Hospital services are provided, but ambulance services are not described. The Applicant cites an EFSEC (2007) reference for some of the information for helicopter (emergency) services. This information should be updated (and ESFEC 2007 is not included among the references at the end of the chapter).	Provide current information for ambulance services in Section 4.4.25, including current information for helicopter (emergency) services. Should TUUSSO desire to retain some information from 2007, include the EFSEC (2007) reference at the end of the chapter.		The Camas, Fumaria, Penstemon, and Urtica Solar Project sites are served by Kittitas Valley Fire and Rescue/Fire District 2. The Typha Solar Project site is served by Kittitas County Fire District 1 (Kittitas County Assessor 2018). Each of these fire districts provide ambulance and emergency medical services to their respective service areas (KVFR 2017). Medical air transport is provided by Life Flight Network, with rotor-wing transport provided from its Moses Lake base and rotor-wing and fixed-wing transport provided from its Tri-Cities base in Richland, Washington (Life Flight 2018). Harborview Medical Center in Seattle, Washington, is the only designated Level I adult and pediatric trauma and burn center in the state of Washington. Thus, any serious head injuries, severe burns, and other serious traumas from the solar project sites would be transported to Harborview (Harborview 2018). This information has been added into ASC Section 4.4.25. The EFSEC (2007) reference was provided in the October 16 version of the ASC, in Section 4.5 References, on Page 431, and as follows: Washington Energy Facility Site Evaluation Council (EFSEC). 2007. Kittitas Valley Wind Power Project Final EIS, Section 3.13 Public Services and Utilities. Available at: http://www.efsec.wa.gov/kittitaswind/FEIS/Vol%201%20Text/3.13%20Public%20Services%20final.pdf. February.
5-1	463-60-540; Other permit applications	The Applicant did not address subparts (2) and (3) of this rule in the ASC. State Permits required by the Applicant are listed in Table 2.23-1, but NOIs for these permits (with the exception of construction stormwater) are not included in the ASC	Address subparts (2) and (3) of WAC 463-60-540 in Part 5 of the ASC.		We have added a new Section 5.3 Other Permit Applications 463-60-540 to the ASC, and provided responses to address these comments. ASC Table 2.23-1 lists state codes, ordinances, statutes, rules, regulations, and permits that would have to be complied with or required for the five Columbia Solar Projects. The new subpart (3) only addresses the permits that would be needed, per the requirements of that subpart. Thus, we have described the two permits that would be needed, and cultural permit application has been placed in the Penstemon Permits appendix.
S-1	SEPA Checklist - Water	The SEPA checklist suggests it will use on-site existing water allocations but is not clear whether they are surface or groundwater allocations at each of the 4 sites where they exist. We suggest a table which shows each site for the rows, and the various water use stages for the columns (e.g. for construction - water use, water source, water volume; for operation - water source, water use, water volume. In the water source cell the table could state if the source is an existing surface or ground water right.	For each site: • Clearly identify the proposed water use, water source, and water volume for construction. • Clearly identify the proposed water use, water source (including ground or surface allocation) and water volume for operations.	X B.3.a.4 B.3.b.1	Text and two tables have been added to SEPA Section 3.a.4, consistent with the information provided in updated ASC Section 2.6 and others, providing the requested water supply information for construction and operation of the five Columbia Solar Projects.

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S-2	SEPA Checklist - Animals	A potential impact related to "lake effect" associated with birds and PV panels is not clearly discussed.	State whether this issue has been considered and whether there is currently a proposed method for avoiding injury to birds from "lake effect" of the PV panels.	X B.5	Bullets were added to "Other Mitigation Measures" stating that PV panels will be designed using an anti-reflective surface coating to minimize the lake effect on migratory birds. This subject will also be addressed in the Avian Protection Plan.
S-3	SEPA Checklist - Noise	WAC 173-60-040 measures noise levels at a receiving property boundary. Residential properties (Class A), have a limit of 60 dBA at the property boundary when the noise source is a Class C source. For example, some sites will have a 67.6 dBA at the project site's boundary. If the adjacent property at that location is residential, there would be a 7.6 dBA exceedance.	Specify the dBA expected at each receiving property boundary and the noise category/class of the receiving property (e.g. class A/residential, Class B/commercial, etc.). Describe if noise reducing mitigation is feasible for whatever exceedance noise level (e.g., 7.6 dBA) projected to be emitted at a receiving property boundary.	X B.7.b	Calculations used to estimate operational noise impacts to estimate Ldn levels at each receiving property boundaries and to compare the estimated noise impacts to appropriate the WAC 173-60-040 maximum allowable noise threshold are provided in new ASC Appendix N. Summary noise impacts for each solar project site were provided in Section 7.b. of the SEPA Environmental Checklist, to specify maximum noise impacts at each receiving property's boundary. Noise mitigation measures were listed in SEPA Section 7.b.3, in case a projected noise level exceeded the thresholds in WAC 173-60-040.
S-4	SEPA Checklist - Land and Shoreline Use	The checklist is not clear about all adjacent land uses. It says "…is surrounded by other farmland." For each site, the checklist should clearly identify the adjacent uses on all sides. Camas has a commercial operation, Better life for Dogs, on the northwest side of the property boundary. There is a golf and country club on the southeast side of Typha.	Clearly describe all adjacent, or nearby land uses within 0.25 miles of the property boundary, for each site.	X B.8.a	We have added new ASC Table 4.2-2 and summary text to ASC Section 4.2.1.2, and new Table 15 and summary text to SEPA Checklist Section 8.a, identifying the types of surrounding land uses radiating out from each cardinal direction within 0.25 mile of each of the five solar project sites.
S-5	SEPA Checklist - Aesthetics	The checklist states that adjacent viewers would experience the greatest change in views since the contrast is most noticeable when viewing up close……Under general mitigation it states "that each of the five solar sites would be adequately screened by either existing or new vegetation or through the application of perimeter fencing to reduce contract from glint and glare for KIPs with level views." The checklist information is not clear whether any measures are proposed to mitigate effects for close up viewers such as those on adjacent properties.	Reference the discussion in the ASC regarding commitments to mitigate changes to views at adjacent properties, including 1) where mitigation would be implemented, 2) nature of the mitigation (e.g. vegetation, fencing), 3) size of visual barrier, etc.	X B.10	We have added text into the SEPA Checklist and ASC Table 1.10-1 Summary of Mitigation Measures indicating where vegetation would be planted as a mitigation measure for potential aesthetic impacts, including: • Camas Solar Project site – along the northeast border of the site (see ASC Figure 2.3-1) • Fumaria Solar Project site – along the southeast border of the site (see ASC Figure 2.3-2) • Penstemon Solar Project site – along the northern and western borders of the site (see ASC Figure 2.3-3) • Typha Solar Project site – along the east-central border of the site (see ASC Figure 2.3-4) • Urtica Solar Project site – along the northwestern and southeastern borders of the site (see Figure 2.3-5) These plants will include a mixture of vegetation at varying heights up to 15 feet tall, to add variety to the screening characteristics.

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					We have also added the requested references to ASC Section 4.2.4 Affected Environment for Aesthetics, Section 4.2.5 Impacts to Aesthetics, and Appendix D: Visual/Aesthetics Assessment Report (where the mitigation measures are listed) to the SEPA Checklist.
S-6	SEPA Checklist - Noise and Public Services	The response states that TUUSSO would coordinate with Fire District No.2/Kittitas Valley Fire and Rescue and Fire District No. 1 to provide PV training to fire responders and construction staff.	Clarify whether the fire district training would be one training or regular trainings to fire districts scheduled periodically during the life of the facility or reference the relevant discussion within the ASC.	X B.7.a.4 B.15.a	Text has been added to SEPA Sections 7.4). and 15.a. stating that TUUSSO would coordinate with Fire District No 2/Kittitas County Fire and Rescue/ and Fire District No. 1 to provide PV training to fire responders, construction, operational, and maintenance staff on a recurring basis during the life of the five solar projects, based on the training requirements of those fire departments.
S-7	SEPA Checklist - Public Services	The current response focuses on utilities associated with housing.	Clarify whether any additional utilities would be needed or are planned for installation at any of the sites or reference the relevant discussion within the ASC.	X B.15.b	The only utilities that would be needed or would be installed on any of the five Columbia Solar Project sites are electrical power to supply the very limited power needs when the solar project is not operating. Section 4.4.16 has been amended to address this limited need for utilities. Except for potential fire, ambulance and hospital, or law enforcement services in the unlikely event that a fire or emergency medical situation would occur on any of the five Columbia Solar Project sites, no additional public services would be required. The ASC indicates that there would be no impacts to or additional services required for transportation (Section 4.3), schools (Sections 4.4.11 and 4.4.12), parks and recreation (Sections 4.4.13 and 4.4.14), utilities (Sections 4.4.15 and 4.4.16), county maintenance (Sections 4.4.17 and 4.4.18), communications (Sections 4.4.19 and 4.4.20), water and stormwater (Sections 4.4.21 and 4.4.22), sewer and solid wastes (Sections 4.4.23 and 4.4.24), other governmental services (Sections 4.4.25 and 4.4.26), or local government revenues (Sections 4.4.27 and 4.4.28). This information was added into the SEPA Checklist.
	463-60-101				ASC Section 1.12 has been updated to include an updated consultation Table 1.12-1 with more up-to-date information about the Agency Consultation and Tribal Communications carried out by Applicant and Applicant's representatives.