ADDENDUM TO FINAL SUPPLEMENTAL EIS

Pursuant to Chapter 463-47 WAC, WAC 197-11-600 (3)(b), and (4)(c) and WAC 197-11-625

Addendum to the **Desert Claim Wind Power Project Final Supplemental EIS** issued by the Energy Facility Site Evaluation Council (EFSEC), November 6, 2009; in response to a Request for Amendment to the Site Certification Agreement (SCA) for the Desert Claim Wind Power Project.

Date of Addendum: September 25, 2018

Date of original FSEIS and FEIS:

- Desert Claim Wind Power Project Final Supplemental EIS, November 6, 2009, prepared by the Energy Facility Site Evaluation Council.
- Desert Claim Wind Power Project, August 2004; prepared by Kittitas County.

Description of current proposal's changes: The Certificate Holder, Desert Claim Wind Power LLC, requests that EFSEC amend the SCA to address the proposed changes to the Project.

- Change Project footprint. The proposal now includes 324 acres in T19N-R17E Section 13 at the northwest edge of the previous Project Area (4 turbines proposed) and 140 acres in Section 30 along the southwest edge of the previous Project Area (no turbines proposed). T19N-R18E Sections 9, 16, 22, and 27 are removed from the proposal. The Project area has been reduced from 5,200 acres in the SCA to 4,400 acres and there will no longer be any turbines or associated facilities located on approximately 1,500 acres east of Reecer Creek.
- Reduce number of turbines. The total number of turbines has been reduced from no more than 95 to no more than 31. The capacity of the project has been reduced from a maximum of 190 megawatts (MW) to a maximum 100 MW.
- Change to taller, higher capacity turbines. The Project would utilize different turbines than originally approved. The Certificate Holder proposes to use commercially available turbines with nameplate capacities of between 2.0 and 4.2 MW, as opposed to the 2.0 MW REpower turbines originally proposed for the Project. There would be fewer turbines that are taller with a hub height between 262 and 279 feet rather than 258 feet originally approved. The tip height would change from 410 feet to 440-492 feet depending on which turbine model would be used. Two of three layout options proposed by the Certificate Holder include 20-25 units of the taller model.
- <u>Increase minimum turbine distance to all residences</u>. Turbine distance from all residences will be at least 2,500 feet rather than 1,687 to 2,241 feet for previously described non-participating residences.
- <u>Change site access route</u>. Access to the site has changed from Reecer Creek Road and Pheasant Lane to Smithson Road.

- <u>Change access route road width.</u> The access route road width has increased from a 15-foot wide travel surface to a 16-foot wide travel surface for the straight sections.
- <u>Change temporary disturbance area along access roads.</u> The temporary disturbance area along the Project access road is assumed to be 60-feet wide on average as compared to 35-50 feet wide in the SCA.
- Reconstruction of Access Road Bridge. The Kittitas Division North Branch Canal Farm Bridge Station No 346 on the proposed access road may be reconstructed.
- Reduce temporary construction disturbance around turbine pads. The temporary construction disturbance around the turbine pads has been reduced from 13 acres per turbine to 3 acres per turbine.
- Reduction in rotor swept area. Due to the reduction in the number of turbines, the rotor swept area will be reduced by 36-48 percent.
- Identify wetland impacts and mitigate measures. Wetland impacts were not identified for the 2009 proposal although wetland impacts were likely that would have needed to be delineated and mitigated. A wetland delineation has been conducted for the revised proposal and it identifies approximately 2 acres of temporary impact and less than 0.5 acre of permanent impact to wetlands.
- Reduce the total number of miles of site access roads. Due to fewer turbines there would be approximately 20 miles of internal access roads as compared to 27 miles identified in the SCA.

Proponent: Desert Claim Wind Power LLC

Location of proposal: The Project Area is located approximately 8 miles north of the City of Ellensburg and consists of contiguous property owned by the Washington State Department of Natural Resources (1,529 acres), four private landowners (2,551 acres), and an affiliate of the Applicant (1,120 acres). It consists of sections and portions of sections in Township 19N, Range 18E, Sections 17, 18, 19, 20, 21, 29, and 30; along with the NW corner of Section 25 and the east half of Section 13 in Township 19N, Range 17E.

Mitigation: The following measure are identified for nonsignificant impacts:

Mitigating Conditions:

Resource	Impact	Mitigation
Water	Wetland and stream impacts during construction Wetland mitigation	While finalizing construction plans, the Certificate Holder will coordinate with WDFW and Ecology regarding finalizing construction and operating plans, in relation to micro-siting of project facilities and roads, in order to avoid or minimize the facility elements' temporary and permanent impacts on streams and wetlands. The Certificate Holder will be required to conduct wetland mitigation monitoring
	wetland mitigation monitoring Wetland, stream, and buffer impacts	for a period of 10 years. Prior to construction of the site, a final set of wetland buffers, setbacks, and mitigation standards for permanent and temporary impacts shall be determined by EFSEC in consultation with Ecology. Wetland buffers shall be determined in accordance with applicable provisions of the Kittitas County Code for Critical Areas in KCC 17A. Where supported by the following Ecology guidance documents, EFSEC may require buffers of greater width than would be required under KCC 17A: Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance, Ecology Publication #06-06-011a (March 2006); Wetland Mitigation in Washington State – Part 2: Developing Mitigation Plans, Ecology Publication #06-06-011b (March 2006); Update on Wetland Buffers: The State of the Science, Final Report, Ecology Publication #13-06-011 (October 2003). Based on the final wetlands requirements from EFSEC, the Certificate Holder shall submit a Wetlands Mitigation Plan to EFSEC for approval at least sixty (60) days
Environmental Health	Shadow flicker	prior to the beginning of Site Preparation, which shall summarize how the Site is in compliance with those wetland buffers, setbacks, and mitigation standards. Develop a mitigation and complaint monitoring plan to respond to any residential complaints. The mitigation plan will include avoidance, minimization, and mitigation of shadow flicker through turbine shut down, planting trees, shading windows, or other mitigation measures. The complaint monitoring plan will be reviewed and approved by EFSEC prior to operation and, at a minimum, will include: • Notification of EFSEC within five (5) business days of receipt of any request to mitigate shadow flicker, • Notification of EFSEC, within two (2) weeks of original receipt, of the actions taken in response, and • EFSEC shall retain authority to review and override the Certificate Holder's denial(s) of any requests in this regard.
Noise	Wind Turbine operation Low frequency noise and aeroacoustic noise	The Certificate Holder shall submit a Complaint-Based Noise Monitoring and Response Plan to EFSEC for review and approval prior to operation, to address low frequency noise and aeroacoustic noise.
Light and Glare	Wind turbine tower lighting in the Night sky	The Certificate Holder shall investigate the application of an Aircraft Detection Lighting System (ADLS) prior to construction and report its findings to EFSEC. The report should include the benefits and feasibility of ADLS for the Desert Claim project.
Historic and Cultural Preservation	Cultural or Historic Resource disturbance or degradation during construction	The Certificate Holder will comply with their historic and cultural preservation Memorandum of Understanding (MOU) with the Yakama Nation.
Transportation	Traffic impacts during construction	The Certificate Holder's Construction Traffic Management Plan should address increased construction traffic on Smithson Road to limit construction delivery vehicles during peak travel times and to accommodate agricultural road use on Smithson Road.
Environmental Monitoring	Environmental impacts during construction	EFSEC will provide full-time on-site environmental monitoring for the construction phase of the Project, at the Certificate Holder's cost.

Purpose of Addendum: In 2004, Kittitas County issued a Final EIS (FEIS) for a maximum capacity 180 megawatt wind energy facility at this location. In November 2009, EFSEC issued a Final Supplemental FEIS (FSEIS) for a revised proposal for a maximum capacity 190 megawatt wind energy facility at this location. An SCA between EFSEC and the Certificate Holder was signed on February 2, 2010. The Project was not built. In 2017 the Certificate Holder contacted EFSEC and indicated they wished to revise the Proposal and were seeking an amendment to the SCA. The Certificate Holder submitted a package of information including a revised Project description, proposed amended SCA, and a SEPA checklist on February 26, 2018. EFSEC reviewed the revised proposal and analyzed the environmental impacts (Memorandum to Stephen Posner, September 25, 2018).

Consistent with WAC 197-11-600 (3)(b) (i) and (ii) concerning when a proposal has been changed following completion of SEPA review, EFSEC has determined that the new information and analysis from the proposed changes does not substantially change the analysis of significant impacts and alternatives in the existing environmental documents. Consistent with WAC 197-11-600 (4)(c), an addendum is appropriate for documenting this environmental review under SEPA.

A 15 day Public Comment period on the SEPA Addendum is September 26, 2018 -5 PM October 10, 2018.

Electronic comments can be submitted online at: www.efsec.wa.gov/Desert Claim/SCA.html

Comments can also be submitted by mail to:

PO Box 47250

Olympia, WA 98504-7250

The Desert Claim SEPA Addendum and supporting documentation can be found on EFSEC's website: www.efsec.wa.gov/Desert Claim/SCA.html

Name of agency:

Energy Facility Site Evaluation Council

PO Box 47250

Olympia, WA 98504-7250

Responsible Official: Stephen Posner, EFSEC Manager

Signature:

Contact person:

Sonia Bumpus

(360) 664-1363

Attachment:

September 25, 2018 Memorandum to Stephen Posner from Sonia Bumpus