Horse Heaven Wind Farm

EIS Mitigation and Council Actions

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Environmental Impact Statement (EIS)

- EIS informs decision makers and the public of significant environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts.

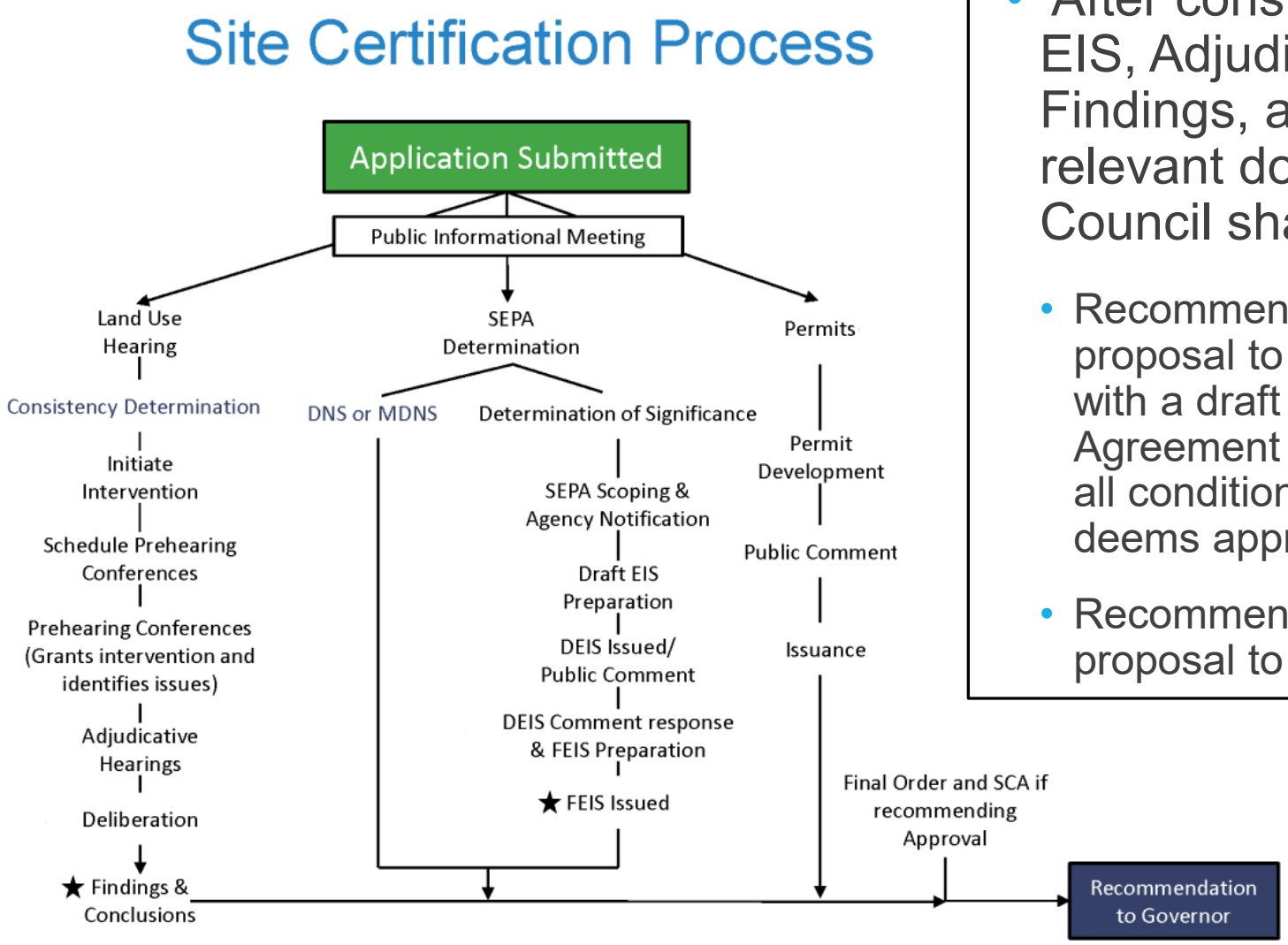
- For private projects, the EIS need only evaluate reasonable alternatives for achieving the proposal's objective on the same site and the no action alternative.

EIS and SEPA

- EIS is not required to evaluate and document all possible effects. Rather, it analyzes *environmental* impacts and should be used by decision makers in concert with other relevant documents. (WAC 197-11-448)

- SEPA contemplates general welfare, social, economic, and other considerations of state policy. SEPA does not require that an EIS be an agency's only decision-making document.

Upcoming Actions



- After consideration of the EIS, Adjudication Findings, and other relevant documents, the Council shall either:
  - Recommend approval of the proposal to the governor along with a draft Site Certification Agreement (SCA) to include all conditions that the Council deems appropriate.
  - Recommend rejection of the proposal to the governor.

Council Authority

- EFSEC Council has the authority to:
  - Deny the proposal based on the finding of significant adverse environmental impacts within the EIS.
    - Significant impacts are not required to be eliminated for approval.
  - Condition the proposal to exclude the possibility of specific Project elements or areas based on identified environmental impacts.
  - Impose mitigation measures beyond those recommended by the EIS if it believes the measures are insufficient to address impacts.

Mitigation Authorities

SEPA Substantive Authority (WAC 197-11-660)

- Any SEPA action on a proposal "may be conditioned or denied under SEPA to mitigate the environmental impact."

EFSEC Council Powers (RCW 80.50.040)

- Council can "develop and apply environmental and ecological guidelines in relation to type, design, location, construction, initial operations conditions of certification, and ongoing regulatory oversight."

Mitigation should:

- Be reasonable,
- Be capable of being accomplished, and
- Be attributable to a specific environmental impact

EFSEC Mitigation

- "It is the policy of the state of Washington to recognize the pressing need for increased energy facilities, and **to ensure through available and reasonable methods** that the location and operation of all energy facilities and certain clean energy product manufacturing facilities **will produce minimal adverse effects on the environment**, ecology of the land and its wildlife, and the ecology of state waters and their aquatic life. [emphasis added]" (RCW 80.50.010)

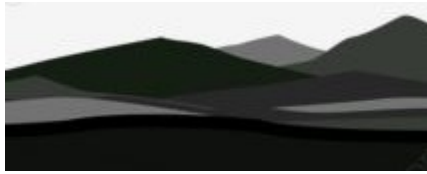
- Mitigation may take one of several forms (WAC 197-11-768):

1. Avoiding the impact altogether by not taking a certain action or parts of an action;
2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;
3. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
4. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
5. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or
6. Monitoring the impact and taking appropriate corrective measures.

EIS Recommended Mitigation

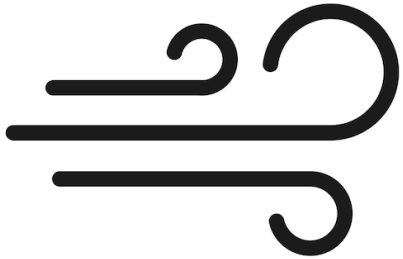
Mitigation for **Wildlife and Habitat, Historic and Cultural, Visual Aspects, Light, and Glare,** and **Public Health and Safety** will be discussed at the 11/29/23 EFSEC Council Meeting when subject matter experts will be available to address Council questions.

EIS Recommended Mitigation – Earth (Geo)



- **Geo-1:** Minimize soil disturbance activities with the potential for soil compaction when soils are saturated, such as following a major precipitation event (e.g., five-day antecedent rainfall of greater than 1.1 inches during mid-October to mid-April or greater than 2.1 inches during mid-April to mid-October). Direct construction away from areas with saturated soils and where drainage may concentrate until soils are no longer saturated, and limit vehicular traffic to established access roads. Where possible, leave existing vegetation root structure intact to enhance soil stability and infiltration capacity. Utilize best management practice (BMPs) such as low-ground-pressure and/or long-reach equipment, temporary matting and work pads, and localized engineered drainage improvements (e.g., interceptor drains, detention basins). Where soil compaction is observed to have occurred, decompact subsoils to a minimum depth of 18 inches or as identified in site reclamation plans and lease agreements.
  - **Rationale:** This mitigation measure limits erosion and disturbance of natural soil profiles.
- **Additionally:** A-1, W-2, Veg-7, LSU-4, and LSU-5

EIS Recommended Mitigation – Air (A)



- **A-1:** Limit traffic speeds on unpaved areas to less than 15 mph rather than the Applicant-proposed 25-mph limit. Access-road-related fugitive dust from construction vehicle traffic is the single largest source of PM_{10} and $PM_{2.5}$ emissions from Project construction.
  - **Rationale:** Road-related fugitive dust emissions increase with increasing vehicle speed. Consequently, one of the BMPs for mitigation of road-related fugitive dust emissions is to limit vehicle speed. The Applicant has proposed to limit vehicle speed to 25 mph. A lower vehicle speed limit of 15 mph is feasible and would further reduce fugitive PM_{10} and $PM_{2.5}$ emissions.

- **A-2:** Applicant shall submit a Proof of Contact: Soil Destabilization Notification to EFSEC at least 90 days prior to commencement of construction.
  - **Rationale:** Fugitive dust emissions are a potential concern. This notification will facilitate EFSEC awareness of commencement construction so that compliance with implementation of all Applicant-proposed BMPs can be field validated.

EIS Recommended Mitigation – Water (W)

- **W-1: Least Risk Fish Windows:** Project construction and decommissioning within ephemeral and intermittent streams would observe the least risk windows for spawning and incubating salmonoids, which are, conservatively, August 1 to September 15 for the Yakima and Columbia Rivers and their tributaries in Benton County.
  - **Rationale:** This mitigation measure addresses potential impacts on surface water and fish habitat and would minimize risk to aquatic species.
- **W-2: Minimize Work in Heavy Rain:** Project construction and decommissioning would be minimized during rainy periods and heavy rain—in particular, work near ephemeral or intermittent streams.
  - **Rationale:** This mitigation measure addresses potential impacts of surface water and runoff and would minimize the risk of sediment release to surface water and wetlands.
- **W-3: Check Dams:** As indicated in Ecology BMP C207E, check dams cannot be placed or used in streams unless approved by WDFW. Check dams used for work within ephemeral or intermittent streams would be approved by EFSEC in coordination with WDFW and Ecology prior to use. Stream crossing designs and associated mitigation plans would be provided and approved by EFSEC in coordination with WDFW and Ecology.
  - **Rationale:** This mitigation measure addresses the use of check dams on site, which would require approval by WDFW and Ecology prior to use.

EIS Recommended Mitigation – Water (W)

- **W-4: Culvert Installation BMPs:** Based on the ASC, one culvert is proposed along one intermittent stream. Installation of the culvert would follow U.S. Department of Agriculture BMPs:
  - Be oriented and aligned with the natural stream channel.
  - Be constructed at or near natural elevation of the streambed to avoid or minimize potential flooding upstream of the crossing and erosion below the outlet.
  - Use suitable measures to avoid or minimize water from seeping around the culvert.
  - Use suitable measures to avoid or minimize culvert plugging from transported debris or bedload.
  - Be regularly inspected and cleaned as necessary for the life of the Project.
  - Cover culvert with sufficient fill to avoid or minimize damage by traffic.
  - Install culverts long enough to extend beyond the toe of the fill slopes to minimize erosion.
  - **Rationale:** This mitigation measure addresses permanent impacts on ephemeral streams. It provides specifications on culvert installation to enable assessment of the potential impacts.

- **W-5: Employee Training:** An employee training plan would be included as part of the SPCC Plan. For the duration of the Project, employees and workers on site would receive appropriate training according to the employee training plan to ensure that any spills are reported and responded to in an appropriate manner. This would include training on the use of spill response equipment and orientations identifying the location of hazardous materials, proper storage of hazardous materials, and location of spill response equipment to ensure that workers are competent in spill response.
  - **Rationale:** This mitigation measure addresses potential impacts on water quality, including sedimentation and accidental spill. Employee training reduces the risk of human error and increases confidence in the effectiveness of spill response in the event of accidents such as accidental spills.

EIS Recommended Mitigation – Water (W)

- **W-6: Wetland SWPPP:** A Stormwater Pollution Prevention Plan (SWPPP) would be designed specifically for work within the Micrositing Corridor adjacent to the wetland (Figure 3.4-1, Section 3.4). The SWPPP would include BMPs from the Stormwater Management Manual for Eastern Washington. The plan would include, but not be limited to, structural measures such as installation of silt fences and sediment ponds, and non-structural measures, including routine inspection and maintenance and enforcement of BMPs, to minimize surface water runoff generated from the construction activities to the wetland.
  - **Rationale:** This mitigation measure addresses potential impacts on the wetland situated near the Micrositing Corridor. The wetland is located downgradient from the construction area, so additional mitigation measures are proposed to avoid impacts.
- **W-7: Clear-Span 100-Year Floodplain:** Clear-span the transmission line to avoid temporary disturbance to the 100-year flood plain. Site transmission line poles outside the 100-year floodplain.
  - **Rationale:** This mitigation measure addresses physical disturbance of the 100-year floodplain, a CARA.
- **W-8: Spill Response Equipment:** Spill response equipment would be stored in every vehicle accessing the site during construction, operation, and decommissioning. In addition, an oil pan would be placed below heavy equipment when stored or not in use on site.
  - **Rationale:** This mitigation measure addresses spill response impacts by specifying locations for spill response equipment.

EIS Recommended Mitigation – Water (W)

- **W-9: Minimize Water Use:** During construction, operation, and decommissioning, water use would be minimized where possible. During drought or water shortage, schedule adjustment would be considered to minimize water needs on the site, where possible, or additional alternate off-site water supplies would be identified.
  - **Rationale:** The mitigation measure addresses impacts on public water supply to minimize water use on site throughout the life of the Project.
- **W-10: Panel Washing:** During drought or water shortage, panel washing would be postponed or alternate off-site water sources could be identified to minimize impacts on public water supply. Panel wash water would be recycled and re-used where possible during operation.
  - **Rationale:** This mitigation measure addresses impacts on public water supply to minimize water use on site from panel washing, if required.
- **W-11: Concrete Batch Plant to Avoid Streams:** Laydown areas or locations where temporary concrete batch plants will be sited should be a minimum of 100 ft from mapped streams or waterbodies.
  - **Rationale:** Siting temporary concrete batch plants outside of stream and riparian areas reduces the potential impacts off accidents and malfunctions from release of concrete wash water on water quality.

EIS Recommended Mitigation – Vegetation (Veg)

- **Veg-1: Tree Avoidance:** Construction would avoid removing or disturbing trees within the Project Lease Boundary. Disturbance to trees includes any disturbance within the drip-line of the tree (i.e., the area from the edge of the outermost branches), including topping, which preserves an intact root system. Disturbance within the drip-line of the tree should be avoided as this can lead to tree mortality. The avoidance area within the drip-line of trees in work areas should be delineated using snow fencing or similar measure to improve the visibility of avoidance zones. Trees cannot be removed without pre-approval. Where tree disturbance cannot be avoided by the Project (e.g., near transmission lines), the number and location of the trees would be provided to EFSEC, along with a statement justifying why avoidance cannot be achieved, and a mitigation plan. The mitigation plan would include replanting trees within the Lease Boundary to maintain the diversity of habitat structures provided by trees and would require approval by EFSEC prior to proceeding.
  - **Rationale:** Trees are a rare feature on the landscape that provide habitat value to wildlife species and structural diversity. Replanting trees may be challenging in an arid environment, and there would be a time lag before trees reach the same size and age. Veg-1 seeks to avoid physical disturbance to existing trees.

EIS Recommended Mitigation – Vegetation (Veg)

- **Veg-2: Pre-Disturbance Surveys for Special Status Plant Species:** Special status plant species are known to occur near the Lease Boundary. Areas with increased potential for special status plant species include areas of Priority Habitat and areas identified by the Applicant as potential habitat for woven spore lichen. Where possible, disturbance to Priority Habitat and high potential areas will be avoided, but if avoidance is not possible surveys for special status plant surveys will be conducted. Surveys would be conducted by a qualified professional. Surveys would be conducted prior to both construction and decommissioning activities. All findings would be documented and provided to EFSEC in an annual report. Where special status plant species are encountered within proposed disturbance areas, the Applicant will modify the Project design to avoid the species or, where modification is not possible, develop additional mitigation measures based on discussions with EFSEC and WDFW, such as relocation where a species is tolerant of relocation; minimization; or other form of mitigation. Mitigation plans for encountered special status plant species will be provided to EFSEC for consideration and to provide additional direction. Any modifications to Project design would also be provided to EFSEC as part of the report. An environmental monitor would be required to track any mitigation associated with the finding of special status plant species.
  - **Rationale:** This mitigation measure minimizes potential impacts on special status plant species by providing an opportunity to modify the design to avoid any identified plants, prior to actual disturbance activities during construction and decommissioning. It also provides the opportunity to apply additional mitigation should special status plant species be encountered within disturbance areas.

EIS Recommended Mitigation – Vegetation (Veg)

- **Veg-3: Special Status Plant Species Education:** The environmental orientation provided to workers on site would include information on special status plant species. This would include diagnostic characteristics, suitable habitat descriptions, and photos of special status plant species with potential to occur within the Lease Boundary. A protocol would be established for any chance find by workers, who would notify the environmental monitor on site prior to proceeding with work. The environmental monitoring would report any findings of special status plant species to EFSEC in a report, and EFSEC would consider these reports and provide additional direction on actions to address any impacts. Workers' completion of the environmental orientation would be tracked by the Applicant and provided in an annual report to EFSEC.
  - **Rationale:** This mitigation measure minimizes impacts on special status plant species by educating workers in identification and suitable habitat.

EIS Recommended Mitigation – Vegetation (Veg)

- **Veg-4: As-Built Report, Offset Calculation, and Monitoring of Revegetation:** Within 60 days of completing construction, the Applicant would provide an as-built report that documents the amount of temporary and permanent disturbance associated with the Project. This would include associated maps and georeferenced spatial files. The as-built report would be factored into the final calculation of habitat offset based on the Applicant-provided ratios. The acreages of modified habitat planted for the Project under the solar arrays would also be included in this report. EFSEC would determine the number of years that vegetation monitoring of temporary disturbance and modified habitat would be conducted and the success criteria for revegetation. The success criteria would include measurable parameters that the Applicant would measure to determine whether successful revegetation has occurred. The Applicant would submit annual reports for each year of vegetation monitoring following construction to document the success of revegetation. At the end of the vegetation monitoring period, as determined by EFSEC, areas of modified habitat and revegetated temporary disturbance that have met the success criteria would be eligible for offset by the Applicant at the respective ratios. Any areas of modified habitat or temporary disturbance that do not meet the success criteria after completion of revegetation monitoring would be considered permanent disturbance, and this would be added to the offset requirement.
  - **Rationale:** This mitigation measure addresses habitat offset by providing a final calculation of offset requirements based on actual disturbance. In addition, it addresses the uncertainty associated with the success of revegetation and, in particular, of restoring shrub-steppe ecosystems.

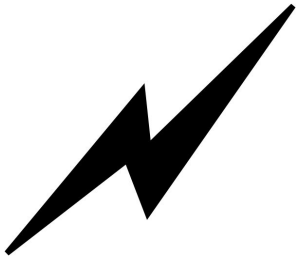
EIS Recommended Mitigation – Vegetation (Veg)

- **Veg-5: Operation and Decommissioning Dust Control Plan:** A dust control plan would be prepared for Project operation and decommissioning, similar to the dust control plan presented by the Applicant. The plan would minimize impacts on vegetation from dust during the Operation and Decommissioning stages of the Project.
  - **Rationale:** This mitigation measure minimizes indirect impacts from dust during operation and decommissioning.
- **Veg-6: Decommissioning Legislated Requirements:** Mitigation measures that would be applied during decommissioning would follow the applicable legislated requirements at the time of decommissioning.
  - **Rationale:** This mitigation measure enables adjustment of requirements based on changes in legislation once decommissioning occurs, based on the requirements at that time.
- **Veg-7: Detailed Site Restoration Plan:** The Detailed Site Restoration Plan is a required, regulatory document. It would be prepared and submitted for approval by EFSEC for final revegetation prior to Project decommissioning for the temporary and permanent disturbance areas. It would be adapted to include modified habitat.
  - **Rationale:** The Detailed Site Restoration Plan would be a living document. It would include the methods, success criteria, monitoring, and reporting for revegetation at the end of the Project life. It would also include provisions for adaptive management and would be prepared based on any lessons learned from implementing the revegetation planned for the temporary disturbance from Project construction as described in Appendix N of the 2022 ASC.

EIS Recommended Mitigation – Vegetation (Veg)

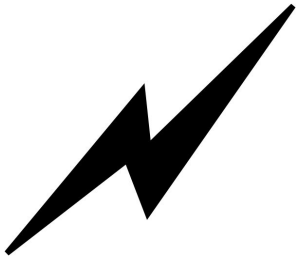
- **Veg-8: Decommissioning Noxious Weed Management Plan:** A Noxious Weed Management Plan (or extension of the current plan) to include prevention and control during decommissioning of the Project would be prepared. This Plan would include monitoring of the area for three years following decommissioning of the Project.
  - **Rationale:** This mitigation measure addresses noxious weeds during decommissioning. It is designed to minimize the introduction and spread of noxious weeds during decommissioning.
- **Veg-9: Maintenance of Solar Array Fence:** During Project operation, the solar array fence would be maintained, including removal of vegetation material that may become entwined in the fence
  - **Rationale:** This mitigation measure enables adjustment of requirements based on changes in legislation once decommissioning occurs, based on the requirements at that time.
- **Additionally:** Hab-2, Hab-3, Hab-4, Hab-6, Hab-7, and Hab-8

EIS Recommended Mitigation – Energy and Natural Resources (ENR)



- **ENR-1:** The Applicant would provide an executed agreement to EFSEC that identifies the source and quantity of water intended to be supplied to the Project prior to its construction, operation, and decommissioning.
  - **Rationale**: Provides verification that water being used by the Project is originating from a sustainable source.
- **ENR-2:** The Applicant would install high-efficiency electrical fixtures and appliances in the O&M facility, BESS, and substations to reduce energy needs for the Project's operations stage.
  - **Rationale**: Reduces the Project's demands on energy and natural resources.
- **ENR-3**: The Applicant would install high-efficiency security lighting to reduce energy needs for the Project's operations stage.
  - **Rationale**: Reduces the Project's demands on energy resources.

EIS Recommended Mitigation – Energy and Natural Resources (ENR)



- **ENR-4:** The Applicant would install low-water-use flush toilets in the O&M facilities to reduce the Project's water requirements during its operations stage.
  - **Rationale**: Reduces the Project's demands on water resources.
- **ENR-5:** The Applicant would capture and recycle wash water to reduce the Project's water requirements during its operations stage.
  - **Rationale**: Reduces the Project's demands on water resources.
- **ENR-6:** To retrieve as much of the natural resources used in construction and operation of the Project as possible, the Applicant would demolish and recycle all components of the Project that have the potential to be used as raw materials in commercial or industrial applications. If the Applicant intends to leave any portion of the facility, including concrete foundations, they must submit a request to EFSEC in an update to their decommissioning plan.
  - **Rationale:** Reduces the Project's demands on natural resources.

EIS Recommended Mitigation – Land and Shoreline Use (LSU)

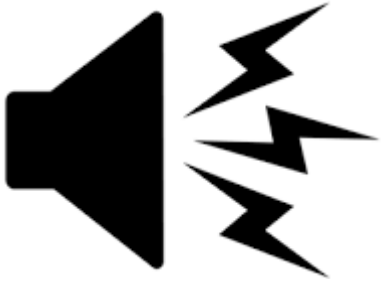
- **LSU-1:** The Applicant would prepare a livestock management plan with property owners and livestock owners to control the movement of animals within the Lease Boundary during construction, operation and decommissioning.
  - **Rationale:** To limit conflicts between the Project and farmers and ranchers.
- **LSU-2:** The Applicant would prepare a dryland farming management plan for construction, operation, and decommissioning that outlines communication requirements between the Certificate Holder and the land owners. The plan would establish work windows that would allow farmers uninterrupted access to their fields for dryland wheat planting and harvesting.
  - **Rationale:** To limit conflicts between the Project and farmers and ranchers.
- **LSU-3:** The Applicant would be responsible for ensuring that arrangements for the removal of all livestock have been made during Project construction and decommissioning.
  - **Rationale:** To limit conflicts between the Project and farmers and ranchers.

EIS Recommended Mitigation – Land and Shoreline Use (LSU)

- **LSU-4:** After construction is completed, the Applicant would restore all temporary disturbance areas to their preconstruction status.
  - **Rationale:** This measure would allow the areas of temporary disturbance within the Lease Boundary to return to their preconstruction agricultural production levels as soon as possible.

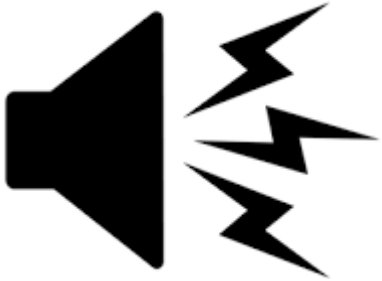
- **LSU-5:** Prior to decommissioning, the Applicant would submit a Detailed Site Restoration Plan, per WAC 463-72-050, for restoring the site to its preconstruction character. The Applicant would be responsible for working with the landowner to return all agricultural land to its preconstruction status. If future site conditions or land ownership no longer allows for the land to be returned to agricultural production, the Applicant would submit a request to EFSEC for an alternative land use that would be in alignment with the Lease Boundary's preconstruction rural character and resource value. If the Detailed Site Restoration Plan requests an alternative land use, EFSEC may require that the Applicant provide additional mitigation to offset impacts from a permanent conversion of the land.
  - **Rationale:** This measure would assist in preventing conversion of a land use that is not in alignment with the Lease Boundary's current designation.

EIS Recommended Mitigation – Noise and Vibration (N)



- **N-1:** Avoid laydown and equipment storage/parking areas closer than 2,500 feet from the nearest NSR location.
  - **Rationale:** These laydown and storage areas would have more noise sources for longer periods of time than other areas; therefore, siting these locations further from NSR locations would limit the sound level and the duration that such equipment could impact an NSR.
- **N-2:** Limit large, noise-generating equipment operations, such as earth-moving equipment, cranes, and trucks, as outlined in Table 4.11-8, to daytime hours (between 7 a.m. and 10 p.m.), and limit the loudest and most impulsive pieces of construction equipment and activities, such as pile-driver operations and blasting, to typical working hours only: 7 a.m. to 6 p.m., Monday through Saturday.
  - **Rationale:** This measure would ensure that a typical workday would not include pile-driver operations or blasting during evening hours (6 p.m. to 10 p.m.) but could include some on-site activities during nighttime hours such as early-morning setup and preparation for the workday. Nighttime operations would be atypical. The purpose is to limit noise impacts during sensitive hours while allowing contractors some flexibility.
- **N-3:** Monitor noise during nighttime construction operations (between 10 p.m. and 7 a.m.), when construction activities have the potential to impact NSRs or reduce activities to ensure that construction noise does not exceed state noise limits.
  - **Rationale:** This monitoring would take place throughout the entirety of the nighttime hours or until construction activities cease.

EIS Recommended Mitigation – Noise and Vibration (N)



- **N-4:** Update the Applicant's noise complaint resolution procedure to better address and respond to noise complaints from the public. The updates include the following: a complaint hotline during construction and providing a phone number to be posted on signage throughout the construction project and ensure that current site contact information is maintained with EFSEC. The Applicant would log all correspondence and promptly follow up with inquiries to provide appropriate resolution. The correspondence and resolutions would be logged throughout the construction process, and the log would be made available to EFSEC during routine reporting or upon request. During the operation stage, the site would be staffed and contact information would be available.
  - **Rationale:** This measure would better address and respond to noise complaints from the public.

- **N-5:** Establish a noise complaint resolution procedure similar to that proposed for construction and decommissioning to better address and respond to noise complaints.
  - **Rationale:** This measure would better address and respond to noise complaints from the public.

EIS Recommended Mitigation – Recreation (R)

- **R-1:** The Certificate Holder would coordinate with DNR and Benton County to identify new recreational activities and/or improve existing recreational activities within the Lease Boundary (e.g., multi-use trails).
  - **Rationale:** To mitigate the potential loss of recreational activities due to the Project.

- **R-2:** The Certificate Holder would provide a minimum of five informational boards approved by DNR and EFSEC at viewpoints within the Lease Boundary and/or in the surrounding communities associated with scenic areas of interest. The construction of the informational boards would be completed within five years of the beginning of construction.
  - **Rationale:** To mitigate the loss of uninterrupted views of scenic viewpoints and provide information to the public regarding the Project, the Project's expected years of operation and the reclamation of the Project. Additionally, photographs of the viewshed prior to the construction of the Project should be displayed, in color, on the informational boards.

EIS Recommended Mitigation – Recreation (R)

- **R-3:** The Certificate Holder would coordinate with local and regional (when appropriate) recreation groups (e.g., the Northwest Paragliding Club, the Tri-City Bicycle Club) to develop and maintain an adaptive safety management plan, prior to construction and approved by EFSEC, to continue access to recreation activities in the Project area while keeping recreation enthusiasts safe. This plan should identify potential hazards within the Project Area (e.g., construction on or near common bicycle paths, Project-created no fly zones for recreation activities, etc.) and provide opportunities to identify or improve other similar recreation use areas to offset any recreation removed from the Project area as a result of the Project. Specific to paragliding, the Certificate Holder would perform outreach to other regional paragliding entities to share the safety management plan to ensure that recreationists are aware of the limitations the Project creates for safe landing and safe air space.
  - **Rationale:** To mitigate the loss of safe use for recreation enthusiasts.

EIS Recommended Mitigation – Transportation (TR)

- **TR-1:** The load movement team would review the procedures to be followed if the load should become lodged at a crossing and would review the emergency contact numbers for each crossing daily—that is, before starting travel for the day.
  - **Rationale:** Ensures safe practices during the transportation of materials for construction and decommissioning.

- **TR-2:** The Applicant would work with WSDOT and Operation Lifesaver to provide train safety presentations to employees and contractors to increase knowledge regarding train safety, including train track crossings. Since this measure involves action by another agency, it cannot be required by EFSEC and cannot be considered fully effective mitigation for the purpose of this analysis.
  - **Rationale:** Lessens potential collisions at train crossings.

- **TR-3:** A third-party engineer would provide a traffic analysis prior to decommissioning. The traffic analysis would evaluate all modes of transportation (e.g., waterways, rail, roads, etc.) used for the movement of people and materials during decommissioning via the haul route(s) in Washington State.
  - **Rationale:** Ensures that no changes have occurred since the traffic analysis was originally provided prior to construction.

EIS Recommended Mitigation – Transportation (TR)

- **TR-4:** All railroad crossing and grade changes would be included in a route survey performed by a third-party engineer, with the Washington Utilities and Transportation Commission participating, to determine if current traffic control systems at crossings are appropriate or if additional mitigation is needed prior to decommissioning. The route survey would include anticipated traffic counts. Since this measure would require the participation of other agencies before it could be implemented, it cannot be considered fully effective mitigation for the purpose of this analysis.
  - **Rationale:** Ensures that no changes have occurred since the route survey was originally provided prior to construction.

- **TR-5:** The analysis of impacts from decommissioning is based on existing laws and regulations at the time when the ASC was submitted to EFSEC. The Applicant would consult with WSDOT and Benton County on the development of a Decommissioning-Stage Traffic and Safety Management Plan, prior to decommissioning. The Traffic and Safety Management Plan must include a safety analysis of the WSDOT-controlled intersections (in conformance with the WSDOT Safety Analysis Guide) and recommend mitigation or countermeasures where appropriate. The analysis would review impacts from decommissioning traffic and be submitted to WSDOT for review and comment prior to decommissioning. Since this measure would require the participation of other agencies before it could be implemented, it cannot be considered fully effective mitigation for the purpose of this analysis. EFSEC would work with the identified agencies to facilitate cooperation in implementing this mitigation measure.
  - **Rationale:** Ensures that no changes have occurred to the laws and regulations used in this analysis.

EIS Recommended Mitigation – Transportation (TR)

- **TR-6:** The Applicant provided a Traffic Impact Analysis (TIA) with the Final ASC. Oversize truck routes to the Project Area were analyzed using I-82, north through State Route 397, Locust Grove Road, and Plymouth Road. Additionally, the delivery of turbine towers was only analyzed from I-82 to the Locust Grove/State Route 397 exit. The use of additional routes for oversize or overweight deliveries would require supplemental analysis and approval by EFSEC .
  - **Rationale:** Ensures consistency with state and county transportation plans and codes.
- **TR-7:** Coordinate with WSDOT, Benton County, and EFSEC prior to construction and prior to decommissioning on potential mitigation for intersections with safety concerns. Mitigation may include the installation of warning signs, rumble strips, or other measures to alert motorists of intersections.
  - **Rationale:** Ensures safe practices during the transportation of materials for construction and decommissioning.

EIS Recommended Mitigation – Public Services and Utilities (PSU)

- **PSU-1:** To address the potential for the inappropriate disposal of Project waste, the Applicant would dispose of all non-recyclable Project components in an appropriately licensed waste disposal facility.
  - **Rationale:** This mitigation measure prevents disposal of Project-related wastes in inappropriate landfills or unauthorized facilities.

- **Additionally:** ENR-5 and ENR-7.

EIS Recommended Mitigation – Socioeconomics (Socio-ec)

- **Socio-ec-1:** Prior to decommissioning, the Applicant would provide an up-to-date analysis on the availability of temporary housing for workers. If sufficient temporary housing for workers is not available, the Applicant would present EFSEC with options for housing workers from outside the community.
  - **Rationale:** This mitigation measure would minimize adverse impacts on the availability of housing for residents of the surrounding communities.

Questions?