Data Request #	Section/ Page	Section	Topic	Information Request	Applicant Response
Land-1	pt.1 pg.2	Land	Transmission - Bonneville Power.	Have agreements been completed? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	See the Applicant's response to Land-7.
Land-3	pt. 1 pg. 5	Land	Sitting Area: 22,020 acres (11,179 acres solar array sitting, 10,841 acres transmission line corridor siting area); Final project area (subject to development) 6,000 acres.	Application states "subject to development", are you anticipating or planning any future expansion of the solar site?	There is a potential to expand the Project in the future to accommodate growing local, regional, and industrial renewable energy demand. Before the Applicant commits to expanding the solar site, the Applicant wants to ensure the expansion will be able to maintain the same development standards as the initial Project including agrivoltaics and a thoughtful approach to cultural and natural resource preservation.
Land-4	pt. 2 pg. 15	Land	$55 million (280 MW) $98 million (500 MW); tax revenue (sales, use, property) $65 million (280 MW) $116 million (500 MW).	Are other project outputs (lower) mw considered? Why these two figures (500 mw, 280 mw) used? What Project constraints may influence the decision between the two options? Please clarify whether the project MW is being measured as "generating capacity" or "grid injection capacity."	As the Applicant has already entered into a power purchase agreement to sell the first 280 MW of the Project, that is the minimum size the Applicant would build. The Applicant is currently in negotiations to sell the full remaining 220 MW. The Project MW are grid injection capacity measured in alternating current (AC) at the point of interconnect.
Land-5	pt. 2 pg. 16	Land	DC wire trenches: 3'w x 4'd (final design determined by thermal resistivity studies); where depths cannot be achieved: above ground cable trays, concrete slurry (National Electric Code).	When will thermal resistivity studies be completed? Will there be pipping/conduit installed in the trenches? Will increased use of concrete impact be calculated in final water runoff determination?	Thermal resistivity studies will be completed during detailed design. The EPC contractor will complete this work in 2025 with a COD being tracked in 2026.
Land-6	pt. 2 pg. 17	Land	AC medium voltage collector lines: trench (3'w x 4'd), final design based on thermal resistivity studies.	How is it anticipated that the resistivity study will impact these measurements?	The resistivity study could affect both the depth of the trenches and amount/type of engineered fill (if any) to dissipate heat.
Land-7	pt. 2 pg. 18	Land	POI (option 2): 15 miles long, project collector substation to POI (existing BPA southwest midway station); POI (option 3): 11.2 mile long (project collector substation to POI existing BPA transmission, northeast Wautoma substation).	What option will most likely be the final option? Have agreements been completed with BPA? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	The Applicant does not have LGIAs signed for any of the options due to delays in the BPA interconnection process. The Applicant will provide all four of our interconnection studies for review. BPA schedule and network upgrade costs will determine which option the Applicant uses for this Project.
Land-8	pt. 2 pg. 18	Land	Transmission line: H frame, single steel structure (60 - 150ft), concrete piers.	Why the need for such a large range? Will the H frame form and height construction be consistent with existing transmission lines the Project will tie into? How specifically will increased height impact the concrete slab? What are the specific measurement for these slabs? Will these impact ephemeral drainage ditches?	The Applicant is proceeding with development of both 230-kV and 500-kV voltage options to match the BPA voltage level. Higher voltage transmission lines require larger structures than 230-kV lines. Additionally, within either voltage class there is a range of options available. The Applicant's general approach will be to use guyed structures wherever possible. However, various constraints (from landowner, cultural, biological, etc.) may cause us to use monopole structures in some areas. Hence, the large range of possible structures. Yes, the H frame form and height construction will be consistent with existing transmission lines the Project will tie into. The Applicant will be utilizing concrete piers, not slabs. Pier dimensions will be determined during detailed design. Impacts are not anticipated for ephemeral drainages. Our design will strive to avoid these.
Land-9	pt. 2 pg. 18	Land	Unoccupied operations and maintenance building: single story, (could be) 5,000 sqft, 8 acres, 4sqft gravel parking lot, open staging area, fire extinguishers, smoke detectors (supervisory control and data acquisition system), firefighting equipment (shovels, beaters, portable water for hand sprayers, ppe; water cistern store water for fire suppression.	Will full time employees be using this facility, why is it determined Unoccupied? What is the purpose of a supervisory and data acquisition system? What is the determinations about the cistern? Is there an expected size (number of gallons)?	The Applicant will have an occupied O&M building that employees will use during daytime hours. The Applicant is considering options both off-site and on-site. If off-site, then the on-site storage facility will be unoccupied. If the Applicant decides to go with an on-site O&M building, then it will be considered an occupied building. The Supervisory Control and Data Acquisition (SCADA) system is the brains and communication center of the facility. It allows operators (both on-site and remote) to monitor generation, equipment status (i.e., breaker open/closed, etc.), weather conditions, and any curtailment or generation limits from the local utility. It allows control of the facility both onsite and remote. It allows remote monitoring of the facility from the BrightNight Network Operation Center, the local utility, and any other appropriate data users/third parties. Fire suppression system details will be determined during detail design and will conform to all local, state and federal regulations as well as utility industry best practices.
Land-11	pt. 2 pg. 25	Land	Final Geotechnical Report.	Please provide an estimate of when this would be completed.	The Applicant anticipates receipt in mid to late 2024.
Land-17	pt. 4 pg.119	Land	Updated Geologically Hazardous Assessment recommends additional exploration.	Is additional exploration planned?	Yes, the Applicant plans to conduct more testing from now until the start of construction as we further our design and refine the location of piles and foundations.
Land-19	pt. 4 pg. 187	Land	Trash and debris pit. Soil under and downhill of the pots is saturated with oil or fuel...covering area of 650 square feet...15 ft from open water canal. Storage area from chemical contained 30 or more 300 gallons polyethylene totes.	Will trash pits, storage areas be removed prior to operations? Will any soil samples in these areas be taken and tested?	Although the Solar Array Siting Area identified these concerns, the Project has worked to site around these constraints in design.

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Land-20	pt. 4 pg. 188	Land	Seven existing transmission lines that cross the project siting area, one solar array siting area: BPA, PacifiCorp.	Have easements been granted from BPA and PacifiCorp? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	Easements have not been granted from BPA or PacifiCorp yet. These crossing agreements are anticipated to be received by Q4 2023/Q1 2024.
Water-2	pt. 2 pg. 21	Water	Depending on moisture levels, 66 million gallons could be used during construction dust suppression.	How will moisture levels be monitored? Has water agreement been secured?	The Applicant plans on securing construction water for the Project in Q1 of 2024. The Applicant's EPC contractor and dust control manager will use humidity, rainfall, soil type, traffic, and road condition to determine the frequency and location of dust suppression efforts.
Water-3	pt. 2 pg. 22	Water	Typical maintenance: surface cleaning (dust, dirt); based on environmental conditions/rainfall (once a year): water trucks (personal scrub heavier soiling).	How will bird defecation impact need for cleaning time, water use, additives? Are there any studies/data that support washing once a year, particularly areas more prone to dust?	At this time, the Applicant is not anticipating that bird defecation would increase the need to clean the panels more than once a year. The O&M staff may spot clean any bird defecation bi-annually.
Water-8	pt. 2 pg. 61	Water	266,000 gallons: panel washing (regular intervals; at least once prior to construction).	What is the process for monitoring water use? What is the process for determining water washing?	The needs for panel washing will be determined by operations staff when monitoring equipment for performance and inspecting for quality control. The water usage volume will be documented at the time(s) washing is required and as required by the permitted source.
Water-9	pt. 3 pg. 70	Water	No fresh water, waste water facilities; onsite septic (if determined) permitted.	Water cistern for firefighting? Has septic needs been determined? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	Septic needs are still being determined based on the final location of the operations building for the project. Water tanks will also be housed at the operations building. The on-site energy storage system will likely utilize a closed loop liquid cooling system that will include a make-up water tank.
Water-11	pt. 3 pg.74	Water	Panel washing: 266,000 gallons of water, .5 gallon of water per panel, per wash, 20% of the panels washed twice a year.	How will water usage be monitored?	The Applicant will measure water use by tracking our water truck volume over the year.
Water-12	pt. 3 pg.76	Water	Grading required will maintain existing drainage.	Will there be any impacts (increased, decreased) volumes of water to ephemeral drainage ditches as a result of any grading?	Crossing locations will be designed to not increase or decrease the volume of flow.
Water-13	pt. 4 pg.119	Water	Project anticipates avoiding impacts to mapped 100 year floodplain.	What does "anticipates" to avoid the 100 year flood plain mean? How close is disturbance proposed to come to the boundaries of the floodplain?	The only floodplain located within the Project area is located along the gen-tie, which we anticipate we can avoid any permanent impacts to by spanning the area in question.
Veg-3	B22/pt. 3 pg. 51	Vegetation	Trees.	Please state whether the Project is anticipated to result in impacts to any trees within the stand located near Spring Creek.	The Project does not plan to impact the stand of trees located near Spring Creek.
Const-1	pt. 1 pg. 5	Construction	Commercial operation date (last quarter 2025), construction date (first quarter 2024) "can be built two phases".	What is the difference and why choose a two phased approach vs one phased? Has there been a final determination?	There are two main items we (Applicant) look at in determining if we should phase the Project or not: 1) customer need and 2) equipment availability. If we have a customer for the first phase of the Project who needs the power as soon as possible, we will break the Project into an earlier phase and later phase to meet this request. In addition, given current supply chain constraints in the industry there is the possibility we will need to wait up to two years to receive all the generation equipment. In this case, we will also break the Project into two serial phases. Currently, we plan on breaking the Project into a primary 280-MW and secondary 220-MW phase.
Const-7	pt. 3 pg.108	Operations	Water hauled to site from offsite source.	Has this source been identified? Have agreements been made? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	This source has not yet been identified and agreements have not been put in place. Identification of this water source and relevant agreements would be put in place by Q4 2024.
Const-10	pt. 4 pg.123	Operations	No backup power generators are proposed.	Does this include the proposed generator proposed for the O&M building?	The Applicant will include a backup generator for the O&M building.
Cult-1	pt. 3 pg.100	Cultural	4,908 acres identified.	When will surveys be completed for the entire proposed project area?	Field surveys are expected to be completed in the summer of 2023.

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Cult-2	pt. 4 pg. 225	Cultural	Pre-contact sites.	What coordination, if any, has been conducted with DAHP and federally recognized Tribal governments? Is this information part of the cultural report?	On behalf of the Applicant, GeoVisions met with DAHP on August 9 and 24, 2022. Letters of Project introduction were sent out to the Wanapum Band of Priest Rapids, the Confederated Tribes of Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribe. A summary of the outreach coordinated by GeoVisions on behalf of the Applicant is included within the Cultural Resources Report (Chapter 1, pp. 6-7).
Cult-3	pt. 4 pg. 229	Cultural	Pedestrian survey of the entire solar array siting area was not conducted.	As a result of applicants request to microsite the project the entire solar array siting area must be surveyed. Please provide an estimate of when the pedestrian survey would be completed.	Planned field surveys for adjustments to design within the Solar Array Siting Area and the gen-tie are planned for completion this summer. The Applicant is actively working on assessing a smaller siting area for consideration to allow for the feasibility of survey completion in the near term.
Mat-1	pt. 3 pg.84	Material, operation	Diesel generator provide backup power to O&M building.	What is the size and type of the generator, emissions rating? Will fuel be stored onsite for operation?	The size and type of generator will be determined during the detail design phase, when critical substation and O&M building equipment has been specified. The generator could be either diesel or propane, and fuel would be stored on-site. There will be a dedicated battery bank in the substation for emergency backup power. The back-up generator is not intended to operate during normal conditions or typical power outages. It would only be used in extreme events - extended periods without grid power or solar generation.
EM-1	pt. 2 pg. 35	Emergency Management	BESS: fire suppression and detection system.	Will this have any PFAS/PFOS?	Fire suppression will not have PFAS/PFOS. Fire suppression is typically an aerosol-based clean agent such as Stat-X or NOVEC. In a fire event, these will be contained within the battery enclosure and not leak outside.
EM-2	pt. 4 pg. 189	Emergency Management	Risk of Fire or Explosion; no petroleum products or other flammable/explosive substances are stored within the siting area.	Have the BESS (battery energy storage system) factored into explosive risks?	There will not be any explosive materials sited near the BESS. The battery enclosures are typically situated away from the O&M building and substation and have a very minimal risk of catching fire from other stored petroleum product. The batteries themselves do not have explosion risk. There are multiple layers of safety to detect heat, smoke, and over pressure inside an enclosure and douse any fire that is initiated. Pressure and fire are not allowed to build up to a level that would cause an explosion.
EM-3	pt. 4 pg. 192	Emergency Management	Bess will contain a fire suppression system...fire suppression system will include sensing equipment, alarm systems, and remote shutoff.	How will active fire be put out?	Each battery enclosure is equipped with active monitoring and sensing devices to detect heat, smoke and fire. In the event that a fire occurs, the fire suppression system deploys a clean agent (Stat-X or NOVEC) or a water based suppression to put out the fire before it can propagate.
Land-2	pt. 1 pg. 5	Land	Surveys conducted "will be" conducted prior to final design, "project components 'may' be constructed, in compliance conditions that 'may' be imposed".	What surveys still need to be completed? What is the time frame for their completion? Change the statement "may be" to " will be".	The Applicant is completing wildlife and habitat, raptor nest and avian point count, botanical, wetlands and waters, and cultural resources surveys in the Transmission Line Corridor Siting Area. Field surveys are expected to be completed in the summer of 2023. The Applicant acknowledges that Project components will be constructed, in compliance with conditions that will be imposed by the Site Certification Agreement (SCA).
Land-13	pt. 2, pg. 31	Land	Shrub steppe mitigation ratio (WDFW) 2:1 permanent impact, 1:1.	How will final design impact; permanent and temporary, disturbance to shrub steppe in the construction, operations maintenance areas. Please identify on a map? Please note that EFSEC requires altered habitat impacts to priority habitats be mitigated, at the same ratio as permanent impacts, given their sensitivity.	Anticipated impacts to habitat types from the Project are identified in Table 3 of ASC Attachment L (Draft Habitat Mitigation Plan). The table identifies temporary, altered, and permanent impacts to shrub steppe based on the preliminary layout reflected on Figure 1 to ASC Attachment L. As described in Section 7.3 of the Draft Habitat Mitigation Plan, these impacts and resulting mitigation acreages will be updated as appropriate once the final design has been completed. The mitigation ratios related to temporarily and permanently impacted habitats shown in Table 4 of ASC Attachment L are based on the WDFW (2009) Wind Power Guidelines. In the absence of solar-specific guidelines, the Wind Power Guidelines are used here to help achieve WDFW's Policy M-5002 goal of "protecting the productive capacity and opportunities reasonably expected of a site in the future." The altered habitat impact mitigation ratios were developed in the absence of solar development guidelines and considering that revegetated habitat under solar arrays does not meet the definition of temporary or permanent impacts from WDFW (2009).
Land-18	pt. 4 pg. 178	Land	Solar array fence lines designed to enclose smaller solar arrays...rather than enclosing one large fenced array...layout of perimeter fence also modified.	Is perimeter fencing different from the solar array fencing? Please identify this fencing on map.	The perimeter fencing and solar array perimeter fencing are not different. Perimeter fencing refers to fencing around the Project solar arrays and other supporting components. The perimeter fencing around the solar array is shown on Figure A-2.
Land-21	pt. 4 pg. 200	Land	3 parcels are federal (BLM) lands.	Are these still being considered?	No, the Project will not be located on BLM lands.
Land-22	pt. 4 pg. 211	Land	No mitigation.	Please include any proposals/commitments for proposed impacts to agriculture lands.	The Applicant demonstrates in the Land Use Consistency Review (see Attachment D) that the Project is designed to be compatible with ongoing agricultural activities. Operation of the Project will not conflict with agricultural uses on surrounding lands and represents compatible use in the GMA Agricultural lands designation. No land use mitigation or monitoring measures are proposed. In addition, the Applicant is also actively pursuing dual use options for the land that would allow it to remain in agriculture while simultaneously providing renewable energy generation, which is both a compatible and efficient use of the land.

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Water-4	pt. 2 pg. 27	Water	Ephemeral streams and stream buffers avoided to the greatest extent possible.	What does "greatest extent possible" mean? Have all streams been avoided?	Ephemeral streams were avoided by Project design to the greatest extent practicable. The Applicant applied a conservative 100-foot buffer to drainages from Project components within the Project Area. However, there are 10 locations where the collector lines and roads will cross an ephemeral drainage. Streams in the Transmission Line Corridor Siting Area will be fully spanned, with no transmission line structures placed within the streams or their buffers. Stream crossings are discussed in greater detail in Part 4 Section 3.C.
Water-6	pt. 2 pg. 58	Water	Storm Water: generally infiltrate cross site, vegetation, or where necessary, permanent detention basins, outlet culverts; impervious surface 188 acres (3.6%).	Define "where necessary". Are locations determined for basins, outlets, culverts? How is the 3.6% calculated? Please calculate all impervious surfaces separately and include this calculations in your waste water management plan.	In order to comply with the National Pollutant Discharge Elimination System (NPDES) permit (i.e., the Construction Stormwater General Permit, CSWGP), the Project's Stormwater Pollution Prevention Plan (SWPPP) will need to meet Ecology requirements in the Construction Stormwater General Permit (CSWGP) and the Stormwater Management Manual for Eastern Washington (SWMMEW), including Core Elements 1 to 4 and 6 to 8 for new development and the 13 SWPPP Elements. Core Element #3 (Preservation of Natural Drainage System) provides guidelines requiring, "To the maximum extent practicable, discharge stormwater in the same manner, at the same location, and at the same flow rate and volume as under the conditions that existed prior to development." Similarly, SWPPP Element 3 requires control of flow rates to "Protect properties and receiving waters downstream of development sites from erosion and the associated discharge of turbid waters due to increases in the velocity and peak volumetric flow rate of stormwater runoff from the project site." In compliance with these and other requirements of the CSWGP and SWMMEW, during the development of the SWPPP an evaluation will be completed to identify if there are locations where basins or other retention/detention features may be needed to maintain flow rates. As required in the SWMMEW, if retention/detention features are required, they will be constructed as one of the first steps in grading and their functionality will be confirmed. If outlet structures for the features are required, during construction an outfall structure will be installed that will allow for long-term storage of runoff and allow sediment to settle. Locations of any required retention, detention, or outfall features will be identified in the SWPPP and final site plans. The SWPPP will be prepared prior to construction. The 3.6 percent impervious area calculation comes from the overall surface types and acreages that are reported in Part 2, Section B.2. Post-construction, approximately 188 acres will qualify as impervious surfaces out of a total acreage of 5,128 (i.e., 3.6 percent). Post-construction impervious surfaces within the Solar Array Siting Area generally include gravel access roads, inverters, and the Project collector substation area, and are calculated based on the Department of Ecology's definition of "impervious" in Ecology's SWMMEW: A hard surface area that either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development. *A hard surface area that causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots or storage areas, concrete or asphalt pavement, gravel roads, packed earthen materials, and oiled macadam or other surfaces that similarly impede the natural infiltration of stormwater* .
Water-6 (Cont.)					Response Continued: The table below provides separated calculations of impervious areas based on preliminary design. The SWPPP developed for the NPDES permit prior to construction will be based on the construction-level plans and will incorporate the final impervious area calculations. **Component** / **Impervious acres** solar array posts — 2.49 power conversion system pads — 9.26 Project service roads — 148.42 O&M structure area — 0.36 Collector substation area — 9.88 Substation Options — 6.79 BESS area — 9.88 Gravel parking area — 0.80 overhead 230-kV gen-tie line poles — 0.04 187.92

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Air-2	pt. 3 pg. 67	Air	Air pollution: heavy equipment, dust emissions.	Are maintenance vehicles, vehicles used for panel washing and decommissioning included in the vehicle emissions?	Vehicle emissions presented in Table 4.2-2 represent the worst-case annual emissions scenario; emissions are related to construction activities, and do not include O&M (e.g., maintenance and panel washing) or decommissioning activities. Emissions from maintenance vehicles and panel washing are expected to be very low in comparison to construction. Emissions from decommissioning activities would be similar to or less than those for construction.
Veg-1	pt. 3 pg.78	Vegetation	Botanical surveys will be conducted siting area 2023.	Are botanical surveys still to be completed in Spring 2023? If not, please provide an estimate of when this would be completed..	The Applicant is completing botanical surveys in the Transmission Line Corridor Siting Area. Field surveys are expected to be completed in the summer of 2023.
Const-2	pt. 2 pg. 21	Construction	Foundation posts installed using a hydraulic pile driver.	Will the noise and vibrations from pile driver have impacts on local communities, wildlife? Was this project activity and equipment included in the acoustic assessment?	WAC 173.60.050 exempts temporary construction noise from the state noise limits. Nonetheless, the Applicant's noise assessment evaluates potential construction-related noise in ASC Attachment Q. The noise assessment addresses equipment noise from a hydraulic driller but did not include an impact pile driver. If needed during construction, adding the impact pile driver to the assessment does not significantly increase noise levels received at receptors (see Const-2 Response Memo). The temporary received noise levels at receptors identified in Table 7 of ASC Attachment Q will increase by approximately 3 dBA on average in areas where temporary impact pile driving is used. Construction may generate noise levels that exceed the ambient levels and has the potential to cause a temporary and short-term disturbance. As identified in the construction noise mitigation measures in Section 3.3 of Attachment Q, the Project will make reasonable efforts to minimize the impact of noise resulting from construction activities. Potential effects on wildlife from noise, light, and glare are described in Section 4.9.C.1. Best Management Practices included in Section 4.16a.D of the Application will minimize impacts of temporary noise disturbance to wildlife in and near the Project.
Const-11	pt. 4 pg. 223	Operation	Project analyzed potential glare hazards to residents, motorists and pilots in the area.	Was wildlife or "lake effect" considered in the glare analysis?	Lake effect is considered in Part 4 (Animals) Section 9.C.1 under noise, light, and glare.
Const-12	pt. 4 pg. 223	Operation	Project components and activities if needed and feasible.	What determines this? Will anti-glare coating be used?	The Project will use panels with anti-reflective coating.
Const-13	pt. 2 pg. 23	Decommissioning	Following equipment will be removed.	This section does not mention: o&m building, parking lots, access roads, water basins. EFSEC does require removal of any site changes made during construction and operations as part of the decommissioning process please update this section to reflect these conditions. Any roads that remain post-project will require additional mitigation.	This section is updated as follows: Once the site has been adequately prepared for decommissioning, the following equipment will be removed: solar PV panels and racking system, including steel piles, power conversion systems (including BESS units and step-up transformers), electrical wiring and connections, Project O&M building and substation components, parking area and water retention basins, communication equipment, and fencing. Above-grade foundations will be removed to a level of no less than 3 feet below the ground surface unless requested to be maintained by the property owner. The extent of which access roads will be removed will be coordinated with the landowners at the time of decommissioning.
Transp-3	B23	Transportation	Train Crossings.	Are there any train crossings along the expected route of Project traffic? Are there any proposed commitments relating to train crossing safety?	No railroad crossings occur on the proposed transportation route that uses SR 241 and Sheller Road. One railroad crossing is identified on the proposed transportation route that uses I-82 to N. Gap Road. The railroad crossing occurs at a signalized crossing on N. Gap Road located north of W. Johnson Road. The signalized crossing is approximately 5 miles south of the Siting Area. Project transportation will follow traffic rules at the signalized crossing and no other commitments are proposed.
Rec-1	pt. 4 pg. 224	Recreation	Blank.	Please updates this section to include the Black Rock Hunting Grounds in the transmission area.	Part 4 Section 17 will be updated as follows: 4.17.A (Studies): No studies are proposed for recreation. 4.17.B (Existing Conditions): As described in Part 3 Section 17, portions of the Transmission Line Corridor Siting Area are located within the Blackrock Valley hunting grounds (Site 295). The proposed 150-foot-wide gen-tie alignment occurs along the eastern boundary of the Blackrock Valley hunting grounds approximately 4 miles from the mapped entrance to the hunting area. The Blackrock Valley hunting grounds are part of a program that provides access to private lands where the WDFW has a management agreement with the landowner to regulate hunting (WDFW 2022b). 4.17.C (Changes to the Existing Condition): During construction, hunting would be temporarily excluded from the private lands within the Transmission Line Corridor Siting Area except in areas or times agreed upon by the landowners and the Applicant where hunting can be conducted without health and safety risks. During operations, hunting could be limited only where the gen-tie line pole structures will occur within the 150 foot wide gen-tie alignment that occurs on the eastern boundary of the Transmission Line Corridor Siting Area. Otherwise, hunting will still be allowed with written permission from landowners throughout the Blackrock Valley hunting grounds as it is currently. 4.17.D (Proposed Mitigation and Monitoring): Based on the information provided above, the Project will have no significant adverse effects on recreation and no mitigation for recreation is proposed.

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Land-10	pt. 2 pg. 21	Land	Some grading; clearing, grubbing, grading will be conducted.	Please include as part of any grading plans, any and all: cuts or fills, as well the locations of the cuts and fil. Please also include a material spoils plan. Please provide an estimate of when this would be completed.	The level of design necessary to develop grading plans will occur following the issuance of the SCA and prior to construction to allow for optimized site design. Grading plans will be prepared for and approved by EFSEC prior to the start of construction. Analysis should assume that the Project will operate in compliance with the grading plans and that EFSEC will have oversight of that compliance during construction.
Land-12	pt. 2 pg. 26	Land	Vegetation weed management plan.	Please provide an estimate of when this would be completed.	The Applicant will prepare a site-specific Vegetation and Weed Management Plan approved by EFSEC prior to the start of construction.
Land-14	pt. 2 pg. 31	Land	Existing artificial water sources (livestock), discussions WDFW, affected landowners; move sources outside fenced areas.	Have agreements been completed to move sources outside fenced areas? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	There has been no discussion regarding movement of artificial water sources at this time, but the Applicant will continue to coordinate with the landowner if any changes need to be made to support the grazing operation.
Land-15	pt. 3 pg.91	Land	Several scattered DNR parcels.	Identify and map all DNR parcels as well as any access or easements for both the solar and transmission areas.	The Applicant confirms the Project will not use DNR lands. DNR parcels are shown on Figure A-2.
Land-16	pt. 4 pg.118	Land	Applicant will provide grading plans.	Please provide an estimate of when this would be completed.	See the Applicant's response to Land-10.
Water-1	pt. 2 pg. 19	Water	Waste water managed using portable toilets.	Will this be part of the waste management plan?	See the Applicant's response to Mat-2.
Water-5	pt. 2 pg. 27	Water	Development stormwater pollution prevention plan, erosion and sediment control, Spill prevention control and counter measure plan.	Please provide an estimate of when this would be completed.	The level of design necessary to develop the SWPPP (construction and operations phase), erosion and sediment control plan, and spill prevention control and counter measure plan will occur following the issuance of the SCA and prior to construction to allow for optimized site design. These plans will be prepared for and approved by EFSEC prior to the start of construction. Analysis should assume that the Project will operate in compliance with these plans and that EFSEC will have oversight of that compliance during construction and operations.
Water-7	pt. 2 pg. 60	Water	66 million gallons of water - construction: evaluating options to purchase water: permitted off site source, hauled.	Have all water needs been accounted for, including during the disposal/decommissioning?	Yes, the Applicant believes they have accounted for all water needs for the Project.
Water-10	pt. 3 pg. 70	Water	Panel washing: not expected to generate runoff/erosion, most water evaporate, easily infiltrate into ground, not expected to enter surface water bodies/aquifers; washing: water only, no surfactants other chemicals.	How will rain runoff effect erosion around the panels, part of the erosion or stormwater runoff plan?	See the Applicant's response to Water-5.
Water-14	pt. 4 pg.120	Water	Applicant will implement an Erosion and Sediment Control Plan and Construction Phase Stormwater Pollution Prevention Plan and Operations Phase.	Please provide an estimate of when this would be completed.	See the Applicant's response to Water-5.
Water-15	pt. 4 pg. 146	Water	Prevent spills during construction.	Develop a spill prevention plan for construction and operation. Reference: https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Spills-Prevention-Preparedness-Response.	See the Applicant's response to Water-5.
Air-1	pt. 2 pg. 27	Air	Truck beds will be covered when transporting dirt or soil.	Please incorporate: when transporting "any materials that is susceptible to being dropped, spilled, leaked, or otherwise escaping there from, must be covered and or tied down" per Washington State law (RCW 46.61.655).	The Applicant acknowledges and will comply with applicable rules under RCW 46.61.655.
Const-3	pt. 2 pg. 21	Construction	Any electrical wiring or collector lines installed belowground.	Please identify all buried line locations on a map. Will conduit be used for wiring in trenches? Will any grading materials be added to trenches?	The level of design necessary to develop the final site plan will occur following the issuance of the SCA and prior to construction to allow for optimized site design. Final construction details will be prepared for and approved by EFSEC prior to the start of construction.
Const-4	pt. 2 pg. 22	Operations	5 fulltime personnel, limited additional personnel: temporary (service technicians); performance audit/inspection: annually.	What are the peak level of employment, site occupancy when service technicians will be there and auditing performed? Will these be local employees, outside contractors?	The Applicant anticipates and prefers that these full-time employees will be local to the community and generally on-site daily through the life of the Project.

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Const-5	pt. 2 pg. 22	Operations	No material quantities of chemicals of fuels stored O&M building; negligible amount: lubricating oil, greases, hydraulic fluid, raw materials.	Please develop and submit a plan for storing any quantities of materials as well as a waste management plan. Notify and provide Benton County Fire a copy of MDS. Reference: https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan.	The Applicant's SPCC Plan and Waste Management Plan will be prepared for and approved by EFSEC prior to the start of construction. Analysis should assume that the Project will operate in compliance with these plans and that EFSEC will have oversight of that compliance during construction and operations.
Const-6	pt. 2 pg. 23	Operations	Plans to use a mix of sheep grazing, mechanical methods production area; herbicide control.	How would sheep grazing, mechanical methods, and herbicide be utilized? Under what conditions would these options not be chosen? Please include these details in your vegetation management plan.	These details will be included in the Applicant's site-specific Vegetation and Weed Management Plan, which will be finalized with EFSEC's approval prior to the start construction.
Const-8	pt. 3 pg.109	Operations	Domestic waste will be handle with licensed waste contractor.	Develop a waste management and recycling plan. Reference https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan.	The Applicant will prepare a Draft Waste Management Plan for EFSEC's review. The Applicant's Final Waste Management Plan will be prepared for and approved by EFSEC prior to the start of construction. Analysis should assume that the Project will operate in compliance with the plan and that EFSEC will have oversight of that compliance during construction and operations.
Const-9	pt. 4 pg.118	Operations	Blasting may be required.	Please include any explosive management plans as part of emergency management plan. Consult with Benton County Fire Dep. prior to conducting blasting operations.	If blasting is determined to be needed during construction, the Applicant will prepare an Explosive Management Plan in consultation with the Benton County Fire Department and for approval by EFSEC. The Applicant's Explosive Management Plan will be prepared for and approved by EFSEC prior to the start of construction. Analysis should assume that the Project will operate in compliance with the plan and that EFSEC will have oversight of that compliance during construction and operations.
Const-14	pt. 2 pg. 23	Decommissioning	Equipment and materials will be salvaged or recycled to extent feasible.	Please develop and submit a waste management plan and recycle plan. Please reference: https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan.	See the Applicant's response to Const-8.
Transp-1	pt. 4 pg. 241	Transportation	Sheller Road, Anderson Road, N Gap Road; N McCreadie Road, N Missimer Road: appear to be in fair to good condition by ariel imagery.	Road conditions need to be field verified. Take into account all anticipated, increased quantities of heavy truck trips along these routes. Please provide an estimate of when this would be completed.	The Project's final construction haul route(s) will be determined by the Applicant's EPC contractor following the issuance of the SCA and prior to construction to allow for optimized site design. Final construction haul route details including verification of road conditions will be prepared with input from the Benton County Road Department and approved by EFSEC prior to the start of construction. The Applicant will implement the mitigation measures identified in ASC Part 4 Section 20.D.
Transp-2	pt. 4 pg. 243	Transportation	No anticipated changes or improvements or existing transportation infrastructure.	Any updates to this section as a result of field verification. Please provide an estimate of when this would be completed.	See the Applicant's response to Transp-2.
Transp-4	B23	Transportation	TIA	Please provide a proposed haul route, level of service analysis at critical intersections for the peak construction phase, a transportation safety plan, and updated traffic counts. Some core elements and methodology of this TIA (the exact nature of which can be determined through discussions among the Applicant, EFSEC, WSDOT, and Benton County)should be prepared and submitted prior to EFSEC making a SEPA threshold determination.	The Applicant discussed Data Request Transp-4 with EFSEC. EFSEC acknowledged that a TIA and additional analysis may not be necessary based on analysis provided in ASC Part 4 Section 20. EFSEC will meet with WSDOT and Benton County and provide input if additional analysis is needed. The Applicant's analysis is based in part on traffic levels obtained from the WSDOT Traffic Count Database System (WSDOT 2022) as described in ASC Part 4 Section 20.B, impacts are discussed in ASC Part 4 Section 20.C, and the Applicant will implement the mitigation measures identified in ASC Part 4 Section 20.D.
Mat-2	pt. 3 pg.86	Waste Management	Project will not generate large quantities of waste.	A draft waste management plan needs to be developed. Please send to EFSEC as a supplemental document. Reference: https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan.	See the Applicant's response to Const-8.
Mat-3	pt. 3 pg.90	Materials Management	Project will properly handle, store, dispose/recycle spent batteries.	Develop a materials storage and waste management plan. Send this plan to EFSEC as a supplemental document. Reference: https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance.	See the Applicant's response to Const-8.
Mat-4	pt. 3 pg.109	Waste Management	Domestic waste will be handle with licensed waste contractor.	Develop a waste management and recycling plan. Reference https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan.	See the Applicant's response to Const-8.
Mat-5	pt. 4 pg. 184	Waste Management	Incomplete.	This section needs to be revised and completed. Reference: https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan.	See the Applicant's response to Const-8.
BMP-1	pt. 4 pg. 179	Best Management Practices	BMP index.	Does this cover the life of the project?	Yes, the BMP index is intended to cover the life of the Project.

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Veg-2	pt. 3 pg.79	Vegetation	Field verification of WDFD mapped data.	Will this be part of botanical surveys to be completed in Spring 2023? If not, please provide an estimate of when this would be completed.	The Applicant is completing botanical surveys in the Transmission Line Corridor Siting Area. Field surveys are expected to be completed in the summer of 2023.
Wild-1	pt. 2, pg. 53	Wildlife	Two Elk areas: Rattlesnake elk wintering area; habitat concentration for elk, mule deer.	What are the mitigation efforts for these species - transmission area? Will there be surveys completed to conducted site verification of PHS data? If yes, please provide a copy, if not, please provide an estimate of when this would be completed.	The Applicant is completing wildlife and habitat surveys, informed by WDFW-mapped PHS data and consultation with WDFW, in the Transmission Line Corridor Siting Area. Field surveys are expected to be completed in the summer of 2023. Mitigation is discussed in ASC Attachment L (Draft Habitat Mitigation Plan). The Draft Habitat Mitigation Plan will be updated as needed based on the results of the wildlife and habitat surveys conducted in the Transmission Line Corridor Siting Area.