WAUTOMA SOLAR ENERGY PROJECT – DATA REQUEST 2			
ID	**Section**	**Comment**	**Applicant response**
Animals-1	ASC 4.9.B beginning page 163	WDFW appreciates that the project illustrated the position of the project in relationship to important elk core areas and linkages (connectivity) but would like to point out that mule deer habitat concentrations areas are also within the project. Additionally, other data sets such as the Statewide Action Plan (WDFW 2015) identify that the proposed Wautoma Solar project is within the observed range of Burrowing Owl, Greater Sage-grouse, and Fer 2ruginous Hawk. Please prepared additional maps showing that more than just elk are dependent on the area of the proposed project and surrounding landscape.	We believe this request has been previously addressed (see 10/31/22 email from Laura O'Neill to Ami Hafkemeyer). In addition to a Revised HMP, we updated ASC Figure A-9 (Big_Game_Habitat_10172022) to include mule deer. The other species noted have either been addressed specifically (i.e., BUOW), or have not been documented to nest with the project site boundary. A single ferruginous hawk was observed briefly soaring in an area of native grassland habitat in the far southwestern edge of the Project as noted in the Habitat and General Wildlife Survey Report (ASC-Appendix L). Based on field surveys conducted in March, May, and October 2021 and May 2022, existing habitat does not provide suitable nesting substrate nor does there appear to be sufficient prey base for larger raptors such as ferruginous hawks and golden eagles in most of the Project Area (Katzner et al. 2020; Ng et al. 2020; Tetra Tech 2022c). No ground squirrel colonies were located, and no jackrabbits were observed; however, raptor nest survey results and small rodent signs indicate that there is a sufficient prey base to support medium-sized raptors such as red-tailed hawks and Swainson's hawks. Regarding Burrowing Owl and Greater Sage-Grouse, mentioned in WDFW's comment letter, dated August 30, 2022, we propose adding the following information to Part 4.9 of the ASC when EFSEC determines that it is an appropriate time to submit a revised version (also see 10/31/22 email from Laura O'Neill to Ami Hafkemeyer): *Greater sage-grouse (Columbia Basin DPS): The Washington population in 2021 was estimated to be 775 birds. There are no known populations of greater sage-grouse in Benton County or suitable habitat within the Project Area. There are two remnant populations of the Columbia Basin DPS of greater sage-grouse: one in Douglas and Grant counties, and one on the Yakima Training Center in Yakima and Kittitas counties. Small reintroduced populations occurred in Lincoln County and on the Yakama Indian Reservation in Yakima County but were lost to fires in 2019 and 2020 (WDFW 2015; Stinson 2021).* *Burrowing Owl: The PHS database contains burrowing owl records that were documented in 2014 located approximately 0.25 mile north of the Project. In addition, one active burrowing owl nest was identified approximately 0.25 mile north of the Project Area during the Raptor Nest Surveys in 2021 (Attachment L). Four additional active burrowing owl nests were observed in the center of the Project Area during surveys in 2022 (these observations were noted in a Wildlife Survey Addendum submitted in August 2022). The active burrowing owl burrows both in the PHS database and documented just north of the Project Area in 2021 and in the central portion of the Project Area in 2022 have been avoided through design modifications to all Project facilities including solar arrays, security fencing, access roads and collection lines. In addition, site-specific conservation measures developed in consultation with WDFW, such as ensuring that occupied burrows plus a 150-meter buffer would not be disturbed during the nesting period (February 15 through September 25), would be implemented. If avoidance is not possible, use or development of nearby natural or artificial burrow systems would be developed in coordination with WDFW.*

Animals-2	4.9 Animals	The ASC notes that the Project is not predicted to impact fish within the project area; however, the application does not discuss the potential for impacts downstream in receiving waters. Please provide information on whether impacts in the project area, such as a spill, could impact fish downstream.	The Yakima River is the first known fish bearing stream, approximately 21 miles downstream of the Project, as described in the ASC (Section 4.3B). Because the Project will not adversely impact ephemeral streams on site as described in the ASC (Section 4.3.C.1), and because the ephemeral streams on site lack connectivity to other intermittent, perennial, or fish-bearing streams, no adverse impacts to downstream fish would occur. As described in the ASC, two of the stream segments (ST-207/Dry Creek, and ST-217 in Attachment I) continue out of the Project Area. ST-217 is a tributary to ST-207/Dry Creek just outside of the Project Area. ST-207/Dry Creek connects to Cold Creek at 4.5 miles downstream from the Project Area. Cold Creek is uncategorized on the Washington Department of Natural Resources (DNR) stream typing maps and does not contain fish per the StreamNet database (DNR 2022; StreamNet 2022). The Cold Creek drainage continues about 21 miles downstream to the Yakima River. However, Cold Creek appears to no longer be directly connected to the Yakima River in the historical orthoimagery (Google 2022). The Horn Rapids Campground and Park as well as the Tapteal Water Trail Access Road cover the historical floodplain and confluence of Cold Creek and the Yakima River (Google 2022). As described in the ASC (Section A.5), Spill Prevention Control and Countermeasure (SPCC) plans will be developed for both the construction and operational phases of the Project. Preventative measures will include best management practices, such as not fueling within the Ordinary High Water Mark of waterbodies to reduce the potential for spills going into water courses. Appropriate containment and spill response kits will be present on site.
SEPA-1	Attachment I, Figures 5-4; 5-5; 5-7 (When overlayed with Attachment A, Figure A-1 Preliminary Site Plans, sheets 4, 5 & 7)	Please address: It is unclear if two of the wetlands are located within the siting of the solar panels. The placement of solar panels over the wetlands could create shading that may alter the wetland's ecology and could be considered an impact. Should impacts be unavoidable, compensatory mitigation would be required. Documentation of mitigation sequencing (avoidance, minimization, rectifying the impact, reducing, or eliminating the impact over time, and compensation) should be provided.	The Project has been designed to avoid impacts to wetlands and their buffers (see ASC Section 4.3.C.1). No solar panels will be placed over the wetlands or their buffers, and disturbance of wetlands and their buffers will be avoided during construction. Therefore, no compensatory mitigation is warranted.
SEPA-2	Attachment A - Project Maps	Please address wildlife habitat connectivity. Figure A-1 (Attachment A – Project Maps) illustrates the project layout with various fenced-in solar arrays but nowhere in any of the documents does the project address impacts to landscape connectivity and wildlife movement. Figure A-9 (Attachment A – Project Maps) shows information from 3 separate data sets: the Arid Lands Initiative, the Statewide Connectivity Analysis, and the Columbia Plateau Connectivity Analysis.	We believe this request has been previously addressed (see 10/31/22 email from Laura O'Neill to Ami Hafkemeyer). We updated ASC Figure A-9 (Big_Game_Habitat_10172022) to include mule deer. Per previous discussions with WDFW regarding big game use in the area, we provided a Revised HMP that addresses big game use and will maintain travel corridors throughout the proposed Project layout (See HMP Section 7.1-Avoidance and Minimization). We will continue to work with WDFW and EFSEC as we finalize our layout and HMP to ensure safe wildlife travel corridors are maintained throughout the Project Area.

SEPA-3	4.14 Land Use, Natural Resource Lands & Shoreline Compatibility	Please provide more clarity on why the identified prime farmlands within the Project Area are isolated and explain why and how topography and drainage limitations result in low economic viability of these farmlands. Additionally, EFSEC recommends the Applicant provide an approximate area of land that would be lost for sheep grazing within the Project Area and an analysis of potential changes in forage quality which could indirectly affect patters of agricultural use in the region.	The identified prime farmlands are isolated because only a small, discrete area of land within the Project Area is irrigated. The landowner has advised that topography and drainage are not factors which impact the economic viability of continued farming operations. The limiting factor is a lack of water. In such a dry climate with low annual rainfall, irrigation is required to support any crop production. The landowner has observed that water levels in the onsite wells are decreasing every year. Consequently, several years ago, the landowner had to switch from alfalfa to crops which required less water (barley hay, triticale, and wheat). It is anticipated that as the water table continues to decrease, no crop will be able to be supported/cultivated. The landowner anticipates that the suspension of irrigation for crops during the 30-50 year operational term of the Project will allow the water table to naturally recharge and that the economic viability of the farmlands will be improved following the Project's operational term. No land will be lost for sheep grazing. Currently, the landowner uses approximately 30 acres for sheep lambing (approximately 1 to 1.5 months of the year). These 30 acres have been set aside from the project layout and will be retained by the landowner for this purpose. Once the lambing period is over, sheep are moved off the property onto separate parcels (held by the same landowner) on an adjacent ridge, for grazing. The Vegetation and Weed Management Plan will prescribe revegetation with species consistent with current habitat makeup; no changes to forage quality, post-decommissioning, are anticipated. Together with WDFW, the landowner will be included in discussions on vegetation strategy and species.

SEPA-4	4.9 Animals	The ASC provides a list of animal species observed during field studies as well as special status species with potential to occur in the vicinity of the Project. The ASC does not include information on non-special status species or guilds that could occur in the area. For example, the ASC does not provide information on the potential for bats or amphibians to use the vicinity of the Projects. Please provide information on wildlife guilds/species groups that could occur in the Project Area or provide rationale for excluding some guilds.	The analysis focused on special status species, as those are the taxa/species to which regulations apply. However, note that the species represented in the special status species list includes a wide range of taxa/groups; including avian species, mammals (including bats), and reptiles. Attachment M: Wildlife Habitat Management and Mitigation Plan of the ASC, as well as the Addendum, indicated all wildlife species seen or heard during various survey efforts (See Appendix C of Attachment G and 2022 Addendum). Although no protocol-level surveys for bats were conducted, there is likely limited use of the area due to lack of day/night roosting or maternity structure for bats (e.g., caves, cliffs, buildings). Use by bats and other species, including most amphibians, is likely around the existing man-made water sources. There are approximately 63 acres (1 percent) of mapped shrubsteppe within the Project Boundary, of which 4.2 acres may be impacted. Due to the limited amount of existing shrubsteppe, use by shrubsteppe obligate species is unlikely and none of those species were documented during surveys. As a result, the information provided for special status species can be used to determine the likelihood of similar non-special status species that occur as well as what potential impacts could be. Regardless of a species "special status", all species that were either documented during surveys or have potential to occur were reviewed and potential impacts assessed.
SEPA-5	4.9 Animals	The ASC does not provide information on invasive animals documented or with potential to occur in the Project Area, which is a SEPA requirement. For a more definitive SEPA evaluation, please provide information on whether invasive animal species are known to or have the potential to occur in the Project Area.	No invasive animal species listed by WDFW are known to occur in the vicinity of the Project area. Potential habitat for invasive fish or aquatic invasive species (e.g., zebra and quagga mussels, European green crabs, or bullfrogs) is not present (Source: https://invasivespecies.wa.gov/find-a-priority-species/?_sft_priority-specie-type=invasive-animals).

SEPA-6	4.8 Plants and Ecosystems	Please provide information on the plant species that would be used in the 'green strips' for potential fire protection, and whether these 'green strips' would include shrubs. Generalized information should be provided for location and extent of 'green strips' and clarification as to whether habitat loss calculations include loss associated with 'green strips' creation.	Details of green strip locations and seed mix have not been developed. If this mitigation measure is included in the final Habitat Management Plan, these details would be confirmed prior to construction. We anticipate the seed mix would be similar to the mix preferred by WDFW when they have previously implemented green strips in the Project vicinity. Mike Ritter/WDFW provided the following information on seed mix used by WDFW when they develop green strips (email from Mike Ritter to Karen Brimacombe dated February 16, 2022): *The mix we use germinates early and in some instances can outcompete cheatgrass, stays green and holds moisture well into the summer/late summer. Additionally some species can be used by wildlife and in the future we will be using cattle to manage the growth. We use the following seed mix:* *Drill 9.5 lbs PLS/ac of the following mix:* *• Forage Kochia – 1.5 lbs PLS/ac* *• Vavilov II Siberian Wheatgrass – 5 lbs PLS/ac* *• Don Alfalfa – 0.75 lbs PLS/ac* *• Small Burnett – 1.8 lbs PLS/ac* *• Lewis Flax – 0.25 lbs/ac* *• Western Yarrow – 0.2 lbs/ac* *We used Western Reclamation, Inc out of Eltopia to purchase the seed. The contact would be Todd Harris: Office: 509-297-4500, Cell: 509-531-1702 and email wri@westernreclamation.com* *You may not want to use forage kochia and Western Reclamation can suggest another forb or grass.* No shrubs are included In the green strip mix preferred by WDFW. Per discussion with Mike Ritter/WDFW, creation of green strips in this area would generally be considered an improvement to habitat, and therefore these areas would not be included in habitat loss calculations.
SEPA-7	4.8 Plants and Ecosystems	Kochia (*Bassia scoparia*), a state- and county-listed noxious weed, was documented during field surveys according to Appendix F and Section 3.8 but is omitted from Section 4.8, assumingly because it does not occur in the Project Area. The SEPA requires the Applicant to provide information on all noxious weeds and invasive species known to be on or near the site. Please confirm that Kochia occurs in the Project Lease Boundary but not the Project Area based on the revised Project Area and indicate whether there are other noxious weed and invasive species not documented in the Project Area but could occur near the site.	As noted in the Botanical Survey Report prepared for the Project (Attachment F of the ASC), one observation of kochia (*Bassia scoparia*) was documented during field surveys conducted for the Project. As shown in Figure 4 of the Botanical Survey Report, this observation is located along the northern portion of the Project Lease boundary and outside of the current Project Area. Kochia is the only noxious weed documented during field surveys that was observed in the Project Lease Boundary but not within the Project Area.

Earth-1	Attachment I	Are wetland associated buffered areas shown on maps?	The buffers are not explicitly drawn out in the figures in the wetland delineation report, but the Project does avoid encroachment on the wetland buffers. Benton County requires a 40 foot buffer on these Category IV wetlands.
Env. Health-1	Part 4.13 , Environmental Health	P. 182, Has well location and availability been verified?	The proposed well is located within the Project Area and has a valid water right with sufficient capacity for the project's needs. We are in discussions with the holder of the water right and the Department of Ecology to determine if the project will source water from this well. If this water source is determined to be unavailable for the project's use, water will be hauled from off-site sources with existing water rights (i.e., a municipal water source or vendor with a valid water right). The transportation calculations included in the ASC include impacts from hauling water from an outside source, as a greatest-impact estimate. Should the on-site well be used, the project's impacts will be lessened. We will inform EFSEC when the final decision has been made and update impact calculations at that time, if necessary.
Light, Gare & Aeasthics-1	Attachment P, Visual Impact Assessment	Of the 5 KOPs, why are only 2 (KOP 3 & 4) provided with simulations?	KOPs were identified based on locations from which the Project infrastructure would potentially be visible and noticeable to the casual observer. In order to provide the most conservative simulations from the selected KOPs, availability of public views of the Project site and the number and type of sensitive viewers were considered. KOPs 3 and 4 have close public views of the Project site and represent the most viewers from residences and the frequently traveled public roadways SR 241 and SR 24. KOP 2 would also have close public views of the Project site, but would represent a lower number of viewers from residences and the less frequently traveled Wautoma Road. At the location of KOP 2, Wautoma Road, while classified as a public road, is unlikely to see significant traffic volumes not associated with the Project. While public residential and roadway views are available from KOP 1, distance and intervening topography reduce the visibility and dominance of the Project site, representing reduced visual impacts in comparison to KOPs 3 and 4. The Project would not be visible from KOP 5 because of distance and the screening of the Project by terrain.
L.U.-1	Part 4.14, Land Use, Natural Resource Lands, & Shoreline Compatibility	P. 197 identifies irrigated agricultural land use. Soil compaction on irrigated agricultural lands can result in permanent damage. Please address efforts to reduce permanent damage on the site during construction and operation as well as restoration plans for agricultural soils.	Excessive soil compaction will be limited by the implementation of construction and operations BMPs. These BMPs would include: -- Flag and prevent access to protected areas where no disturbance should occur, and areas where only minimal disturbance may occur. Protected soil organisms and seeds will remain available to colonize adjacent disturbed areas. -- Where possible, mow vegetation rather than clearing and grubbing areas -- Limiting vehicular traffic to established access roads; place rock bases on access roads and prevent traffic on open soils -- Salvaging, separating, and replacing topsoil -- Where compaction has occurred, cultivating or decompacting the subsoil to a minimum depth of 18 inches -- Avoidance of earthwork activities in saturated conditions, which can produce deep soil compaction that is difficult to reverse without deep tillage practices -- Development and implementation of a Vegetation and Weed Management Plan

L.U.-2	Part 4.14, Land Use, Natural Resource Lands, & Shoreline Compatibility	P. 193 states 524 acres are enrolled in the federal Conservation Reserve Program. Will all these acres be removed from this program for this project?	At this stage, the layout proposed in the ASC is at a preliminary stage. If all or a portion of the lands currently enrolled in CRP (338 acres) are included in the final layout, those lands will be removed from CRP.
Noise-1	Attachment 0 Acoustic Assessment Report	In Attachment O, it is unclear how the 500-kV transmission line was incorporated into the model or the final noise impact results from Project operations. Please clarify noise source inputs into the model or the calculated impacts from the transmission line are included along with the location of the line in the attachment's figures.	See Attachment 1
Noise -2	Attachment 0 Acoustic Assessment Report	Noise impacts from the tracking system motors during operations were omitted from the ASC as a possible source of noise. Please include this possible source of noise in the analysis of noise impacts.	See Attachment 1
Project Info.-1	Part 2, B. Project and Site Information	Part 2, B.2. Surface Types and Acreage, page 45, the table shows impervious surfaces, post construction, will be 161 acres. Part 4, Part 4.1.C, pages 115, 116 states impervious surfaces are anticipated to be 142 acres. Please explain the difference.	There are 33 acres of existing impervious surface, tabulated in table 4.8-2 as "developed/disturbed" habitat and summarized in the table in Section B-2 on page 45. Construction of the Project would create 142 acres of impervious surfaces, as noted in Section 4.1.C.1 on page 116. However, portions of the new impervious surfaces overlap with existing impervious surfaces, so the combined post-Project total of existing plus new surfaces, accounting for areas of overlap, would be 161 acres, as summarized in the table in Section B-2.
Project Info.-2	Part 2, B. Project and Site Information	Part 2, B.2. Surface Types and Acreage, pages 45 46, the table show a reduction of 1 ephemeral stream, post construction. Please explain how we lost 1 stream.	That is a typo; there are no streams lost. The correct number in Part 2, B.2. Surface Types and Acreage, page 45, in the post-construction column should be 3.
Veg.-1	4.8 Plants & Ecosystems	The application notes that altered vegetation communities within the Project area would provide habitat for generalist wildlife species but not steppe-shrub specialists. Please provide a species-specific calculation of habitat loss for special status species that may occur in the Project Area.	Habitat impacts are summarized as permanent, temporary, and altered, rather than direct and indirect. The categories are adapted from the WDFW Wind Power Guidelines and include recent permitting norms around the designation of altered habitat, in accordance with other mitigation plans that have been reviewed and approved by WDFW for solar facilities. There is little shrub-steppe habitat in the Project Area, and calculating habitat loss by species does not seem useful. If this is something that is required, Innergex asks for clarification of the change to assessing impacts and/or anticipated use of such change.

Veg.-2	Attachments G & M	Attachment G (2021 Wildlife and Habitat Survey Report) and Attachment M (Habitat Management Plan) acknowledges the roll of fire in this landscape and its impact on shrub steppe habitat. Attachment M considers burned and recovering shrub steppe as shrub steppe habitat, but Attachment G maps these burned areas as Eastside (interior) Grasslands. Attachment G goes so far as to acknowledge "…remnant dead shrubs…" that "…were likely killed in the 2016 Range 12 Fire," and provides a picture (figure 7) of these burned shrubs. WDFW considers this priority shrub steppe habitat. Please revise the project maps for these areas and show them as priority shrub steppe habitat.	An updated Wildlife and Habitat Survey Report and Habitat Management Plan were provided to EFSEC to respond to this concern (see 10/31/22 email from Laura O'Neill to Ami Hafkemeyer). In addition, the revisions provided were discussed with WDFW and EFSEC during a call on 1/11/2023. We believe the revised figures and updated HMP fully address this comment.
Veg.-3	Plants & Ecosystems 4.8	The application notes that the project may include developing "green strips" as fire and fuel breaks that extend 100 to 150 meters (approximately 328 to 492 feet) beyond the Project Area; however, the application does not calculate the habitat changes created by these green strips. As such, it is unclear whether the habitat loss calculations in the ASC are correct. Please address the anticipated impacts of the green strips on wildlife populations.	Innergex will continue to work with WDFW and landowners to identify areas where green-stripping will be most beneficial and protective of the landscape. This mitigation will be fleshed out in the Final HMP; however, habitat loss calculations of green-stripped areas would be considered part of the mitigation package, not an additional habitat loss, given that the goal will be to reduce catastrophic wildfires in this area, consistent with WDFW goals for fire management. As described in the HMP (Section 7.4), establishment of green strips, which if planted with a predominantly native seed mix, would not only reduce potential fires in the area, but would also provide beneficial habitat if established in currently disturbed ground dominated by non-native species. Further discussion on WDFW's recommendation for the development of green strips and details of the recommended seed mix can be found in the response to SEPA-6.
Veg.-4	Plants & Ecosystems 4.8	Please further address the permanent and temporary impacts on vegetation from project construction and operation and alterations to vegetation within the solar arrays' perimeter fence for the life of the Project.	Please see discussion in the updated Habitat Mitigation Plan regarding permanent (impervious), temporary, and altered habitat within the solar array. The proposed mitigation ratios for permanent and altered habitat proposed are consistent with other habitat mitigation plans that have been approved by WDFW for solar projects in Washington.
Veg.-5	Plants & Ecosystems 4.8	Please further address the detailed assessment of the loss of priority habitat, i.e., identification of plant types, quantities, locations, proposed mitigations…	Per call on January 20, 2023, no additional response needed.
Veg.-6	Plants & Ecosystems 4.8	Please provide a more detailed assessments of temporary impacts to occur within the two acres of shrub-steppe and the three acres of eastside (interior) grassland.	Per call on January 20, 2023, no additional response needed.
Veg.-7	Plants & Ecosystems 4.8	Please provide a more detailed assessment of permanent impacts to occur within less than one acre of shrub-steppe and eastside (interior) grassland each.	Per call on January 20, 2023, no additional response needed.

Veg.-8	Plants & Ecosystems 4.8	Please provide a more detailed assessment of the altered vegetation to occur within less than one acre of shrub-steppe and three acres of eastside (interior) grassland.	Per call on January 20, 2023, no additional response needed.
Veg.-9	Plants & Ecosystems 4.8	Please provide more detail of mitigating measures addressing soil disturbance and vegetation removal during construction to counter the increase of the potential for the introduction or spread of non-native, invasive plant species. Public comments were received concerned with the spread of wind or animal born seeds from non-native, invasive vegetation into the Hanford National Monument.	The Vegetation and Weed Management Plan being prepared for the Project addresses noxious weed prevention and control actions that would be implemented to avoid and minimize the potential for introduction or spread of weeds from Project construction and operation. Measures that would be implemented include: requirement for all equipment entering the site to be inspected for invasive plant species and cleaning as needed, to avoid the introduction of invasive plant species; revegetating temporarily disturbed areas as soon as practicable following disturbance to minimize conditions favorable to weed germination; using only certified weed-free seed mixes; and monitoring for and treating observed infestations of noxious weeds. Please note that there is already an abundance of non-native, invasive vegetation within the Project site, so the spread of wind or animal born seeds of non-native, invasive vegetation into the Hanford National Monument is likely already occurring. Because the Project would be taking efforts to control weeds and return native vegetation to the site, the Project may end up reducing the spread of non-native, invasive vegetation into Hanford National Monument.
Veg.-10	Plants & Ecosystems 4.8	The risk of fire has the potential to affect vegetation resources and create conditions that could facilitate colonization or expansion of non-native, invasive plant species. Please provide a Site Restoration plan addressing measures to undertake in the event fire occurs to prevent the subsequent, non-native species invasion and restore area to pre-conflagration condition.	This topic is addressed in Section 8 of the Vegetation and Weed Management Plan (Attachment 2).

Veg.-11	Plants & Ecosystems 4.8	Please provide a list of species under consideration for seeding in areas under the solar panel if passive revegetation was not successful.	Species under consideration for seeding in areas under the solar panels if passive revegetation is not successful would include lower-growing native grasses and forbs adapted to conditions at the Project Area. Species that would be considered would include : <u>Grasses:</u> Bottlebrush squirreltail (*Elymus elymoides*) Prairie junegrass (*Koeleria macrantha*) Sandberg bluegrass (Poa secunda) Thurber's needlegrass (*Achnatherum thurberiana*) <u>Forbs:</u> Bigseed lomatium (*Lomatium macrocarpum*) Douglas' dustymaidens (*Chaenactis douglasii*) Globemallow (*Sphaeralcea munroana*) Milvetch (*Astragulus* species, such as *A. purshii, A. spaldingii, or A. speirocarpus*) Oregon sunshine (*Eriophyllum lanatum*) Shaggy fleabane (Erigeron pumilus) Wild blue flax (*Linum lewisii*) Yarrow (*Achillea millefoliuim*)
Veg.-12	Plants & Ecosystems 4.8	Please provide justification for why Class II habitat, which includes shrub-steppe and based on recommendations by WDFW, rabbitbrush, is offset at the temporary disturbance ratio for 'altered habitat'. The shrub-steppe and rabbitbrush ecosystems would be the most altered as shrubs are not compatible with solar arrays, resulting in a loss of shrub-steppe and rabbitbrush in the altered habitat for the life of the Project.	Altered habitat is defined in the Habitat Mitigation Plan (Section 5.0). While it is true that the habitat within the fence line is permanently altered, the impacts are not the same as if the area was actually paved or graveled (which is the category of impacts characterized as "permanent" in the 2009 WDFW mitigation guidelines). Because the revegetated areas will still provide habitat for some species, it is appropriate to mitigate at a lower ratio than for areas that would no longer have any vegetation. To distinguish between the category of "permanent impacts" defined in the 2009 guidelines, and this different category that still retains some habitat value, the category of 'altered' habitat has been adopted for other solar projects in Washington. The proposed mitigation ratios for altered habitat are consistent with other habitat mitigation plans that have been approved by WDFW for solar projects in Washington.
Veg.-13	Plants & Ecosystems 4.8	Provide information on how habitat offsets would be adjusted if areas of revegetation do not meet the success criteria.	If revegetation areas are not meeting success criteria, remedial actions (e.g., supplemental seeding or planting, weed control, or herbivory control) would be implemented. If the success criteria are still not met after implementation of remedial actions, the Applicant will work with EFSEC and the WDFW regarding appropriate steps forward. This may include additional reclamation techniques or strategies or additional compensatory mitigation.
Veg.-14	Plants & Ecosystems 4.8	Applicant is requested to provide a Draft Vegetation and Weed Management Plan which should include: a clear description of the Applicant's plans for herbicide/pesticide use, measures for controlling the establishment or spread of invasive and weed plant species, and a proposed post-construction revegetation monitoring plan with success criteria.	Please see Attachment 2.