		WAUTOMA SOLAR ENERGY PROJECT
ID	**Section**	**Comment**
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 Ferruginous Hawk. Please prepared additional maps showing that more than just elk are dependent on the area of the proposed project and surrounding landscape.
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.
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.
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.
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.
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.
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.
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.
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.
Earth-1	Attachment I	Are wetland associated buffered areas shown on maps?
Env. Health-1	Part 4.13 , Environmental Health	P. 182, Has well location and availability been verified?
Light, Gare & Aeasthics-1	Attachment P, Visual Impact Assessment	Of the 5 KOPs, why are only 2 (KOP 3 & 4) provided with simulations?
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.
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?
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.
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.

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.
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.
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.
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.
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.
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.
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.
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.
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.
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.
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.