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Memorandum

To: Dave Walker, SEPA Responsible Official, Energy Facility Site Evaluation Council (EFSEC) Interim Executive Director, (360) 974-9522

From: Amí Hafkemeyer, EFSEC Director of Siting and Compliance, (360) 664-1305

Date: February 17, 2026

RE: Environmental Review and Staff Recommendation for State Environmental Policy Act (SEPA) Review and Determination for *Columbia Generating Station Warehouse Construction*

PROPOSAL: Energy Northwest (Certificate Holder) proposes to construct two 16,500-square-foot warehouses (Project) to support existing facility operations at the Columbia Generating Station (CGS). The total area of disturbance associated with the Project is approximately 5.7 acres of land currently leased by the Certificate Holder. The warehouses would be sited on approximately 0.8 acres of existing graveled area while approximately 4.9 acres of previously-disturbed lands adjacent to the graveled area will be used as laydown yards during construction and operation.

CASE NUMBER: EFSEC Docket No. EF-180299

CERTIFICATE HOLDER: Energy Northwest

LOCATION: The Project would be located in the northeastern portion of the existing Columbia Generating Station, which is itself located approximately 12 miles northwest of Richland, WA in unincorporated Benton County.

A. ENVIRONMENTAL RECORD and EXHIBITS

The environmental review conducted by EFSEC included analysis based on the following documents which are included in the environmental record.

Acronym	Description	Date
EIS	CGS Environmental Report, previously adopted as the Environmental Impact Statement under WAC 463-47-090(2)(c)	1972
EN 10/23	EN Project Summary Email	October 23, 2025
EN 12/11	EN Response to EFSEC Data Request Email	December 11, 2025
Checklist	EN SEPA Environmental Checklist	January 15, 2026
EN 1/15	EN Statement on FAB Building	January 15, 2026
EN 1/27	EN Response to EFSEC Data Request Email	January 27, 2026
EN 1/28	EN Response to EFSEC Data Request Email	January 28, 2026

B. STAFF REVIEW OF THE ENVIRONMENTAL INFORMATION

EN informed EFSEC on October 21, 2025 of their proposal to construct two warehouses to support existing facility operations on approximately 0.8 acres of graveled area adjacent to three existing warehouses on the CGS site.

The following sections correspond with elements of the environment listed in Washington Administrative Code (WAC) 197-11-444 and with the sections in the environmental checklist listed in WAC 197-11-960. Please note that some of the information normally required for the SEPA environmental checklist is included in the original CGS EIS.

The review of the elements listed below is based, at a minimum, on information in the Certificate Holder’s SEPA Environmental Checklist (Checklist). When additional information from a document listed in Part A is relevant to a particular topic in these sections, it is referenced in parentheses.

1. EARTH

- The information provided by the Certificate Holder regarding environmental impacts as they relate to earth satisfies the informational requirements of the SEPA Checklist.
- Elevation on the proposed building site ranges from 404 feet to 410 feet above sea level; there is a minimal slope. (Checklist)
- The soil substrate on the building site is primarily composed of Rupert (also known as Quincy) sand with a non-native fill material, largely gravel and rock, that was placed on the building site during original CGS construction and operation. (Checklist)
- Ground preparation will consist of two 25,000-square-foot concrete foundations and pads for the warehouses and approximate 213,000 square feet of new graveled area around the warehouse site. (Checklist)
- Approximately 50,000 square feet of new impervious surface will be added to the CGS area. (Checklist)

- The potential for incidental erosion to occur during initial excavation and grading is anticipated. The Certificate Holder will minimize erosion by:
 - Timing construction during dry months to the extent practical
 - Using standard construction Best Management Practices (BMPs) for construction that must occur during wet months
 - Staging and refueling machines outside of the work area
 - Installing a silt fence around the construction area, to be removed by hand following construction (Checklist)

Mitigation:

- To limit erosion and disturbance of natural soil profiles, soil disturbance would be postponed when soils are excessively wet, such as following a precipitation event.

2. AIR

- The information provided by the Certificate Holder regarding environmental impacts as they relate to air satisfies the informational requirements of the SEPA Checklist.
- The primary sources of air emissions from the Project are exhaust from vehicles and non-road engines and fugitive dust. Both forms of emissions are anticipated to be low and would not exceed any permitting thresholds. There are no anticipated long-term changes in CGS emissions from this Project. (Checklist)
- The Certificate Holder will implement control measures to reduce emissions, including:
 - Use of emission control converters and mufflers on construction vehicles
 - Use of water dispersal for dust suppression
 - Minimization of activities during periods of high winds
 - Maintenance of clean solid surfaces
 - Limitation of vehicle speeds on unpaved surfaces to 5 mph (Checklist; EN 1/27)

Mitigation: No additional mitigation measures for air quality have been identified.

3. WATER

Water Quality

- The information provided by the Certificate Holder regarding environmental impacts as they relate to water quality satisfies the informational requirements of the SEPA Checklist.
- There are no Project activities proposed in a floodplain or in proximity to any surface water body. The nearest surface water body is the Columbia River, approximately 3 miles east of the Project site. (Checklist)

- As there is no potential for stormwater runoff from the Project to reach any surface water body, there is no requirement to pursue a Construction Stormwater General Permit. (EN 12/11; Checklist)
- During construction, clean water will be drawn from an onsite CGS evaporation pond (CGS evaporation pond 2) and dispersed for dust control. This water would follow natural grading during runoff and not flow into other water systems. (Checklist)
- To minimize the possibility of small quantities of oil, mechanical fluids, adhesive, or gas that could leak from construction equipment, the Certificate Holder will implement several BMPs, including:
 - Training personnel on use of a spill kit that will be located on site
 - Parking and refueling vehicles on impervious surfaces
 - Use of secondary containment measures under equipment
 - Prompt remediation and proper disposal of any spill (Checklist)

Water Quantity

- The information provided by the Certificate Holder regarding environmental impacts as they relate to water quantity satisfies the informational requirements of the SEPA Checklist.
- Clean water from CGS evaporation pond 2 will be dispersed via water truck during construction to minimize fugitive dust emissions. This water is covered under NPDES permit WA 0025151 and is approved by EFSEC for maintenance and dust suppression at CGS. There is no anticipated use of groundwater or water external to CGS. (Checklist)

Mitigation: No additional mitigation measures for water quality or quantity have been identified.

4. PLANTS

- The information provided by the Certificate Holder regarding environmental impacts as they relate to plants satisfies the informational requirements of the SEPA Checklist.
- The Project area has been previously disturbed at several periods during construction and operation of the CGS facility, during which it has been filled with non-native soil and gravel. Approximately 50% of the project area is devoid of vegetation. The remaining 50% is primarily covered with nonnative grass species. Yarrow (*Achillea ssp.*), sage brush (*Artemisia tridentate*), and several grass species (*Bromus tectorum*, *Poa secunda*, etc.) are the primary species observed within the Project area. (Checklist)
- A total of six plant species listed as threatened or endangered at the state and/or federal level have been identified in areas within the larger Hanford area, but none have been identified on the Project site during field observations. (Checklist)

- 13 state and/or county-listed noxious weed species have been identified within the larger CGS lease boundary and have the potential to occur within the Project area. (Checklist)

Mitigation:

- As required under WAC 463-72-050, the Certificate Holder will submit a Detailed Site Restoration Plan (DSRP) to EFSEC for approval within 90 days of the termination of the CGS project. This CGS DSRP will include the decommissioning of the components included in this Project and will include a description of the revegetation and restoration to be undertaken as part of project decommissioning. This document will include the methods, success criteria, monitoring, and reporting for revegetation at the end of the CGS facility's life. It would also include monitoring of the area for at least five years following decommissioning and provisions for adaptive management.

5. ANIMALS AND HABITAT

- The information provided by the Certificate Holder regarding environmental impacts as they relate to animals and habitat satisfies the informational requirements of the SEPA Checklist.
- 7 special status species have been observed within the greater Hanford area, specifically 3 birds (the ferruginous hawk, greater sage-grouse, and sandhill crane), 1 mammal (the pygmy rabbit), and 3 fish (the steelhead, spring-run chinook, and bull trout). None of these species have been observed within the CGS site or the Project area. (Checklist)
- There are no WDFW-designated Priority Habitats located within the Project area, with the location having been previously disturbed on multiple occasions. (Checklist)
- Approximately 50% of the Project area is devoid of vegetation and the remainder is largely covered in nonnative grass species. (Checklist)
- The Pacific Flyway, a known migratory bird route, passes through the project area, with the Columbia River, located approximately 3 miles east of the Project area, serving as a resting area for migratory birds, waterfowl, and shorebirds. (Checklist)
- The Certificate Holder has committed to the monitoring of construction areas during spring to avoid disturbing any identified nesting activities from bird species. If nesting is observed in locations that may be disturbed by construction activities, construction will be delayed in those areas until fledglings abandon the site and the nest is inactive. (Checklist)

Mitigation:

- Ensure that all trash containers are wildlife resistant.

6. ENERGY AND NATURAL RESOURCES

- The information provided by the Certificate Holder regarding environmental impacts as they relate to energy and natural resources satisfies the informational requirements of the SEPA Checklist.
- The proposed buildings will be lighted on the exterior and interior, will be climate controlled, and will include potable water and restroom facilities. Therefore, electrical utilities will need to be provided. (EN 10/23)
- Electrical utilities are currently available at the Project site associated with the existing CGS facility and will be used to power the Project. (Checklist)

Mitigation:

- Install high-efficiency interior and exterior lighting, electrical fixtures, and appliances in warehouses to reduce energy needs for the Project's operations stage.
- At the time of decommissioning, remove all concrete foundations associated with the Project to a level of no less than 4 feet below the surface of the ground, unless some portions of the foundations are requested to be maintained by the landowner.
- To retrieve as much of the natural resources used in construction and operation of the Project as possible, the Certificate Holder would demolish and remove all Project-related equipment and facilities upon Project decommissioning. The Certificate Holder would recycle all components of the Project that have the potential to be used as raw materials in commercial or industrial applications. For any Project components that the Certificate Holder deems non-recyclable, the rationale for that determination shall be presented to EFSEC for approval prior to the disposal of the components. If the Certificate Holder intends to leave any portion of the facility, including concrete foundations, in place following decommissioning, they must submit a request to EFSEC in their decommissioning plan.

7. ENVIRONMENTAL HEALTH

- The information provided by the Certificate Holder regarding environmental impacts as they relate to environmental health satisfies the informational requirements of the SEPA Checklist.
- Several chemicals typically used during construction, such as gasoline, adhesives, and paints, could represent environmental hazards in the event of a spill or accidental ignition. (Checklist)
- The Certificate Holder will implement several BMPs to minimize the likelihood and magnitude of potential spills or ignitions, including:
 - ensure that all chemical products will be properly labeled, stored, and accompanied by accessible safety data sheets
 - comply with safety data sheet requirements

- continue to follow existing CGS procedure for management and disposal of hazardous chemicals
- perform pre-excavation project reviews
- only refuel vehicles on impervious surfaces
- train staff on the use of a spill kit that will be held onsite
- control access to the site through the use of temporary and permanent fencing (Checklist)

Mitigation: No additional mitigation measures for environmental health have been identified.

8. LAND AND SHORELINE USE

- The information provided by the Certificate Holder regarding environmental impacts as they relate to land and shoreline use satisfies the informational requirements of the SEPA Checklist.
- The Project site is located on a gravel lot and other disturbed lands immediately adjacent to three existing warehouse structures. The gravel lot is currently used for temporary storage and staging of equipment, while the other disturbed lands have no current use. (Checklist, EN 1/28)
- As the Project is sited on federal lands, there is no zoning classification from Benton County for the proposed Project area. (Checklist)
- The Project is consistent with the site's designation as "Industrial" in the US Department of Energy's Hanford Comprehensive Land-Use Plan. (Checklist)
- Apart from minimal traffic impacts to adjacent CGS facilities, there are no anticipated impacts from the Project on existing facilities or land ownership. (Checklist)

Mitigation:

- Prior to CGS decommissioning, the Certificate Holder would, per WAC 463-72-050, submit a Detailed Site Restoration Plan to EFSEC for restoring the CGS site, including this Project area, to its preconstruction character. The Certificate Holder would be responsible for working with the landowner to return all land to its preconstruction status. If future site conditions or land ownership no longer allows for the land to be returned to preconstruction conditions, the Certificate Holder would submit a request to EFSEC for an alternative land use that would be in alignment with the Project area's preconstruction natural character and resource value. If the Detailed Site Restoration Plan requests an alternative land use, EFSEC may require that the Certificate Holder provide additional mitigation to offset impacts from a permanent conversion of the land.

9. SOCIOECONOMICS

- Per WAC 463-60-535, EFSEC is required to assess socioeconomic impacts associated with the Project including, but not limited to, the impact of the

Project on “population, workforce, property values, housing, health facilities and services, education facilities, governmental services, and local economy.”

- The information provided by the Certificate Holder regarding environmental impacts as they relate to socioeconomics satisfies the informational requirements of the SEPA Checklist.
- No residences will be displaced by the Project as the Project area is designated as industrial, with no residential, commercial, or recreational facilities located in proximity. (Checklist)
- As the Project area is located on federally-owned lands designated for industrial development, there is no anticipated future residential growth that could be displaced by this Project. (Checklist)
- The Project is anticipated to support approximately 30-40 workers during construction, with an estimated peak of 25 workers supported during operations. Construction workers will primarily be drawn from the local workforce while workers at the Project during operations will primarily be composed of CGS staff from the larger facility. (Checklist; EN 1/27)
- New residents to the county associated with Project construction and operation are anticipated to be minimal, resulting in negligible impacts to housing, services, and public facilities.
- EFSEC incorporates the principles of environmental justice, as defined in RCW 70A.02.010(8), into its project reviews in an effort to ensure that there are no disproportionate environmental and health impacts to vulnerable and overburdened communities.
- EFSEC staff have made use of tools such as the Washington State Department of Health’s Washington Tracking Network and have determined that the Project is not anticipated to result in disproportionate impacts to vulnerable and overburdened communities.

Mitigation: No additional mitigation measures for socioeconomics have been identified.

10. NOISE AND VIBRATION

- The information provided by the Certificate Holder regarding environmental impacts as they relate to noise and vibration satisfies the informational requirements of the SEPA Checklist.
- The Project is located in an industrial area and adjacent to active industrial facilities. No noise or vibration from the construction or operations of this Project are anticipated to extend past the CGS facility boundaries. (Checklist)
- Noise-producing construction activities, such as earth moving, will be limited to daylight hours (5:00am to 8:00pm). Operation-phase noise and vibration will be similar to those from existing CGS operations, with no substantial increase. (Checklist)

Mitigation: No additional mitigation measures for noise and vibration have been identified.

11. VISUAL AND AESTHETICS

- The information provided by the Certificate Holder regarding environmental impacts as they relate to visual and aesthetics satisfies the informational requirements of the SEPA Checklist.
- Limited receptor sites have been identified in the vicinity of the project. The Project is unlikely to be viewed by any individuals other than CGS staff. The nearest public road of transit is Route 4 South, located approximately 1.75 miles southwest of the Project. The nearest recreational facility is the LIGO Hanford Observatory and Exploration Center, located approximately 4 miles southwest of the Project. The nearest residences are located approximately 4.25 miles east of the Project, across the Columbia River.
- The warehouses will be 55-60 feet tall and constructed of almond-colored metal panels and green trim, the standard design used for the existing adjacent warehouse facilities. (Checklist)
- The relatively small size of the warehouses, combined with their location adjacent to other, pre-existing warehouses of similar size, shape, and color, would result in minimal viewshed changes; the warehouses are expected to visually blend in with the existing CGS facility.

Mitigation: No additional mitigation measures for visual and aesthetics have been identified.

12. LIGHT AND GLARE

- The information provided by the Certificate Holder regarding environmental impacts as they relate to light and glare satisfies the informational requirements of the SEPA Checklist.
- The Project is not anticipated to introduce any substantial new source of nighttime lighting. External safety lighting will be installed at the primary access points. (Checklist)
- Glare from sunrise and sunset is anticipated to be minimal due to the matte-colored exterior of the buildings. (Checklist)

Mitigation:

- Ensure that external lighting provides the minimum illumination needed, be downward-facing, and shielded.
- Ensure that non-essential lighting will be controlled by motion sensors.

13. RECREATION

- The information provided by the Certificate Holder regarding environmental impacts as they relate to recreation satisfies the informational requirements of the SEPA Checklist.

- The nearest recreational opportunities are the Columbia River, located approximately 3 miles east of the Project site and the LIGO Hanford Observatory and Exploration Center, located approximately 4 miles southwest of the Project site. The Project is not anticipated to have any impacts to access, quality of experience, or viewsheds associated with these opportunities. (Checklist)

Mitigation: No additional mitigation measures for recreation have been identified.

14. HISTORIC AND CULTURAL RESOURCES

- The information provided by the Certificate Holder regarding environmental impacts as they relate to historic and cultural resources satisfies the informational requirements of the SEPA Checklist.
- Prior to CGS construction and during operations, five separate cultural resource surveys have been performed for the larger CGS site, with the most recent produced in April of 2012. These studies have not identified any archaeological features or historic structures in proximity to the Project site, with limited evidence of Native American presence located elsewhere within the larger CGS site. (Checklist)
- The Certificate Holder elected to site this Project at this location as it has been previously surveyed, with no historic or cultural resources identified, and has been significantly disturbed as a result of excavation and fill during initial construction of the CGS facility. (Checklist)
- The Certificate Holder will report any incidental archaeological discoveries to the Washington Department of Archaeology and Historic Preservation (DAHP), the US Department of Energy, EFSEC, and any affected tribes. (Checklist)

Mitigation:

- Halt all work within 100 feet of any unrecorded archaeological resources found during Project construction until such time that DAHP and EFSEC have reviewed the Certificate Holder's reported find and approved for work in that area to continue.

15. TRANSPORTATION

- The information provided by the Certificate Holder regarding environmental impacts as they relate to transportation satisfies the informational requirements of the SEPA Checklist.
- The Project would be accessed primarily from Route 4 South. The CGS facility has designated paved access off of Route 4. There is no anticipated need for new road construction or improvements to support construction or operational traffic. (Checklist)

- Project construction would add up to 80 one-way vehicle trips (40 round trips) per day over a 10-month period to Route 4 South. (Checklist; EN 1/27)
- Construction traffic would primarily be composed of worker commutes to the Project area from the Richland/Tri-Cities area but would also include semi-trailer trucks to deliver construction materials. Vehicles would be parked at the CGS facility and off of public roads.
- Operations workers would primarily be composed of CGS staff from the larger facility; there is no anticipated increase in vehicle trips associated with Project operation. (Checklist)

Mitigation:

- When project activities may overlap with train use of the onsite rail line, provide a train safety briefing to contractors that would include train safety training, procedures to be followed if a load becomes lodged at a crossing, and review of the emergency contact numbers for each crossing.

16. PUBLIC SERVICES

- The information provided by the Certificate Holder regarding environmental impacts as they relate to public services satisfies the informational requirements of the SEPA Checklist.
- The Project is located on federally-owned lands currently under lease by the Certificate Holder and would not have any impact on public open space. (EN 10/23)
- The Project is located within the security fencing of the controlled CGS facility, so there is no anticipated need for police protection. (Checklist)
- The CGS facility is served by Station 93 of the Hanford Fire Department, located approximately 7.5 miles southeast of the Project. The Project is not anticipated to result in any substantial increased risk of accidental fire. (Checklist; EN 1/27)
- The construction workforce is anticipated to number no more than 40 workers primarily drawn from the local workforce, resulting in no notable increase in the population of the county. During operation, the Project would be used as a support facility for staff from the larger CGS facility. As a result, the Project is not anticipated to substantially affect the availability or effectiveness of public services and facilities during construction or operation. (Checklist; EN 1/27)

Mitigation: No additional mitigation measures for public services have been identified.

17. UTILITIES AND WASTE MANAGEMENT

- The information provided by the Certificate Holder regarding environmental impacts as they relate to utilities and waste management satisfies the informational requirements of the SEPA Checklist.

- The project will make use of electrical, water, waste disposal, sewer, fire protection, and telecommunication utilities during construction and operation. All of these utilities are currently available at the CGS site and are provided by the Certificate Holder through existing agreements. (Checklist)
- The Project is not anticipated to result in any substantial increase in utility use.

Mitigation: No additional mitigation measures for utilities and waste management have been identified.

Cumulative Effects:

Extended Power Uprate

The Certificate Holder has informed EFSEC of an anticipated CGS extended power uprate (EPU) scheduled for implementation in 2031. This process would involve increasing the nameplate generating capacity of the CGS facility by replacing and upgrading major non-nuclear components, such as turbines, generators, and pumps that would improve energy production efficiency, reliability, and output. One of the two warehouses will provide interim support for the EPU until full project implementation, while also serving the long-term operational needs of the existing facility.

EFSEC assessed whether it was more appropriate to consider the EPU-related warehouse in a phased environmental review as one component of the larger EPU project. However, as described in WAC 197-11-060(5)(d)(iii), “phased review is not appropriate when ... the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.” In this scenario, the level of detail and type of environmental review needed for this warehouse vary substantially from those anticipated for the EPU due to the nature and timing of the proposals. The environmental review to assess adverse environmental impacts from two warehouses on less than 6 acres of previously-disturbed land should be considered as standard. Impacts from the construction of these warehouses are anticipated to be common, apparent, and consistent with other projects of this scope and scale. Conversely, the EPU of an active nuclear energy facility is an activity that has never before been reviewed under SEPA. The type and level of detail for the environmental review are expected to vary substantially from the review required for these warehouses. The adverse environmental impacts associated with the EPU may be complex, intricate, and unique. Additionally, the time gap between the construction of these warehouses in 2026 and EPU implementation in 2031 means that there is a substantial difference in the timing of these proposals, which is reflected in the disparate availability of the project and environmental information needed to perform an effective SEPA review. Further supporting the determination to not perform a phased SEPA review of the EPU at this time is that the Certificate Holder has stated that this warehouse will be used to support existing CGS facility operations and would have been

proposed even if the EPU were not being planned (EN 1/15). As a result of these factors, the cumulative effects analysis for this second warehouse has been limited to this Project alone, rather than as part of the entire EPU project.

Due to the small size and scope of this Project and its location on disturbed lands adjacent to an active industrial facility, no cumulative effects of note have been identified for this Project. However, WAC 197-11-060(5)(d)(ii) states that the decision to not perform a phased review cannot be made “merely [to]...avoid discussion of cumulative impacts.” EFSEC recognizes and acknowledges that the EPU project will require a full environmental review for potential cumulative impacts when it is formally proposed and that one of the two warehouses in this Project will be used to support the EPU. The cumulative analysis performed here for that warehouse does not preclude EFSEC from future consideration of any cumulative impacts resultant from the warehouse as a result of its role in the EPU. EFSEC will include this warehouse as part of any subsequent review of the EPU project to ensure that no discussion of cumulative impacts is inadvertently avoided.

APPLICABLE SEPA RULES

Addendum to an EIS

WAC 197-11-706 specifies when an Addendum is issued.

WAC 197-11-706:

"Addendum" means an environmental document used to provide additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in the existing environmental document. The term does not include supplemental EISs. An addendum may be used at any time during the SEPA process.

Addendum Procedures and Distribution

WAC 197-11-625 identifies five procedural elements associated with the issuance of an Addendum.

WAC 197-11-625:

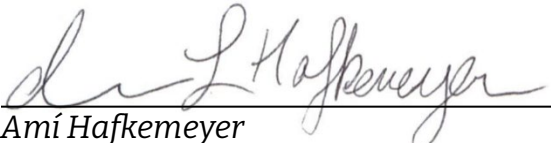
- (1) An addendum shall clearly identify the proposal for which it is written and the environmental document it adds to or modifies.
- (2) An agency is not required to prepare a draft addendum.
- (3) An addendum for a DEIS shall be circulated to recipients of the initial DEIS under WAC 197-11-455.
- (4) If an addendum to a final EIS is prepared prior to any agency decision on a proposal, the addendum shall be circulated to the recipients of the final EIS.

(5) Agencies are encouraged to circulate addenda to interested persons. Unless otherwise provided in these rules, however, agencies are not required to circulate an addendum.

Consistent with WAC 197-11-706, EFSEC has determined that the proposed warehouse construction does not substantially change the analysis of significant impacts and alternatives in the existing EIS and, therefore, an Addendum is appropriate. As there is an agency decision following the issuance of this Addendum, specifically the approval of the proposed construction plans, EFSEC is required to circulate this Addendum to previous recipients of the original EIS and will publish it to the SEPA Register and the EFSEC website. Given the lapse in time since the distribution of the EIS in 1972, EFSEC cannot guarantee that this distribution will reach all recipients of the original EIS, but will make a good-faith effort to comply with WAC 197-11-625(4). There is no public comment period requirement for the publication of an Addendum, but it is EFSEC policy to provide a public comment period for EFSEC decisions whenever practical. EFSEC anticipates holding a 14-day public comment period following distribution of this Addendum.

Nothing in this environmental review or the associated Addendum shall preclude further review or conditioning of future development proposals for the subject property.

I have reviewed and considered the referenced material in Part A for this Project. The environmental review in Part B has identified no significant changes to the environmental analysis within the CGS EIS. I hereby recommend the issuance of an Addendum to the EIS with a 14-day public comment period.


Amí Hafkemeyer
EFSEC Director of Siting and Compliance

2/17/2026
Date