STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
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Memorandum

To: Sonia Bumpus, SEPA Responsible Official, Energy Facility Site Evaluation Council (EFSEC) Director, (360) 664-1363
From: Amí Hafkemeyer, EFSEC Director of Siting and Compliance, (360) 664-1305
Date: May 15, 2024

RE: Environmental Review and Staff Recommendation for State Environmental Policy Act (SEPA) Review and SEPA Determination for *Wautoma Solar*

PROPOSAL: The Wautoma Solar Energy Project (Project) is a 470 megawatt (MW) solar photovoltaic facility, including a battery energy storage system (BESS). The project is proposed by Innergex Renewable Development USA, LLC (IRD), (Applicant). The Project Lease Boundary spans 5,852 acres of privately owned land. Within the Lease Boundary, the Project Area would occur on 4,573 acres. All construction and operational activities would occur within the Project Area. Within the Project Area, fencing would enclose 2,974 acres. The fenced area would encompass all Project components. Components at the facility include:

- Solar modules
- Tracker Racking System
- Posts
- Underground and above ground cabling
- Inverters and transformers
- Collector lines
- Project substation
- Operations and maintenance buildings
- Access and service roads
- Fences
- Gates and security lighting
- 0.25 mile-long overhead 500-kilovolt (kV0) generation-tie transmission line
- BESS capable of storing 470 MW

The Wautoma Solar Project would interconnect with the Bonneville Power Administration (BPA) transmission system at the BPA Wautoma

Substation, which is located on BPA federal lands surrounded by Project Area. A 0.25 mile-long overhead 500 kV generation-tie transmission line would extend from the Project substation to the BPA Wautoma substation.

CASE NUMBER: EFSEC Docket No. EF-220355

APPLICANT: Innergex Renewable Development, LLC

LOCATION: The Project would be located approximately 12.5 miles northeast of the City of Sunnyside and 1 mile south of the interchange between SR 241 and SR 24 in unincorporated Benton County, WA. See Attachment 2. *Figure A-10: Wautoma Solar Transportation Routes.*

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. The documents listed are available for review on EFSEC's website at: https://www.efsec.wa.gov/energy-facilities/wautoma-solar-project.

Acronym	Description	Date
ASC	Wautoma Solar Application for Site Certification	June 9, 2022
Attachments A-T	Subject area and relevant information attachments to ASC	June 9, 2022
IRD WBS	Wildlife and Botanical Survey Addendums	August 16, 2022
IRD 9/1	Applicants Response to comments received from the Yakama Nation (YN)	September 1, 2022
IRD HMP	Wautoma Revised Habitat Management Plan	October 10, 2022
TT	Tetra Tech Memo to Applicant outlining proposed prime farmland commitments	March 29, 2023
USDA 1985	Fryrear, D. W., and E. L. Skidmore, Methods for Controlling Wind Erosion Report from US Department of Agriculture	1985
DNR CM	DNR Factsheet on Columbia milkvetch (https://www.dnr.wa.gov/publications/amp_nh_asco9.pdf)	Undated

The environmental review also consisted of input or recommendations from state and local agencies, tribes, and EFSEC's consultant as listed below.

Commenter and Acronym	Description	Date of Input	Form of Comment
Jessica Lally, Yakama Nation Archaeologist YN	YN technical review of Cultural Resources draft reports	06/20/2022	Written

Commenter and Acronym	Description	Date of Input	Form of Comment
Lori White, WA. Dept. of Ecology WDOE	WDOE project review of shorelands, wetlands and waters of the state	06/27/2022	Written
Christian Nauer, Confederated Tribes of Warm Springs CTWR	CTWR technical review of Cultural Resources draft reports	06/29/2022	Written
Greg Wendt, Benton County BC	BC comments on land use consistency	08/08/2022	Written
Mike Ritter, WA Dept. of Fish and Wildlife WDFW	WDFW comments on ASC	08/30/2022	Written
Chad Unland, WA Dept. of Natural Resources DNR	WA State Department of Natural Resources (DNR) comments on project near DNR lands	10/07/2022	Written
WSP Golder WSP	WSP Golder Application Review Comments	10/18/2022	Written
Mike Ritter, WA Dept. of Fish and Wildlife WDFW 2	Meeting between WDFW staff, EFSEC staff, and the Applicant	01/11/2023	Verbal
Kelly McClain, WA Dept. of Agriculture AG	AG comments on ASC	02/01/2023	Written
Kelly McClain, WA Dept. of Agriculture AG 2	Meeting between AG staff and EFSEC staff	02/22/2023	Verbal
Mike Ritter, WA Dept. of Fish and Wildlife WDFW 3	Email from Mike Ritter	04/17/2023	Written
Lori White, WA. Dept. of Ecology WDOE 2	WDOE wetland determination confirmation	06/14/2023	Written
Casey Barney, Yakama Nation Cultural Resources Program YN 2	TCP Concerns and Recommendations	01/04/2024	Written
Emily Grabowsky, WA Dept. of Fish and Wildlife	Email from Emily Grabowsky	02/22/2024	Written

Commenter and Acronym	Description	Date of Input	Form of Comment
WDFW 4			
David Witt, WA Department of Archaeology & Historic Preservation DAHP	DAHP Review of the Wautoma Cultural Resources Survey	05/17/2024	Written

B. STAFF REVIEW OF THE ENVIRONMENTAL INFORMATION

IRD submitted an application on June 9, 2022 which EFSEC used for conducting the SEPA environmental review.

EFSEC staff visited the site on August 9, 2022 and November 1-2, 2022.

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 WAC 197-11-960. They were also used to organize and document EFSEC's environmental review for the *Wautoma Solar* proposal. Additional information (listed in Part A above) was provided by the Applicant and by Washington regulatory subject matter experts as contracted to EFSEC and used as part of the environmental review. The mitigation identified here is in addition to commitments the Applicant has supplied in their application, which would be required. Please note that the information normally required for the SEPA Environmental Checklist is included in the application.

The review of all elements listed below is based, at a minimum, on information in the Applicant's Application for Site Certification (ASC). When additional information is relevant to a particular topic, it is referenced in parentheses.

1. EARTH

- The information provided by the Applicant regarding environmental impacts as they relate to earth satisfies the informational requirements of the SEPA checklist. (WSP)
- Portions of the Project Area are mapped by Benton County as geologically hazardous, including areas of combined erosion hazard and steep slopes greater than 15 percent, moderate to high liquefaction, and alluvial fan intermediate risk.
- For areas with identified geological hazards (e.g., seismic hazards, 15 percent or greater slopes, erosive soils, collapsible soils, high risk flood areas, etc.), the Applicant would avoid the areas to the greatest extent feasible and implement strategies to reduce impacts when avoidance is not possible. (ASC; Attch. S)
- Based on the Preliminary Geotechnical Engineering Report, the Applicant would implement a series of construction commitments including:
  - Avoiding identified geological hazards to the greatest extent feasible
  - Ensuring shallow foundations have a minimum embedment of 1.5 feet below final site grade or meet other approved alternatives
  - Remediating soft silts for bearing capacity if encountered
  - Providing seismic design using the 2018 International Building Code

    - Ensuring the general fill and engineered fill meet placement and compaction requirements. (ASC; Attch. S)
- The Applicant would prepare a Final Geotechnical Engineering Report prior to the Project's final design. This report would provide appropriate updates to impact reduction commitments for geohazards if the geotechnical engineers deem it necessary. (ASC)
- Erosion caused by wind can occur on some sites, including solar project sites. Parts of Benton County are known to experience high winds. Effective mitigation (e.g., vegetative screening, geotextiles) is available and can be implemented should wind-caused erosion occur. (USDA 1985)
- The Applicant would address possible wind erosion impacts through measures included within the Project's Erosion and Sediment Control Plan and Vegetation and Weed Management Plan. (ASC)

Mitigation:

- The Applicant would prepare a Final Geotechnical Engineering Report prior to the Project's final design, which may include updated commitments. If any Applicant-proposed commitments are added, removed, or changed as a result of the Final Geotechnical Engineering Report, EFSEC would be required to review and approve the alterations prior to the start of construction.
- 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 Applicant regarding environmental impacts as they relate to air quality satisfies the informational requirements of the SEPA checklist. (WSP)
- The primary sources of air emissions from the Project are vehicle exhaust and fugitive dust. Emissions from both sources are anticipated to be low and would account for less than 0.5 percent of emissions within Benton County. Air emission impacts are primarily of concern during the construction and decommissioning phases of the project when project activities and vehicle use would be at their greatest. (ASC)
- The ASC includes a series of applicant commitments that would reduce air quality impacts. These include:
    - Vehicles and equipment used during construction would be properly maintained to minimize exhaust emissions.
    - Operational measures such as limiting engine idling time and shutting down equipment when not in use.
    - Watering or other fugitive dust-abatement measures would be used as needed to control fugitive dust generated during construction. When applied, the Applicant would use water or a water-based environmentally safe dust palliative such as lignin for dust control. The Applicant intends to deploy up to 53 million gallons of water for dust suppression during construction.
    - Construction materials that could be a source of fugitive dust would be covered when stored.
    - Traffic speeds on unpaved roads would be limited to 25 miles per hour to minimize generation of fugitive dust.

- Truck beds would be covered when transporting dirt or soil.
- Carpooling among construction workers would be encouraged to minimize construction-related traffic and associated emissions.
- Erosion-control measures would be implemented to limit deposition of silt to roadways, to minimize a vector for fugitive dust.
- Replanting or graveling disturbed areas would be conducted during and after construction to reduce wind-blown dust. (ASC)

Mitigation:

- Limit traffic speeds on unpaved areas to 15 mph, rather than the Applicant-proposed 25-mph limit. This mitigation measure would reduce the anticipated fugitive dust emissions associated with the Project.

3. WATER

Water Quality

- The information provided by the Applicant regarding environmental impacts as they relate to water quality satisfies the informational requirements of the SEPA checklist. (WSP)
- The Applicant's Wetland Delineation Report identified 34 ephemeral streams within the boundaries of the Project. Per the Benton County Code, all streams within the Project Boundary are considered Non-Fish Seasonal (category N) streams, which require 50-foot buffers without adjacent slopes of 10 percent or greater and 100-foot buffers with adjacent slopes of 10 percent or greater. The Project would result in no permanent impacts to any streams and approximately 1 acre of temporary impacts to Dry Creek to accommodate a crossing that would be returned to grade and restored upon Project completion. (ASC)
- The ephemeral streams onsite lack connectivity to other intermittent, perennial, or fish-bearing streams. Dry Creek connects to Cold Creek approximately 4.5 miles downstream of the Project Area. Cold Creek is uncategorized by DNR stream typing maps and does not contain fish per the StreamNet database. The Cold Creek drainage continues approximately 21 miles downstream to the Yakima River, but there is no longer an active connection between Cold Creek and the Yakima River. (ASC)
- WDFW has concurred with the Applicant's judgement that the ephemeral streams onsite do not connect to any other intermittent, perennial, or fish-bearing streams. (WDFW 3)
- At the time of application review, the mechanism for the Dry Creek crossing has not been identified. Authorization for such impacts through an Administrative Order may be required if the project cannot meet the water quality standards outlined in the Water Pollution Control Act (RCW 90.48). (WDOE)
- Access road widening and culvert installation would take place on a 2,424-square-foot area between Streams ST-216 and ST-217. While this project activity would take place outside of the 50-foot buffers of both streams, WDFW has determined that a Hydraulic Project Approval is required for the activity. (ASC)
- WDOE has recommended that a jurisdictional determination from the US Army Corps of Engineers be received verifying the waters within the Project Boundary are non-federally jurisdictional. EFSEC would require the applicant to supply this determination. (WDOE)

- The Applicant's Wetland Delineation Report identified three wetlands within the boundaries of the Project. The Project would not result in any impacts to wetlands or wetland buffers. (ASC)
- The three wetlands have a Category IV rating which, per Benton County Code 15.08.320(b)(1)(iv), require a 50-foot-wide upland buffer. If solar panel placement would result in impacts to upland buffers, impacts would need to be mitigated at a 1:1 ratio. WDOE has recommended that a buffer planting plan and buffer mitigation plan be provided for review (WDOE)
- While the wetland investigations were conducted within an appropriate time of growing season, some indicators may be problematic due to the seasonality of wetland in the Arid West Land Resource Region. WDOE staff visited the site on May 12, 2023 to further examine several areas of interest and, following testing, concurred with the determinations made within the Wetland Determination Report. (WDOE, WDOE 2)
- The Project would cause temporary impacts to a Zone A (100-year) floodplain associated with Dry Creek resulting from a temporary 50-foot-wide access corridor. No permanent impacts are proposed to any floodplains. (ASC)
- 142 acres of new impervious surfaces are proposed for the Project. (ASC)
- The project sites are not located within the regulatory jurisdiction of any Benton County or State Shorelines. (WDOE)
- As the Project Area is generally very flat, minimal grading would occur and existing drainage areas would be maintained. Areas where grading would impact slopes of 15 percent or greater would be avoided to the greatest extent feasible and would include mitigation within the Project's Stormwater Management Plan, Erosion Control Plan, and design BMPs for these areas to address potential erosion and stability concerns. (ASC)
- During construction and operation of the Project, stormwater would be retained on-site and be treated by infiltration in compliance with applicable codes. The Applicant would prepare an Erosion and Sediment Control Plan, Construction Phase Stormwater Pollution Prevention Plan (SWPPP), Operations Phase SWPPP, and Vegetation and Weed Management Plan, which would incorporate BMPS from the WDOE Stormwater Management Manual for Eastern Washington. (ASC)

<u>Water Quantity</u>

- The information provided by the Applicant regarding environmental impacts as they relate to water quantity satisfies the informational requirements of the SEPA checklist. (WSP)
- Depending on soil moisture levels, up to 53 million gallons of water may be used during construction for dust suppression. This water may be sourced either from an existing on-site well with a valid water right to be confirmed by WDOE or by purchasing water from a permitted off-site source and hauling it to the Project Area. (ASC)
- During operations, panel washing may occur once per year across approximately 20 percent of the panels. This would result in the use of approximately 120,000 gallons of water per year, which would be supplied by 1-2 water truck trips per day over a period of 2-3 weeks. Washwater would not contain additives and would not be discharged into nearby water bodies (it is expected to infiltrate into the ground surface at or near the point of application). (ASC)

- Operation-phase washwater and domestic water for use at the O&M building would either be sourced from a new groundwater permit-exempt well within the Project Area, an existing on-site well with a valid water right, or from an off-site source with existing water rights (i.e. a municipal water source or vendor). Groundwater permit-exempt wells allow for a maximum withdrawal of up to 5,000 gallons per day, or 1,825,000 gallons per year. The Applicant anticipates an annual withdrawal of approximately 120,000 gallons per year. (ASC)
- Impervious surfaces would cover approximately 3% (142 acres) of the Project Area and are not anticipated to significantly alter stormwater infiltration patterns. Stormwater runoff from impervious surfaces would generally infiltrate the site through vegetation or, where necessary, through permanent detention basins with outlet culverts. (ASC)

Mitigation:

Water Quality

- If the US Army Corps of Engineers determines the ephemeral streams are non-federally regulated waters, an Administrative Order would be needed if details showed the project would not meet the State's water quality standards. Additional mitigation would be imposed if needed to replace any of the features' functions and values.
- The Applicant would prepare a Wetland Buffer Planting Plan and a Wetland Buffer Mitigation Plan that would be provided to WDOE and EFSEC for review and approval prior to the start of construction.
- The Applicant has committed to the preparation of a Construction Spill Prevention Control and Countermeasure (SPCC) Plan and Operations SPCC Plan to reduce the likelihood of an accidental release of a hazardous or regulated liquid and expedite the response to and remediation of the release should one occur. These Plans are to be completed and submitted to EFSEC for review prior to the start of construction. These Plans are to include a requirement that spill response equipment be stored in all Project vehicles (not to include personal vehicles) accessing the site during construction, operation, and decommissioning. Additionally, these Plans are to include a requirement that an oil pan be placed beneath heavy equipment when stored or not in regular use on site.
- An employee training plan is to be included as part of the SPCC Plans. For the duration of the Project, employees and workers on site would receive appropriate training according to the employee training plan to ensure that any spills are reported and responded to in an appropriate manner. This would include training on the use of spill response equipment and orientations identifying the location of hazardous materials, proper storage of hazardous materials, and location of spill response equipment to ensure that workers are competent in spill response.
- Project construction and decommissioning would be minimized during rainy periods and heavy rain—in particular, work near ephemeral or intermittent streams.

Water Quantity

- Prior to the start of construction, the Applicant would provide an executed agreement and/or permit to EFSEC that identifies the source and quantity of water intended to be supplied to the Project for construction and operation.

- During periods of drought conditions or water shortage, as declared by any state or local government agency, water use would be minimized or postponed where possible or additional alternate off-site water supplies would be identified.
- The Applicant would ensure that water rights held by the landowner in relation to irrigated farmlands within the Project Boundary are maintained and returned to the landowner following Project decommissioning. These rights can be retained either by meeting identified minimum water usage rates on an annual basis or by placement of the rights within a trust for the duration of the Project. This would be documented and provided to EFSEC prior to the start of operations.

4. PLANTS

- The information provided by the Applicant regarding environmental impacts as they relate to plants and ecosystems satisfies the informational requirements of the SEPA checklist. (WSP)
- A review of plant species known to occur or potentially occur within Benton County was conducted by the Applicant. Based on that assessment, four special status species are rated as having a high likelihood of occurrence within the Project Area, two species are rated at a medium likelihood, four species are rated at a low-to-moderate likelihood, and four species are rated at a low likelihood. (ASC)
- Botanical surveys covering approximately 3,830 acres of the Project Area were conducted from May 10 through 14, 2021. An additional survey to cover the remaining 990 acres within the Project Area was performed on May 9 and 10, 2022 (ASC; Attch. F; IRD WBS)
- One special status plant species, Columbia milkvetch (*Astragalus columbianus*) has been identified within the Project Area; a population of approximately 125 individuals was identified in a 3-acre area. The Project has been sited to avoid this area and the closest Project facility is located more than 150 feet from the population. (ASC)
- Nine state and/or county listed noxious weed species were identified during field surveys, with eight of the species believed to occur within the Project Area. Diffuse knapweed (*Centaurea diffusa*) and cereal rye (*Secale cereale*) were the most abundant weed species. (ASC)
- The Applicant has prepared a Draft Habitat Management Plan that includes proposed mitigation measures for impacts to Priority Habitats and would prepare a Vegetation and Weed Management Plan and Final Habitat Management Plan that would require EFSEC approval prior to construction. (ASC; Attch. M)
- In areas that have been temporarily disturbed, the Applicant would hydroseed with native grass species. (ASC)
- WDFW has identified three areas of palustrine wetlands within the Lease Boundary that contain trees. Several of these trees and associated woody vegetation have been lost to recent wildland fires and WDFW has recommended that any trees removed as a result of the Project should be replanted at a ratio of 3:1/ (WDFW 4)
- Pursuant to WAC 463-72-040, the Applicant would prepare an Initial Site Restoration Plan (ISRP) addressing planned site restoration following the conclusion of the Project's operating life. The Applicant would submit this initial plan to EFSEC for approval at least 90 days prior to the start of construction. (ASC)

Mitigation:

- Prior to the start of construction the Applicant would prepare a Vegetation and Weed Management Plan to be reviewed by WDFW and WDOE and approved by EFSEC which is to include the following mitigation measures, though further mitigation may be imposed as necessary:
    - a list of species under considering for seeding in areas where passive revegetation is unsuccessful, a description of the Applicant's herbicide and/or pesticide plans, including a commitment to prohibit the use of any herbicides or pesticides restricted by WAC 16-230-600 and 16-230-800,
    - information on the proposed management for the "green strips" that would be used in the Project Area, and
    - measures for controlling the establishment or spread of invasive and weed species, and other related topics.
- The Applicant would create a Detailed Site Restoration Plan (DSRP), as required by WAC 463-72-050, that would include a description of revegetation to be undertaken during decommissioning. The DSRP would be prepared and submitted for approval by EFSEC for final revegetation prior to Project decommissioning for the temporary and permanent disturbance areas, including modified habitat. The DSRP would be a living document. It would include the methods, success criteria, monitoring, and reporting for revegetation at the end of the Project life. It would also include monitoring of the area for at least five years following decommissioning of the Project, provisions for adaptive management and would include any lessons learned from implementing the Revegetation Plan created for the temporary disturbance from Project construction.
- The Applicant, in consultation with EFSEC, would establish a Technical Advisory Committee (TAC) prior to the start of construction. The TAC may be composed of representatives from the Washington Department of Ecology, Washington Department of Fish and Wildlife, Washington Department of Agriculture, local interest groups, not-for-profit groups, and landowners and would be responsible for reviewing and providing technical advice on documents, reports, and data produced by the Applicant in relation to management of wildlife, habitat, and prime farmland. The TAC would also provide direction on adaptive management throughout the life of the Project. The TAC would be responsible for, at minimum:
    - Providing input to, and review of, Project wildlife and habitat management plans (i.e. Vegetation and Weed Management Plan, Detailed Site Restoration Plan, Wildlife Habitat Management and Mitigation Plan, etc.)
    - Reviewing and providing advice to EFSEC on the final Project design following finalization of the micrositing plan
    - Advising on the monitoring of mitigation effectiveness and reviewing monitoring reports
    - Advising on thresholds to be applied to the Project that would trigger the need for additional mitigation measures to reduce Project impacts to the desired level
    - Advising on new or expanded mitigation measures that would be implemented at EFSEC's directive as adaptive management to ensure mitigation success thresholds are reached

    - Advising on mitigation measures that can be removed or replaced based on new information (i.e. hydroseeding being unnecessary when native vegetation naturally recruits to the site)
- The Applicant's Vegetation and Weed Management Plan would include a commitment to, within 60 days of Project completion, create an as-built report that documents the amount of modified habitat, temporary disturbances, and permanent impacts associated with the Project. Vegetation monitoring of modified habitat would be conducted annually for a minimum of three years, though EFSEC may, under advisement from the TAC, elect to extend this monitoring period. The TAC would review these monitoring reports for progress in meeting measurable success criteria for revegetation and impose remedial management actions if success criteria are not being reached. At the end of the revegetation monitoring period, areas of modified habitat and temporary disturbance that have met the established success criteria would be eligible for offset by the Applicant at the respective ratios. Areas that have not met the success criteria after the end of the revegetation monitoring period would be considered permanent impacts and would be added to the offset requirement.
- Construction would avoid removing or disturbing trees within the Project Lease Boundary. Disturbance to trees includes any disturbance, including topping, within the drip-line of the tree (i.e., the area from the edge of the outermost branches), which preserves an intact root system. Disturbance within the drip-line of the tree should be avoided as this can lead to tree mortality. The avoidance area within the drip-line of trees in work areas should be delineated using snow fencing or similar measure to improve the visibility of avoidance zones. Trees cannot be removed without pre-approval. Where tree disturbance cannot be avoided by the Project (e.g., near transmission lines), the number and location of the trees would be provided to EFSEC, along with a statement justifying why avoidance cannot be achieved, and a mitigation plan. The mitigation plan would include replanting trees at a 3:1 ratio within the Lease Boundary to maintain the diversity of habitat structures provided by trees and would require approval by EFSEC prior to proceeding.
- The environmental orientation provided to workers on site would include information on special status plant species. This would include diagnostic characteristics, suitable habitat descriptions, and photos of special status plant species with potential to occur within the Lease Boundary. A protocol would be established for any chance find by workers, who would notify supervisory staff on site prior to proceeding with work. Work within proximity to any chance find would not proceed until the supervisory staff have informed the environmental monitor and the monitor has approved the resumption of normal work activities.

5. ANIMALS AND HABITAT

- The information provided by the Applicant regarding environmental impacts as they relate to animals and habitat satisfies the informational requirements of the SEPA checklist. (WSP)
- WDFW has indicated that the Project Area is located within a larger region that represents some of the largest remaining functional blocks of shubsteppe habitat in southcentral Washington. WDFW is concerned regarding the potential for cumulative

impacts to this habitat that would result from the combination of this Project and other projects proposed within the region. (WDFW)

- WDFW stated that further discussion is required regarding the impacts of the Project in relation to habitat connectivity and wildlife movement, both individually and in a cumulative sense. Elk and mule deer habitat concentration areas and linkages have been identified in and around the Project area. WDFW noted that both elk and greater sage-grouse are wary of fencing or restrictions to their movement and elk can require movement paths as wide as 1-2 miles in width. (WDFW)
- WDFW accepts the habitat maps prepared by the applicant as accurate except for where the Wildlife and Habitat Survey Report documents areas of burned shrub-steppe as eastside (interior) grasslands. WDFW considers burned and recovering shrub-steppe habitat as shrub-steppe habitat. WDFW recommends that the Applicant remap these burned areas within the Wildlife and Habitat Survey Report as priority shrub-steppe habitat to make them consistent with the Habitat Management Plan. (WDFW; Attch. G; Attch. M)
- WDFW has indicated that further wildlife and habitat surveys are not required for the Project and that, as the Project impacts to animals and habitat are mitigatable, the preparation of an Environmental Impact Statement is not necessary. (WDFW)
- Wildlife surveys covering approximately 3,830 acres of the Project Area were conducted from May 10 through 14, 2021. Surveys covering the remaining 990 acres were conducted on October 12 and 13, 2021. An additional survey of the 990 acres was performed on May 9 and 10, 2022 (ASC; Attch. G; IRD WBS)
- Three WDFW Priority Habitats were identified within the Project Area: 93 acres of eastside (interior) grasslands, 63 acres of shrub-steppe, and 3 acres talus. The Project would result in permanent impacts to <1 acre of eastside (interior) grasslands and <1 acre of shrub-steppe, temporary impacts to 2.3 acres of eastside (interior) grasslands and 2.6 acres of shrub-steppe, and altered habitat impacts to 1.5 acres of eastside (interior) grasslands and 1.6 acres of shrub-steppe. No impacts to talus would occur. (ASC; IRD HMP)
- Rabbitbrush shrubland is present within the Project Area. As rabbitbrush shrubland is considered an early-stage succession for shrub-steppe, the Applicant has committed to treating the habitat type as equivalent to shrub-steppe for the purposes of mitigation. For rabbitbrush shrubland, the Project would result in permanent impacts to 4.4 acres, temporary impacts to 2.7 acres, and altered habitat impacts to 84.7 acres. (ASC; IRD HMP)
- In order to achieve “no net loss of habitat functions and values” as required by WAC 463-62-040, the Applicant would continue to coordinate with WDFW and EFSEC to determine appropriate compensatory mitigation for habitat impacts. Mitigation would be achieved either through implementation of a conservation easement on sufficiently similar lands as those being impacts or through funding of an EFSEC-designated conservation project (ASC; Attch. M)
- 26 special status wildlife species were identified with the potential to occur in the Project Area including 18 birds, 6 mammals, and 2 reptiles. Four of these species, specifically the American White Pelican, Ferruginous Hawk, Greater Sage-grouse, and Sandhill Crane, are state-listed as threatened or endangered. No federally listed species were identified with the potential to occur on site. (ASC; Attch. G)

- During wildlife surveys, 42 bird species, 7 mammal species, and 1 reptile species were directly or indirectly observed within the Project Area. Additionally, raptor nest surveys indicate that a sufficient small mammal population is present to support medium-sized raptors, so ground squirrel and jackrabbit populations are assumed to exist onsite. (Attch. G; IRD WBS)
- During wildlife surveys, observations included 5 special status bird species (Ferruginous Hawk, Golden Eagle, Burrowing Owl, Lewis' Woodpecker, and Northern Harrier) and 4 special status mammal species (American badger, mule deer, Rocky Mountain elk, and an unidentifiable jackrabbit species). No federally listed species were observed. (ASC; Attch. G; IRD WBS)
- The Applicant has acknowledged that the Project may disturb wildlife, potentially resulting in some species displaying avoidance behavior. The extent of this disturbance has not been estimated or included in the habitat calculations. (ASC)
- The Applicant has noted that the Project would result in impacts to elk winter habitat and elk and mule deer migration routes, but migration routes have not been mapped and habitat loss has not been calculated. The Applicant would leave unfenced areas to provide wildlife corridors, but without existing movement routes documented, it cannot be determined whether proposed corridors align with existing routes. (ASC; Attch. G)
- Impacts to wildlife movement and habitat connectivity are identified at a landscape/cumulative level. Based on continued coordination with WDFW, refined project siting, and review by EFSEC, wildlife corridors would be implemented through the Project area to mitigate impacts to habitat connectivity and wildlife passage. (WDFW)
- Existing transmission line rights of way and ephemeral drainages would be left unfenced to maintain existing wildlife movement corridors for elk and mule deer. (ASC)
- Perimeter fencing would be composed of separate smaller units in lieu of a single large array to facilitate wildlife movement. Project fencing would be sited to avoid long narrow passages that are closed at one end. These openings could serve as false corridors that may discourage wildlife passage or trap prey species. (ASC; WDFW 2)
- Except for fencing around the Project substation, which would extend to the ground, perimeter fencing would be designed to end at least 4 inches above the ground to facilitate small animal passage. (ASC)
- The Applicant is in active discussion with WDFW and affected landowners to determine whether existing artificial water sources can be moved outside of the fenced area to allow for continued wildlife access during Project operations. (ASC)
- The Applicant is in active discussion with WDFW regarding potential mitigation for burrowing owls that would include permanent and seasonal buffers around identified burrows. (WDFW; WDFW 2)
- Direct impacts to wildlife also include the potential for collisions with construction vehicles and equipment. (ASC)
- Vegetation removal during breeding season may result in destruction of nests and injury or death to birds or eggs. Special status raptors would experience a direct loss of foraging habitat. (ASC)
- The Applicant would conduct nest clearance surveys prior to construction activities during bird nesting season. (ASC)

- The Applicant would prepare a Final Wildlife Habitat Management and Mitigation Plan that outlines measures that would be taken to avoid, minimize, and mitigate for impacts to wildlife habitat from construction and operation of the Project. (ASC; Attch. G)

Mitigation:

- Prior to the start of construction, a Final Wildlife Habitat Management and Mitigation Plan would be developed in coordination with WDFW and EFSEC, as described in the ASC, to include considerations of any potential additional mitigation as identified by WDFW or other micrositing options that may be feasible to further reduce the impact to habitat connectivity. Among micrositing options, the Applicant would consider if incremental expansion of Project wildlife corridors is practicable through intra-site relocation of solar arrays.
- For the purposes of impact assessment and compensatory mitigation, all burned and recovering shrub-steppe habitat should be mapped and considered as shrub-steppe, rather than as eastside (interior) grass.
- The Applicant would prepare a Final Wildlife Habitat Management and Mitigation Plan prior to Project construction, which may identify additional impacts to Priority Habitats. All impacts to Priority Habitats and rabbitbrush shrubland would be mitigated for at the following ratios:
    - Eastside (interior) grass
        - 1:1 for permanent impacts
        - 0.5:1 for altered habitat impacts
        - 0.1:1 for temporary impacts
    - Shrub-steppe
        - 2:1 for permanent impacts
        - 2:1 for altered habitat impacts
        - 1:1 for temporary impacts
    - Rabbitbrush shrubland
        - 2:1 for permanent impacts
        - 2:1 for altered habitat impacts
        - 1:1 for temporary impacts
- All trash containers would be wildlife resistant.
- The Applicant would avoid the use of pesticides, including rodenticides, during Project construction and operation. If the use of pesticides is required, the Applicant would develop a management plan for submission to and approval by EFSEC that describes how the Applicant would avoid and/or otherwise minimize potential impacts on wildlife, including all potentially impacted special status species.
- The Applicant would limit construction disturbance by identifying sensitive areas on mapping and flagging any sensitive areas including wildlife features, such as wildlife colonies, active nests, dens, and wetlands in the field. The Applicant would conduct ongoing environmental monitoring during construction to ensure that flagged areas are avoided.
- The Applicant would maintain a database of identified wildlife carcasses found within the Project area, especially on or along roadways and wildlife corridors, through construction and operation as part of the operational procedures. The Applicant and the TAC would review mortalities annually and propose additional mitigation for areas under the control

of the Applicant with frequent mortalities or wildlife crossing observations. Additional mitigation measures may include, but are not limited to, speed control, signage, temporary road closures (e.g., during migration periods), or fencing changes.

- Vegetation clearing and grubbing would avoid local bird breeding periods, when feasible, to reduce potential destruction or disturbance of nesting birds. If avoidance of this period is not feasible, additional mitigation measures, such as pre-construction surveys for and buffering of active bird nests, would be undertaken.
- The Applicant would locate Project components, including roads and powerlines, outside of identified movement corridors to the extent feasible. Rationale would be provided to EFSEC for siting components within movement corridors, and a Corridor Mitigation Plan would be required that describes:
    - Extent of direct and indirect habitat impact within the movement corridor
    - Proposed measures to be implemented to reduce potential impacts on movement corridors (e.g., habitat enhancements to promote continued use of corridors)
    - Proposed features to accommodate wildlife movement for linear Project components (e.g., roads, powerlines)
    - Proposed restoration in movement corridors following Project decommissioning
- All roadways constructed for the Project during the construction and operation phases would be removed and restored during decommissioning. The Applicant would provide EFSEC with rationale and propose additional mitigation measures for EFSEC review and approval if roadways are not decommissioned post-operation.

6. ENERGY AND NATURAL RESOURCES

- The information provided by the Applicant regarding environmental impacts as they relate to energy and natural resources satisfies the informational requirements of the SEPA checklist. (WSP)
- The Project is not expected to consume or remove significant quantities of energy or other natural resources during construction or operations. (ASC)
- Non-renewable resource use includes some construction materials and fossil fuels that would power construction vehicles, equipment, and operational vehicles. The quantity of non-renewable resources required for construction are stated to be typical of commercial construction facilities of a similar size. (ASC)
- Electricity for the Project's O&M building would be provided by the local utility, Benton Rural Electric Association, which has ample ability to meet Project needs. (ASC)

Mitigation:

- The Applicant would install high-efficiency electrical fixtures and appliances in the O&M facility, BESSs, and substations to reduce energy needs for the Project's operations stage.
- The Applicant would install high-efficiency security lighting to reduce energy needs for the Project's operations stage.
- The Applicant would remove all concrete foundations associated with the Project to a level of no less than 3 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 Applicant would demolish and remove all Project-related

equipment and facilities from the Lease Boundary upon Project decommissioning. The Applicant 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 Applicant deems non-recyclable, the rationale for that determination shall be presented to EFSEC for approval prior to the disposal of the components. If the Applicant intends to leave any portion of the facility, including concrete foundations, they must submit a request to EFSEC in an update to their decommissioning plan.

7. ENVIRONMENTAL HEALTH

- The information provided by the Applicant regarding environmental impacts as they relate to environmental health satisfies the informational requirements of the SEPA checklist. (WSP)
- Pesticides and herbicides have been applied in a typical manner during the historic agricultural and ranching uses of the Project area, but no evidence has been observed that the site contains potentially hazardous materials. The Applicant would perform a site-specific Phase 1 Environmental Site Assessment prior to construction to identify any existing environmental contamination. (ASC)
- The Applicant would develop a Spill Prevention, Control, and Countermeasure Plan to prevent spills during construction and identify measures for rapid release response. (ASC)
- The BESS units would contain a protection system to avoid risks of fire and spills. (ASC)
- Spent batteries, which can be considered hazardous materials, would be handled, stored, and disposed or recycled in accordance with manufacturer's specification and applicable regulations. (ASC)
- Along SR 241, a "green strip" of native, maintained grasses approximately 100-150 feet wide pre-exists the Project as a form of firebreak. The Applicant would maintain this existing green strip and is in discussions with WDFW regarding the creation and management of a similar strip along the northern border of the Project area to further reduce the risk of wildfire spread. (WDFW 2)
- The Applicant would prepare an Emergency Management Plan, Best Management Practices, and Fire Prevention Plan to mitigate and minimize the risk of fire or other emergencies. (ASC)
- The Applicant is in active discussion with affected landowners to determine whether an existing artificial water source can be moved outside of the fenced area to allow for continued use as a water source for helicopter fire suppression. (WDFW 2)

Mitigation:

- The Applicant would prepare a Phase 1 Environmental Site Assessment prior to Project construction, which may identify site contamination. If evidence of potential contamination is found within the Project area, the Applicant would perform a Phase 2 Environmental Site Assessment and consult with EFSEC to identify potential additional mitigation measures.
- The Applicant would construct and maintain a "green strip" along the northern and western boundaries of the site to reduce the risk of spread of wildlife either into or out of the site. The dimensions and composition of this strip would be determined in coordination with WDFW and EFSEC.

- The Applicant would locate an artificial water source outside of the fenced project area to provide a water source for helicopter fire suppression.

8. LAND AND SHORELINE USE

- The information provided by the Applicant regarding environmental impacts as they relate to land and shoreline use satisfies the informational requirements of the SEPA checklist. (WSP)
- No designated waterbodies or shorelines are located within or adjacent to the Project. (ASC)
- Benton County has determined that the Project is not consistent with the County's Growth Management Act Agricultural Zoning District. (BC)
- The Project would not result in any changes to existing land ownership. (ASC)
- Permanent (for the life of the Project) disturbances would impact 2,978 acres of farmlands, or about 0.5% of all agricultural-designated lands in Benton County.
- The Project would result in impacts to 690 acres of NRCS-classified prime farmlands. 25.4 acres of these prime farmlands would be covered by the Project's permanent disturbance footprint such as access roads, while the remaining 664.6 acres would be located under solar arrays. (ASC)
- Construction activities and Project operations are likely to result in soil compression, cracking, and loss of organic material on prime farmlands. While the Applicant's restoration commitments may limit the severity of these impacts, they alone are not sufficient to eliminate the potential of permanent production capacity losses to prime farmlands. (AG, AG 2)
- Project termination and decommissioning would include a restoration of the Project area to its original condition. This would include removal of gravel and other aggregate material, localized grading and disking to match surrounding elevations, replacement of topsoil from on-site stockpiles, de-compaction of impacted soils, and revegetation of disturbed areas with an appropriate hydroseed mix. (ASC, TT)
- The Applicant has not identified any significant adverse effects from the Project on land use and believe that through the implementation of environmental best practices, the Project area should remain compatible with surrounding agricultural land uses. (ASC)

Mitigation:

- Prior to decommissioning, the Applicant would submit a Detailed Site Restoration Plan, per WAC 463-72-050, for restoring the site to its preconstruction character. This would assist in preventing conversion of a land use that is not in alignment with the Lease Boundary's current designation (Growth Management Act Agricultural District). The Applicant would be responsible for working with landowners to return all agricultural land to its preconstruction status. If future site conditions or land ownership no longer allows for the land to be returned to agricultural production, the Applicant would submit a request to EFSEC for an alternative land use that would be in alignment with the Lease Boundary's preconstruction rural character and resource value. If the Detailed Site Restoration Plan requests an alternative land use, EFSEC may require that the Applicant provide additional mitigation to offset impacts from a permanent conversion of the land.
- The Applicant would develop a Soil Monitoring Plan for the 690 acres of prime farmlands to be impacted prior to the start of construction which would be provided to

EFSEC, the Washington Department of Agriculture, and Washington Department of Fish and Wildlife for review and approval. This Plan would last for the duration of the Project's life with a baseline soil test conducted within the fall season immediately prior to the start of construction on the impacted prime farmlands, annual fall season testing for the first 5 years following the completion of construction, and testing once every 5 years following the initial 5-year period (i.e., Years 10, 15, 20, etc.). With the understanding that specific testing methods and criteria may be modified by the TAC as appropriate, the soil monitoring should include, at a minimum, measurements for the following soil traits and characteristics:
    - Compaction
    - Topsoil depth
    - Water-holding capacity
    - Organic carbon content
    - Organic matter
    - Nutrient content
    - pH levels
    - Productivity
    - Structure
- The use of gravel on prime farmlands would be reduced to the greatest extent feasible, with justification for its use presented to EFSEC for approval prior to the start of construction. If gravel must be used on areas designated as prime farmland, EFSEC may require additional relevant mitigation.
- The TAC would review the results of the soil testing, provide adaptive management guidance, and recommend mitigation to EFSEC to ensure that the impacts of soil cracking, compaction, and nutrient loss are minimized to the extent that the Applicant can completely recover the prime farmlands to their pre-Project production capacity following decommissioning. The form of mitigations imposed by EFSEC would be dependent on the site conditions, but can include, among other measures:
    - Periodic grazing and/or mowing
    - Water dispersal events
    - Conservation tilling
    - Application of soil amendments, nutrients, or minerals
    - Seedings or plantings to reinforce natural revegetation

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, work force, property values, housing, health facilities and services, education facilities, governmental services, and local economy."
- The information provided by the Applicant regarding environmental impacts as they relate to housing and jobs satisfies the informational requirements of the SEPA checklist. (WSP)
- According to occupational data for the two Metropolitan Statistical Areas within 1 hour commute of the Project, the area has a large construction workforce pool. The Applicant would prioritize local construction worker hiring and would have a local procurement policy and community event sponsorship. (ASC)

- No residences are located within the Project Boundary and the Project is not expected to displace any future housing. (ASC)
- The housing study area (Benton, Franklin, and Yakima Counties) contains approximately 2,100 housing units available for rent plus a variety of other housing options, exceeding the anticipated need for the peak of 180 to 283 non-local workers. (ASC)
- EFSEC incorporates the principles of environmental justice, as defined in RCW 70.A02.010(8), into its project reviews in an effort to ensure that there are no disproportionate environmental and health impacts to vulnerable and overburdened communities.
- The socioeconomic impacts associated with the Project are not anticipated to disproportionally affect communities of color, low-income populations, or indigenous people. (ASC)
- EFSEC staff have made use of tools such as the Environmental Protection Agency's EJScreen and the Washington State Department of Health's Washington Tracking Network and concur with the finding that the Project is not anticipated to result in disproportionate impacts to vulnerable and overburdened communities.

Mitigation:

- Prior to decommissioning, the Applicant would provide a new housing analysis that would include up-to-date housing information to determine if current socioeconomic analysis and Project impacts on housing are appropriate or if additional mitigation is needed to address temporary housing availability.

10. NOISE AND VIBRATION

- The information provided by the Applicant regarding environmental impacts as they relate to noise and vibration satisfies the informational requirements of the SEPA checklist. (WSP)
- Project noise during the construction and decommissioning phases would cause short-term unavoidable impacts significant enough to temporarily interfere with speech communication outdoors and indoors with windows open. Construction noise would vary significantly depending on several factors including age, condition, type, and model of equipment and type of operations being performed. (ASC; Attch. O)
- To the extent practicable, construction and decommissioning activities would be scheduled during normal working hours on weekdays. Major excavating and earth-moving machinery would be limited exclusively to daytime hour operation and potential evening shift work would be limited to low-noise activities such as welding, wire pulling, and similar activities. (Attch. O)
- All tools, vehicles, and equipment would be kept in good operating order, including equipping all appropriate equipment with properly operating mufflers and keeping all engine housing doors closed. (Attch. O)
- Project noise during operation would comply with a 50-dBA nighttime limit at all non-participating noise sensitive receptors (NSRs), all applicable WAC regulatory limits at the Project Lease Boundary and is expected to be lower than existing sound sources from the Project area, such as the operation of agricultural equipment. (ASC; Attch. O)

Mitigation:

- Avoid laydown and equipment storage/parking areas closer than 2,500 feet from the nearest NSR location. These laydown and storage areas would have more noise sources for longer periods of time than other areas; therefore, setting these locations further from NSR locations would limit the sound level and the duration that such equipment can impact an NSR.
- Limit large, noise-generating equipment activities, such as earth-moving equipment, cranes, and trucks to daytime hours (between 7 a.m. and 10 p.m.) and limit the loudest and most impulsive pieces of construction equipment and activities, such as pile-driver operations and blasting, to typical working hours only: 7 a.m. to 6 p.m., Monday through Saturday. Nighttime operations should be atypical.
- Monitor noise during nighttime operations (between 10 p.m. and 7 a.m.), when operations have the potential to impact Class A NSRs to ensure that operations do not exceed state noise limits. When nighttime operations do not have the potential to exceed state noise levels, monitoring would not be required.
- Set up a "noise hot line" or other form of communication that the public could use to report any undesirable noise conditions associated with the Project, with the ability to log the date and time of a complaint and complainants receiving a contact attempt within 24 hours. This line of communication would be maintained through construction and for at least the first year of Project operation, with all complaints and resolutions shared with the EFSEC Council during the Project's monthly updates.
- Perform noise monitoring during operations, at a frequency and at locations identified in coordination with EFSEC for the first 180 days of operation. Noise monitoring results would be adjusted appropriately for extraordinary weather events (e.g. high wind, rain, etc.) that significantly influence noise levels. Additional mitigation (e.g., noise barriers, etc.) and subsequent noise monitoring would be required if the facilities are receiving and documenting ongoing substantiated noise complaints and/or operational noise levels exceed maximum permissible noise levels as indicated in WAC 173-60-040.

11. VISUAL AND AESTHETICS

- The information provided by the Applicant regarding environmental impacts as they relate to visual and aesthetics satisfies the informational requirements of the SEPA checklist. (WSP)
- The Applicant assessed the level of visual change from five key observation points using the Bureau of Land Management (BLM) contrast ration system to evaluate visual and aesthetic impacts. This assessment indicated that, depending on the viewpoint, views of the Project area would shift from agricultural fields, local roadways, and existing substation and electrical transmission lines to solar arrays and support components. Due to the distance of potential viewpoints from the Lease Boundary and the presence of screening terrain, visual impacts would primarily be experienced by drivers on Wautoma Road, drivers on SR 241 within 1 mile of the Project area, and residents. (ASC)
- Where the Project is visible, components would be consistent with other horizontal and vertical lines and geometric shapes visible throughout the landscape (e.g., existing fencing, roadways, substation, transmission towers and lines, utility poles and lines, and agricultural structures) and would not block views of the surrounding hills. Views of the

Project would attract attention and co-dominate or dominate the landscape with weak to strong contrasts, depending on viewpoint proximity. (ASC)

Mitigation:

- Avoid complete removal of vegetation beneath solar arrays during construction, where possible, to reduce contrast between the exposed soil and adjacent undisturbed areas during project operation.
- Install opaque fencing to directly screen views of the solar arrays where sited within 150 feet of viewpoints (i.e. public roadways) or residences. To allow the proposed fencing to blend into the setting, color-treat the opaque fencing material to minimize color contrast with the existing landscape.
- To the extent practicable, design BESS to blend with the adjacent agricultural character, including selecting materials and paint colors to reduce contrast with the existing setting. By mimicking design characteristics of agricultural structures in the area, the BESS facilities would appear consistent with the area's agricultural setting, including the overall visual scale of those existing structures.
- Choose the type of proposed transmission structure (H-frame or monopole) to best match the adjacent transmission lines and to minimize visual clutter from the introduction of different structure types into the landscape, which would result in increased visual contrast.

12. LIGHT AND GLARE

- The information provided by the Applicant regarding environmental impacts as they relate to light and glare satisfies the informational requirements of the SEPA checklist. (WSP)
    - Glare analysis of potential glare hazards concluded that the Project would not introduce a source of glare that would impact motorists, residents, or views of the area. The Project does not exceed the criteria required to formally file the site with the Federal Aviation Administration. (ASC)
    - The Project would use anti-reflective coating on solar panels to minimize glare. (ASC)
    - External safety lighting would be installed at the Project access points, substation, BESS, and O&M building. This lighting would be designed to provide the minimum necessary illumination, would be downward-facing, and would be shielded to focus illumination on the immediate area. (ASC)
    - Unnecessary lighting would be turned off at night to limit attraction of migratory birds and minimize lighting impact to the area. (ASC)

Mitigation: No additional mitigation measures for light and glare identified.

13. RECREATION

- The information provided by the Applicant regarding environmental impacts as they relate to recreation satisfies the informational requirements of the SEPA checklist. (WSP)
- The fenced Project area occupies approximately 23% of the 12,502-acre Blackrock Valley hunting grounds. During operations, hunting would be excluded from the fenced area of the Project site. Hunting would be excluded from the private lands within the

Project area except in areas or times agreed upon by the landowners and the Applicant where hunting can be conducted without health and safety risks. (ASC)

- Several DNR state trust and BLM-managed parcels are located within 5 miles of the Project area. These sites have limited road access and are limited to off-highway vehicle use or hunting. The Project would not significantly impact access or use of these sites. (ASC)
- The closest designated recreation sites are the Hanford Manhattan Project National Historical Park located approximately 13 miles to the northeast of the Project and city parks located in the City of Sunnyside approximately 12 miles southwest of the Project. The Project would not significantly impact access of use of these sites. (ASC)

Mitigation:

- The Project area is located within District 4 (which includes the Blackrock Valley hunting grounds), which has high quality hunting opportunities. To mitigate the impacts to access and use of the Blackrock Valley hunting grounds by the Project, the applicant would develop a Recreational Hunting Access Management Plan in coordination with WDFW prior to construction which would include:
    - A map of the allowed hunting areas and access points during construction and operation
    - Allowed access times
    - Types of games and hunting seasons
    - Identification of potential health and safety risks to hunters during Project construction, operation, and decommissioning
    - Appropriate mitigation measures such as scheduling and planning construction activities with the aim of minimizing conflicts with important hunting seasons as much as practicable
    - Engagement procedures with key stakeholders such as WDFW, guided hunting outfitters, and recreational hunters

14. HISTORIC AND CULTURAL RESOURCES

- The information provided by the Applicant regarding environmental impacts as they relate to historic and cultural resources satisfies the informational requirements of the SEPA checklist. (WSP)
- In accordance with RCW 80.50.060(8), EFSEC has made an effort to engage all federally recognized tribes in "early and meaningful participation and input during siting review," including providing regular updates on the application process review and an open dialogue on impacts and potential mitigation to resources, rights, or interests reserved by the tribes. (YN; YN2; CTWR)
- The Yakama Nation has recommended that all historic and pre-contact resources found in proximity to one another receive consideration as to whether they may be related. (YN)
- The Yakama Nation has expressed a "strong preference" for avoidance as a mitigation measure for any identified historic or pre-contact resources. (YN)
- The Confederated Tribes of the Warm Springs Reservation of Oregon have recommended that the Applicant develop an Inadvertent Discovery Plan and provide related training to construction crews and Project leaders prior to the start of construction. (CTWR)

- The Applicant is conducting ongoing outreach to the Confederated Tribes of the Warm Springs Reservation of Oregon, the Samish Indian Nation, the Wanapum Tribe, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Colville Reservation, and the Confederated Tribes of the Umatilla Indian Reservation. (ASC)
- 20 archaeological resources (17 sites and 3 isolated finds) and 7 historic properties were identified with the Project area during field surveys. An additional 2 historic properties were identified on parcels adjacent to the Project area. (ASC)
- The Washington Department of Archaeology & Historic Preservation (DAHP) has reviewed the final Cultural Resources Survey provided by the Applicant and concurs with the findings and recommendations included within the Survey. (ASC, DAHP)
- As currently proposed, the Project has been designed to avoid all impacts within a 30-meter buffer around NRH-listed or unevaluated/potentially eligible resources. (ASC)
- If any pre-contact-era or NRH-eligible historic-era archaeological resources are impacted by the Project's final design, the Applicant would obtain the requisite DAHP excavation permit and perform all necessary archaeological work. (ASC)
- In the event unrecorded archaeological resources are identified during Project construction or operation, work within 30 meters of the find would be halted and directed away until the discovery can be assessed in accordance with the Applicant's Unanticipated Discovery Plan. (ASC)
- The Yakama Nation has identified traditional cultural properties (TCPs) within the vicinity of the Project area that would be impacted by Project actions, including visual impacts and encroachment on a TCP landform. (YN 2)
- The Yakama Nation has suggested that the following mitigation measures be implemented in response to anticipated TCP impacts from the Project, with EFSEC response actions also included for each measure:
    - Redesign panel layout and fencing to allow for animal passage corridors to reduce animal entrapment in correspondence with Yakama Nation Wildlife as appropriate. (YN 2)
        - Following coordination with WDFW staff, the Applicant has implemented site layout changes to facilitate wildlife passage, including the maintenance of corridors and closing off long, narrow passages that are closed at one end to avoid entrapment. (WDFW; WDFW 2)
    - Obtain concurrence from DAHP and Yakama Nation CRP on the final draft cultural resources report. (YN 2)
        - DAHP has completed review on the cultural resources report and has indicated that they concur with the findings of the report apart from the two Property IDs noted above. (DAHP)
    - Avoid all precontact archaeological sites and isolates with a minimum 30 meter buffer. (YN 2)
        - The Applicant has committed to providing all NRH-listed or unevaluated/potentially eligible resources with a 30-meter buffer. (ASC)
    - All construction must occur under an Inadvertent Discovery Protocol to be drafted in consultation with Yakama Nation CRP and DAHP. (YN 2)

        - The Applicant has committed to creating an Unanticipated Discovery Plan that would be developed in coordination with DAHP and the Yakama Nation. (ASC)
    - Reduce the project footprint to exclude Sections 32 and 33, reducing visual impacts and encroachment on a TCP landform. Secure these lands from future development. (YN 2)
        - EFSEC has imposed mitigation requiring that the Applicant prioritize removing panels from the specified areas as they undergo anticipated micrositing prior to the finalization of the Project layout.
    - Seek agreement with adjacent landowners to secure adjacent parcels and public lands surrounding the project location against further development by energy projects. These parcels should be secured as part of the project (via landowner compensation) but be considered a non-development corridor. This would help alleviate future local cumulative impacts by reducing options for neighboring projects to increase pressures on resources of concern. (YN 2)
        - A narrative description of the anticipated potential for cumulative impacts to TCPs has been included in the relevant section below. This narrative includes an assessment of Project impacts when combined with past, present, and reasonably foreseeable future actions and describes mitigation for this and potential future projects.

Mitigation:

- Maintain ongoing engagement with affected Tribes to facilitate identification, location, quantification, and mitigation of potential impacts to TCPs. Tribal review of site/engineering plans would provide input to guide design and avoidance without confidential disclosure of sensitive locations. This engagement should also include opportunities to evaluate the effectiveness of any implemented mitigation measures throughout the Project's lifecycle. Appropriate mitigation measures may include (but are not limited to) the demarcation of "no-go," culturally sensitive areas to be avoided by contractors through Project redesign, refinement, or maintenance of safe access by Tribes.
- Mitigation discussions would be ongoing once site impacts are fully assessed by EFESC, affected Tribes, and DAHP. These discussions would likely occur on a case by case basis for each archaeological resource and historic property and include affected Tribes and DAHP.
- As the Applicant further refines the Project layout, they anticipate that reduction and/or relocation of panels is likely as part of micrositing. During this process, there must be a reduction in the total panel footprint within Benton County Assessor Parcels 133240000000000 and 132241000002000 to reduce visual impacts and physical encroachment on a Yakama Nation-identified TCP landform. The exact scale of the reduction would be determined during the micrositing process, but all reductions and/or relocations must first come from these identified parcels.

15. TRANSPORTATION

- The information provided by the Applicant regarding environmental impacts as they relate to transportation satisfies the informational requirements of the SEPA checklist. (WSP)
- A Traffic Control Plan would be developed consistent with WSDOT, Benton County, and Yakima County design standards to facilitate safe movement of vehicles in the vicinity of the construction zone. This Plan would be prepared in accordance with 23 Code of Federal Regulations §655 Subpart F. (ASC)
- The Project would be accessed primarily from SR 241 and Wautoma Road. A new approach from SR 241 would be constructed in the northwest corner of the Project area and a site entrance would be constructed on Wautoma Road. The applicant would obtain applicable permits from Yakima and Benton Counties and WSDOT. (ASC)
- New service roads constructed for the Project would be private, located inside the Project fence line, and would not provide any new travel routes for area residents. (ASC)
- Project construction would add an average of 588 one-way vehicle trips (294 round trips) per day over a 22-month period to SR 241, with peak traffic reaching 1,210 one-way vehicle trips (605 round trips) per day over a 3-month period. (ASC)
- Construction traffic would primarily be composed of worker commutes to the Project area from the Yakima, Sunnyside, and Richland/Tri-Cities areas, but would also include semi-trailer dump trucks, 40-foot container trucks, and water trucks. Vehicles would be parked at designated areas of the construction site and off of public roads. (ASC)
- Operations traffic would include limited worker commutes and truck trips for water deliveries (approximately 1-2 truck trips per day over a 2-3 week period for annual panel washings). (ASC)

Mitigation:

- To mitigate for potential collisions at train crossings, the Applicant should work with WSDOT and Operation Lifesaver to provide train safety presentations to employees and contractors to increase knowledge regarding train safety, including train track crossings. The Applicant should establish procedures to be followed if the load should become lodged at a rail crossing and would review the emergency contact numbers for each crossing.
- To ensure that no changes have occurred since the traffic analysis originally provided prior to construction, a third-party engineer would provide a traffic analysis prior to decommissioning. The traffic analysis would evaluate all modes of transportation (e.g., waterways, rail, roads, etc.) used for the movement of people and materials during decommissioning via the haul route(s) in Washington State.
- The analysis of impacts from decommissioning is based on existing laws and regulations at the time when the ASC was submitted to EFSEC. To ensure that no changes have occurred to laws and regulations used in this analysis, the Applicant should consult with WSDOT, Benton County, and Yakima County on the development of a decommissioning-stage Traffic and Safety Management Plan prior to decommissioning. The Traffic and Safety Management Plan must include a safety analysis of the WSDOT-controlled intersections (in conformance with the WSDOT Safety Analysis Guide) and provide mitigation or countermeasures where appropriate. The analysis would review

impacts from decommissioning traffic and be submitted to WSDOT for review and comment prior to decommissioning activities.

16. PUBLIC SERVICES

- The information provided by the Applicant regarding environmental impacts as they relate to public services satisfies the informational requirements of the SEPA checklist. (WSP)
- During construction, the Project workforce is anticipated to peak at 515 employees, with an average of 225 workers at the site. During operation, the Project would be staffed by up to four personnel. (ASC)
- The non-local share of the construction workforce is anticipated to number an average of 79-124 workers, resulting in a peak temporary increase in the local population of approximately 0.1%. As a result, the Project is not expected to significantly affect the use of public services and facilities during construction or operation. (ASC)
- The Project is not located on public land and its construction and operation would not have any impact on public open space. (ASC; DNR)
- Prior to the start of construction, Emergency, Fire Control, and Health and Safety Plans would be developed in consultation with stakeholders (e.g. Benton County Sheriff's Office, DNR Wildland Fire Management Division) to mitigate and minimize any potential impacts from hazardous spills, fire, or other emergencies. (Attch. O)

Mitigation: No additional mitigation measures for public services identified.

17. UTILITIES AND WASTE MANAGEMENT

- The information provided by the Applicant regarding environmental impacts as they relate to utilities and waste management satisfies the informational requirements of the SEPA checklist. (WSP)
- Depending on soil moisture levels, up to 53 million gallons of water may be used during the 22-month construction period for dust suppression. This water may be sourced either from an existing on-site well with a valid water right to be confirmed by WDOE or by purchasing water from a permitted off-site source and hauling it to the Project Area. (ASC)
- During operations, panel washing may occur once per year across approximately 20 percent of the panels. This would result in the use of approximately 120,000 gallons of water per year, which would be supplied by 1-2 water truck trips per day over a period of 2-3 weeks. Washwater is expected to infiltrate into the ground surface at or near the point of application. (ASC)
- Operation-phase washwater and domestic water for use at the O&M building would be sourced either from an existing on-site well with a valid water right, an offsite vendor with existing water rights, or from a groundwater permit-exempt well within the Project Area. Groundwater permit-exempt wells allow for a maximum withdrawal of up to 5,000 gallons per day, or 1,825,000 gallons per year. The Applicant anticipates an annual withdrawal of approximately 120,000 gallons per year. (ASC)
- The Applicant is considering the installation of a 10,000-gallon water cistern to store water for potential fire suppression needs. (ASC)

- As a solar power generating facility, the Project is expected to produce the majority of its own electricity needs. As needed, a small amount of electricity would be supplied from the Benton Rural Electric Association to power the O&M facility. (ASC)
- A licensed waste contractor would be used to transport and dispose of construction and operations waste and recyclable material. Several solid waste landfills and waste transfer stations in Benton County and nearby Yakima County have sufficient capacity to accommodate waste generated by the Project. (ASC)
- During construction, portable toilets would be used for sanitary wastes. (ASC)
- During operation, a licensed professional would be contracted to install an on-site septic system for the sanitary wastes produced from the O&M facility. (ASC)
- Construction materials, used batteries and components, and spent solar panels would be recycled to the extent practicable and in coordination with licensed subcontractors, recycling facilities, and/or authorized sites. (ASC)

Mitigation:
- Prior to construction, an approved source of water with enough legally available (approximately 80,000 gallons/day) water to supply the needed amount for construction would be identified and confirmed via a contract or certificate of availability, whether that be an existing on-site well with a valid water right, off-site sources with existing water rights, or some combination of the two.
- The Applicant would install a 10,000-gallon water cistern to store water for potential fire suppression needs.

Cumulative Effects:
Isolation of special status plant species:
A population of approximately 125 individuals of Columbia milkvetch has been identified within a 3-acre area of the Project. The range of this species is restricted to an area of approximately 125 square miles along the Columbia River. Populations of this species are sometimes ephemeral in nature and generally do not persist in disturbed area (DNR CM). As a result, impacts to this species from the Project may exceed those that can be identified by surveys. EFSEC is aware of a number of proposed projects within the limited range of the Columbia milkvetch that could cumulatively contribute to the isolation and fragmentation of species populations.

The Applicant has committed to avoiding the identified population of Columbia milkvetch within the Project area and would not construct any Project components within 150 feet of any identified individual. If additional projects are constructed within the range of the Columbia milkvetch, the species would benefit from similar considerations such as those proposed for this project. Avoidance of identified populations and ideal habitat while allowing buffers for propagation would assist in minimizing cumulative impacts to the Columbia milkvetch.

Loss and degradation of Priority Habitat:
The Yakama Ridge (Yakima Training Center area), Rattlesnake Ridge (Department of Energy; Hanford Site), and Black Rock Valley (Project area) regions represent some of the largest remaining blocks of shrub-steppe habitat in southcentral Washington. WDFW is concerned that cumulative effects of lineal energy projects paralleling SR 24 and SR 241 would result in habitat fragmentation and loss of ecological connectivity between these remaining blocks of shrub-

steppe (WDFW). EFSEC is aware of several large projects proposed within the Black Rock Valley area that would cumulatively impact thousands of acres. Combined, these projects could serve to isolate pockets of Priority Habitat, reduce connectivity and genetic exchange between plant and animal populations, and shrink the connective habitat between Yakama and Rattlesnake Ridges.

The Applicant has sited Project facilities on previously disturbed (e.g. cultivated agricultural land, non-native grassland, and forbland) to the greatest extent feasible and has minimized proposed impacts to Priority Habitats as much as practicable. Additionally, the Applicant would implement compensatory mitigation for all impacts to Priority Habitat, including rabbitbrush shrubland which it is treating as equivalent to shrub-steppe for the purposes of mitigation, and develop a Vegetation and Weed Management Plan in coordination with WDFW that would include measures for revegetation and monitoring following Project construction and restoration following Project decommissioning.

Wildlife movement/habitat connectivity:
Presently, there is little resistance (i.e., any type of significant development) on this landscape for animal movement and, both individually and cumulatively, the Project would impact priority habitats, dependent species, and connectivity, as well as result in short- and long-term behavioral changes and impact populations dynamics across a large landscape. Large, fenced areas, such as solar facilities have the potential to adversely affect wildlife movement. The Project is proposed to be constructed within the Black Rock Valley, an important habitat/wildlife connectivity corridor between the Yakama Ridge to the north and Rattlesnake Ridge to the south (WDFW). The Project would also impact a known migration route for Rocky Mountain elk and mule deer. Conversations between the applicant, WDFW, and EFSEC throughout the siting process have acknowledged that habitat connectivity in the area is a topic of importance. EFSEC is aware of several projects proposed in the area and EFSEC and WDFW continue to evaluate proposals in the area with an emphasis on maintaining habitat connectivity through the region.

Each solar project can cover hundreds to thousands of acres. The Wautoma Solar Project would cover 4,573 acres, of which 2,974 acres would be enclosed in fencing. The Project design includes multiple considerations that recognize the impact that this Project would have on wildlife movement, including, but not limited to, developing, in coordination with WDFW, wildlife corridors through the Project area where practicable, leaving corridors along ephemeral streams and transmission line rights of way open, limiting fencing to surround consolidated arrays, and moving at least one existing artificial water source outside of fenced areas. In general, the site provides local connectivity functions and value. Wildlife movement would be able to occur around and between solar arrays where allowed by fencing, including at least three northeast-to-southwest corridors in between sets of arrays.

Some species, such as deer and elk, are very wary of fencing or movement restrictions and may need wildlife passages as wide as 1-2 miles in width, and potentially larger, in order to maintain effective movement. As additional projects which fence large areas are constructed, as several are currently identified in planning, wildlife movement and connectivity could be more substantially affected. Creating protected wildlife corridors connecting Yakima Ridge and Rattlesnake Ridge north to south would sustain vital connected core habitat areas in the Black

Rock Valley landscape. Additional wildlife corridors should be identified and protected as mitigation for future large, fenced projects in this rural area. EFSEC would expect that any future development in the area would demonstrate, through site design and coordination with EFSEC and WDFW, an effort to maintain the continuity of wildlife movement corridors through the region.

Loss and degradation of farmlands

The Project is located entirely on land within the Benton County Growth Management Act Agricultural District (GMAAD), which is designated by Benton County as a zone of agricultural lands of long-term commercial significance. Project facilities would be sited on approximately 793 acres of cultivated agricultural lands composed of fallow and active wheat fields, irrigated alfalfa fields, livestock and horse pastures, and irrigated hedgerows, 3,216 acres of vegetated uplands that consist of undeveloped rangelands, portions of which are used for sheep grazing, and 524 acres of vegetated uplands that are enrolled in the Conservation Reserve Program. In total, 2,978 acres of GMAAD-designated lands, representing approximately 0.5 percent of such lands within Benton County would be fenced in and removed from crop and livestock production for the life of the project (approximately 35 years). While the degree of loss of agricultural lands of commercial significance as a result of this project alone are comparatively minimal in the context of total available agricultural lands within Benton County, EFSEC is aware of a number of existing and proposed projects within the County that would cumulatively remove many thousands of acres of existing agricultural lands from active production for extended, overlapping, periods of time.

The Applicant has made efforts to reduce the Project impacts on agricultural lands as much as possible by condensing the solar array micrositing to reduce the overall footprint, leaving as much of the Project Area free of fencing as practicable, and primarily targeting lands that are less intensively used for agricultural production. The Applicant would perform regular soil testing for a variety of soil characteristics with a Technical Advisory Committee being given authority to recommend adaptive management measures to the Council, which would represent a significant mitigative action to maintain the agricultural nature and character of the lands throughout Project operations. Additionally, the Applicant's Detailed Site Restoration Plan would include commitments to restore all agricultural lands to their pre-project condition through the removal of all gravel and aggregate material, localized grading and disking to match surrounding elevations, replacement of topsoil from on-site stockpiles, and revegetation of disturbed areas with an appropriate hydroseed mix. EFSEC would seek similar commitments from other projects to ensure that agricultural lands that are removed from production for the life of a project can effectively be returned to production following decommissioning.

There is additionally a concern that the development of this and similar projects may produce impacts to agricultural lands that reduce their productivity long after the lifespan of the Project. Specifically, long-term impacts to soils including cracking, loss of organic material, and compaction can be difficult or impossible to fully recover from, potentially permanently reducing agricultural production potential in the region. While the 2,978 acres of farmlands to be impacted by the placement of solar arrays from this Project are unlikely to have a significant negative effect on agricultural production in the region if they were to permanently lose productivity due to changes in soil characteristics, if similar impacts were to occur with other

known projects, there could very well be cumulative impacts to agricultural productivity in the region.

A combination of Applicant commitments and EFSEC-imposed mitigation should result in no permanent loss in productivity for agricultural soils within the Project area, and EFSEC would ensure that comparable mitigative measures are put into place for other energy projects subject to EFSEC authority. This Project would include a Technical Advisory Committee composed of subject matter experts that would be responsible for assessing soil quality within prime farmlands during Project operation and adapting mitigation as needed to ensure that full productivity is recoverable following Project decommissioning. Mitigation may include periodic grazing or mowing, soil testing, irrigation, organic material dispersal, and conservation tilling to ensure that the high-quality soils present within prime farmlands do not suffer any long-term or permanent loss in productivity. EFSEC would review the effectiveness of these mitigations and adapt them as appropriate for upcoming projects with the explicit goal of maintaining agricultural productivity potential in Benton County.

Traditional Cultural Properties

The Yakama Nation has indicated that there are several tribe-identified traditional cultural properties (TCPs) in proximity to the Project that have been documented by the Yakama Nation Cultural Resources Program during prior research (YN 2). TCPs can consist of natural or human-constructed resources that have historic, cultural, religious, or other significance to a living community and are important in maintaining the continuing cultural identity of that community. The Yakama Nation considers most impacts to TCPs to be significant due to the historic and continued degradation and loss of these properties, resulting in comparatively few remaining TCPs that are of heightened sensitivity and particularly vulnerable to any new effects from development. Yakama Nation staff have stated that they anticipate Project actions would result in "visual impacts and encroachment on a TCP landform" as well as impacts to other TCPs in the area (YN 2). EFSEC is aware of a number of existing and proposed projects within the region that may cumulatively impact some of these same TCPs.

While specific descriptions and geographic boundaries for all known nearby TCPs have not been provided to EFSEC, a landform-scale TCP to the south of the Project Lease Boundary has been identified that would be impacted by the Project through physical encroachment and viewshed changes. Prior to final Project design, the Applicant anticipates undergoing a micrositing process wherein solar array placement may shift within the Lease Boundary. EFSEC has imposed mitigation requiring that any solar panel relocations internal to the site should prioritize moving panels away from the southernmost areas of the Lease Boundary so as to reduce Project impacts to the identified landform-scale TCP.

Cumulative impacts to this TCP should be considered as the combined result of incremental direct and indirect impacts from this Project, past and present actions, and any other reasonably foreseeable developments. The visual setting of the Project is primarily agricultural land with a mix of irrigated cropland, dryland agriculture, and open rangeland with a low of number of associated agricultural buildings and dispersed residences. An existing electrical substation covers approximately 28 acres in the northern portion of the Project Area. The dispersed, small-scale past and present actions present within the viewshed would not meaningfully contribute to

cumulative impacts to the identified TCP. Following consultation with other state agencies and County governments, EFSEC is aware of only one reasonably foreseeable development (RFD) in this area, a 164 MW solar energy facility that would be sited, in part, on approximately 350 acres approximately 0.5 miles north of the Lease Boundary. The site of the RFD is separated from the Project Area by the Yakama Ridge, which rises approximately 600 feet above the Project Area. The Applicant has provided EFSEC with field photographs from areas of high ground on the Rattlesnake Hills south of the Project facing northwards toward the Project and RFD that suggest that there would be little to no combined visual impacts to the Rattlesnake Hills. Visual simulations from the Project Area facing north also show that little to none of the RFD would be visible from the Project Area.

EFSEC is aware that the development of renewable, particularly solar, energy facilities is proliferating throughout Benton and Yakima Counties, especially within the Moxee and Black Rock Valleys along the SR 24 corridor. These solar facilities, when in close proximity, are difficult to distinguish visually from one another and effectively combine into a single, much larger, visual impact on sensitive viewsheds and TCPs. For any future projects in close proximity to the Project Area, EFSEC will consider whether the cumulative impacts from those projects when combined with the Wautoma Project could be reduced through mitigation. This mitigation would be defined by the nature and degree of cumulative impacts and could include measures such as relocation of components away from sensitive areas, the imposition of undeveloped buffer lands between new and existing projects to break up their visual impacts, or other measures as needed. EFSEC recognizes the cultural value of TCPs and the importance of minimizing impacts to what TCPs remain following a history of loss, degradation, and destruction and will continue to seek discussion with affected Tribes on how to best use the SEPA process to identify and reduce cumulative impacts from development on or near these sites.

APPLICABLE SEPA RULES

Mitigated Determination of Nonsignificance (DNS).

WAC 197-11-350 specifies when a Mitigated DNS is issued.

> WAC 197-11-350. (3) Whether or not an applicant requests early notice under subsection (2), if the lead agency specifies mitigation measures on an applicant's proposal that would allow it to issue a DNS, and the proposal is clarified, changed, or conditioned to include those measures, the lead agency shall issue a DNS.

Comment period

WAC 197-11-340 identifies 5 circumstances when a 14-day comment period is required.

> WAC 197-11-340 (2) (a) An agency shall not act upon a proposal for fourteen days after the date of issuance of a DNS if the proposal involves:
>
> > iv) a DNS under WAC 197-11-350 (2), (3) or 197-11-360(4)

Consistent with WAC 197-11-350, EFSEC has identified conditions that would allow it to issue a DNS, or the applicant has clarified or changed their proposal to include additional measures that allow EFSEC to issue a DNS. The DNS should be identified as mitigated and a 14-day comment period should be provided.

Nothing in this environmental review or the associated SEPA Mitigated DNS 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 Wautoma Solar. I have identified no probable significant adverse environmental impacts if the mitigation measures identified in part B are included in a DNS and in the Site Certification Agreement. I hereby recommend a Mitigated Determination of Nonsignificance with a 14-day public comment period.

Amí Hafkemeyer — 05/17/2024

Amí Hafkemeyer — Date

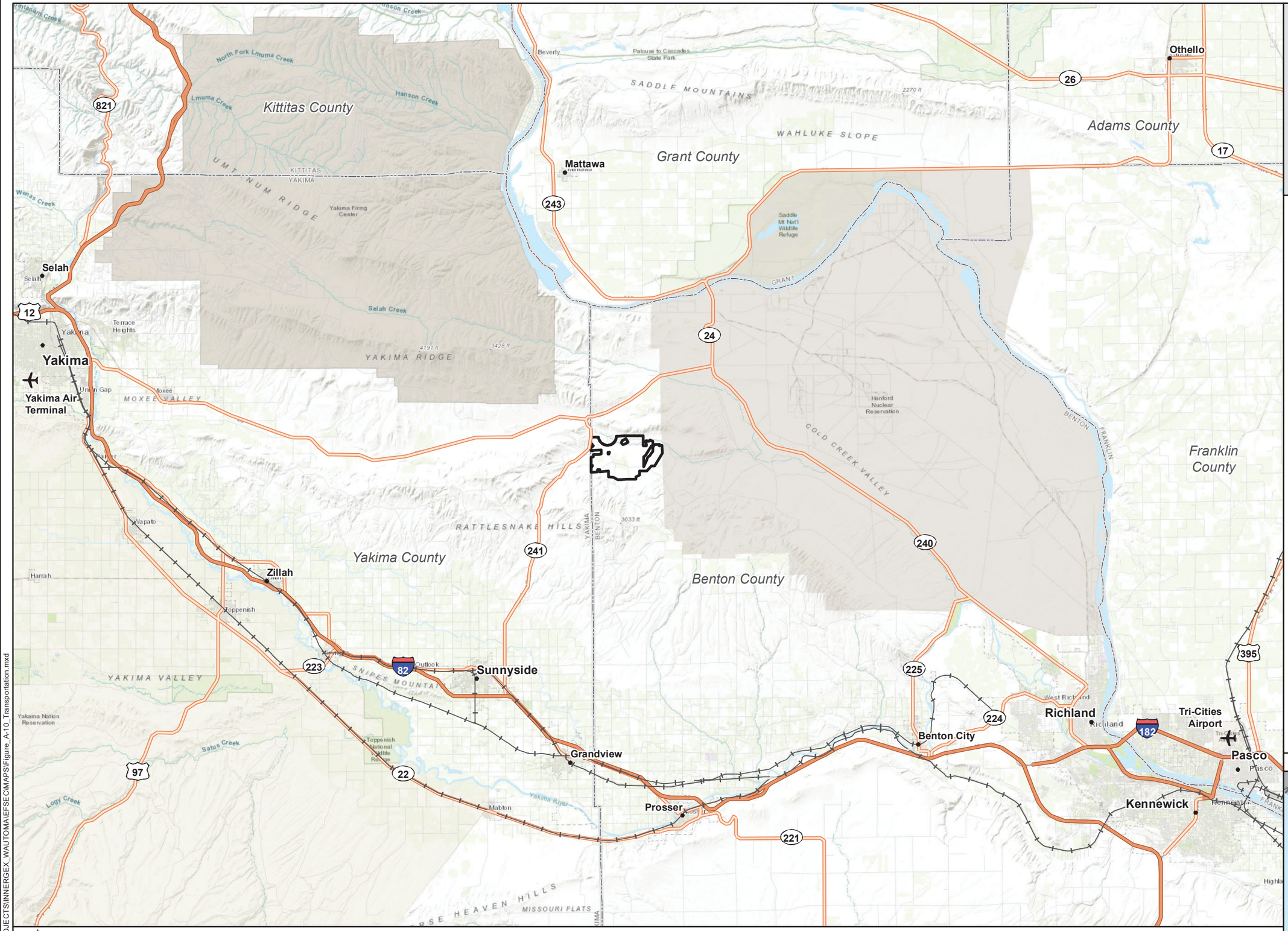
EFSEC Director of Siting and Compliance

Attachment 2: Figure A-10: Wautoma Solar Transportation Routes

Wautoma Solar

Figure A-10
Transportation Routes

BENTON AND YAKIMA COUNTIES, WA



Project Area
County Boundary
Airport
Railroad
Interstate
Highway

INNERGEX
TETRA TECH

Reference Map

1:330,000 NAD 1983 StatePlane Washington South FIPS 4602 Feet

0 5 10 20 Miles

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