



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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February 7, 2024

Joanne Snarski
Energy Facility Site Evaluation Council
PO Box 47250
Olympia, WA 98504

SENT VIA ELECTRONIC MAIL

RE: Carriger Solar Project Amended Wetlands and Waters Report Dated Dec 15, 2023

Dear Joanne Snarski:

The Department of Ecology's (Ecology) Shorelands and Environmental Assistance (SEA) Program has reviewed Cyprus Creek Renewables' response to Ecology's letter and their Amendment to the 2020, 2022, and 2023 Carriger Solar, LLC Project Wetland and Waterbodies Delineation Reports Dated December 15, 2023.

Based on field observations collected by Tetra Tech in October 2023, Ecology concurs with the lack of observed wetland indicators for the areas of interest that were investigated, except for AOI 1 and AOI 23 that are potential wetlands, as noted in the amended report. Some ephemeral streams may have riverine wetlands that are only observable during the wettest part of the growing season, making wetlands determinations difficult during site visits at other times. Site visits conducted during the spring may provide a more complete characterization.

WT-104, WT-105, and WT-106 were revised to be Category III wetlands and have a moderate level of function for habitat. Based on Table 8D-5 in Ecology's guidance document, Wetlands in Washington State, Volume 2: Guidance for Protecting and Managing Wetlands, Appendix 8-D, Ecology recommends a 150 ft buffer width for WT-104, WT-105, and WT-106. When the buffer widths in Klickitat County's CAO differ from those in Ecology's guidance document, Ecology recommends the wider of the two.

In its wetland determination data form, Dp-3 is noted to have hydrophytic vegetation and wetland hydrology, but no hydric soil. The Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0), Chapter 5, Difficult Wetland Situations in the Arid West, may be needed for wetland determination in this situation. If there is soil saturation or inundation for 14 or more days during the growing season, a soil may be

considered hydric even in the absence of hydric soil indicators. Further field studies could provide a more complete determination for Dp-3.

According to Attachment E Carriger Wetlands and Waters Report Compiled Part 2, a wetland determination data form was not completed for Wetland O due to a large animal in the area that presented a safety concern during the site visit. Has additional data been collected for Wetland O and is a data form now available?

We thank Cyprus Creek Renewables for their response to our letter and amendments to their Wetlands and Waters report, and for field work conducted in October 2023 to investigate our Areas of Interest. We look forward to visiting the project site this spring. If you have any questions or would like to discuss these comments, please contact Heather Durkee at (509) 379-4530.

Sincerely,



Heather Durkee
EFSEC Federal Permit Manager
Shorelands and Environmental Assistance Program

ec: Lori White, Department of Ecology
Loree' Randall, Department of Ecology

