



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

November 6, 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 October 10, 2024

Dear Joanne Snarski,

Ecology has reviewed the Amended Wetlands and Waters Report dated October 10, 2024. This amended report addresses wetland characteristics observed during the April 16, 2024, site visit, and includes revisions from discussion on September 26, 2024.

Ecology staff concurs with the findings in this report. We thank Cyprus Creek Renewables and Tetrattech for their cooperative efforts in identifying and delineating additional wetlands found on site and for their work in preparing this amended report.

Mitigation sequencing should be applied to the project design. Project proponents need to demonstrate that they've followed the mitigation sequence and worked first to avoid and minimize impacts to wetlands whenever practicable before proposing compensation for the impacts. Ecology recommends use of the [Avoidance and minimization checklists](#) to demonstrate how your project has avoided and minimized impacts to wetlands.

If impacts to wetland buffers are unavoidable, Ecology guidance recommends that impacts to buffers be evaluated as indirect impacts to wetlands. If indirect impacts are proposed, agencies typically require compensation at one-half of the recommended ratio for permanent impacts. More information can be found in Ecology's mitigation guidance document [Wetland Mitigation in Washington State Part 1: Agency Policies and Guidance Version 2](#), Table 6B-1. See also Chapter 3.4.5 for examples of indirect impacts.



The interagency mitigation guidance document, section 6B.5.5, discusses mitigation ratios for impacts to vernal pools. Per this guidance, the preferred mitigation for vernal pools is preservation, with 16 acres of vernal pools to be preserved for every one acre impacted. The guidance document also provides options for compensation in some cases, through creation, re-establishment, or rehabilitation of one or more seasonally ponded wetlands, with ratios of 3:1 for creation or re-establishment, and 6:1 for rehabilitation.

If project plans change, details should be provided for review to determine if the State's water quality standards will be met.

Ecology looks forward to providing the Energy Facility Site Evaluation Council with technical assistance and expertise in the future. If you have any questions or would like to discuss these comments, please call me at (509) 379-4530.

Sincerely,



Heather Durkee
EFSEC Federal Permit Manager
Shorelands and Environmental Assistance Program

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

