

Attachment A: Data Request 3 Table

Data Request ID	Washington Administrative Code (WAC) Reference	Notes	Data Request	Required for SEPA Determination	Applicant Response
S-15 Noise	WAC 197-11-960. Environmental Checklist. B.7.b.2 and B.7.b.3.	Applicant did provide some baseline noise information that was prepared by Ramboll. However, the information did not identify if this data is in dBA, nor did it identify the methodology or equipment used for collecting the information. This information is required to make a SEPA determination.	<ul style="list-style-type: none"> Identify the dB weighting the baseline noise data in the previously provided in the February 2018 Ramboll document. Identify the methodology used, and the equipment/used for collecting the baseline noise data provided in the February 2018 Ramboll tables. 	Yes	<p>In response to EFSEC Data Request No. 2, Desert Claim provided a supplemental memorandum from noise consultants at Ramboll Environmental dated May 25, 2018. The Ramboll memorandum summarizes ambient noise data collected in March 2016, and includes a figure showing where the data were collected. The noise data is presented in A-weighted decibels – dBA.</p> <p>Each measurement used a Type 1 sound level meter that had been factory certified within the previous twelve months, and field calibrated immediately prior to and at the end of measurements.⁽¹⁾ The microphones for each meter were placed on tripods in acoustically neutral environmental shrouds and placed approximately 5 feet above the ground, connected to the sound level meters with extension cables. The meters were programmed to record 1-second sound level data in both broadband and 1/3 octave frequency resolution.⁽²⁾ Three of the SLMs were made using Larson Davis LxT sound level meters, and the fourth using a Brüel & Kjær (B&K) Model 2250 meter. The B&K meter also recorded audio for post-processing review of ambient sounds.</p> <p>Weather conditions during the measurement period were generally dry, with temperatures in the low 50s F. Wind speeds were relatively low, with some periods of higher wind speeds at the beginning of the measurement program.</p> <p>Sound level measurement data were collected in 1-second resolution for post-processing and source identification. Using these 1-second data, Ramboll Environ computed hourly average sound levels (Leq(1)) for each 1-hour measurement period.</p> <p>Note that at SLM1, SLM2, and SLM3, measurements were made between March 16 and March 21, 2016; at SLM4, measurements were made between March 18 and March 21, 2016. SLM4 was started 2 days later due to limitations in accessing this measurement location.</p> <p>In addition to the sound level data, meteorological data (specifically wind speed and wind direction) were collected at the same time as the sound level measurements at a station operated by EDF-RE.</p>

⁽¹⁾ Type 1 sound level meters as defined in WAC 173-58

⁽²⁾ Broadband sound levels include all frequencies present; 1/3 octave data provide sound levels in terms of the center frequency of each 1/3 octave frequency band.

Data Request ID	Washington Administrative Code (WAC) Reference	Notes	Data Request	Required for SEPA Determination	Applicant Response
S-16 Visual	WAC 197-11-960. Environmental Checklist. B.10.b.	The current proposal does not provide rationale for the visual impact assessment for the revised turbine locations and turbine structure presented in the Request for Amendment. The revised figures, simulations, and assertion of potential impacts in the Request for Amendment must be supported by documentation that details the decision making process and analysis.	Provide the following: <ul style="list-style-type: none"> • Provide detailed site specific methodology used to choose the seven visual simulation viewpoints used for the layout and configuration presented to support the Request for Amendment. • Provide a detailed explanation on how other viewpoint simulation locations used in the original visual impact assessment were eliminated. 	Yes	<p>The Desert Wind Claim project holds a Site Certification Agreement (SCA) for a project of 90 turbines. The SCA Amendment request provides a proposal to decrease the number of turbines from approximately 90 to approximately 31 turbines. Certificate holder Desert Claim developed new simulations for the updated project layout and footprint. Based on the reduced project footprint and number of turbines, the visual simulation viewpoints were chosen based on the following factors:</p> <ul style="list-style-type: none"> • Viewpoints should provide an overall balanced variety of views of the proposed project; • Viewpoints should provide views from publicly accessible roads and/or areas in the vicinity of residential dwellings; • Viewpoints should consider project-specific surrounding topography and vegetation; • Viewpoints should allow for various orientations of views to allow for back-lit, side-lit and front-lit turbines to address different scenarios of turbine contrast against landscape and sky background; and • Based on the site-specific context, viewpoints should allow for assessment of cumulative effects in conjunction with other existing wind turbine infrastructure already in place near the proposed project. <p>To complete the additional visual simulations for the smaller project in the proposed Amendment, Desert Claim selected seven viewpoints in the context of the smaller project footprint and reduced number of turbines based on an analysis of these factors. Before the actual visual simulations were performed, all seven viewpoints were again verified on-site and other possible additional viewpoints were considered, using the above factors, before final selection and before the TrueView photo simulations of the final seven viewpoints were created.</p> <p>Attached is a spreadsheet providing the key observation point (KOP) coordinates, heading and horizontal field view for the selected viewpoints. We are also providing this information in GIS format, as requested by EFSEC.</p> <p>Because the proposal reflected in the SCA Amendment request is significantly smaller than in the permitted project, the number of viewpoints to be used in an updated visual simulation also needed to be smaller. As described above, the visual simulation that supported the project authorized by the SCA provides what is now an overly broad, overly inclusive visual simulation. Because that visual simulation is already in the record supporting the certified project, Desert Claim selected viewpoints that provided full visual simulation coverage for the new proposal's footprint. Desert Claim selected viewpoints for the new proposal that reflected a worst case visual impact from close range. Existing viewpoints used to support the certified project that did not meet this worst case visual impact criteria were not again included in the revised proposal's visual simulation.</p>

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S-17 Transportation	WAC 197-11-960. Environmental Checklist. B.14.	<p>The current proposal in the Request for Amendment does not describe the potential transportation impacts as a result of the Project. The proposed construction and operation access routes were revised in the Request for Amendment (new access route on Smithson Road and access over the old Farm Bridge). In order to determine whether the mitigation measure related to ground transportation is still adequate for the Project, EFSEC needs to understand the potential impacts of the revised Facility transportation route.</p> <p>The SEPA Checklist (Section B.14) refers readers to the FEIS which did not analyze the 2018 revisions to the construction and operation access routes. Potential transportation impacts for the construction and operation access routes proposed in the Request for Amendment are required for a SEPA determination.</p>	<p>As a result of project changes as proposed in the Request for Amendment, EFSEC requires more information about the transportation route, roads, and access onto private land up to and including the old Farm Bridge. The level of information to be provided can be similar to the kind and level of information that was verbally shared during the May 30, 2018 EFSEC staff site visit. Provide information for the following:</p> <ul style="list-style-type: none"> • Existing traffic numbers on Smithson Road • Expected temporary and permanent changes: <ul style="list-style-type: none"> ○ at the intersection of Hwy 97 and Smithson Road ○ at the intersection of Smithson Road and the entrance to the site ○ along Smithson Rd and ○ along the access road up to and including the Farm Bridge • Any road or lane closures during construction or restoration of Smithson Road • Construction information such as the use of flaggers during construction • Times of day for construction supplies (e.g. turbine parts) traffic • Number of construction supply (e.g. turbine parts, crane delivery) trucks per day and night (can be a range or the maximum number) • Maximum truck speeds on Smithson Road • Temporary or permanent changes to power lines along Smithson Road. If there would be changes, any expected power interruptions to power customers • Lighting for night delivery. If yes, the kind of lighting and how it would be managed to avoid shining into adjacent residences 	Yes	<p>Desert Claim provides the following information, in addition to that shared verbally during the May 30, 2018 EFSEC staff site visit. For ease of reference, EFSEC's requests are copied below, with responsive information provided by Desert Claim <i>in italics</i>. Desert Claim also notes that its amendment request to the SCA will shrink the size of the project and number of turbines, which will also decrease the amount of vehicles necessary to construct the project.</p> <ul style="list-style-type: none"> • Existing traffic numbers on Smithson Road <p><i>Desert Claim does not have 2018 information at this time. Desert Claim will develop a detailed traffic control plan with traffic counts and estimates prior to construction. The 2009 Final Environmental Impact Statement (FEIS) that supported the project's SCA provided average daily traffic volumes. Refer to FEIS, Section 3.12.1.1.</i></p> <ul style="list-style-type: none"> • Expected temporary and permanent changes: <ul style="list-style-type: none"> ○ at the intersection of Hwy 97 and Smithson Road <p><i>Desert Claim expects that the corner radius area will be increased by placing engineered fill in the voids on the NE and SE sides of Hwy 97. This work will be completed within the existing right of way. This change is temporary and will be removed after delivery of all turbines.</i></p> <ul style="list-style-type: none"> ○ at the intersection of Smithson Road and the entrance to the site <p><i>Desert Claim expects some improvements will be required to access private property to the NE of Howard Road. Temporary improvements will be added to the NE side of the private property to allow long trucks to access the field and have sufficient radius to allow a straight transition for driving across the canal.</i></p> <ul style="list-style-type: none"> ○ along Smithson Rd and <p><i>Desert Claim is not able to conclude what, if any changes will be needed along Smithson Road at this time. Any such changes will need to be determined during the final project design and development of the final traffic control plan. Any changes will be temporary.</i></p> <ul style="list-style-type: none"> ○ along the access road up to and including the Farm Bridge <p><i>Desert Claim will need to complete some new construction to access the site from Smithson Road to the project boundary. These activities will include matching the grade of the existing levee and installing a new bridge over the canal.</i></p> <ul style="list-style-type: none"> • Any road or lane closures during construction or restoration of Smithson Road <p><i>Desert Claim anticipates there will be some closure or single lane traffic restrictions during construction and restoration of Smithson Road, including work to support the bridge over Dry Creek.</i></p>

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					<ul style="list-style-type: none"> • Construction information such as the use of flaggers during construction <i>Desert Claim will perform all construction activities using reasonable and prudent safety precautions. We will develop a detailed traffic control plan prior to construction.</i> • Times of day for construction supplies (e.g. turbine parts) traffic <i>Desert Claim anticipates that turbine delivery will occur during the night and/or early morning hours, or as required by any needed transportation permits for oversized materials.</i> • Number of construction supply (e.g. turbine parts, crane delivery) trucks per day and night (can be a range or the maximum number) <i>Desert Claim anticipates that up to 2,200 construction supply trucks will use Hwy 97/Smithson Road access. At this time, Desert Claim's best estimate of trucks per day and night is:</i> <ul style="list-style-type: none"> ○ Night Turbine delivery to site vehicles - ~279 (*31 turbine scenario) ○ Day Turbine delivery from site vehicles - ~279 (*31 turbine scenario) ○ Day Crane delivery to site vehicles - ~60 (* includes 2 cranes) ○ Day Crane delivery from site vehicles - ~60 (* includes 2 cranes) ○ Day concrete delivery to site vehicles - ~1860 (* 10yd concrete trucks) ○ Day concrete leaving site - ~1860 (* 10yd concrete trucks) • Maximum truck speeds on Smithson Road <i>Maximum truck speeds should be between 15 MPH or the posted speed limit. Final maximum speed limits will be part of the final traffic control plan.</i> • Temporary or permanent changes to power lines along Smithson Road. If there would be changes, any expected power interruptions to power customers <i>Desert Claim does not anticipate any changes.</i> • Lighting for night delivery. If yes, the kind of lighting and how it would be managed to avoid shining into adjacent residences <i>Desert Claim anticipates that some additional lighting will be needed for night deliveries. The final traffic control plan will address additional lighting, and Desert Claim will use all reasonable efforts to shield any affected residences from the effects of additional lighted to assist with night deliveries.</i>

From: [McGaffey, Karen \(Perkins Coie\)](#)
To: [Moon, Amy \(UTC\)](#); [Betts, Patricia \(UTC\)](#)
Cc: [Brian Sarantos \(Brian.Sarantos@edf-re.com\)](#)
Subject: Desert Claim - Follow-up
Date: Tuesday, August 21, 2018 4:26:03 PM

Amy & Patty,

This email follows up on our telephone conference last week. You had questions about the visual simulations and the construction truck traffic numbers, which are addressed below. Please do not hesitate to call me if you need additional clarification.

Visual Simulations

Desert Claim's February 2009 Application for Certification provided photographic simulations from 23 locations. That set of photographic simulations included several views from locations more than 5 miles away the Project Area boundary, as well as locations much closer to the Project Area. At the time of the 2009 EFSEC proceedings, the Kittitas Valley Wind Project had not yet been constructed, so most residents in that part of the county had little idea how turbines might look in the landscape. Desert Claim provided numerous photographic simulations to give interested party a sense of what the project would look like. During the course of those proceedings, concerns about view focused on residences that were close to turbines. Indeed, although the SCA authorizes Desert Claim to place turbines less than 1700 feet from residences, the SCA also included a provision requiring Desert Claim to make its best efforts to increase the distance of any turbine that was within 2,500 feet of a residence. During the 2009 EFSEC proceedings, we do not recall concerns expressed about the visual impacts from more distant viewpoints.

When considering what sort of visual simulations to prepare for the Amendment Request, Desert Claim was mindful of the fact that new configurations would significantly reduce the number of turbines (from 95 to 31, a 68% reduction). Even with turbines that have a hub height that is as much as 7 meters taller than previously permitted (an 8% increase) and a tip height of up to 25 meters taller (a 20% increase), the project will have a much smaller visual impact from a distance. From the perspective of nearby residences, we also believe that reduction in turbines, the significant increase in the distance between a turbine and the nearest residence (from 1,687 to 2,500 feet, a 50% increase) and the elimination of any areas where turbines surround residences on 3 sides, more than outweigh the relatively small increase in turbine height. Nonetheless, given the concern during the 2009 EFSEC proceedings about the visual impact at nearby residences, Desert Claim felt it was appropriate to prepare simulations from some of the areas where there are residences relatively close to the Project Area boundary, and Desert Claim decided to use the sophisticated Truescape computer modeled simulations, rather than the more primitive photo-simulation technology used in 2009.

Desert Claim's submitted seven Truescape modeled simulations with its Amendment Request in February 2018. See Attachment 5 to the Amendment Request. Two figures submitted along with the simulations show the location and orientation of the simulation viewpoints relative to the proposed Vestas and Siemens turbine configurations. It may also be useful to compare those figures

to the Figure 3 accompanying the Project Description, which shows the locations of residences near the Project Area Boundary. Mindful of the location of residences, we selected 7 viewpoints near the Project Area Boundary. We felt these viewpoints would provide a good sense of the revised project, viewed from several different directions. During our telephone conference last week, we got the impression that you wanted us to provide some numeric criteria or mathematical formula that we used to select the viewpoint locations, but that is not the process we used to select the locations. Rather, we used our best judgment to select a reasonable variety of locations and directions, taking into account the concerns expressed during the 2009 proceedings, the location of proposed turbines, and the locations of residences.

Preparing the Truescape simulations required considerable time and expense. It would not have been practical to prepare a visual simulation from every nearby residence, much less from numerous distant locations. We tried to provide a reasonable number of simulations providing a variety of perspectives. Now that the Kittitas Valley Wind Project is operating nearby, we anticipate that EFSEC staff, councilmembers and other interested parties may find that seeing the Project Area and the nearby wind turbines may give them a better sense of the visual impacts than could be provided by any number of simulations. That said, we submitted these simulations more than six months ago, and if EFSEC staff or councilmembers felt they needed additional simulations prepared, we would have expected to have received such a request quite some time ago.

Construction Truck Traffic

Data Request S-17 included several parts, one of which asked about the number of construction supply trucks expected to use the Highway 97/Smithson Road route. In our rush to provide responses to the data requests, we now realize that our original response may have been ambiguous, and confused project numbers with daily numbers.

As we mentioned previously, it is impossible to predict the number of trucks that will use the Highway 97/Smithson Road access route during construction with any level of precision. The number and timing of deliveries will depend upon a variety of factors, including a final determination of the number of turbines to be constructed, the timing and availability of construction supplies, the contractor selected and truck availability, and the staging of construction. The more specific the request for traffic information (i.e. daily versus weekly versus project totals), the more difficult it is to provide an accurate answer. Desert Claim will be in a position to provide more detail as the time of construction gets closer, and Desert Claim will provide more detailed information in connection with the submission of required plans, including the Construction Traffic Management Plan. At this stage, however, it is clear that the requested SCA amendment would have significantly fewer construction traffic impacts compared to construction of the much larger project authorized by the SCA (which as authorized is part of the no-action alternative).

The following table provides our best guess of the number of one-way truck trips on the Highway 97/Smithson Road route that will be associated with the construction activities identified.

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Activity	One-Way Truck Trips Day-Time*	One-Way Truck Trips Night-Time*
Delivery of Concrete for turbine, substation and O&M building foundations.	4,500 to 4,600 one-way trips during a 2-3 week period. Up to 1,525 one-way trips per week. Up to 395 one-way trips per day.	N/A
Delivery and Removal of two Cranes	Approximately 120 one-way trips over a total of 8 days. 14-16 trips per day	N/A
Delivery of up to 31 Turbines & a Power Transformer	Approximately 560 one-way trips total over 5 weeks 56-65 one-way trips per week 18-20 one-way trips per day	Approximately 560 one-way trips total over 5 weeks 56-65 one-way trips per week 18-20 one-way trips per day

*All estimates refer to one-way trips. One truck delivery to the site involves two one-way trips: a trip to the site and a trip away from the site.

We hope this answers your questions. Please call me if you need further information.

Karen

Karen McGaffey | **Perkins Coie LLP**
206.359.6368

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From: [McGaffey, Karen \(Perkins Coie\)](#)
To: [Moon, Amy \(UTC\)](#); [Bumpus, Sonia \(UTC\)](#)
Cc: [Brian Sarantos \(Brian.Sarantos@edf-re.com\)](#); [Rick Miller \(Richard.Miller@edf-re.com\)](#)
Subject: FW: Transportation - Desert Claim
Date: Tuesday, September 18, 2018 5:24:37 PM

Amy,

Sorry about the confusion over the truck numbers. I think we just had too many numbers going back and forth, and somehow truck trips got double-counted. Here is our best estimate of truck traffic associated with wind turbine delivery and concrete delivery, at this point.

-
Turbine Deliveries

Each turbine is expected to require 9 trucks to deliver it to the site: 9 trucks drive in, 9 trucks drive out. Under the revised project, there will be a maximum of 31 turbines, so a total of 279 trucks in, and 279 trucks out, for a total of 558 one-way trips.

At most, we expect two turbines to be delivered in a 24-hour period: 18 trucks in at night, and 18 trucks out during the following day

In contrast, the 2004 FEIS was considering a project with 120 turbines, each of which would require 7 trucks to deliver it to the site.

The FEIS estimates a total of 820 trips in and 820 trips out, for a total of 1640.

Concrete Delivery

The foundation of each turbine requires approximately 600 yards of concrete, and each concrete truck holds approximately 9 yards.

31 turbines would require a total of 18,600 yards of concrete, which would require 2067 trucks to deliver. 2,067 trucks in and 2,067 trucks out, for a total of 4,134 one-way trips.

We would expect that two foundations could be poured in a day. That would require 1200 yards of concrete, which would require 134 truckloads. That means 134 trucks in, and 134 trucks out, for a total of 268 one-way trips. Those truck deliveries would occur over a 12-hour shift, for an average of 22 trucks an hour or 44 one-way trips.

The 2004 FEIS did not provide total concrete volume estimates. Regardless of the total volume, the FEIS estimated that it would be delivered at a rate of 20 trucks (40 trips) per hour. Our current estimate is slightly higher, but it is important to understand that these are just estimates at this stage.

Please give me a call after you have had a chance to look through this.

Karen McGaffey | Perkins Coie LLP
206.359.6368

From: Moon, Amy (UTC) [mailto:amy.moon@utc.wa.gov]
Sent: Tuesday, September 18, 2018 3:34 PM
To: McGaffey, Karen (SEA); Brian Sarantos (Brian.Sarantos@edf-re.com)
Cc: Bumpus, Sonia (UTC)
Subject: RE: Transportation - Desert Claim

Karen and Brian-

Please send your feedback on the transportation numbers by close of business on 9/19/18.

Thank you,

Amy

From: McGaffey, Karen (Perkins Coie) [mailto:KMcGaffey@perkinscoie.com]
Sent: Tuesday, September 18, 2018 10:19 AM
To: Moon, Amy (UTC) <amy.moon@utc.wa.gov>; Brian Sarantos (Brian.Sarantos@edf-re.com) <Brian.Sarantos@edf-re.com>
Cc: Bumpus, Sonia (UTC) <sonia.bumpus@utc.wa.gov>
Subject: RE: Transportation - Desert Claim

Amy,
Thank you for your email. We're trying to get to the bottom of these numbers and will provide you additional information as soon as possible.
Karen

Karen McGaffey | Perkins Coie LLP
1.206.359.6368

From: Moon, Amy (UTC) <amy.moon@utc.wa.gov>
Sent: Tuesday, September 18, 2018 9:43 AM
To: Brian Sarantos (Brian.Sarantos@edf-re.com) <Brian.Sarantos@edf-re.com>
Cc: McGaffey, Karen (SEA) <KMcGaffey@perkinscoie.com>; Bumpus, Sonia (UTC) <sonia.bumpus@utc.wa.gov>
Subject: RE: Transportation - Desert Claim

Brian and Karen-

Please look at the numbers presented below and let me know if you have anything to add to this analysis.

Thank you,

Amy

From: Moon, Amy (UTC)
Sent: Thursday, September 13, 2018 4:07 PM
To: Brian Sarantos (Brian.Sarantos@edf-re.com) <Brian.Sarantos@edf-re.com>
Cc: 'McGaffey, Karen (Perkins Coie)' <KMcGaffey@perkinscoie.com>
Subject: Transportation - Desert Claim

Brian-

To follow-up on my telephone message this afternoon, please take a look at the construction traffic numbers in the FEIS and those provided to EFSEC on 8/21/18. I am seeing an increase in turbine delivery trips over the life of the project as well as an increase in concrete trucks per hour.

FEIS listed 20 concrete trucks per hour

- The proposed SCA amendment (from information received 8/21/18) is not consistent with the FEIS
- 395 trucks in a 12-hour period = 33 trucks per hour which is a **65% increase in concrete trucks per hour** ($395 / 12 = 33$ trucks per hour – 20 trucks per hour = $13 / 20 = 0.65 \times 100\% = 65\%$ increase)

Turbine delivery for the life of the project

- FEIS – 1,640 trips (820 each way)

- From Certificate Holder on 8/21/18 – 1,120 trips in daylight (560 each way) and 1,120 trips at night (560 each way) for a total of 2,240 trips
- $2240 - 1640 = 600$ change / $1640 = 0.366 \times 100\% = \mathbf{36.6\% \text{ increase in turbine delivery trips.}}$

Thank you,

Amy I. Moon

Energy Facility Site Specialist | Energy Facility Site Evaluation Council | Utilities and Transportation
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