



Washington State Energy Facility Site Evaluation Council

AGENDA

POTENTIAL ACTION ITEM

MONTHLY MEETING
Wednesday January 18, 2023
1:30 PM

VIRTUAL MEETING ONLY
[Click here to join the meeting](#)
Conference number: (253) 372-2181 ID: 56502492#

1. Call to Order Kathleen Drew, EFSEC Chair
2. Roll Call Andrea Grantham, EFSEC Staff
3. Proposed Agenda Kathleen Drew, EFSEC Chair
4. Minutes
Meeting Minutes Kathleen Drew, EFSEC Chair
 - November 15, 2022 Monthly Meeting Minutes
 - November 29, 2022 Special Meeting Minutes
5. Projects
 - a. Kittitas Valley Wind Project
 - Operational Updates Eric Melbardis, EDP Renewables
 - b. Wild Horse Wind Power Project
 - Operational Updates Jennifer Galbraith, Puget Sound Energy
 - c. Chehalis Generation Facility
 - Operational Updates Michael Adams, Chehalis Generation
 - d. Grays Harbor Energy Center
 - Operational Updates Chris Sherin, Grays Harbor Energy
 - e. Columbia Generating Station
 - Operational Updates Denis Mehinagic, Energy Northwest
 - NPDES Permit Update Amy Moon, EFSEC Staff
 - f. WNP – 1/4
 - Non-Operational Updates Denis Mehinagic, Energy Northwest
 - g. Columbia Solar
 - Project Updates Owen Hurd, Tuusso Energy
 - h. Horse Heaven Wind Farm
 - Project Updates Amy Moon, EFSEC Staff
 - i. Goose Prairie Solar
 - Project Updates Sara Randolph, EFSEC Staff
 - Initial Site Restoration Plan (ISRP) Sara Randolph, EFSEC Staff
 - The Council may consider and take FINAL ACTION on the ISRP for the Goose Prairie Solar Project.*
 - j. Badger Mountain
 - Project Updates Ami Hafkemeyer, EFSEC Staff
 - k. Whistling Ridge
 - Project Updates Ami Hafkemeyer, EFSEC Staff
 - l. High Top & Ostrea
 - Project Updates Ami Hafkemeyer, EFSEC Staff
 - m. Wautoma Solar
 - Project Updates Lance Caputo, EFSEC Staff
 - n. Hop Hill Solar
 - New Application Ami Hafkemeyer, EFSEC Staff
 - Applicant presentation Chris Wissel-Tyson, BrightNight Power
6. Other
 - 3rd Quarter Cost Allocation Sonia Bumpus, EFSEC Staff
7. Adjourn Kathleen Drew, EFSEC Chair

Note: "FINAL ACTION" means a collective positive or negative decision, or an actual vote by a majority of the members of a governing body when sitting as a body or entity, upon a motion, proposal, resolution, order, or ordinance. RCW 42.30.020

Verbatim Transcript of Monthly Council Meeting
Washington State Energy Facility Site Evaluation Council
November 15, 2022



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Verbatim Transcript of Monthly Council Meeting - 11/15/2022

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">WASHINGTON STATE ENERGY FACILITY SITE EVALUATION COUNCIL NOVEMBER 15, 2022 1:30 p.m.</p> <p style="text-align: center;">Virtual Council Meeting Verbatim Transcript of Proceedings</p> <p style="text-align: center;">(All parties appearing via videoconference.)</p> <p>REPORTED BY: Brianna Figueras, RSR, CCR #22013454</p>	<p style="text-align: right;">Page 3</p> <p>1 [Council meeting commenced at 1:30 p.m.]</p> <p>2 CHAIR DREW: Good afternoon. This is</p> <p>3 Kathleen Drew, chair of the Energy Facility Site</p> <p>4 Evaluation Council, calling our November meeting</p> <p>5 to order.</p> <p>6 Ms. Grantham, will you call the role?</p> <p>7 MS. GRANTHAM: Yes.</p> <p>8 Department of Commerce?</p> <p>9 MS. KELLY: Kate Kelly, present.</p> <p>10 MS. GRANTHAM: Department of Ecology?</p> <p>11 MR. LEVITT: Eli Levitt, present.</p> <p>12 MS. GRANTHAM: Department of Fish and</p> <p>13 Wildlife?</p> <p>14 MR. LIVINGSTON: Mike Livingston, present.</p> <p>15 MS. GRANTHAM: Department of Natural</p> <p>16 Resources?</p> <p>17 MR. YOUNG: Lenny Young, present.</p> <p>18 MS. GRANTHAM: Utilities and Transportation</p> <p>19 Commission?</p> <p>20 MS. BREWSTER: Stacy Brewster, present.</p> <p>21 MS. GRANTHAM: Local government and optional</p> <p>22 state agencies for the Horse Heaven Project?</p> <p>23 Department of Agriculture, Derek Sandison?</p> <p>24 MR. SANDISON: Derek Sandison, present.</p> <p>25 MS. GRANTHAM: Benton County, Ed Brost?</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2 Councilmembers:</p> <p>3 KATHLEEN DREW, Chair</p> <p>4 ELI LEVITT, Department of Ecology</p> <p>5 LENNY YOUNG, Department of Natural Resources</p> <p>6 MIKE LIVINGSTON, Department of Fish and Wildlife</p> <p>7 KATE KELLY, Department of Commerce</p> <p>8 STACEY BREWSTER, Utilities and Transportation Commission</p> <p>9 Local Government and Optional State Agencies for the Horse</p> <p>10 Heaven Project:</p> <p>11 DEREK SANDISON, Department of Agriculture</p> <p>12 Badger Mountain Project:</p> <p>13 JORDAN JULIO, Douglas County</p> <p>14 Wautoma Solar Project:</p> <p>15 DAVE SHARP, Benton County</p> <p>16 PAUL GONSETH, Washington State Department of Transportation</p> <p>17 Assistant Attorney General:</p> <p>18 JON THOMPSON</p> <p>19 Administrative Law Judge:</p> <p>20 ADAM TOREM</p> <p>21 LAURA BRADLEY</p> <p>22 DAN GERARD</p> <p>23 EFSEC Staff:</p> <p>24 AMI HAFKEMEYER</p> <p>25 AMY MOON</p> <p>ERIC MELBARDIS, Kittitas Valley Wind</p> <p>JENNIFER GALBRAITH, Wild Horse Wind Power Project</p> <p>CHRIS SHERIN, Grays Harbor Energy Center</p> <p>MICHAEL ADAMS, Chehalis Generation Facility</p> <p>DENNIS MEHINAGIC, Columbia Generating Station</p> <p>OWEN HURD, Columbia Solar</p> <p>MEGAN SALLOMI, Counsel for The Environment</p>	<p style="text-align: right;">Page 4</p> <p>1 For the Badger Mountain Project,</p> <p>2 Douglas County?</p> <p>3 MS. JULIO: Jordan Julio, present.</p> <p>4 MS. GRANTHAM: For the Wautoma Solar</p> <p>5 Project, Benton County, Dave Sharp?</p> <p>6 MR. SHARP: Dave Sharp, present.</p> <p>7 MS. GRANTHAM: Washington State Department</p> <p>8 of Transportation, Paul Gonseth?</p> <p>9 MR. GONSETH: Paul Gonseth, present.</p> <p>10 MS. GRANTHAM: The assistant attorney</p> <p>11 general?</p> <p>12 MR. THOMPSON: Jon Thompson, present.</p> <p>13 MS. GRANTHAM: Thank you.</p> <p>14 Administrative law judges, Adam Torem?</p> <p>15 JUDGE TOREM: This is Judge Torem. I'm</p> <p>16 here.</p> <p>17 MS. GRANTHAM: Laura Bradley?</p> <p>18 JUDGE BRADLEY: This is Judge Bradley,</p> <p>19 present.</p> <p>20 MS. GRANTHAM: Dan Gerard?</p> <p>21 JUDGE GERARD: Judge Gerard, present.</p> <p>22 MS. GRANTHAM: For EFSEC staff,</p> <p>23 Sonia Bumpus?</p> <p>24 Ami Hafkemeyer?</p> <p>25 MS. HAFKEMEYER: Ami Hafkemeyer, present.</p>

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<p>1 MS. GRANTHAM: Amy Moon?</p> <p>2 MS. MOON: Amy Moon, present.</p> <p>3 MS. GRANTHAM: Patty Betts?</p> <p>4 MS. BETTS: Patty Betts, present.</p> <p>5 MS. GRANTHAM: Stew Henderson?</p> <p>6 MR. HENDERSON: Stew Henderson, present.</p> <p>7 MS. GRANTHAM: Joan Owens?</p> <p>8 MS. OWENS: Joan Owens, present.</p> <p>9 MS. GRANTHAM: Dave Walker?</p> <p>10 MR. WALKER: Dave Walker, present.</p> <p>11 MS. GRANTHAM: Sonja Skavland?</p> <p>12 MS. SKAVLAND: Sonja Skavland, present.</p> <p>13 MS. GRANTHAM: Lisa Masengale?</p> <p>14 Sara Rudolph?</p> <p>15 MS. RANDOLPH: Sara Randolph, present.</p> <p>16 MS. GRANTHAM: Sean Greene?</p> <p>17 MR. GREENE: Sean Greene, present.</p> <p>18 MS. GRANTHAM: Lance Caputo?</p> <p>19 MR. CAPUTO: Lance Caputo, present.</p> <p>20 MS. GRANTHAM: John Barnes?</p> <p>21 For the operational --</p> <p>22 (Indiscernible chatter from unmuted speaker.)</p> <p>23 MS. GRANTHAM: Is that John Barnes?</p> <p>24 If you have an open mic, please make sure to</p> <p>25 mute it.</p>	<p>1 came out, which --</p> <p>2 Ms. Grantham, can you tell me again what the</p> <p>3 change was between the earlier agenda and the</p> <p>4 revised agenda?</p> <p>5 MS. GRANTHAM: Yes.</p> <p>6 So the revision was under Horse Heaven Wind</p> <p>7 Farm. It is the DEIS update. Before, it was the</p> <p>8 SEPA update. And we have Amy Moon covering that.</p> <p>9 (Stenographer interruption to inform that no audio had been</p> <p>10 heard via Microsoft Teams.)</p> <p>11 UNIDENTIFIED SPEAKER: Yeah. I had about a</p> <p>12 45-second gap.</p> <p>13 MR. SHARP: This is Dave Sharp. My audio</p> <p>14 has been off also.</p> <p>15 MS. GRANTHAM: Can you hear us now?</p> <p>16 MR. SHARP: Yes.</p> <p>17 MS. GRANTHAM: Okay.</p> <p>18 Chair, can you please start over from the</p> <p>19 beginning of the minutes, just to get the record</p> <p>20 corrected?</p> <p>21 CHAIR DREW: Okay.</p> <p>22 MS. GRANTHAM: Thank you.</p> <p>23 CHAIR DREW: Am I being heard now?</p> <p>24 UNIDENTIFIED SPEAKER: Yes.</p> <p>25 CHAIR DREW: Okay. Thank you.</p>
Page 6	Page 8
<p>1 For the operational updates, Kittitas Valley</p> <p>2 Wind Project?</p> <p>3 MR. MELBARDIS: Eric Melbardis, present.</p> <p>4 MS. GRANTHAM: Wild Horse Wind Power</p> <p>5 Project?</p> <p>6 MS. GALBRAITH: Jennifer Galbraith, present.</p> <p>7 MS. GRANTHAM: Grays Harbor Energy Center?</p> <p>8 MR. SHERIN: Grays Harbor Energy Center.</p> <p>9 Chris Sherin is present.</p> <p>10 MS. GRANTHAM: Chehalis Generation Facility?</p> <p>11 MR. ADAMS: Mike Adams, present.</p> <p>12 MS. GRANTHAM: Columbia Generating Station?</p> <p>13 MR. MEHINAGIC: Dennis Mehinagic, present.</p> <p>14 MS. GRANTHAM: Columbia Solar?</p> <p>15 MR. HURD: Owen Hurd, present.</p> <p>16 MS. GRANTHAM: And for the Council for the</p> <p>17 Environment?</p> <p>18 MS. SALLOMI: Megan Sallomi, present.</p> <p>19 MS. GRANTHAM: Chair, there is a quorum for</p> <p>20 the regular council, the Horse Heaven council,</p> <p>21 Badger Mountain, and the Wautoma councils.</p> <p>22 Thank you.</p> <p>23 CHAIR DREW: Thank you.</p> <p>24 We'll now move on to the proposed agenda.</p> <p>25 You did see a revised agenda that recently just</p>	<p>1 So the corrections to the minutes, starting</p> <p>2 with Page 24, Line 1, "interested party,"</p> <p>3 singular, should be "parties," plural. And on</p> <p>4 Page 11, Lines 17 and 20, T-R-I-D-U-U-M should be</p> <p>5 T-R-I-T-I-U-M.</p> <p>6 Was that heard by everybody?</p> <p>7 UNIDENTIFIED SPEAKER: Yep.</p> <p>8 CHAIR DREW: Stenographer, please? Brianna,</p> <p>9 did you get that?</p> <p>10 STENOGRAPHER: Yes. I can hear. Thank you.</p> <p>11 MR. SHARP: Dave Sharp heard.</p> <p>12 CHAIR DREW: Okay. Thank you.</p> <p>13 So now, any other corrections to the</p> <p>14 minutes?</p> <p>15 Hearing none. All those in favor of</p> <p>16 approving the meeting minutes from October 18th</p> <p>17 as corrected, please say "aye."</p> <p>18 COUNCILMEMBERS: Aye.</p> <p>19 CHAIR DREW: Opposed?</p> <p>20 Meeting minutes are approved.</p> <p>21 Moving on to our professional updates,</p> <p>22 Kittitas Valley Wind Project, Mr. Melbardis?</p> <p>23 MR. MELBARDIS: Good afternoon, EFSEC staff,</p> <p>24 Chair Drew. This is Eric Melbardis with EDP</p> <p>25 Renewables, Kittitas Valley Wind Power Project.</p>

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<p>1 We have nothing nonroutine to report for the</p> <p>2 period. We're just getting our site in shape for</p> <p>3 winter.</p> <p>4 CHAIR DREW: Thank you.</p> <p>5 Wild Horse Wind Power Project,</p> <p>6 Ms. Galbraith?</p> <p>7 MS. GALBRAITH: Yes, thank you, Chair Drew,</p> <p>8 Councilmembers, and staff. This is</p> <p>9 Jennifer Galbraith with Puget Sound Energy at the</p> <p>10 Wild Horse Wind Facility, and I have nothing</p> <p>11 nonroutine to report for the month of October.</p> <p>12 CHAIR DREW: Thank you.</p> <p>13 Chehalis Generation Facility, I believe we</p> <p>14 have Michael Adams, Mike Adams, with us.</p> <p>15 MR. ADAMS: That's correct.</p> <p>16 So good afternoon, Chair Drew, EFSEC Council</p> <p>17 and staff. For the record, this is Mike Adams,</p> <p>18 plant manager, representing Pacificorp Chehalis</p> <p>19 Generation Facility.</p> <p>20 Nothing nonroutine to report for the month</p> <p>21 of October. We are looking forward to tomorrow's</p> <p>22 scheduled visit by EFSEC staff and the fire</p> <p>23 marshal.</p> <p>24 And I have nothing further.</p> <p>25 Any questions?</p>	<p>1 sulfuric acid and the sulfur dioxide samples at</p> <p>2 the laboratory. This caused the laboratory to</p> <p>3 report the sulfuric acid results as SO₂" -- or</p> <p>4 sulfur dioxide -- "and the sulfur dioxide results</p> <p>5 as sulfuric acid. Sulfur dioxide and the</p> <p>6 sulfuric acid samples are analyzed using an</p> <p>7 identical test method at the laboratory and there</p> <p>8 is no way to differentiate between whether a</p> <p>9 sample contains sulfuric acid or sulfur dioxide</p> <p>10 without proper sample control and labeling. The</p> <p>11 sample mix-up was identified by comparing the</p> <p>12 sulfuric acid and sulfur dioxide sample volumes.</p> <p>13 The laboratory report indicated that the sulfuric</p> <p>14 acid samples had a larger volume than the sulfur</p> <p>15 dioxide samples. Per the source test contractor,</p> <p>16 the larger volume sample containers were</p> <p>17 erroneously labeled as condenser rinses" -- or</p> <p>18 for the sulfuric acid -- "when the smaller volume</p> <p>19 bottles were actual condenser rinses. Sulfuric</p> <p>20 acid/sulfur dioxide laboratory report was revised</p> <p>21 and reissued based on correctly labeled samples,</p> <p>22 and the revised source test report was generated</p> <p>23 by the source test contractor to incorporate the</p> <p>24 revised laboratory results. The sulfuric</p> <p>25 acid/sulfur dioxide ratios in the revised report</p>
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<p>1 CHAIR DREW: Any questions for Mr. Adams?</p> <p>2 Thank you.</p> <p>3 MR. ADAMS: Thank you.</p> <p>4 CHAIR DREW: Gray's Harbor Energy Center,</p> <p>5 Mr. Sherin?</p> <p>6 MR. SHERIN: Good afternoon, Chair Drew,</p> <p>7 Councilmembers, and staff. Chris Sherin, plant</p> <p>8 manager, Gray's Harbor Energy Center.</p> <p>9 For the month of October, the only</p> <p>10 nonroutine item we have to report is that we</p> <p>11 submitted a revised Relative Accuracy Test Audit</p> <p>12 and sulfuric acid source test result.</p> <p>13 "An investigation was conducted to determine</p> <p>14 the cause of the sulfuric acid and sulfur dioxide</p> <p>15 source tests for Gas Turbines 1 & 2 to result in</p> <p>16 a ratio greater than the one in the source test</p> <p>17 report issued on September 30th. A ratio less</p> <p>18 than one is an unexpected result based on the</p> <p>19 theoretical calculations for converting sulfur</p> <p>20 dioxide to sulfuric acid in gas turbine exhaust.</p> <p>21 The source test contractor investigated this</p> <p>22 issue and identified an error was made on the</p> <p>23 chain of custody paperwork and sample labels for</p> <p>24 the sulfuric acid and sulfur dioxide samples.</p> <p>25 The error resulted in a mix-up between the</p>	<p>1 are less than one" -- as expected -- "and are</p> <p>2 similar results to those of the tests conducted</p> <p>3 in past years."</p> <p>4 CHAIR DREW: Mr. Sherin, how often do you</p> <p>5 have that test conducted?</p> <p>6 MR. SHERIN: The source tests are normally</p> <p>7 five-year intervals.</p> <p>8 CHAIR DREW: Okay. So you found out what</p> <p>9 the -- that it was mislabeled in this instance?</p> <p>10 MR. SHERIN: Yes, Chair Drew.</p> <p>11 CHAIR DREW: Okay. Thank you.</p> <p>12 Are there any other questions from</p> <p>13 councilmembers?</p> <p>14 Thank you for that update. And you have a</p> <p>15 little bit more here in terms of current upcoming</p> <p>16 projects?</p> <p>17 MR. SHERIN: Yes. We -- earlier in the</p> <p>18 year -- I believe it was April -- we submitted</p> <p>19 modification for the operating permit and PSD</p> <p>20 permit. Amendment 5.</p> <p>21 CHAIR DREW: And that's under review at this</p> <p>22 point?</p> <p>23 MR. SHERIN: Yes, it is.</p> <p>24 CHAIR DREW: Okay. Thank you.</p> <p>25 Any other questions for Mr. Sherin?</p>

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<p>1 Thank you.</p> <p>2 Moving on to Columbia Generating Station and</p> <p>3 WNP-1 and 4. And we have Mr. Mehina -- okay.</p> <p>4 You're going to have to help me with your name,</p> <p>5 sir.</p> <p>6 Dennis?</p> <p>7 Is there someone from Energy Northwest?</p> <p>8 MS. MOON: Chair Drew, this is Amy Moon with</p> <p>9 EFSEC. But maybe Dennis is --</p> <p>10 MR. MEHINAGIC: Can you hear me now?</p> <p>11 MS. MOON: Oh, there he is. There we go.</p> <p>12 Thank you.</p> <p>13 MR. MEHINAGIC: Good afternoon Chair Drew,</p> <p>14 EFSEC Council and staff.</p> <p>15 For the record, this is Dennis Mehinagic,</p> <p>16 reporting for Columbia Generating Station and for</p> <p>17 WNP-1 and 4. For October of this year, I have</p> <p>18 one item to report on.</p> <p>19 "On October 26th, 2022, Washington State</p> <p>20 Department of Ecology conducted a Synthetic Minor</p> <p>21 Air Permit Inspection at Columbia Generating</p> <p>22 Station. The purpose of the inspection was to</p> <p>23 assess the station's compliance with EFSEC Order</p> <p>24 Number 873. The inspectors conducted a visual</p> <p>25 inspection of diesel generators and the auxiliary</p>	<p>1 substantial completion, which is expected on the</p> <p>2 23rd. And then, we have some rocks on site that</p> <p>3 need to be removed off of Urtica. And then,</p> <p>4 we'll begin seeding shortly after that.</p> <p>5 That's all I've got.</p> <p>6 CHAIR DREW: Thank you very much.</p> <p>7 Horse Heaven Wind Farm? Ms. Moon with the</p> <p>8 DEIS update?</p> <p>9 MS. MOON: Thank you, Chair Drew.</p> <p>10 Good afternoon. For the record, this is</p> <p>11 Amy Moon, EFSEC staff member. I'm providing a</p> <p>12 draft Environmental Impact Statement, or draft</p> <p>13 EIS update, on the Horse Heaven Wind Project.</p> <p>14 EFSEC staff continued our work preparing the</p> <p>15 draft EIS. We are focused on finalizing the</p> <p>16 document for a late-fall publication, including</p> <p>17 compiling the draft EIS sections into a cohesive</p> <p>18 document and finalization of an executive summary</p> <p>19 and fact sheet.</p> <p>20 As a reminder, a minimum 30-day comment</p> <p>21 period is required; however, due to the timing of</p> <p>22 the draft EIS issuance, EFSEC is extending this</p> <p>23 by 15 days, as allowed by the Washington</p> <p>24 Administrative Code 197-11-455. And that's</p> <p>25 Item 7 in that WAC.</p>
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<p>1 boiler. No deficiencies were noted by Ecology</p> <p>2 during the walk-down and exit meetings."</p> <p>3 Those are all the updates I have for</p> <p>4 October.</p> <p>5 CHAIR DREW: Thank you.</p> <p>6 Are there any questions for Mr. Mehinagic?</p> <p>7 Okay. Thank you.</p> <p>8 Columbia Solar Project, Mr. Hurd?</p> <p>9 MR. HURD: All right. Good afternoon,</p> <p>10 Chair Drew, Councilmembers, and EFSEC staff.</p> <p>11 This is Owen Hurd from Tuusso Energy, reporting</p> <p>12 on the Columbia Solar Projects.</p> <p>13 Penstemon is currently operational. There</p> <p>14 was a question last week about the generation</p> <p>15 thus far, and so, for the month of October, we</p> <p>16 had 796 megawatt hours of generation, so it works</p> <p>17 out to about a 21 percent capacity factor. And I</p> <p>18 think there were a couple days in there where the</p> <p>19 plant was taken offline, so that may stabilize a</p> <p>20 little bit higher than where it currently is.</p> <p>21 Camas is currently operational, and next</p> <p>22 month, we can include generation data from that.</p> <p>23 And then Urtica, we finally achieved the PSE</p> <p>24 Witness Test. We completed that mechanical</p> <p>25 completion, so we're now just marching toward</p>	<p>1 This is to allow the public time to review</p> <p>2 in light of the winter holidays.</p> <p>3 Any questions on that?</p> <p>4 CHAIR DREW: So the 45 days would begin from</p> <p>5 the date of issuance of the DEIS, so they've not</p> <p>6 begun yet in terms of the --</p> <p>7 MS. MOON: Correct.</p> <p>8 CHAIR DREW: -- comment period?</p> <p>9 MS. MOON: Correct.</p> <p>10 CHAIR DREW: Thank you.</p> <p>11 MS. MOON: Correct.</p> <p>12 And then, I also wanted to thank the EFSEC</p> <p>13 Council for attending the Horse Heaven site tour</p> <p>14 on November 1st. And although the weather was</p> <p>15 wet and rainy for that tour, the site tour</p> <p>16 hopefully will provide helpful information in</p> <p>17 understanding the proposed project, the existing</p> <p>18 environment, and project impact analysis during</p> <p>19 your review of that draft EIS.</p> <p>20 Does the council have any questions?</p> <p>21 CHAIR DREW: Any questions for Ms. Moon?</p> <p>22 Thank you.</p> <p>23 MS. MOON: You're welcome.</p> <p>24 CHAIR DREW: We're now moving to the DEIS</p> <p>25 presentation by Patricia Betts.</p>

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<p>1 Ms. Betts?</p> <p>2 MS. BETTS: Greetings, Chair Drew, EFSEC</p> <p>3 Council and staff and the public.</p> <p>4 For the record, my name is Patricia Betts.</p> <p>5 I provide support to EFSEC for implementing the</p> <p>6 State Environment Policy Act for the Horse Heaven</p> <p>7 proposals, environmental review, and EIS</p> <p>8 preparation.</p> <p>9 CHAIR DREW: Can you pause for just a</p> <p>10 minute?</p> <p>11 Is there a way we can have the volume up?</p> <p>12 MS. BETTS: I apologize.</p> <p>13 Is that better?</p> <p>14 CHAIR DREW: That's okay.</p> <p>15 MS. BETTS: Okay.</p> <p>16 I have prepared a presentation to provide</p> <p>17 some basic information about an Environmental</p> <p>18 Impact Statement and to talk a little bit about</p> <p>19 the contents about this EIS and about reviewing</p> <p>20 it.</p> <p>21 I'm happy to take questions at the end of</p> <p>22 the presentation. I have not prepared a long</p> <p>23 list of slides, but I do have a fair amount of</p> <p>24 information that I'd like to share with each of</p> <p>25 those that I have prepared.</p>	<p>1 adverse environmental impacts or when the agency</p> <p>2 and the applicant agree an EIS is the best</p> <p>3 approach for analyzing the impacts of the</p> <p>4 proposal. And I believe, in the case of this</p> <p>5 project, we did -- the applicant and EFSEC</p> <p>6 ultimately did agree that an EIS was the best</p> <p>7 path forward for this project -- or for this</p> <p>8 proposal.</p> <p>9 An EIS analyzes the adverse environmental</p> <p>10 impacts of the proposal and identifies mitigation</p> <p>11 that could reduce those impacts. It also</p> <p>12 examines any alternatives to the proposal that</p> <p>13 would meet the objectives of that proposal, but</p> <p>14 with lower environmental consequences, and it</p> <p>15 generally does not examine positive environmental</p> <p>16 impacts of the proposal, except when those</p> <p>17 positive impacts could be mitigating identified</p> <p>18 adverse environmental impacts that are in the</p> <p>19 EIS.</p> <p>20 A draft EIS provides the public, local,</p> <p>21 state, and federal agencies and tribal</p> <p>22 governments the opportunity to comment on the</p> <p>23 completeness and accuracy of the EIS before it is</p> <p>24 finalized.</p> <p>25 And then, thirdly, the EIS analyzes</p>
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<p>1 CHAIR DREW: Okay. If you can just move</p> <p>2 closer to your microphone, because we are having</p> <p>3 a little bit of trouble hearing you, that would</p> <p>4 be great.</p> <p>5 MS. BETTS: Is this better?</p> <p>6 CHAIR DREW: Just a little bit.</p> <p>7 MS. BETTS: Okay. All right. One second</p> <p>8 and I will move my laptop closer to me.</p> <p>9 Okay. Is this any better?</p> <p>10 CHAIR DREW: Quite a bit, thank you.</p> <p>11 MS. BETTS: Okay.</p> <p>12 All right. So we can move to the first</p> <p>13 slide, "What is an Environmental Impact</p> <p>14 Statement."</p> <p>15 So SEPA stands for the State Environmental</p> <p>16 Policy Act. And in regards to what an EIS is,</p> <p>17 I'm going to just talk about four basic points on</p> <p>18 what an EIS analyzes and when an EIS is prepared.</p> <p>19 An EIS requires agencies, with an agency</p> <p>20 action, on a proposal, to consider the adverse</p> <p>21 environmental impacts of the proposal prior to</p> <p>22 making a decision whether to approve, approve</p> <p>23 with conditions, or deny the proposal.</p> <p>24 It's prepared when there's an indication the</p> <p>25 proposal would or could result in significant</p>	<p>1 environmental impacts and must be used by agency</p> <p>2 decision-makers along with other relevant</p> <p>3 considerations or documents in making final</p> <p>4 decisions on a proposal.</p> <p>5 So it is not the only document or</p> <p>6 considerations that will be used by</p> <p>7 decision-makers to decide whether to approve,</p> <p>8 approve with conditions, or deny the proposal.</p> <p>9 For example, decision-makers may take the general</p> <p>10 welfare, social, economic, and state policy into</p> <p>11 account in weighing and balancing alternatives</p> <p>12 and in making final decisions.</p> <p>13 So it's a very important document, but it's</p> <p>14 not the only piece of information that</p> <p>15 decision-makers use.</p> <p>16 We can move to the next slide.</p> <p>17 The table presented on this slide will be</p> <p>18 found at the end of Chapter 1, and it provides a</p> <p>19 little bit of information about each of the</p> <p>20 chapters. And I'm just going to briefly talk</p> <p>21 about those.</p> <p>22 There's an executive summary, and it is not</p> <p>23 intended as a standalone document. It provides</p> <p>24 fundamental information, but each chapter, such</p> <p>25 as 2, 3, 4, and 5, provides a more complete</p>

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<p>1 discussion. It -- the effective summary includes</p> <p>2 a large summary table; however, the tables at the</p> <p>3 end of each resource section in Chapter 4 provide</p> <p>4 a more comprehensive assessment and directly</p> <p>5 reflect the information provided in that resource</p> <p>6 section's narrative.</p> <p>7 The executive summary also includes a</p> <p>8 comprehensive list of key issues, and those are</p> <p>9 not discussed in other chapters of the document,</p> <p>10 so that is specific to the executive summary.</p> <p>11 Chapter 1, purpose of action provides an</p> <p>12 introduction to the proposal, the applicant, the</p> <p>13 SEPA process, agency decision-making, and maybe a</p> <p>14 short -- a very, very brief discussion or court</p> <p>15 summary of the key issues.</p> <p>16 The Chapter 2, the information in Chapter 2</p> <p>17 is the applicant's description of their proposal.</p> <p>18 It covers construction, operation, and</p> <p>19 decommissioning. The applicant identified a</p> <p>20 maximum footprint for the proposals so that the</p> <p>21 adverse environmental impacts of all possible</p> <p>22 components would be analyzed.</p> <p>23 This chapter also provides a collated list</p> <p>24 of applicant commitments, so if a reader has a</p> <p>25 question about what the proposal will entail,</p>	<p>1 Chapter 3 is the -- about the project. I'm</p> <p>2 sorry, the -- it's about the environment -- the</p> <p>3 existing -- affected environment is covered in</p> <p>4 Chapter 3, and the project -- because the project</p> <p>5 is going to cause disturbance and impacts to</p> <p>6 environmental resources, it's important for us to</p> <p>7 know what the existing condition is of the</p> <p>8 resources that are going to be affected by the</p> <p>9 project.</p> <p>10 There's actually 14 environmental resource</p> <p>11 topics covered in the EIS. There's the natural</p> <p>12 environment, which includes earth, air,</p> <p>13 vegetation and habit; and then, there's the built</p> <p>14 environment, which includes energy, land, and</p> <p>15 shoreline use; historic and cultural resources;</p> <p>16 visual; noise and vibration; recreation; public</p> <p>17 health and safety; transportation; public</p> <p>18 services; and utilities.</p> <p>19 Socioeconomics is normally not analyzed in</p> <p>20 an EIS; however, EFSEC rules require</p> <p>21 socioeconomics to be analyzed. Rather than</p> <p>22 creating a separate socioeconomics document, it</p> <p>23 is included in the EIS as the 15th topic.</p> <p>24 In order to understand the impacts of the</p> <p>25 proposal, we need to first understand the</p>
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<p>1 this section should provide that information.</p> <p>2 Alternatives are also discussed at the end</p> <p>3 of Chapter 2. The proposal is also known as an</p> <p>4 action alternative, and so there is also a</p> <p>5 no-action alternative, which analyzes the impacts</p> <p>6 to the environment if the proposal were not</p> <p>7 permitted and constructed. And this provides a</p> <p>8 comparison of environmental impacts with and</p> <p>9 without the project.</p> <p>10 Only one action alternative was analyzed in</p> <p>11 the draft EIS, which is the applicant's proposal.</p> <p>12 Although there are no other action alternatives,</p> <p>13 the EIS does examine the specific adverse</p> <p>14 environmental impacts of some of the components</p> <p>15 of the proposal. For example, it examines the</p> <p>16 turbinized option of up to 150 taller turbines and</p> <p>17 the turbinized option of up to 244 shorter turbines</p> <p>18 and the three different solar array locations.</p> <p>19 And so this additional information about</p> <p>20 each of those components can identify which, if</p> <p>21 any, of those components are contributing to a</p> <p>22 medium or high impact and will assist in further</p> <p>23 examination of possible options to mitigate the</p> <p>24 impact of those components and ultimately reduce</p> <p>25 the impact of the comprehensive proposal.</p>	<p>1 existing environmental condition of the</p> <p>2 environment that can be impacted by the project.</p> <p>3 For some environmental resources, we may need to</p> <p>4 understand the environmental condition off-site</p> <p>5 as well. For example, if a project creates noise</p> <p>6 during construction, that noise may extend beyond</p> <p>7 the project site. In Chapter 3, the EIS collects</p> <p>8 information about the existing sound conditions</p> <p>9 and the type of activities -- such as</p> <p>10 residential, recreation, commercial,</p> <p>11 industrial -- in the areas where the project's</p> <p>12 construction noise can reach.</p> <p>13 Additionally, environmental justice impacts</p> <p>14 are examined in the "Socioeconomics" section.</p> <p>15 Environmental justice analyzes disproportionate</p> <p>16 adverse impacts to low-income and minority</p> <p>17 populations. And that -- and although, as I had</p> <p>18 mentioned, socioeconomics is not a traditional</p> <p>19 part of an EIS, environmental justice issues have</p> <p>20 become a standard part of EIS. It just makes</p> <p>21 sense, though, to put it in the "Socioeconomics"</p> <p>22 section.</p> <p>23 For Chapter 4, the impact analysis in</p> <p>24 Chapter 4 is based on the project description</p> <p>25 information provided by the applicant in</p>

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<p>1 Chapter 2. The terms "direct" and "indirect"</p> <p>2 relates to the impacts of the proposal on the</p> <p>3 various environmental resources. It examines the</p> <p>4 changes that would occur to the existing</p> <p>5 conditions described in Chapter 3 and translates</p> <p>6 those changes as appropriate into environmental</p> <p>7 impacts.</p> <p>8 Impacts can be very close in time and</p> <p>9 distance from the project -- for example,</p> <p>10 vegetation that's removed during construction --</p> <p>11 and can also be later in time or farther in</p> <p>12 distance but still be the result of the project.</p> <p>13 For example, the vegetation that was removed</p> <p>14 provided a food source or range area for</p> <p>15 wildlife. Both are impacts of the proposal. It</p> <p>16 is less important to worry whether an impact is</p> <p>17 direct or indirect and more important to ensure</p> <p>18 both types of impacts are considered.</p> <p>19 And then, lastly, we -- there are a variety</p> <p>20 of options for accomplishing mitigation, and</p> <p>21 that's another discussion that occurs in</p> <p>22 Chapter 4. There may be avoidance; there may be</p> <p>23 minimization; there may be rectifying the impact,</p> <p>24 reducing or eliminating the impact over time,</p> <p>25 compensating for the impact, and/or monitoring</p>	<p>1 or extent or setting of the impacts.</p> <p>2 Each factor helps the reader to consider how</p> <p>3 much of an environmental concern the impacts</p> <p>4 should be. And the beginning of each resource</p> <p>5 section in Chapter 4 defines these four factors.</p> <p>6 And then for magnitude, the description is</p> <p>7 actually covered in each resource section and is</p> <p>8 unique to that resource. So there will be</p> <p>9 specific identifiers and descriptions for earth</p> <p>10 and how one determines magnitude as it relates to</p> <p>11 earth, as it relates to air, as it relates to</p> <p>12 water, and so on.</p> <p>13 And then, lastly, there's the "Cumulative</p> <p>14 Impacts" section. And that -- the cumulative</p> <p>15 impacts are those that are direct and indirect</p> <p>16 impacts of the proposal that can increase in</p> <p>17 significance when considered along with past,</p> <p>18 present, and reasonably foreseeable future</p> <p>19 projects that have also impacted the same</p> <p>20 resource. So, for example, loss of habitat</p> <p>21 within our wildlife movement corridors</p> <p>22 contributes to habitat fragmentation and barriers</p> <p>23 to wildlife by affecting an animal's ability to</p> <p>24 move between habitats on the landscape. It can</p> <p>25 present obstacles that can deter wildlife</p>
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<p>1 with a contingency. We consider all those forms</p> <p>2 of mitigation, and I expect you will see all</p> <p>3 those included as part of the comprehensive</p> <p>4 package of mitigation measures that have been</p> <p>5 identified for this project.</p> <p>6 And then, we also have a responsibility with</p> <p>7 regards to determining significance. In SEPA, it</p> <p>8 is defined as a reasonable likelihood of more</p> <p>9 than a moderate adverse impact on environmental</p> <p>10 equality. And, as my mentor often said -- she</p> <p>11 would say that -- suggest that that was "clear as</p> <p>12 mud." And it is a very -- somewhat vague</p> <p>13 description of how one would determine</p> <p>14 significance.</p> <p>15 But we are required to identify significant</p> <p>16 adverse environmental impacts that cannot or will</p> <p>17 not be mitigated, and we have done so in the EIS.</p> <p>18 And as part of being able to determine</p> <p>19 significance, we've used four factors, which</p> <p>20 are -- will be identified as impact ratings in</p> <p>21 the EIS. And we've used four factors that are</p> <p>22 descriptors, you might say, or adjectives that</p> <p>23 are used for helping to identify how one is going</p> <p>24 to determine significance, and those are</p> <p>25 magnitude, duration, likelihood, and the spatial</p>	<p>1 movement, such as fences or roads, and/or require</p> <p>2 wildlife to expend additional energy to move</p> <p>3 around.</p> <p>4 The project has the potential to contribute</p> <p>5 to these cumulative barriers to wildlife movement</p> <p>6 along with past, present, and reasonably</p> <p>7 foreseeable future projects.</p> <p>8 So that's an example of a cumulative impact</p> <p>9 issue that we look at in this EIS.</p> <p>10 And then -- and this -- and cumulative</p> <p>11 impacts are -- besides direct and indirect</p> <p>12 impacts, SEPA requires us to consider cumulative</p> <p>13 impacts in how the proposal contributes to those.</p> <p>14 So it's a mandatory part of analysis in an EIS.</p> <p>15 We can move to the next slide.</p> <p>16 So just wanted to maybe provide a few</p> <p>17 pointers for reviewing the draft EIS and kind of</p> <p>18 understanding the overall organization of the</p> <p>19 document.</p> <p>20 It's important to understand that all the</p> <p>21 chapters are interrelated. Don't be surprised if</p> <p>22 you end up moving between chapters as you read</p> <p>23 about a particular topic. The executive summary</p> <p>24 provides brief information about the entire EIS</p> <p>25 and provides additional context for reviewing the</p>

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<p>1 rest of the chapters, but it is not a summarized 2 regurgitation of the whole document, which might 3 be the case for -- or expectation when you see 4 something labeled as an "Executive Summary." 5 Remember that the end of Chapter 1 describes 6 the contents of each chapter, if you need a 7 refresher of how it's all put together. And 8 familiarize yourself with the proposal and the 9 information in Chapter 2. And that's just the 10 proposal description. 11 And the beginning of Chapter 3 and 4 12 provides some basic explanation about key terms 13 and content that applies to all of Chapter 3 and 14 4. And then, use Chapter 3 and 4 together. You 15 can read about the impacts of Chapter 4 and refer 16 to the information in Chapter 3 to understand how 17 or why the impacts are identified in Chapter 4. 18 And then, the end of each Chapter 4 resource 19 section also identifies the applicant commitments 20 relevant to that resource topic, and it 21 summarizes the impacts of the proposal and 22 identifies mitigation and help that can help to 23 reduce those impacts. 24 Refer to the appendices when you want more 25 detailed information on a particular resource</p>	<p>1 EFSEC is responsible for the completeness and 2 accuracy of the information in the EIS, we review 3 the comments and confirm any information that is 4 provided by commentators before inserting any 5 changes into the final EIS. 6 So the more evidence and/or explanation as 7 to why you think something should be changed or 8 added or deleted will provide us with the 9 information that we need to confirm that it's a 10 relevant comment that we need to use for 11 modifying the EIS or collecting additional 12 information. 13 There are comments that are not relevant on 14 an EIS, and they are not used for the final EIS 15 and not used as kind of as a substantive -- 16 considered a substantive comment received. So 17 expressions of support or opposition of the 18 proposal are not going to be useful. Comments of 19 the value for -- another example might be 20 comments about the value of renewable energy -- 21 or the use of fossil fuels are, as well, not the 22 kind of comments that are going to help us to 23 improve the completeness and accuracy of the EIS. 24 And to the last slide on the final 25 Environmental Impact Statement.</p>
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<p>1 discussed in Chapter 4. 2 Next slide. 3 So providing comments on the draft EIS. 4 EFSEC's created a comment database that 5 commenters can use to submit their comments, and 6 the link to that database will be provided on 7 EFSEC's Horse Heaven website along with the draft 8 EIS. 9 Comments should be as specific as possible 10 and may address either the adequacy of the EIS 11 and/or the merits of the alternatives discussed. 12 The public is encouraged to comment on the 13 methodology needed, additional information, and 14 mitigation measures. 15 For example, is information missing or 16 incorrect? Is there additional mitigation that 17 should be considered? Or are there impacts that 18 are being underrated or overrated? 19 Or, for example, you might think that just 20 the spatial extent of the -- of an impact may be 21 incorrectly described. Maybe instead of being 22 local, you might think it should be more of a 23 regional impact. 24 Remember to provide your reasoning for why 25 the ratings should be changed. And, because</p>	<p>1 As I mentioned above, there will be a final 2 Environmental Impact Statement, and there are 3 changes that occur between the draft EIS and the 4 final EIS. Those are expected and normal. For 5 example, for one thing, the -- during the EIS 6 process, projects -- or applicants respond to the 7 identified environmental impacts. They often 8 make adjustments to the proposal based on the 9 information about impacts and mitigation in the 10 draft EIS. 11 Applicants may have identified other changes 12 or details related to the proposal as a result of 13 further work defining the proposal, so that's one 14 kind of change that we might find between the 15 draft and the final. 16 Also, the project description, applicant 17 commitments, and agency-identified mitigation 18 typically evolves. Although changes to the 19 project during the process creates more work 20 between the draft and the final EIS, the changes 21 also meet the intent of SEPA, which is to result 22 in an environmentally improved project. 23 Decision-makers will ultimately decide whether 24 that refined project should be approved, approved 25 with conditions, or denied.</p>

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<p>1 And, lastly, a final EIS includes responses</p> <p>2 to public comments, more analysis when warranted,</p> <p>3 responding to those comments, new analysis,</p> <p>4 responding to project changes, and more or</p> <p>5 refined mitigation.</p> <p>6 So that brings me to the end of the</p> <p>7 presentation. I appreciate you letting me get</p> <p>8 through that.</p> <p>9 Are there any questions that you --</p> <p>10 follow-up questions that you -- anybody has?</p> <p>11 CHAIR DREW: Thank you, Ms. Betts, for your</p> <p>12 very thorough description of what to expect in</p> <p>13 each section and how to review the EIS. I think</p> <p>14 that serves the council well and, hopefully, also</p> <p>15 the people that are listening and participating</p> <p>16 on this call as they review it and look and</p> <p>17 prepare comments.</p> <p>18 Again, once the draft EIS is published, it</p> <p>19 will be 45 days from that that you will have an</p> <p>20 opportunity to comment.</p> <p>21 Are there questions from the Horse Heaven</p> <p>22 councilmembers?</p> <p>23 Mr. Levitt?</p> <p>24 MR. LEVITT: I have one brief question.</p> <p>25 Can you talk briefly about -- I see there's</p>	<p>1 agencies and our consultant, et cetera, those --</p> <p>2 we have identified additional mitigation that was</p> <p>3 warranted.</p> <p>4 We also did the -- did actually do a great</p> <p>5 deal of outreach with the Yakima tribe -- or the</p> <p>6 Yakima Nation, and we are continuing to do that</p> <p>7 work -- or our communications with them -- with</p> <p>8 their staff, I should say. And it's the same</p> <p>9 kind of thing, where we are working with them to</p> <p>10 understand what their concerns are, to see if</p> <p>11 there is -- so that -- clearly articulate what</p> <p>12 the impacts are in the EIS and also to</p> <p>13 investigate possible mitigation.</p> <p>14 As I mentioned to you, there were about six</p> <p>15 different kinds of mitigation -- anywhere from</p> <p>16 avoidance to monitoring -- to investigate, then,</p> <p>17 what kinds of mitigation might be most</p> <p>18 appropriate and feasible for the impacts that</p> <p>19 have been identified.</p> <p>20 Does that answer your question?</p> <p>21 MR. LEVITT: Yes. Thank you.</p> <p>22 I mean, I also see that there are general</p> <p>23 scoping comments that don't come from agencies,</p> <p>24 so I imagine we -- we or you -- EFSEC review them</p> <p>25 and consider them when drafting the draft EIS.</p>
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<p>1 seven agencies that provided scoping comments,</p> <p>2 and just from a technical standpoint, how you go</p> <p>3 about integrating feedback on the scope?</p> <p>4 And I also see there were no tribal comments</p> <p>5 during the scoping. Could you just briefly talk</p> <p>6 about the scoping comments, please?</p> <p>7 MS. BETTS: Well, if I remember correctly --</p> <p>8 and I don't remember exactly which those seven</p> <p>9 agencies were, but basically, what happens is</p> <p>10 that we follow up with all those agencies as</p> <p>11 we're working on preparing the draft EIS. We get</p> <p>12 clarification from them on what their concerns</p> <p>13 are, but then we include them to assist us</p> <p>14 with -- clearly collect -- if we need to collect</p> <p>15 additional information.</p> <p>16 If we need to actually do some additional</p> <p>17 work, either with the applicant -- in at least</p> <p>18 one case, we brought everybody together and not</p> <p>19 only kind of, like, figured out how to define the</p> <p>20 project, how to identify the impacts, but also to</p> <p>21 discuss mitigation and come up with additional</p> <p>22 ideas for mitigation. And some of those things</p> <p>23 would -- ended up being applicant commitments,</p> <p>24 and some of those ended up being additional</p> <p>25 mitigation that, based on feedback from those</p>	<p>1 MS. BETTS: Absolutely. Our first and</p> <p>2 foremost responsibility during scoping is to</p> <p>3 consider all comments that were received and use</p> <p>4 those to determine what we need to investigate</p> <p>5 and collect additional information for.</p> <p>6 I believe -- and perhaps maybe Amy Moon or</p> <p>7 Ami Hafkemeyer can confirm. I believe we do have</p> <p>8 a scoping report.</p> <p>9 Is --</p> <p>10 MS. MOON: Scoping report. So that --</p> <p>11 CHAIR DREW: So this is Amy Moon.</p> <p>12 MS. MOON: This is -- Moon, yes. Thank you.</p> <p>13 A scoping report doesn't ring a bell, Patty.</p> <p>14 I would have to look at that.</p> <p>15 But I did just to want to confirm with you,</p> <p>16 Eli, when you said that there were seven</p> <p>17 agencies, do you mean the scoping comments that</p> <p>18 are posted to the Horse Heaven Project on the</p> <p>19 EFSEC public website?</p> <p>20 MR. LEVITT: Yes.</p> <p>21 MS. MOON: Yeah. Okay. Yeah. And we don't</p> <p>22 have tribal comments posted there, but, as Patty</p> <p>23 said, we have been working with -- pretty closely</p> <p>24 with staff at the Yakima Nation on that.</p> <p>25 But I -- so, Eli, I'll have to report back</p>

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<p>1 next month if there is a scoping report, because 2 I'm not -- 3 That's just not ringing a bell, Patty. 4 MS. BETTS: Okay. Well -- and it may not 5 have been called a scoping report. We did -- we 6 used our consultant to assist us to review all of 7 the scoping comments and basically identified the 8 kinds of comments that we received, you know, the 9 extent of those comments, and then ultimately 10 determined which ones needed to be carried 11 forward into the draft EIS. Some of the comments 12 may not have been, you know, qualified as 13 substantive kinds of comments that were 14 appropriate for an Environmental Impact 15 Statement, but we have, you might say, some 16 documentation about what we received during 17 scoping and then how that fed into the scope that 18 was set for the Environmental Impact Statement. 19 MS. MOON: Yeah. And, Patty, this is Amy 20 again -- and Eli and the EFSEC Council. 21 We did issue a memorandum to the SEPA 22 responsible official, which was Sonia Bumpus, 23 that did summarize scoping of what the DEIS would 24 include. And that was September 20th of 2021. 25 MS. BETTS: Thank you, Amy. They are</p>	<p>1 does it take into account that it would be full 2 build-out, or how does that work if there's -- if 3 the project is ultimately changed once it -- we 4 get close to final or if we get close to final? 5 MS. BETTS: So first off, the applicant has 6 identified what they believe to be the maximum 7 footprint, with the understanding that it will 8 probably not be the maximum, but that they wanted 9 the flexibility to choose between three -- the 10 three solar array locations, to choose between 11 the taller, fewer turbines, and/or the shorter, 12 great -- you know, 244 shorter turbines or 150 13 taller turbines. So they have identified what 14 they believe to be the maximum footprint, and 15 that was analyzed in the EIS. 16 If the applicant changes their proposal -- 17 and let's just say, for example, they decide that 18 there's some acreage somewhere that they had not 19 originally anticipated they wanted to use, but 20 they now want to use that acreage and it's added 21 to the proposal -- we have to re-examine that 22 from a SEPA perspective. But that -- it could 23 trigger a supplemental EIS, or it could trigger 24 an addendum to the EIS. And it just depends on 25 whether or not the proposal changes enough or the</p>
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<p>1 oftentimes called "scoping reports," but "scoping 2 memorandum" is another type of the same kind of 3 document. 4 CHAIR DREW: Any more questions? 5 MS. BETTS: Does that answer your question, 6 Eli? 7 MR. LEVITT: Yes, it does. 8 I mean, there's lots of interesting ideas in 9 some of those scoping comments, like studying the 10 traffic, the dust, the light, you know, the 11 views. So it will be interesting to see what's 12 in the draft EIS when we're ready to review it. 13 CHAIR DREW: Thank you. 14 Are there questions from other 15 councilmembers for the Horse Heaven council? 16 MS. KELLY: Chair Drew, this is Kate Kelly. 17 CHAIR DREW: Go ahead. 18 MS. KELLY: The question I have is -- and 19 when we went to visit the Horse Heaven site -- 20 and thank you, EFSEC staff, for that wonderful 21 visit. You weren't responsible for the weather. 22 The -- it seemed like the project was in -- 23 not in a defined state of planning, that there 24 were some parts and pieces that still needed to 25 be settled on. So when the EIS is conducted,</p>	<p>1 additional impacts -- there are new or greater 2 impacts, a large additional acreage, and maybe -- 3 maybe sensitive habitats, et cetera. 4 All those factors are taken into 5 consideration. The bottom line is that we have 6 to document that in a SEPA document. We have to 7 analyze that in a SEPA document. And if the 8 changes are significant enough from an adverse 9 environmental impact perspective, then we could 10 potentially be pushed into a supplemental EIS. 11 That's partly why the applicant has provided 12 this, quote, unquote, maximum footprint 13 information to us, hoping that we've got it 14 covered in this first draft EIS. 15 But, as I mentioned, changes can occur. If 16 the proposal gets smaller or some aspects of the 17 proposal are removed -- let's just say, for 18 example, they decided they didn't want to do 19 battery energy storage. Well, that wouldn't be 20 the kind of change that would trigger, really, 21 more than just an addendum. For example, you 22 know, a minor -- or just -- or would just be 23 acknowledged in the final EIS. 24 So that might kind of give you an -- some 25 idea as to -- you know, we do have to document</p>

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<p>1 it; we do have to analyze it, but it does --</p> <p>2 there's a couple pathways that we might end up --</p> <p>3 use for dealing with it.</p> <p>4 CHAIR DREW: If I can also add on that what</p> <p>5 Ms. Betts is describing is what the applicant</p> <p>6 might choose to do, but it is ultimately the</p> <p>7 responsibility of this Horse Heaven EFSEC Council</p> <p>8 to make a recommendation to the governor, which</p> <p>9 includes the elements of the EIS as information</p> <p>10 to deliberate as well as the adjudicative</p> <p>11 process, which we'll talk about next.</p> <p>12 And so the council does have the flexibility</p> <p>13 to look at all of those overall impacts and make</p> <p>14 a recommendation to the governor that is specific</p> <p>15 to the information that we have received</p> <p>16 throughout the process. And then, the governor</p> <p>17 has the choices whether to accept our</p> <p>18 recommendation, whether to reject our</p> <p>19 recommendation, or whether to ask us -- send it</p> <p>20 back to us for more work. So, although the</p> <p>21 applicant has submitted what they consider to be</p> <p>22 the maximum footprint and the information within</p> <p>23 that, the council also has a responsibility to</p> <p>24 look at all that information and to make --</p> <p>25 deliberate and make that recommendation to the</p>	<p>1 do an interactive process under the</p> <p>2 Administrative Procedures Act in a format more</p> <p>3 familiarly known as a hearing. This allows us to</p> <p>4 hear about various disputed issues that might</p> <p>5 come up from the application itself, from the</p> <p>6 environmental review process, and anything else</p> <p>7 leading up to your recommendation to the</p> <p>8 governor. So this is a chance to go beyond the</p> <p>9 documents, and we're going to have a chance to</p> <p>10 hear from expert witnesses on both sides as well</p> <p>11 as members of the public. So that's where the</p> <p>12 adjudication is going to -- what it's going to</p> <p>13 be.</p> <p>14 For now, we have this order drafted up,</p> <p>15 notifying the public we're starting this,</p> <p>16 starting a chance to assemble who's going to be a</p> <p>17 party to this and have a chance to participate</p> <p>18 just like in a lawsuit or any other hearing</p> <p>19 format as a formal party -- not just a state or</p> <p>20 opposition to or support of the project, but</p> <p>21 formally introduce topics to you, sponsor</p> <p>22 witnesses, and go forward and state things that</p> <p>23 they want you to do with the application, and,</p> <p>24 based on environmental review and expert</p> <p>25 testimony, including, as the Chair said, setting</p>
Page 42	Page 44
<p>1 governor as we see the information provides us.</p> <p>2 MS. KELLY: Thank you.</p> <p>3 CHAIR DREW: Any other questions from</p> <p>4 councilmembers?</p> <p>5 Okay. Hearing none, I think we are moving</p> <p>6 from this to the adjudication update from</p> <p>7 Judge Torem.</p> <p>8 Judge Torem?</p> <p>9 JUDGE TOREM: Sorry. Thank you, Chair Drew.</p> <p>10 I think my unmuting was successful.</p> <p>11 CHAIR DREW: It is.</p> <p>12 JUDGE TOREM: Okay. Very well.</p> <p>13 I'll try to be brief today, given what</p> <p>14 you've learned about what to expect when the</p> <p>15 draft environmental impact statement comes out.</p> <p>16 Once we have a firm date for the publication --</p> <p>17 I've been working with staff to develop what's</p> <p>18 called the "Order Commencing Adjudication," and</p> <p>19 absent any concern from the council, here's</p> <p>20 pretty much the plan:</p> <p>21 Once we have a firm date for publication,</p> <p>22 we'll be commencing the adjudication -- and</p> <p>23 that's required by the statute and under our</p> <p>24 administrative code provisions -- by telling the</p> <p>25 public we're ready to go forward. We're going to</p>	<p>1 conditions, maybe limiting certain things,</p> <p>2 inquiring further of the applicant, and making</p> <p>3 that ultimate decision, should this project go</p> <p>4 forward or not.</p> <p>5 Many of you work for agencies that will be</p> <p>6 part and parcel not only as you are serving as</p> <p>7 members on the council, but your state agencies</p> <p>8 may become formal parties of record. The other</p> <p>9 parties you can expect to see will be the</p> <p>10 applicant, Council for the Environment, and any</p> <p>11 of the agencies that you serve may formally</p> <p>12 choose to take an active role and be a party.</p> <p>13 The county will also be a formal party to this,</p> <p>14 and Benton County will have a vote on the</p> <p>15 council, but they'll also have representatives in</p> <p>16 front of you. Some of you may remember they</p> <p>17 participated in the Land Use Consistency Hearing</p> <p>18 a year ago in March.</p> <p>19 So the county will be there, the agencies</p> <p>20 that you represent may or may not be actively</p> <p>21 involved, Council for the Environment, and Scout</p> <p>22 Clean Energy and then folks that want to</p> <p>23 intervene, formerly as a party.</p> <p>24 This Order Commencing Adjudication is going</p> <p>25 to set a deadline, probably coterminous with the</p>

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<p>1 end of the DEIS comment period, but enough time 2 for folks to know what's in the DEIS and the 3 application to decide formally, is there an issue 4 on which they want to offer testimony for you to 5 consider in making your recommendation? 6 We were hoping it would be sometime in 7 January, but it may push into February. We'll 8 know a lot more once we hear from Amy Moon 9 formally, when are we going to get this 10 published? 11 The order is also going to set up a chance 12 for other parties to object to any interveners 13 who might want to participate as a party, and 14 then, we'll have to make some rulings. When I 15 say "we," it will be me in conjunction with 16 Jon Thompson at the AG's office and other EFSEC 17 staff, and we'll be deciding who comes in under 18 our rules as an intervener and who does not and 19 then in what capacity and what scope of topic 20 they're going to participate. 21 The other thing that's going to happen in 22 the commencement of the adjudication is going be 23 setting up yet another opportunity for public 24 comment. The way the EFSEC statute currently 25 reads, a lot of people have made comments up to</p>	<p>1 travel, if any, involved. And once we figure out 2 your nonavailability -- could be around other 3 commitments you already have, including family 4 commitments for school or spring-break-type 5 things -- but we'll probably be seeking out your 6 availability for late March, April, May and 7 possibly into early June. Currently, the 8 application's been extended, I believe, to 9 July 8th of 2023, and that's the current target 10 date we have to get the recommendation to the 11 governor. 12 So the adjudication will kick off as soon as 13 we know when the DEIS is going to be ready so 14 these processes can go forward on parallel 15 tracks. And that's what you can expect as far as 16 scheduling on basically what's going to happen 17 between now and early next year. 18 Chair Drew, anything else you want me to go 19 into about the Order Commencing Adjudication? 20 CHAIR DREW: Thank you. As I understand it, 21 it will be an order written by you. 22 But at this point, if councilmembers have 23 any questions or concerns about what was laid 24 out, this could be an appropriate time, or you 25 could also contact Sonia Bumpus or -- that would</p>
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<p>1 this point, but if they want to participate in 2 the hearing process or the adjudication process, 3 they've got to file a new public comment in 4 writing, and we have to give a deadline for that. 5 That will be published in this order as well. 6 I'm trying to look at my notes and see if 7 there is anything else I can tell you today. 8 I guess the last thing is, you can expect to 9 see notice of a prehearing conference. And it's 10 at that prehearing conference when we'll know and 11 identify who the interveners are that will 12 actually be able to sit down with those parties 13 and sort out which are the issues in dispute that 14 need to be litigated. We'll establish the 15 hearing procedures, including formal discovery, 16 as it would be in a lawsuit, and then we'll start 17 setting up a presentation schedule for the 18 evidence. 19 And that's where I'm going to need your 20 help, and staff will be reaching out to you to 21 find out somewhere in the April-to-May time 22 frames, maybe into June, periods of time when 23 you're not available to be present at a hearing. 24 Chair Drew advises that this hearing is 25 going to be virtual, so there won't be a lot of</p>	<p>1 probably be the best. And she can communicate 2 them with Judge Torem as well. 3 But are there any questions or concerns at 4 this point in time? I know this is just coming 5 at you, so you may take a little while to think 6 about it as well. 7 Thank you, Judge Torem. I think, at this 8 point -- so the council will not be voting on 9 this order, is what I'm saying. It will be an 10 order by Judge Torem, as is provided in the APA. 11 JUDGE TOREM: That's correct. 12 So this order and the prehearing conference 13 orders will come out under my signature, but 14 they'll certainly have been developed with 15 consultation with EFSEC staff. And Chair Drew is 16 aware of what we're doing to make sure that the 17 adjudication scheduling goes forward. Council 18 involvement in that will be, again, 19 when-are-you-available/when-are-you-not-available 20 attendance limitations. 21 CHAIR DREW: Thank you. Thank you for that 22 information. 23 Moving on to the Goose Prairie Solar Project 24 update. 25 Ms. Hafkemeyer?</p>

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<p>1 MS. HAFKEMEYER: Thank you. For the record, 2 this is Ami Hafkemeyer -- sorry. For the record, 3 this is Ami Hafkemeyer. 4 EFSEC staff are working with a certificate 5 holder and our contractors to review and refine 6 preconstruction plans. In particular, staff are 7 coordinating with the certificate holder on 8 revisions to the initial site restoration plan, 9 which will come to the council for review and 10 approval once fully refined. 11 There are no further updates at this time. 12 Are there any questions? 13 CHAIR DREW: Any questions? 14 No. Thank you. 15 Moving on to the Badger Mountain Project 16 update. 17 Ms. Hafkemeyer? 18 MS. HAFKEMEYER: Thank you. Thank you. 19 Again, this is Ami Hafkemeyer, for the 20 record. Staff have been working with our 21 contractor in the initial stages of drafting the 22 Environmental Impact Statement, or EIS. We are 23 also coordinating with Department of Fish and 24 Wildlife, Department of Natural Resources, and 25 Department of Archeologic and Historical</p>	<p>1 Ms. Hafkemeyer? 2 MS. HAFKEMEYER: Thank you. I would like to 3 start by thanking the council for their 4 attendance at the November 2nd site visit. And, 5 as you will recall, at the October 18th council 6 meeting, EFSEC staff presented the Revised 7 Mitigated Determination of Non-Significance 8 issued for the High Top & Ostrea Projects. And 9 the council also voted on the Land Use 10 Consistency Order, deeming the proposal 11 consistent with local land use codes. 12 With these two criteria being met, the 13 council directed staff to prepare an order 14 granting expedited process for this application. 15 In your council packets, you'll find this 16 draft order prepared by Judge Bradley, EFSEC 17 staff, and our attorney, Jon Thompson. 18 And at this time, staff recommends that the 19 council approves the order, granting expedited 20 process to this application. 21 Are there any questions? 22 CHAIR DREW: Yes. Did we receive any 23 comments on this expedited process order? 24 MS. HAFKEMEYER: No comments were received 25 on this action.</p>
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<p>1 Preservation on multiple incoming supplemental 2 reports, which will be posted to the website once 3 finalized. 4 Are there any questions? 5 CHAIR DREW: Are those additional reports 6 part of the EIS or separate from the EIS? 7 MS. HAFKEMEYER: The information from those 8 reports will be incorporated into the EIS. 9 There's some additional fieldwork being 10 conducted -- or has recently been conducted but 11 is being finalized in coordination with these 12 agencies to provide to staff for our use. 13 CHAIR DREW: Okay. Thank you. 14 Any other questions? 15 Moving on to the Whistling Ridge Project 16 update. 17 Ms. Hafkemeyer? 18 MS. HAFKEMEYER: Thank you. EFSEC staff are 19 waiting for the certificate holder to submit the 20 remaining materials for the SCA amendment 21 request. 22 There are no further updates at this time. 23 CHAIR DREW: Thank you. 24 Moving on to the High Top and Ostrea Project 25 update.</p>	<p>1 CHAIR DREW: Thank you. 2 So in front of you is Council Order 3 Number 885. Walk through the Background, the 4 Land Use Consistency Finding, the SEPA Mitigated 5 Determination of Non-Significance, the Revised 6 MDNS, Finding of Facts about the project itself, 7 to Page 4, the Conclusions of Law. 8 "(1) The Council has jurisdiction over the 9 subject matter of this proceeding and the parties 10 to it pursuant to RCW 80.50.075 and WAC chapter 11 463-43. 12 "(2) the Council provided adequate notice to 13 interested parties, and the Council has adequate 14 information to render a land use consistency 15 decision" -- which we did at the last meeting. 16 "The Applicant has met its burden of proof 17 of demonstrating that the sites are consistent 18 and in compliance with Yakima County's 19 Comprehensive Plan and applicable zoning 20 ordinances as required by RCW 80.50.075(1). 21 "(4) The environmental impact of the 22 proposed High Top & Ostrea Facility can be 23 mitigated to a nonsignificant level under RCW 24 43.21C.031 as required by RCW 80.50.075(1). 25 "(5) The criteria for expedited processing</p>

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<p>1 set forth in RCW 80.50.090 and WAC 463-43-050 as 2 of the date of the Application have been 3 satisfied, and therefore, the Applicant's request 4 for expedited processing should be granted. 5 "THE COUNCIL ORDERS: Cypress Creek 6 Renewable, LLC's request for expedited processing 7 is GRANTED; EFSEC will evaluate Cypress Creek 8 Renewable, LLC's Application for Site 9 Certification of the High Top & Ostrea Facility 10 in an expedited process consistent with 11 requirements of RCW 80.50.075, RCW 80.50.090 and 12 WAC chapter 463-43." 13 You've heard the motion -- the order before 14 us. Is there someone who would like to make a 15 motion to approve the order granting expedited 16 processing of the Application for Site 17 Certification of the High Top & Ostrea projects? 18 MR. YOUNG: Lenny Young, so moved. 19 CHAIR DREW: Thank you. 20 Is there a second? 21 MR. LEVITT: Eli Levitt, second. 22 CHAIR DREW: Okay. Mr. Levitt, second. 23 Thank you. 24 Is there discussion? 25 As we have heard, both the pieces that are</p>	<p>1 the SEPA threshold determination. 2 Are there any questions before I move on to 3 the draft order? 4 CHAIR DREW: Any questions from 5 councilmembers? 6 Thank you. Go ahead. 7 MS. HAFKEMEYER: Thank you. 8 Next, I would like to bring your attention 9 to the draft Land Use Order provided in your 10 packets, prepared by Judge Gerard, EFSEC staff, 11 and our attorney, Jon Thompson. 12 While open for public comment, EFSEC 13 received some recommended substantive edits for 14 your consideration. The first being to add 15 Councilmember Dave Sharp to the list of 16 councilmembers on Page 2, Paragraph 3; and the 17 second edit would be to remove nine landowners 18 listed on Page 3, Paragraph 8. This proposed 19 edit would correct the number of parcels to 20 "thirty-five" from "fifty-seven" and the list 21 after "United States Government." The landowners 22 listed in that paragraph after "United States 23 Government" are adjacent to but not included in 24 the proposed facility. 25 And I'd like to pause for a moment and ask</p>
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<p>1 required for expedited processing have been 2 completed. So all those in favor of approving 3 the order granting expedited processing for the 4 High Top & Ostrea Project, please say "aye." 5 COUNCILMEMBERS: Aye. 6 CHAIR DREW: The motion is adopted. Thank 7 you. 8 Is there -- we now are moving to the Wautoma 9 Solar Project Update. 10 Ms. Hafkemeyer? 11 MS. HAFKEMEYER: Thank you. And I just 12 wanted to say thank you, again, Council, for your 13 attendance at the November 2nd site visit. The 14 staff hoped that the site visits were informative 15 to your review of projects and your 16 decision-making. 17 Staff continue to work with the applicant 18 and our contractors to review the application. 19 The applicant submitted their responses to the 20 first data request on November 10th, which staff 21 are now reviewing and will be posted to the 22 project website. 23 Staff are also working on a second data 24 request, the responses to which we anticipate 25 will provide the remaining information needed for</p>	<p>1 if there are any questions or concerns about the 2 proposed edits. 3 CHAIR DREW: Any questions about the 4 proposed edits? 5 JUDGE GERARD: This is Judge Gerard. Based 6 on those edits, after "Robin Robert," there 7 should be an "and" for "United States Government" 8 if that is the last -- going to be the last 9 listed parcel on there. 10 CHAIR DREW: Oh. So, then, adding an 11 "and" -- 12 MS. HAFKEMEYER: I'm going to make that 13 edit. Thank you. 14 CHAIR DREW: Yeah. Yeah. 15 JUDGE GERARD: Thank you. 16 CHAIR DREW: Thank you. 17 So before you is an order finding the 18 project inconsistent with land use regulations 19 and walks through the Background, the Land Use 20 Consistency Hearing, the Applicant's Description 21 of the Proposed Facility, the change in 22 Paragraph 8 from "fifty-three down to 23 "thirty-five parcels," which includes those which 24 will be -- the project will be located on, adding 25 an ad -- excuse me, adding the word "and," after</p>

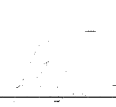

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<p>1 "Robin Robert," before the "United States 2 Government" -- excuse me. On the first page -- 3 or the second page, adding Dave Sharp in the 4 appropriate location with the councilmembers in 5 Paragraph 3. I missed that. 6 "Definitions of 'Land Use Plan' and 'Zoning 7 Ordinances'" -- "Findings of Fact" about the 8 application submitted. "The project would be a 9 470-megawatt photovoltaic generation facility 10 coupled with a 4-hour battery energy storage 11 system" -- "as well as related interconnections 12 and ancillary support infrastructure." 13 The public meeting we held on August 8th, 14 that the project is located in unincorporated 15 Benton County, and the primary land use of the 16 parcels of project would be for solar power 17 generators. 18 And on December 21st of 2021, the Board of 19 County Commissioners for Benton County adopted a 20 Benton County Ordinance Amendment, which removed 21 the conditional use permit option for commercial 22 solar power generation facility, major, from the 23 Growth Management Act Agricultural District. 24 And, therefore, are "Conclusions of Law." 25 The council has jurisdiction. Council provided</p>	<p>1 determine conditions to be included in a draft 2 Site Certification Agreement that consider local 3 governmental or community interests affected by 4 the construction or operation of the alternative 5 energy resource and the purposes of the 6 ordinances to be preempted pursuant to RCW 7 80.50.110(2)." 8 So the council orders that "Innergex 9 Renewable Development USA, LLC's ASC is not 10 consistent with local zoning regulations. The 11 matter shall be set for adjudication, concurrent 12 with the general adjudication required by RCW 13 80.50.090(4), to consider whether to recommend 14 preemption of Benton County's zoning regulations. 15 If the environmental impact of the proposed 16 facility is determined by the EFSEC responsible 17 official to be non-significant or if the 18 facility's impacts will be mitigated to a 19 non-significant level, the Council may limit the 20 topic of the general adjudicative proceeding 21 required by RCW 80.50.090(4) to whether any land 22 use plans or zoning ordinances with which the 23 proposed site is determined to be inconsistent 24 should be preempted." 25 That is the order which is scheduled for</p>
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<p>1 adequate notice to interested parties. The 2 definition of "solar power generator facility, 3 major" and the definition of "solar power 4 generator facility, minor." The primary land 5 use, Paragraph 5, would be for commercial solar 6 power generation, "and not primarily to offset 7 part or all of the Applicant's requirement for 8 electricity." And, therefore, it is a solar 9 power generator facility, major. And because of 10 the ordinance passed on December 21st, 2021, 11 solar power generator facilities, major, may not 12 apply for a conditional use permit for lands 13 within the Growth Management Agricultural 14 District in Benton County. The applicant filed 15 for the application on June 9th, 2022. The 16 project site is not in compliance with 17 Benton County's applicable zoning ordinances. 18 And then, Paragraph 8, "Pursuant to the WAC 19 463-28-060 and -070, the matter will be scheduled 20 for an adjudication to consider whether the 21 Council should recommend to the Governor that the 22 state preempt Benton County's land use plans, 23 zoning ordinances, or other development 24 regulations for the site or portions of the site 25 for the proposed facility, and if so, to</p>	<p>1 consideration today. Is there a motion to bring 2 that proposed order before the council? 3 MR. YOUNG: Lenny Young, so moved. 4 CHAIR DREW: Thank you. 5 Is there a second? 6 MS. BREWSTER: Stacey Brewster, second. 7 CHAIR DREW: Are there questions or 8 comments? 9 Okay. All those in favor of approving the 10 order determining that the proposed Wautoma Solar 11 Project site is not consistent or in compliance 12 with Benton County land use regulations and to 13 set for adjudication the matter of whether to 14 recommend preemption of Benton County Zoning 15 Regulations, please say "aye." 16 COUNCILMEMBERS: Aye. 17 CHAIR DREW: All those opposed? 18 The motion is adopted. Thank you. 19 We've come to the end of a rather long 20 agenda here today, but we do have one more item 21 for the council and the public. We do have two 22 new staff people who have joined the EFSEC team. 23 Ms. Hafkemeyer? 24 MS. HAFKEMEYER: Thank you. Yes. 25 I would like to introduce two of our new</p>

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<p style="text-align: right;">Page 61</p> <p>1 staff members. EFSEC has brought on board two 2 new siting specialists to join our team. 3 First is Lance Caputo, who joined us on 4 October 31st, and he will be overseeing the 5 Wautoma Project going forward. 6 CHAIR DREW: Lance, do you want to say 7 hello? Lance? 8 MR. CAPUTO: Yes. Thank you. 9 I look forward to a very productive 10 relationship with the council, and we're going to 11 get a lot done. I'm very excited about this 12 opportunity. 13 CHAIR DREW: Thank you and welcome to the 14 team. 15 MS. HAFKEMEYER: And next, I would like to 16 introduce John Barnes, who is also new to EFSEC, 17 and his first day was yesterday, so he's even a 18 little bit newer than Lance. He is our other 19 siting specialist, who we've brought on board, 20 and he will be overseeing applicants -- or review 21 of new applications and he has yet to be assigned 22 a project. 23 But welcome, John and Lance, both of you. 24 CHAIR DREW: Hello, John. Would you like to 25 say hello?</p>	<p style="text-align: right;">Page 63</p> <p>1 CERTIFICATE 2 3 STATE OF CALIFORNIA 4 COUNTY OF LOS ANGELES 5 6 I, Brianna Figueras, a Certified Shorthand Reporter in and 7 for the State of Washington, do hereby certify that the 8 foregoing transcript is true and accurate to the best of my 9 knowledge, skill, and ability. 10 This certification does not apply to reproduction of this 11 transcript by any means not under my direct supervision and 12 control. 13 Signed and dated this 2nd day of December, 2022. 14 15 16 17 18 19   20 BRIANNA FIGUERAS, RSR, CCR #22013454 21 22 23 24 25</p>
<p style="text-align: right;">Page 62</p> <p>1 MR. BARNES: Yes. 2 Thank you, Council, for having me. And, 3 everyone, it's good to be here with the 4 Environmental Site Evaluation Council. I'm super 5 excited to be here and work on alternative energy 6 projects throughout the state. And so I'm just 7 excited to be here. Thank you very much. 8 CHAIR DREW: Thank you and welcome to the 9 team. 10 With that, our meeting is adjourned. 11 (Meeting adjourned at 2:49 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	

WASHINGTON STATE

ENERGY FACILITY SITE EVALUATION COUNCIL

SPECIAL MEETING

November 29, 2022

Conducted Remotely via Microsoft Teams

Reporter: John M.S. Botelho, CCR, RPR

EFSEC 2022 Meetings
Special Meeting, - November 29, 2022

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<p>1 APPEARANCES</p> <p>2 (All parties appearing remotely.)</p> <p>3 State Agency Members:</p> <p>4 Kathleen Drew, Chair</p> <p>5 Kate Kelly, Department of Commerce</p> <p>6 Eli Levitt, Department of Ecology</p> <p>7 Mike Livingston, Department of Fish and Wildlife</p> <p>8 Lenny Young, Department of Natural Resources</p> <p>9 Stacey Brewster, Utilities & Transportation Comm.</p> <p>10</p> <p>11 Assistant Attorney General:</p> <p>12 Jon Thompson</p> <p>13</p> <p>14 Administrative Law Judge:</p> <p>15 Laura Bradley</p> <p>16</p> <p>17 Council Staff:</p> <p>18 Sonia Bumpus Dave Walker</p> <p>19 Ami Hafkemeyer Sean Greene</p> <p>20 Stew Henderson Lance Caputo</p> <p>21 Joan Owens John Barnes</p> <p>22 Andrea Grantham</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 BE IT REMEMBERED that on Tuesday,</p> <p>2 November 29, 2022, at 4:30 p.m. Pacific time, the</p> <p>3 following Special Meeting of the Washington State</p> <p>4 Energy Facility Site Evaluation Council was held</p> <p>5 virtually via Microsoft Teams, to wit:</p> <p>6</p> <p>7 <<<<<< >>>>>></p> <p>8</p> <p>9 CHAIR DREW: Good afternoon. This</p> <p>10 is Kathleen Drew, Chair of the Energy Facility Site</p> <p>11 Evaluation Council, bringing to order today's special</p> <p>12 meeting.</p> <p>13 This special meeting is with regard to the High</p> <p>14 Top and Ostrea projects extension request. And you</p> <p>15 see the agenda in front of you.</p> <p>16 Ms. Grantham, will you please call the roll.</p> <p>17 MS. GRANTHAM: Yes.</p> <p>18 Department of Commerce.</p> <p>19 MS. KELLY: Kate Kelly, present.</p> <p>20 MS. GRANTHAM: Department of</p> <p>21 Ecology.</p> <p>22 MR. LEVITT: Eli Levitt, present.</p> <p>23 MS. GRANTHAM: Department of Fish</p> <p>24 and Wildlife.</p> <p>25 MR. LIVINGSTON: Mike Livingston,</p>
Page 3	Page 5
<p>1 MEETING INDEX</p> <p>2 EVENT: PAGE NO.</p> <p>3 Call to Order 4</p> <p>4 Roll Call 4</p> <p>5 Proposed Agenda 6</p> <p>6 PROJECTS</p> <p>7 High Top & Ostrea - Extension Request 7</p> <p>8 Questions from Council Members 8</p> <p>9 Opportunity for Public Comments 9</p> <p>10 Opportunity for Council Discussion 9</p> <p>11 Motion and Vote 10</p> <p>12 Adjournment 11</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 present.</p> <p>2 MS. GRANTHAM: Department of</p> <p>3 Natural Resources.</p> <p>4 MR. YOUNG: Lenny Young, present.</p> <p>5 MS. GRANTHAM: Utilities and</p> <p>6 Transportation Commission.</p> <p>7 MS. BREWSTER: Stacey Brewster,</p> <p>8 present.</p> <p>9 MS. GRANTHAM: The assistant</p> <p>10 attorney general.</p> <p>11 MR. THOMPSON: Jon Thompson,</p> <p>12 present.</p> <p>13 MS. GRANTHAM: Administrative Law</p> <p>14 Judge Laura Bradley.</p> <p>15 JUDGE BRADLEY: Judge Bradley,</p> <p>16 present.</p> <p>17 MS. GRANTHAM: For EFSEC staff,</p> <p>18 Sonia Bumpus.</p> <p>19 MS. BUMPUS: Sonia Bumpus, present.</p> <p>20 MS. GRANTHAM: Ami Hafkemeyer.</p> <p>21 MS. HAFKEMEYER: Ami Hafkemeyer,</p> <p>22 present.</p> <p>23 MS. GRANTHAM: Amy Moon.</p> <p>24 Patty Betts.</p> <p>25 Stew Henderson.</p>

<p style="text-align: right;">Page 6</p> <p>1 MR. HENDERSON: Stew Henderson, 2 here. 3 MS. GRANTHAM: Joan Owens. 4 MS. OWENS: Joan Owens, present. 5 MS. GRANTHAM: Dave Walker. 6 MR. WALKER: Dave Walker, present. 7 MS. GRANTHAM: Sonja Skavland. 8 Lisa Masengale. 9 Sara Randolph. 10 Sean Greene. 11 MR. GREENE: Sean Greene, present. 12 MS. GRANTHAM: Lance Caputo. 13 MR. CAPUTO: Lance Caputo, present. 14 MS. GRANTHAM: John Barnes. 15 MR. BARNES: John Barnes, present. 16 MS. GRANTHAM: And do we have 17 someone for the counsel for the environment? 18 With that, Chair, there is a quorum for the 19 regular Council. Thank you. 20 CHAIR DREW: Thank you. 21 You see in front of us the proposed agenda with 22 one item on it. Hearing -- if there is any 23 objection, please let me know that that's the agenda. 24 Otherwise, we will move right into the topic in front 25 of us. And we will have an opportunity for public</p>	<p style="text-align: right;">Page 8</p> <p>1 completed. 2 Are there any questions to this point? 3 CHAIR DREW: Are there any 4 questions from Council members? 5 MR. YOUNG: Yeah. 6 Ami, you said "to complete the following steps." 7 What are "the following steps"? 8 MS. HAFKEMEYER: Of course. So we 9 are required to hold the land-use meeting, which is 10 different from our land-use consistency hearing that 11 was held earlier this year. 12 The following meeting, which was originally 13 scheduled to follow this one but is currently being 14 rescheduled, will seek input from members of the 15 public on criteria akin to what would be heard during 16 the County's conditional use permit process to 17 determine whether or not it's appropriate to include 18 any recommendations or requirements of the applicant 19 in a site certification agreement to be consistent 20 with those criteria. 21 The staff must also prepare the documents for the 22 recommendation to the governor once the Council has 23 directed staff to do so. And we need a little bit of 24 time to do that following the land-use meeting. 25 MR. YOUNG: Thank you.</p>
<p style="text-align: right;">Page 7</p> <p>1 comment before the Council votes on this item. 2 So moving forward, Ms. Hafkemeyer, would you like 3 to bring -- discuss the item in front of us on the 4 extension request? 5 MS. HAFKEMEYER: Thank you, Chair 6 Drew. 7 In front of you, you'll see the extension -- my 8 apologies. 9 In front of you, you will see an extension 10 request from the applicant, extending the decision 11 for the Council's recommendation to the governor to 12 February 22nd, 2023. 13 The reason for this extension is that the 14 deadline for the recommendation to the governor is 60 15 days after the Council makes its decision on 16 expedited process. But looking at the calendar and 17 noticing that the -- that 60-day deadline would 18 actually fall in the -- the first part of January, 19 the -- the applicant and staff have recognized that 20 we will need a little bit more time to complete the 21 following steps for the -- the conditional use permit 22 meeting and preparing the Council's recommendation to 23 the governor ahead of that time frame. 24 So the applicant has submitted this extension 25 request to allow for the remaining work to be</p>	<p style="text-align: right;">Page 9</p> <p>1 CHAIR DREW: Any other questions 2 from Council members? 3 At this point, I'd be happy to hear if there are 4 any public comments on this issue. 5 Please raise your hand, or -- if you raise your 6 hand, we will give you three minutes to speak. Or 7 let us know in some fashion, either through the chat 8 or by letting us know through your microphone that 9 you would like to comment on this topic. 10 I know we have had it on our site, but we didn't 11 have the usual -- it up for the usual amount of time, 12 which is a week, to gather those comments. 13 So, again, is there anyone on this call who would 14 like to make a comment to the Council on this action 15 item? 16 Council members, I'm looking for discussion. Is 17 there discussion that you would like to have before 18 we vote? 19 Speaking for myself, I know that both staff and 20 the public have a lot going on this time of year and 21 heading into the holidays. I think it makes more 22 sense not to rush the meeting for considering what 23 the public might want to bring forward as conditions 24 to make sure we meet the intent of the conditional 25 use in the Yakima County Code as we move forward with</p>

EFSEC 2022 Meetings
Special Meeting, - November 29, 2022

Pages 10..12

<p style="text-align: right;">Page 10</p> <p>1 any conditions, any -- that have not yet been put 2 forward by the applicant or through our environmental 3 SEPA process. 4 So it seems to me to be better to take a little 5 more time, make sure the public knows about this 6 opportunity, and to have that meeting in January, 7 which does put us beyond the statutory framework of 8 60 days following the determination of expedited 9 processing. 10 All those in favor of -- well, first, I guess we 11 have to have a motion in front of us, so let's start 12 with that. 13 Is there a motion to approve the request for 14 extension? 15 MR. YOUNG: Lenny Young. So moved. 16 CHAIR DREW: Thank you. 17 Second? 18 MS. KELLY: Kate Kelly. Second. 19 CHAIR DREW: Thank you. 20 All those in favor of this motion, please say 21 "aye." 22 MULTIPLE SPEAKERS: Aye. 23 CHAIR DREW: Opposed? 24 Motion is carried. And the extension is granted. 25 Thank you. I don't -- the special meeting will</p>	<p style="text-align: right;">Page 12</p> <p>1 STATE OF WASHINGTON) I, John M.S. Botelho, CCR, RPR, 2) ss a certified court reporter 3 County of Pierce) in the State of Washington, do 4 hereby certify: 5 6 That the foregoing Special Meeting of the Washington 7 State Energy Facility Site Evaluation Council was conducted 8 in my presence and adjourned on November 29, 2022, and 9 thereafter was transcribed under my direction; that the 10 transcript is a full, true and complete transcript of the 11 said meeting, transcribed to the best of my ability; 12 That I am not a relative, employee, attorney or counsel 13 of any party to this action or relative or employee of any 14 such attorney or counsel and that I am not financially 15 interested in the said action or the outcome thereof; 16 17 IN WITNESS WHEREOF, I have hereunto set my hand 18 this 5th day of December, 2022. 19 20 21 22 23 24 25</p> <p style="text-align: right;"><i>John M.S. Botelho</i> John M.S. Botelho, CCR, RPR Certified Court Reporter No. 2976 (Certification expires 5/26/2023.)</p>
<p style="text-align: right;">Page 11</p> <p>1 now be adjourned. 2 (Meeting adjourned at 3 4:39 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	

EFSEC Monthly Council Meeting – Facility Update Format

Facility Name: Kittitas Valley Wind Power Project

Operator: EDP Renewables

Report Date: December 7, 2022

Reporting Period: November 2022

Site Contact: Eric Melbardis, Sr Operations Manager

Facility SCA Status: Operational

Operations & Maintenance (only applicable for operating facilities)

- Power generated: 11283 MWh
 - Wind speed: 4.2 m/s
 - Capacity Factor: 13.5%
-

Environmental Compliance

- No incidents

Safety Compliance

- Nothing to report

Current or Upcoming Projects

- Nothing to report

Other

- No sound complaints
- No shadow flicker complaints

EFSEC Monthly Council Meeting – Facility Update Format

Facility Name: Kittitas Valley Wind Power Project

Operator: EDP Renewables

Report Date: January 6, 2023

Reporting Period: December 2022

Site Contact: Eric Melbardis, Sr Operations Manager

Facility SCA Status: Operational

Operations & Maintenance (only applicable for operating facilities)

- Power generated: 10170 MWh
 - Wind speed: 4.0 m/s
 - Capacity Factor: 12.7%
-

Environmental Compliance

- No incidents

Safety Compliance

- Nothing to report

Current or Upcoming Projects

- Nothing to report

Other

- No sound complaints
- No shadow flicker complaints

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Wild Horse Wind Facility
Operator: Puget Sound Energy
Report Date: December 12, 2022
Report Period: November 2022
Site Contact: Jennifer Galbraith
SCA Status: Operational

Operations & Maintenance

November generation totaled 35,930 MWh for an average 18.31%.

Environmental Compliance

Nothing to report.

Safety Compliance

Nothing to report.

Current or Upcoming Projects

Nothing to report.

Other

Nothing to report.

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Wild Horse Wind Facility
Operator: Puget Sound Energy
Report Date: January 6, 2023
Report Period: December 2022
Site Contact: Jennifer Galbraith
SCA Status: Operational

Operations & Maintenance

December generation totaled 35,736 MWh for an average 17.62%.

Environmental Compliance

Nothing to report.

Safety Compliance

Nothing to report.

Current or Upcoming Projects

Nothing to report.

Other

Nothing to report.

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Grays Harbor Energy Center

Operator: Grays Harbor Energy LLC

Report Date: December 20, 2022

Reporting Period: November 2022

Site Contact: Chris Sherin

Facility SCA Status: Operational

Operations & Maintenance

-GHEC generated 289,083MWh during the month and 2,753,737MWh YTD.

-GHEC was limited to 1x1 operation for 14days due to transmission line maintenance.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-There were no emission, outfall, or storm water deviations, during the month.

-Routine monthly, quarterly, and annual reporting to EFSEC Staff.

- Monthly Outfall Discharge Monitor Report (DMR).

-Submitted notification that an annual review and update of the Wastewater Treatment Operations and Maintenance Manual has been completed.

Safety Compliance

- Annual Spill Prevention Control and Countermeasures Plan (SPCCP) & Storm Water Pollution Prevention Plan (SWPPP) refresher training was conducted.

None.

Current or Upcoming Projects

-- Application for a Modification to the Air Operating Permit submitted to EFSEC in April. GHEC is currently authorized to operate under PSD Permit EFSEC/2001-01, Amendment 5 and Federal Operating Permit EFSEC/94-1 AOP Initial.

Other

-None.

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Grays Harbor Energy Center

Operator: Grays Harbor Energy LLC

Report Date: January 18, 2023

Reporting Period: December 2022

Site Contact: Chris Sherin

Facility SCA Status: Operational

Operations & Maintenance

-GHEC generated 407,496MWh during the month and 3,161,233MWh YTD.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-There were no emission, outfall, or storm water deviations, during the month.

-Routine monthly, quarterly, and annual reporting to EFSEC Staff.

- Monthly Outfall Discharge Monitor Report (DMR).
- Quarterly Stormwater Discharge Monitor Report (DMR).
- Annual Single Sample Discharge Monitor Report (DMR).

Safety Compliance

- None.

Current or Upcoming Projects

-- Application for a Modification to the Air Operating Permit submitted to EFSEC in April. GHEC is currently authorized to operate under PSD Permit EFSEC/2001-01, Amendment 5 and Federal Operating Permit EFSEC/94-1 AOP Initial.

Other

-None.

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Chehalis Generation Facility
Operator: PacifiCorp
Report Date: December 05, 2022
Reporting Period: November 2022
Site Contact: Mike Adams, Plant Manager
Facility SCA Status: Operational

Operations & Maintenance

-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

- 310,696 net MW-hrs generated in the reporting period for a capacity factor of 84.7%.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-Monthly Water Usage: 2,246,244 gallons

-Monthly Wastewater Returned: 1,089,836 gallons

-Permit status if any changes.

- No changes.

-Update on progress or completion of any mitigation measures identified.

- No issues or updates.

-Any EFSEC-related inspections that occurred.

- EFSEC Staff and WSP Fire Marshal visited site on 11/17/22. No violations received.

-Any EFSEC-related complaints or violations that occurred.

- Nothing to report

-Brief list of reports submitted to EFSEC during the monthly reporting period.

- Nothing to report

Safety Compliance

-Safety training or improvements that relate to SCA conditions.

- Zero injuries this reporting period for a total of 2679 days without a Lost Time Accident.

Current or Upcoming Projects

-Planned site improvements.

- No planned changes.

-Upcoming permit renewals.

- Nothing to report.

-Additional mitigation improvements or milestones.

- Nothing to report.

Other

-Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).

- Nothing to report.

-Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council).

- Nothing to report.

-Public outreach of interest (e.g., schools, public, facility outreach).

- Nothing to report.

Respectfully,



Mike Adams
Plant Manager
Chehalis Generation Facility

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Chehalis Generation Facility
Operator: PacifiCorp
Report Date: January 4, 2023
Reporting Period: December 2022
Site Contact: Mike Adams, Plant Manager
Facility SCA Status: Operational

Operations & Maintenance

-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

- 320,509 net MW-hrs generated in the reporting period for a capacity factor of 83.85%.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-Monthly Water Usage: 2,790,040 gallons

-Monthly Wastewater Returned: 1,553,603 gallons

-Permit status if any changes.

- No changes.

-Update on progress or completion of any mitigation measures identified.

- The Chehalis Generation Facility received a letter from Mr. Joseph Kasperski of the Dept. of Ecology on December 08, 2022, regarding VCP Project Status Request for the Site. Facility management held a call with Mr. Kasperski on December 27, 2022, to address the request and options for an extension. An official request was sent to Mr. Kasperski on December 28, 2022, for a 90-day extension, which was approved. The additional time is required to contract with an Environmental Remediation Firm, allow said company to visit the site, and develop a detailed Spill Remediation Plan. The Chehalis Generation Facility will ensure that a detailed plan is communicated to and approved by the Dept. of Ecology prior to April 04, 2023.

-Any EFSEC-related inspections that occurred.

- Nothing to report

-Any EFSEC-related complaints or violations that occurred.

- Nothing to report

-Brief list of reports submitted to EFSEC during the monthly reporting period.

- Nothing to report

Safety Compliance

-Safety training or improvements that relate to SCA conditions.

- Zero injuries this reporting period for a total of 2710 days without a Lost Time Accident.

**Current or Upcoming Projects**

-Planned site improvements.

- No planned changes.

-Upcoming permit renewals.

- Nothing to report.

-Additional mitigation improvements or milestones.

- Nothing to report.

Other

-Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).

- Nothing to report.

-Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council).

- Nothing to report.

-Public outreach of interest (e.g., schools, public, facility outreach).

- Nothing to report.

Respectfully,

A handwritten signature in black ink, appearing to read "MA", written over a light blue horizontal line.

Mike Adams
Plant Manager
Chehalis Generation Facility

EFSEC Monthly Council Meeting

Facility Name: **Columbia Generating Station (CGS) and Washington Nuclear Projects 1 and 4 (WNP 1/4)**

Operator: **Energy Northwest**

Report Date: **December 29, 2022**

Reporting Period: **November 2022**

Site Contact: **Marshall Schmitt**

Facility SCA Status: (Pre-construction/Construction/Operational/Decommission) **Operational Operations & Maintenance (only applicable for operating facilities)**

CGS Net Electrical Generation November 2022: **836,503 MWh**

Environmental Compliance

On November 17th, Energy Northwest received approval from EFSEC on the Columbia Generating Station Annual Air Emission Source Registration for 2020 and 2021.

No other non-routine items to report. All routine reports were submitted on-time.

Safety Compliance

None.

Current or Upcoming Projects

None.

Other

None.

EFSEC Monthly Council Meeting

Facility Name: **Columbia Generating Station (CGS) and Washington Nuclear Projects 1 and 4 (WNP 1/4)**

Operator: **Energy Northwest**

Report Date: **January 9, 2023**

Reporting Period: **December 2022**

Site Contact: **Marshall Schmitt**

Facility SCA Status: (Pre-construction/Construction/Operational/Decommission) **Operational Operations & Maintenance (only applicable for operating facilities)**

CGS Net Electrical Generation December 2022: **859,620 MWh**

Environmental Compliance

On December 1st, 2022, Energy Northwest received the Inspection Report for the 2022 Columbia Generating Station Synthetic Minor Air Inspection that was conducted on October 26th, 2022. There were no issues nor findings identified.

No other non-routine items to report. All routine reports were submitted on-time.

Safety Compliance

None.

Current or Upcoming Projects

None.

Other

None.

EFSEC Monthly Council Meeting Facility Update

Facility Name: Columbia Solar Projects (Penstemon, Camas and Urtica)

Operator: Tuusso Energy, LLC

Report Date: Dec 2, 2022

Reporting Period: 30 days ending Dec 2, 2022

Site Contact: Owen Hurd

Facility SCA Status: Construction

Construction Status

- Penstemon
 - Currently operational
 - Total Generation during the month of November was 385 megawatt hours
 -
 - Camas
 - Currently operational
 - Total Generation during the month of November was 356 megawatt hours
 -
 - Urtica
 - Troubleshooting issues with inverters; Substantial Completion expected in late-Jan
-

Other

- Submitted revised planting plan to EFSEC & agencies for review; meeting to discuss feedback in next few weeks.

EFSEC Monthly Council Meeting Facility Update

Facility Name: Columbia Solar Projects (Penstemon, Camas and Urtica)

Operator: Tuusso Energy, LLC

Report Date: Jan 6, 2023

Reporting Period: 30 days ending Jan 6, 2023

Site Contact: Owen Hurd

Facility SCA Status: Construction

Construction Status

- Penstemon
 - Currently operational
 - Total Generation during the month of December was 216 megawatt hours
 -
 - Camas
 - Currently operational
 - Total Generation during the month of December was 209 megawatt hours
 -
 - Urtica
 - Troubleshooting issues with inverters; Substantial Completion expected in late-Jan
-

Other

- Currently responding to request for increased plant density; planting & revegetation efforts to commence once resolved.

Horse Heaven Wind Project

December 2022 and January 2023
project update

[Place holder]

Goose Prairie Solar Project

December 2022 and January 2023
project update

[Place holder]

Goose Prairie Solar

Initial Site Restoration Plan



January 2023

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Goose Prairie Solar, LLC

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Appendix B	Applicable Requirements from the Site Certification Agreement for the Goose Prairie Solar Project
Appendix C	Cost Estimate of Decommissioning and Site Restoration
Appendix D	Pre-Construction Vegetation Photographs

Restriction on Disclosure and Use of Data

This document is the property of Goose Prairie Solar, LLC, prepared by Tetra Tech, Inc., and is provided upon the condition that it will not be reproduced, copied, or issued to a third party, will be used solely for the original intended purpose and solely for the execution or review of the engineering and construction of the subject project.

ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
AC	Alternating Current
BMP	Best Management Practice
BPA	Bonneville Power Administration
Certificate Holder	Goose Prairie Solar, LLC
DAHP	Department of Archaeology and Historic Preservation
DC	Direct Current
EFSEC	Energy Facility Site Evaluation Council
ESCP	Erosion and Sediment Control Plan
Facility	Goose Prairie Solar Project
ISRP	Initial Site Restoration Plan
MDNS	Mitigated Determination of Non-Significance
MWac	Megawatt Alternating Current
PV	Photovoltaic
RCW	Revised Code of Washington State
SCA	Site Certification Agreement
SPCC	Spill Prevention, Control, and Countermeasures
SWPPP	Stormwater Pollution Prevention Plan
Tetra Tech	Tetra Tech, Inc.
WAC	Washington Administrative Code
YCC	Yakima County Code

1.0 INTRODUCTION

1.1 PROJECT DESCRIPTION

The Goose Prairie Solar Project (Facility) is an 80-megawatt (MWac) solar photovoltaic project located in Yakima County, Washington. The Facility received approval for construction and operation from the state of Washington on December 20, 2021 (ESFEC 2021a). Goose Prairie Solar, LLC (Certificate Holder) will construct and operate the Facility.

1.2 PURPOSE OF THIS REPORT

The purpose of this initial site restoration plan (ISRP) is to identify, evaluate, and resolve all major environmental and public health and safety issues reasonably anticipated by the Certificate Holder in compliance with Article IV Part F of the Site Certification Agreement (SCA). This ISRP describes the process used to evaluate the options and select the measures that will be taken to restore or preserve the site location or otherwise protect the public against risks or danger resulting from the site. The plan includes a discussion of economic factors regarding the costs and benefits of various restoration options versus the relative public risk and addresses provisions for funding or bonding arrangements to meet the site location restoration or management costs.

2.0 PROJECT COMPONENTS

The project's components subject to decommissioning include all equipment summarized below and ancillary facilities authorized under Article 1, Section C of the SCA and subsequently constructed by the Certificate Holder. These components are discussed in detail in the Mitigated Determination of Non-Significance (MDNS) for the project. The decommissioning activities associated with these components are discussed in Section 3.0 of this ISRP.

2.1 WATER WELL AND WATER TANKS

Water for use during the operation of the Facility (dust control water for construction, fire protection water, and water for panel washing, watering vegetation [if required], and use at the Facility's Operation and Maintenance Building) will either come from off-site, stored in above-ground water tanks or from a newly installed well installed in accordance with Yakima County regulations.

2.2 PHOTOVOLTAIC ARRAY

The photovoltaic (PV) equipment for the project will consist of approximately 193,200 PV panels mechanically fastened on steel support structures and driven by single axis trackers. The steel support structures will be supported on galvanized steel piles that will be driven into the ground. The tracker motors are mounted on the structure.

2.3 SUBSTATION

The project will be connected to a substation located on-site. The project substation consists of the main step-up transformer to increase the voltage to 115 kV for interconnection to the grid and the control house which houses protective equipment including communications equipment, circuit breakers, disconnect switches and relays. The project substation will be connected to an existing utility transmission line.

2.4 OPERATIONS AND MAINTENANCE BUILDING

The facility may include an Operations and Maintenance (O&M) building which would consist of a single-story structure with office space, warehousing space, a bathroom and breakroom facilities. A graveled parking area with at least three spaces for employees and visitors would be located adjacent to the building.

2.5 POWER COLLECTION SYSTEM

The PV modules will convert sunlight into direct current (DC) electricity. The PV-generated DC power will be collected from each of the multiple rows of PV modules, from which it will be connected to multiple combiner boxes and ultimately to skids containing inverters and collection system transformers. The inverters will convert the DC power to alternating current (AC) power, which will then flow to the transformer that will increase the AC power voltage to 34.5 kV. Multiple transformers from multiple skids will be connected in parallel to on-site switchgear and protection equipment. The power will then be delivered to the existing aboveground Bonneville Power Administration (BPA) transmission line.

2.6 FENCES, GATES, AND ROADS

Gravel project roads will be constructed in accordance with the design drawings issued for construction, approved by the Certificate Holder. The roads will be installed in a manner to access Project inverters, the Project substation and O&M building, and provide maintenance for PV equipment and site access. The project will be fenced with woven wire security fencing. Access to the facility would be gated and locked.

2.7 SITE VEGETATION

Vegetation under the solar panels (low-growth native grasses) will be managed as per the SCA and other safety and operational requirements.

3.0 PROJECT DECOMMISSIONING AND RECYCLING

The activities involved in the facility closure will depend on the expected future use of the project site. At the time of decommissioning, in addition to this ISRP, a detailed removal work plan and schedule, and a site restoration plan, shall be filed with EFSEC and approved. The removal work plan and schedule will describe the proposed equipment that will be removed and an associated schedule for such removal. The currently envisaged plan involves completion of the decommissioning, excluding establishment of revegetation, in a less

than the required 12-month period. Revegetation will be initiated but vegetation may not yet be established in the 12-month period.

In general, decommissioning will attempt to maximize the recycling of all facility components, to the extent practicable. Specific opportunities for recycling (e.g., PV solar panels) are discussed below in the context of various site components. The individual project components to be decommissioned will be recycled to the maximum extent practical.

The key project components affected by decommissioning activities are discussed below. The general decommissioning approach will be the same whether a portion, or all the project is decommissioned.

3.1 EVALUATION PROCESS

Upon decommissioning, the Certificate Holder is required by the SCA to remove all project facilities and re-seed disturbed areas. Restoration activities will return the project site to the landowner in essentially the same condition that it was initially provided in.

The Certificate Holder will provide financial security for the estimated cost required to decommission the project, remove facilities, and perform restoration activities. See Section 4 below and Appendix C.

3.2 SITE RESTORATION TIMING AND SCOPE

3.2.1 Timing

Per Article VIII.C.1, the Certificate Holder is required to begin decommissioning of the project within 12 months following project termination. Project termination can be triggered directly by the Certificate Holder, or if the Certificate Holder is required to terminate the project according to the requirements of Article VIII.B of the SCA. This plan assumes that decommissioning and restoration activities would occur at the end of the useful life of the project, but all activities outlined herein would be the same if required prior to that time or if the site was suspended or terminated during construction, as required in Article IV.F.5.

The SCA allows the period to perform the decommissioning to be extended if there is a delay caused by conditions beyond the control of the Certificate Holder including, but not limited to, inclement weather conditions, equipment failure, wildlife considerations, or the availability of cranes or equipment to support decommissioning.

3.2.2 Scope

As required by Article VIII.C.2 of the SCA, decommissioning the project shall involve removal of the solar panels and mounting structures; removal of foundations or other site facilities to a depth of 4 feet below grade; restoration of any disturbed soil to preconstruction condition; and removal of project access roads, security gates, fences, O&M building, facility substation, and overhead poles and transmission lines (except for any roads and/or overhead infrastructure that the site location landowner wishes to retain) (all of which shall comprise site restoration). Removing the PV panels will be the priority of site restoration and performing the remaining elements will occur thereafter. If the Certificate Holder constructs the site with solar panels

incorporating hazardous materials, such as cadmium telluride, site restoration shall also include the use of appropriate precautions during decommissioning and removal of the solar panels to safely dispose of, avoid, and, if necessary, remediate any soil contamination resulting from the hazardous materials as outlined in Article VII.C.2¹. Prior to the initiation of project decommissioning an on-site audit will be performed to identify and determine the appropriate method for disposing of hazardous materials (if any) present on the site. Location and remediation of hazardous contamination (if any) at the project location.

If the project is suspended during construction, the Certificate Holder would plan to remove or secure all loose materials, tools, and equipment immediately and protect any exposed soils with appropriate erosion control measures. If construction is suspended the Certificate Holder will coordinate with EFSEC on progress made to restart construction. If construction is suspended for three months the Certificate Holder will declare that construction has been terminated or coordinate with EFSEC on a reasonable timeline by which construction will restart. If the project is terminated during construction, the Certificate Holder would decommission all in-place equipment and restore the site to pre-construction conditions in accordance with this plan. Specific Site suspension or termination measures would be developed in conjunction with the contractor in accordance with Article VIII.B.

3.3 SITE RESTORATION FINANCIAL ASSURANCE

In accordance with Article VIII.D.1 of the SCA, the Certificate Holder, or any Transferee will provide financial assurance sufficient, based on detailed engineering estimates, for required site restoration costs in the form of a surety bond, irrevocable letter of credit, or guaranty. The anticipated amount of this security will be based on the detailed engineering estimate of the cost of decommissioning shown in Appendix C of the ISRP.

Appendix C to this plan includes a cost estimate for decommissioning. In accordance with Article VIII.D.1 of the SCA, the decommissioning costs will be adjusted for inflation within 60 days prior to the annual anniversary date of the establishment of the financial instrument used to provide financial assurance. The Certificate Holder must increase the financial assurance amount accordingly to ensure sufficient funds for site restoration.

The Certificate Holder will choose between one of the financial security instruments listed in Article VIII.D.2 at least 60 days prior to the beginning of construction of the site and will notify EFSEC of the type of instrument chosen. No later than 30 days before the beginning of construction, the Certificate Holder will have the chosen financial security instrument in effect, and the appropriate documentation of such security will be filed with EFSEC.

3.4 DECOMMISSIONING PLAN

The Certificate Holder shall submit a detailed Site Restoration Plan to EFSEC for approval at least 90 days prior to decommissioning in accordance with the requirements of Article VIII of the SCA. The following sections outline the preliminary decommissioning plan for the project.

¹ The Goose Prairie Solar project is designed using panels that do not contain cadmium telluride.

3.4.1 Decommissioning Preparation

The first step in the decommissioning process will be to assess existing site conditions and prepare the project site for demolition, including preparation and submittal of the above referenced removal work plan and schedule for the components and provisions described below. Per Article IV.F.7 the initial demolition plan includes salvaging equipment to the greatest extent possible.

Site decommissioning, excluding revegetation, is estimated to take less than the required 12 months. Establishment of revegetation on the project site will be the responsibility of the Certificate Holder in coordination with the landowner, assuming the site is returned to the pre-project condition of grazing lands. If the landowner chooses to plant crops on the site, following decommissioning, the selection and planting of crops will be the landowner's responsibility. The current land use of the project site is agricultural, and the site historically produced hay or served as pasture.

Demolition debris will be placed in a temporary on-site storage area for no more than 120 days with no more than one 120-day extension if determined necessary by EFSEC, pending final transportation and disposal/recycling according to the procedures listed below. The location of the temporary on-site storage area will be included on a site plan with the removal work plan and schedule and site restoration plan review submittal.

3.4.2 Photovoltaic Equipment

At the start of decommissioning, the project will be de-energized and disconnected from the transmission system.

Removal of solar modules will be completed by manual labor. All wiring, cables, and electrical interconnections will be disconnected from the PV arrays. The module components will be mechanically disconnected from the solar array and transferred to a staging location for transporting to an offsite facility. Panels suitable for reuse will be sold for market value and panels not suitable for reuse will be processed at an offsite facility for recycling or disposal.

The racking structure materials can be recycled, reused, or sold as scrap metal. Disassembly and removal of the racking structure will be performed manually.

Steel piles will be completely removed by hoisting with a piece of heavy equipment. Steel components will be segregated and transferred to a staging location for offsite recycling or sold as scrap metal.

Any other foundation structures and below-ground concrete will be removed to 4' below grade. The affected area will be backfilled with native soil or gravel removed from the Facility (i.e., access roads). If gravel is used only the first three feet of backfill will be gravel and it will be covered with at least one foot of native soil.

The demolition debris and removed equipment may be cut or dismantled into pieces that can be safely lifted or carried with the on-site equipment being used. The majority will be processed for transportation to an off-site recycling center. All steel, copper, and aluminum will be recycled to the maximum extent possible.

3.4.3 Substation

The substation will be de-energized. Oil in the substation's transformer will be drained for disposal as required by local/state/federal regulations. The substation equipment and structures, including the control house communications equipment, circuit breakers, disconnect switches and relays will be mechanically disassembled with the use of support equipment for hoisting components. Steel will be segregated for offsite recycling or sold for scrap. The substation site restoration will include the removal of the gravel surfacing and concrete foundations, soil preparation, grading, and seeding of disturbed areas.

3.4.4 Water Well and Water Tanks

The on-site well, if installed, will be decommissioned in accordance with requirements of Yakima County and the State of Washington as appropriate or left in service at the discretion of the landowner.

Any on-site water tanks used for fire protection or other purposes (if present) will be removed.

3.4.5 Internal Power Collection System

The combiner boxes that convey DC power generated from the solar arrays will be dismantled and removed. The inverters that convert DC power to AC power and the transformers that increase the AC power voltage to 34.5 kV will also be removed. Any insulating and cooling mineral oil and fluids from the transformers will be drained, removed from the site, and recycled or disposed of at an appropriately licensed disposal facility.

Structures supporting above-ground electrical cabling will be dismantled, with the steel segregated for offsite recycling or sold for scrap. Concrete from sleepers will be broken down into manageably sized pieces (if required) and disposed of. Associated electrical cabling will be removed from the conduit, if practical. Cabling will be segregated for offsite recycling or sold for scrap.

The underground 34.5kV cables and conduits that form the AC collection systems, will be removed, and recycled if cabling is less than 4 feet below grade. Cable or conduit deeper than 4 feet below grade will be left in place. Associated electrical cabling will be removed from the conduit, if practical. Remaining conduit will be capped or filled with a fine construction material.

3.4.6 Operations and Maintenance Building

The O&M building will be mechanically disassembled with the use of support equipment for hoisting components. Steel will be segregated for offsite recycling or sold for scrap. The substation site restoration will include the removal of the gravel surfacing and concrete foundations, soil preparation, grading, and seeding of disturbed areas.

3.4.7 Transmission Line

Above ground electrical cabling owned by BPA will be left in place. Any high voltage lines or structures on the projects side of the Point of Interconnection will be dismantled, with the steel segregated for offsite recycling or sold for scrap. The associated concrete foundations will be removed and transferred to a staging location for offsite disposal or recycling at an approved facility.

3.4.8 Access Roads

On-site access roads will remain in place to accomplish decommissioning at the end of the facility's life, which is assumed to be 30 years. At the time of decommissioning, if the landowner determines that some of these roads will be beneficial for future use of the site, such roads may remain after decommissioning.

Roads that will not be re-used will be restored to preconstruction conditions. Gravel associated with the access roads will be stockpiled for recycling or reuse. Underlying geotextile fabric will be collected for offsite disposal.

For any asphalt access driveways that will be removed, asphalt material will be broken up and removed to an appropriate disposal site. The landowners may choose to maintain the access driveways for farming purposes.

3.4.9 Fences and Gates

Once the site has been fully restored according to Section 3.1 above, the agricultural fences and gates will be assessed prior to dismantling to determine if the landowner wishes to retain them. If the fence is to be removed, the fencing will be sold for scrap or dismantled and recycled.

4.0 SITE RESTORATION

Once removal of project equipment is complete, the site will be restored to preconstruction conditions. The Certificate Holder in coordination with the landowner, assuming the site is returned to the pre-project condition of grazing lands. If the landowner chooses to plant crops on the site, following decommissioning, the selection and planting of crops will be the landowner's responsibility.

Photographic documentation of the preconstruction vegetative conditions on the site is provided in Appendix D. At the time of decommissioning, the site will be evaluated by a qualified biologist to determine the extent of and type of vegetation existing on the site. The decommissioning will leave the existing vegetation on-site and allow the landowner to determine the revegetation of the area for farming purposes. The project area will either be revegetated or planted in crops of the land owners choosing within twelve months of decommissioning. The landowner will also determine any fertilizers to apply that are applicable to the specific crop they choose to plant.

4.1 RESTORATION PLAN

All decommissioning shall occur in a manner where appropriate dust suppression can be achieved. Measures that will be outlined in the detailed decommissioning plan, completed by the Certificate Holder and approved by EFSEC prior to decommissioning, may include those outlined in Section 2.A.5 Mitigation Measure Summary of the Application under Air Quality (e.g., watering and controlling speeds in unpaved areas). Based on the site conditions, a biologist will develop a restoration plan acceptable to EFSEC at the time of decommissioning.

4.2 SITE RECONTOURING

Because of the limited disturbance to soils and site contours in the construction of the project, it is expected that, with the exception of recontouring of stormwater detention ponds as described in Section 4.3, restoration

will not involve further grading and only entail spreading topsoil and reseeding by the Certificate Holder. Best management practices to be implemented to provide erosion and sediment control until revegetation efforts have sufficiently stabilized the soil will be stipulated in the final site restoration plan.

4.3 DRAINAGE RESTORATION

Storm water detention ponds installed for the Facility will be decommissioned as part of the restoration effort. Removal of the detention ponds along with regrading and recontouring will ensure that pre-construction drainage patterns and release rates can be maintained. A stormwater management plan will be prepared as part of the detailed decommissioning plan that will be completed by the Certificate Holder and approved by EFSEC prior to decommissioning.

4.4 REVEGETATION

The Certificate Holder will be responsible for the revegetation of the site. If the landowner chooses instead to plant crops on the site, rather than returning it to grazing land, as it was pre-project, then crop selection and planting will be the responsibility of the landowner. Regardless, the site will either be revegetation or replanted within twelve months of decommissioning.

In all areas, restoration will include, as reasonably required, mulching, and other necessary steps to prevent soil erosion, to ensure establishment of vegetation, and to control noxious weeds. Reseeding shall continue until the disturbed areas has been fully reseeded and reclaimed.

4.5 MONITORING

Prior to commencement of decommissioning and site restoration the project's biologist will coordinate with EFSEC on site-specific monitoring of the revegetated area. Specific site restoration success criteria and monitoring protocols will be included in the Detailed Site Restoration Plan completed by the Certificate Holder and approved by EFSEC prior to decommissioning.

4.6 CRITERIA FOR RESTORATION

According to Article VIII.A, success criteria for site restoration will be established prior to commencement of decommissioning activities, based on the documented preconstruction conditions, experience gained with revegetation during operation, and the condition of the site at the time of decommissioning. The restoration success criteria will be established in the restoration plan submitted with the removal work plan and schedule to EFSEC in consultation with the designated biologist.

4.7 REPORTING AND SCHEDULE

Acceptable levels of revegetation success and the schedule for achieving them could vary based on various factors such as soil, rainfall conditions, and farming operations. The revegetation success and scheduling of success monitoring efforts will be determined to the satisfaction of EFSEC and the designated biologist, with

the cooperation of the landowner. The annual reports submitted to EFSEC of the project site will include copies of completed site review forms and a summary of monitoring data and results, and identification of site locations successfully revegetated.

Once restoration of the project site is determined to be complete, a final report of restoration activities and results will be submitted to EFSEC, in consultation with the designated biologist, for review and approval.

5.0 MITIGATION MEASURES

During project decommissioning and site restoration the Certificate Holder shall implement the mitigation measures set forth in the SCA, including, but not limited to those presented in Section 2.A.5 of the Revised Application for Site Certificate, those identified in the Final State Environmental Policy Act Environmental Checklist as commitments made by the Certificate Holder, and those presented in the Revised MDNS, as applicable. The mitigation measures likely to be applicable during project decommissioning and site restoration are summarized in Appendix A.

6.0 REFERENCES

ESFEC (Washington Energy Facility Site Evaluation Council). 2021a. Site Certification Agreement Between the State of Washington and OER WA Solar 1, LLC for the Goose Prairie Solar Project, Yakima County, Washington. Executed December 20, 2021. Olympia, Washington

APPENDIX A

MITIGATION MEASURE SUMMARY FROM THE REVISED APPLICATION FOR SITE
CERTIFICATE, SECTION 2.A.5

2.A.5. Mitigation Measure Summary

Mitigation Measure	Description	Expert agency participation
Earth		
Implementation of Geotechnical Recommendations	The Certification Holder would follow all geotechnical recommendations provided by GN Northern in section 14 of the Geotechnical Site Investigation and Critical Areas/Geohazards Report.	GN Northern, Inc.
Best Management Practices - Erosion	<p>The Certificate Holder would implement an Erosion and Sediment Control Plan (ESCP) and a Construction Phase Stormwater Pollution Prevention Plan (SWPPP) and Operations Phase SWPPP. These plans would address stormwater runoff, flooding, and erosion to assure compliance with state and federal water quality standards. The ESCP would include Best Management Practices (BMPs) such as the appropriate use of silt fencing to avoid or eliminate runoff of contaminants. The SWPPP would include BMPs from the Department of Ecology's Stormwater Management Manual for Eastern Washington.</p> <p>The Vegetation and Weed Management Plan would be implemented to revegetate temporarily impacted areas and minimize erosion.</p>	Ecology

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Mitigation Measure	Description	Expert agency participation
Air Quality		
Best Management Practices - Air Quality	<p>Washington Administrative Codes (WAC) addressing air quality include:</p> <ul style="list-style-type: none"> • WAC 173-400-040(3) Fallout. • WAC 173-400-040(4–4a) Fugitive emissions. • WAC 173-400-040(5) Odors. • WAC 173-400-040(9)(a) Fugitive Dust. • WAC 463-62-070 Air quality. <p>To adhere to these codes, the Facility would implement BMPs and standard construction practices, including the following:</p> <ul style="list-style-type: none"> • Graveling, watering or other fugitive dust-abatement measures would be used as needed to control fugitive dust generated during construction. When applied, the Certificate Holder would use water or a water-based environmentally safe dust palliative such as lignin for dust control. • 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 would be implemented. • 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. 	N/A

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Water Quality—Stormwater Runoff		
Construction Stormwater General Permit	In compliance with WAC 173-200, the Certificate Holder would obtain a Construction Stormwater General Permit (CSWGP) from EFSEC and Ecology. The CSWGP requires an Erosion and Sediment Control Plan (ESCP) and a SWPPP. Additionally, the Certificate Holder would provide Yakima County with a Stormwater Plan in compliance with Yakima County Code (YCC) 12.10.210.	EFSEC, Ecology
Best Management Practices - Stormwater	<p>The ESCP and SWPPPs would address stormwater runoff, flooding, and erosion to assure compliance with state and federal water quality standards. The ESCP would include BMPs such as the appropriate use of silt fencing to avoid or eliminate runoff of contaminants. The SWPPPs would include BMPs from the Department of Ecology's Stormwater Management Manual for Eastern Washington.</p> <p>The Vegetation and Weed Management Plan would be implemented to revegetate temporarily impacted areas and minimize erosion.</p>	Ecology
Preventative procedures to avoid spills	<p>Substantial quantities of oils, fuels, and other potential contaminants are not expected to be stored on-site during construction or operation. The Certificate Holder would prepare a Construction Phase Spill Prevention, Control, and Countermeasures (SPCC) Plan, consistent with requirements of 40 CFR Part 112, to prevent spills during construction and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures would address/prevent potential water quality issues.</p> <p>The Certificate Holder would also prepare an Operations Phase SPCC Plan in consultation with Ecology and pursuant to the requirements of CFR Part 112, Sections 311 and 402 of the Clean Water Act, Section 402 (a)(1) of the Federal Water Pollution Control Act, and RCW 90.48.080. The Operations Phase SPCC Plan would be updated, as needed, to address activities occurring during decommissioning and site restoration.</p>	N/A

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Plants		
Best Management Practices - Special Status Plant	<p>During construction, existing trees, vegetation, and wildlife habitat would be protected and preserved to the extent practical.</p> <p>The Certificate Holder would implement the Vegetation and Weed Management Plan. Noxious weeds would be controlled in compliance with RCW 17.10.140. All herbicide and pesticide applications would be conducted in accordance with manufacturer instructions and all federal, state, and local laws and regulations; herbicides and pesticides would only be directly applied to localized spots and would not be applied by broadcasting techniques (RCW 17.21). Additionally, any new gravel needed for decommissioning or site restoration would be procured from a certified weed-free source.</p> <p>The Certificate Holder would implement the Construction Stormwater Pollution Prevention Plan (SWPPP) and Operations SWPPP to reduce erosion. The SWPPP would be updated to address decommissioning and site restoration activities, as needed.</p>	WDFW

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Wildlife		
Best Management Practices - Wildlife and Habitat	<p>During decommissioning and site restoration activities unnecessary lighting would be turned off at night to limit attraction of migratory birds. This includes downward-directed lighting to minimize horizontal or skyward illumination, and avoidance of steady-burning, high-intensity lights (WAC-20-040).</p> <p>Noxious weeds would be controlled in compliance with RCW 17.10.140 and the Vegetation and Weed Management Plan (Attachment D). All herbicide and pesticide applications would be conducted in accordance with manufacturer instructions and all federal, state, and local laws and regulations; herbicides and pesticides would only be directly applied to localized spots and would not be applied by broadcasting techniques (RCW 17.21).</p> <p>Decommissioning activities would only occur between the hours of 7 am and 10 pm in accordance with WAC 173-60-050 which would limit the impacts of construction noise to wildlife.</p> <p>Prior to decommissioning activities, all supervisory construction personnel would be instructed on wildlife resource protection measures, including: 1) applicable federal and state laws (e.g., those that prohibit animal collection or removal); and 2) the importance of these resources and the purpose and necessity of protecting the resources, and ensuring this information is disseminated to applicable contractor personnel, including the correct reporting procedures. Construction personnel would be trained in the following areas when appropriate: awareness of sensitive habitats and bird species, potential bird nesting areas, potential bat roosting/breeding habitat, and general wildlife issues.</p> <p>Appropriate stormwater management practices in accordance with the SWPPPs that do not create attractions for birds and bats would be implemented.</p> <p>The Certificate Holder would update the Erosion and Sediment Control Plan (ESCP), as needed, to address decommissioning and site restoration activities, which would include BMPs to minimize surface water runoff and soil erosion.</p>	WDFW

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	<p>The Certificate Holder would update the Spill Prevention, Control and Countermeasures (SPCC) Plans, as needed to address decommissioning and site restoration activities, to reduce the likelihood of an accidental release of a hazardous or regulated liquid and, in the event such a release occurs, to expedite the response to and remediation of the release.</p> <p>Vehicle speeds would be limited to 25 mph to avoid wildlife collisions.</p> <p>Fire hazards from vehicles and human activities would be reduced (e.g., use of spark arrestors on power equipment, avoiding driving vehicles off roads, allowing smoking in designated areas only; WAC 463-60-352). The Certificate Holder would prepare Fire Control Plans in consultation with the Yakima County Fire Marshal and the East Valley Fire Department.</p> <p>Following decommissioning, reclamation of the Facility Area shall begin as quickly as possible to reduce the likelihood of ecological resource impacts in disturbed areas.</p>	
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Environmental Health—Hazardous Materials		
Emergency Plans	<p>The Certificate Holder would develop a set of emergency plans including 1) a Construction Phase Emergency Plan, 2) a Construction Phase Fire Control Plan, 3) a Construction Phase Health and Safety Plan, 4) an Operations Phase Emergency Plan, 5) an Operations Phase Fire Control Plan, and 6) an Operations Phase Health and Safety Plan.</p> <p>These plans will be adhered to during decommissioning and site preparation activities.</p>	<p>Yakima County Sheriff's Office</p> <p>East Valley Fire Department - Yakima County Fire District #4.</p> <p>Yakima County Fire Marshal's Office</p>
Best Management Practices - Fire Prevention	<p>To minimize the risk of fire or explosions, the Facility would implement Best Management Practices including:</p> <ul style="list-style-type: none"> • Construction equipment would have spark-arresting mufflers, heat shields, and other protection measures to avoid starting fires. • Fire extinguishers would be available in vehicles and on equipment and work crews would be trained in fire avoidance and response measures. • During construction, water would be trucked on site and would be available for fire suppression should a fire occur. During operation, the Facility's proposed domestic water well would be accessible by standard firefighting equipment and provide adequate water for the potential need of the Facility. <p>Additionally, the Certificate Holder would provide training to fire responders and construction staff on a recurring basis during the life of the Facility. The intent of the training would be to familiarize both responders and workers with the codes, regulations, associated hazards, and mitigation processes related to solar electricity and battery storage systems. This training also would include techniques for fire suppression of photovoltaic (PV) and Battery Energy Storage System technology.</p>	East Valley Fire Department

Goose Prairie Solar, LLC

Use of approved herbicides	In compliance with RCW 17.10.140, the Certificate Holder would only use herbicides that are approved for use in the state of Washington by the Environmental Protection Agency and the Washington State Department of Agriculture.	Yakima County Noxious Weed Control Board
Noise, Light, Glare and Aesthetics		
Best Management Practices - Noise	<p>WAC 173.60.050 exempts temporary construction noise from the state noise limits; however, some BMPs were considered to reduce off-site construction noise impacts.</p> <p>Since construction equipment operates intermittently, and the types of machines in use at the Facility change with the stage of construction, noise emitted during construction would be mobile and highly variable, making it challenging to control. The construction management protocols would include the following noise mitigation measures to minimize noise impacts:</p> <ul style="list-style-type: none"> • Maintain all construction tools and equipment in good operating order according to manufacturers' specifications; • Limit use of major excavating and earth-moving machinery to daytime hours (7am-6pm), which will be set in the construction contracts and enforced by the general contractor; • To the extent practicable, schedule construction activity during normal working hours on weekdays when higher sound levels are typically present and are found acceptable; • Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks; • For construction devices that utilize internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible; • Limit possible evening shift work (6pm-10pm) to low noise activities such as welding, wire pulling, and 	N/A

	<p>other similar activities, together with appropriate material handling equipment. No construction work will occur between the hours of 10pm and 7am; and</p> <ul style="list-style-type: none"> Utilize a complaint resolution procedure to address any noise complaints received from residents. 	
Archaeological and Historical Resources, Cultural Resources		
Avoidance of protected sites and/or DAHP permits	<p>The Facility has been designed to avoid direct impacts to all cultural resources that are eligible for listing on the National Register of Historic Places or protected by RCW 27.53 when feasible. As currently designed, the Facility has no direct impacts to such resources. However, as the design progresses, the Facility layout may be changed such that impacts to the resources that are protected by RCW 27.53 are created. Site 45YA01808 in particular may be impacted by the Facility.</p> <p>The Certificate Holder would continue to communicate with the Yakama Nation regarding the archaeological sites and the potential impacts of the Facility on these sites.</p> <p>If any site protected by RCW 27.53 is impacted by the Facility, the Certificate Holder would obtain a DAHP excavation permit and perform all necessary archaeological work in order to comply with RCW 27.53.</p>	DAHP; Yakama Nation
Unanticipated Discovery Plan	<p>In the event unrecorded archaeological resources are identified during Facility construction or operation, work within 30 meters (100 feet) of the find would be halted and directed away from the discovery until it can be assessed in accordance with steps in the Unanticipated Discovery Plan provided as Appendix G of King et al. (2020) (Attachment H). The plan is in accordance with RCW 27.53.060 and RCW 27.44.040 protecting archaeological resources and Indian graves.</p>	DAHP; Yakama Nation
Ongoing Communication with Yakama Nation	<p>The Certificate Holder would continue to coordinate with the Yakama Nation regarding final design in relation to pre-contact archaeological sites. and continue to communicate with the Yakama Nation regarding tribal resources that may be affected by the Facility.</p>	Yakama Nation

Traffic and Transportation		
WSDOT Permits	<p>Per WAC 468-51, the Certificate Holder will obtain a General Permit from WSDOT to upgrade the portion of the approach off State Route 24 that is within the WSDOT Right-of-Way.</p> <p>A permit would be obtained for heavy or oversized loads in accordance with WSDOT regulations including RCW 46.44 and WAC 468-38.</p>	WSDOT
Traffic Control Plan	<p>A Traffic Control Plan would be prepared in consultation with WSDOT for traffic management during improvement of highway access. This plan would contain measures to facilitate safe movement of vehicles in the vicinity of the construction zone and would be in accordance with 23 CFR §655 Subpart F provides for the Federal Highway Administration to maintain the Manual on Uniform Traffic Control Devices for Streets and Highways, which defines standards for traffic control</p>	WSDOT

APPENDIX B

APPLICABLE REQUIREMENTS FROM THE SITE CERTIFICATION AGREEMENT FOR THE GOOSE PRAIRIE SOLAR PROJECT

Article III: General Conditions**Article III.H. Site Restoration**

The Certificate Holder is responsible for site restoration pursuant to the Council's rules, WAC 463-72, in effect at the time of submittal of the Application.

The Certificate Holder shall develop an Initial Site Restoration Plan in accordance with the requirements set out in Article IV.F of this Agreement and submit it to EFSEC for approval. The Certificate Holder may not begin Site Preparation or Construction until the Council has approved the Initial Site Restoration Plan, including the posting of all necessary guarantees, securities, or funds associated therewith.

The Certificate Holder shall submit a detailed site restoration plan to EFSEC for approval prior to decommissioning in accordance with the requirements of Article VIII.A of this Agreement.

Article IV: Plans, Approvals and Actions Required Prior to Construction**Article IV.F. Initial Site Restoration Plan**

The Certificate Holder is responsible for Project decommissioning and site restoration pursuant to Council rules. The Certificate Holder shall develop an Initial Site Restoration Plan in consultation with EFSEC staff pursuant to the requirements of WAC 463-72-040 in effect on the date of Application. The objective of the Plan shall be to restore the Project Site to approximate pre-Project condition or better.

The Initial Site Restoration Plan shall be prepared in detail commensurate with the time until site restoration is to begin. The scope of proposed monitoring shall be addressed in the Initial Site Restoration Plan.

The Plan shall include the following elements:

1. A detailed engineering estimate of the costs of the Certificate Holder or Transferee hiring a third party to carry out Site Restoration. The estimate may not be reduced for "net present value" or other adjustments
2. Decommissioning Timing and Scope, as required by Article VIII.C of this Agreement.
3. Decommissioning Funding and Surety, as required by Article VIII.D of this Agreement.
4. Mitigation measures described in the Revised Application and this Agreement.
5. A plan that addresses both the possibility that site restoration will occur prior to, or at the end of, the useful life of the Project and also the possibility of the Project being suspended or terminated during construction.
6. A description of the assumptions underlying the plan. For example, the plan should explain the anticipated useful life of the Project, the anticipated time frame of site restoration, and the anticipated future use of the Project Site.
7. An initial plan for demolishing facilities, salvaging equipment, and disposing of waste materials.
8. Performing an on-site audit and preparing an initial plan for disposing of hazardous materials (if any) present on the site and remediation of hazardous contamination (if any) at the site. In particular, if the Certificate Holder constructs the Project with solar panels incorporating hazardous materials, such as Cadmium Telluride, then the Certificate Holder shall use appropriate precautions during

decommissioning and removal of the solar panels to safely dispose of and to avoid, and, if necessary, remediate any soil contamination resulting from the panels' hazardous materials.

9. An initial plan for restoring the Project Site, including the removal of structures and foundations to four feet below grade and the restoration of disturbed soils.
10. Provisions for preservation or removal of Project facilities if the Project is suspended or terminated during construction.

Article VIII: Project Termination, Decommissioning and Site Restoration

Article VIII.A. Detailed Site Restoration Plan

The Certificate Holder shall submit a Detailed Site Restoration Plan to EFSEC for approval within ninety (90) days from the time the Council is notified of the termination of the Project. The Detailed Site Restoration Plan shall provide for restoration of the Project Site within the timeframe specified in Article VIII.C, taking into account the Initial Site Restoration Plan and the anticipated future use of the Project Site. The Detailed Site Restoration Plan shall address the elements required to be addressed by WAC 463-72-020, and the requirements of the Council approved Initial Site Restoration Plan pursuant to Article IV.F of this Agreement. The Certificate Holder shall not begin Site Restoration activities without prior approval from the Council. The Certificate Holder shall consult with WDFW, and Ecology in preparation of the Detailed Site Restoration Plan.

Article VIII.B. Project Termination

1. Termination of this Site Certification Agreement, except pursuant to its own terms, is an amendment of this Agreement.
2. The Certificate Holder shall notify EFSEC of its intent to terminate the Project, including by concluding the plant's operations, or by suspending construction and abandoning the Project.
3. The Council may terminate the SCA through the process described in WAC 463-66-090, and the Council may initiate that process where it has objective evidence that a certificate may be abandoned or when it deems such action to be necessary, including at the conclusion of the plant's operating life, or in the event the Project is suspended or abandoned during construction or before it has completed its useful operating life.

Article VIII.C. Site Restoration Timing and Scope

Site Restoration shall be conducted in accordance with the commitments made in the Detailed Site Restoration Plan required by Article VIII.A and in accordance with the following measures:

1. Timing. The Certificate Holder shall commence Site Restoration of the Project within twelve (12) months following the termination described in Article VIII.B above.

The period to perform the Site Restoration may be extended if there is a delay caused by conditions beyond the control of the Certificate Holder including, but not limited to, inclement weather conditions, equipment failure, wildlife considerations, or the availability of cranes or equipment to support decommissioning.

2. Scope. Site Restoration shall involve removal of the solar panels and mounting structures; removal of foundations or other Project facilities to a depth of four (4) feet below grade; restoration of any disturbed soil to pre-construction condition; and removal of Project access roads and overhead poles and transmission lines

(except for any roads and/or overhead infrastructure that Facility Area landowner wishes to retain) (all of which shall comprise “Site Restoration”). Site Restoration shall also include the use of appropriate precautions during decommissioning and removal of any hazardous material to safely dispose of and to avoid, and, if necessary, remediate any soil contamination resulting from the hazardous materials.

3. Monthly Reports. If requested by EFSEC, the Certificate Holder shall provide monthly status reports until this Site Restoration work is completed.

4. Restoration Oversight. At the time of Site Restoration, the Project Site will be evaluated by a qualified biologist to determine the extent of and type of vegetation existing on the site. Success criteria for Site Restoration will be established prior to commencement of decommissioning activities, based on the documented preconstruction conditions, experience gained with re-vegetation during operation and the condition of the Project Site at the time of Site Restoration. The restoration success criteria will be established in the Detailed Site Restoration Plan approved by EFSEC in consultation with the designated biologist. Once restoration of the Project Site is determined to be complete, a final report of restoration activities and results will be submitted to EFSEC in consultation with the designated biologist, for review and approval.

Article VIII.D. Site Restoration Financial Assurance

1. Except as provided in Article VIII.D.3 below, the Certificate Holder or any Transferee, as the case may be, shall provide financial assurance sufficient, based on detailed engineering estimates, for required Site Restoration costs in the form of a surety bond, irrevocable letter of credit, or guaranty. The Certificate Holder shall include a detailed engineering estimate of the cost of Site Restoration in its Initial Site Restoration Plan submitted to EFSEC. The estimate must be based on the costs of the Certificate Holder or Transferee hiring a third party to carry out Site Restoration. The estimate may not be reduced for “net present value” or other adjustments. During the active life of the facility, the Certificate Holder or Transferee must adjust the Site Restoration cost estimate for inflation within sixty days prior to the anniversary date of the establishment of the financial instrument used to provide financial assurance and must increase the financial assurance amount accordingly to ensure sufficient funds for Site Restoration.
2. The duty to provide such financial assurance shall commence sixty (60) days prior to the beginning of Construction of the Project and shall be continuously maintained through to the completion of Site Restoration. Construction of the Project shall not commence until adequate financial assurance is provided. On or before the date on which financial assurance must be established, the Certificate Holder shall provide EFSEC with one of the following financial assurance mechanisms that is reasonably acceptable to EFSEC:
 - i. Surety Bond. The Certificate Holder or any Transferee, as the case may be, shall provide financial security for the performance of its Site Restoration obligations through a Surety Bond issued by a surety listed as acceptable in Circular 570 of the U.S. Department of the Treasury. The Performance Bond shall be in an amount equal to the Site Restoration costs. A standby trust fund for Site Restoration shall also be established by the Certificate Holder or Transferee to receive any funds that may be paid by the surety to be used to complete Site Restoration. The surety shall become liable for the bond obligation if the

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- Certificate Holder or Transferee fails to perform as guaranteed by the bond. The surety may not cancel the bond until at least one hundred twenty days after the Certificate Holder or Transferee and EFSEC have received notice of cancellation. If the Certificate Holder or Transferee has not provided alternate financial assurance acceptable under this SCA within ninety days of the cancellation notice, the surety shall pay the amount of the bond into the standby Site Restoration trust; or
- ii. Irrevocable Letter of Credit. The Certificate Holder or any Transferee, as the case may be, shall provide financial security for the performance of its Site Restoration obligations through an irrevocable letter of credit payable to or at the direction of EFSEC, that is issued by an institution that has the authority to issue letters of credit and whose letter of credit operations are regulated and examined by a Federal or State agency. The letter of credit shall be in an amount equal to the Site Restoration costs. A standby trust fund for Site Restoration shall also be established by Certificate Holder or Transferee to receive any funds deposited by the issuing institution resulting from a draw on the letter of credit. The letter of credit shall be irrevocable and issued for a period of at least one year, and renewed annually, unless the issuing institution notifies the Certificate Holder or Transferee and EFSEC at least one hundred twenty days before the current expiration date. If the Certificate Holder or Transferee fails to perform Site Restoration, or if the Certificate Holder or Transferee fails to provide alternate financial assurance acceptable to EFSEC within ninety days after notification that the letter of credit will not be extended, EFSEC may require that the financial institution provide the funds from the letter of credit to be used to complete Site Restoration; or
 - iii. Guaranty. Certificate Holder or any Transferee, as the case may be, shall provide financial assurance for the performance of its Site Restoration obligations by delivering a guaranty to fund the Certificate Holder or Transferee's Site Restoration obligations hereunder from an entity that meets the following financial criteria:
 - i. A current rating of AAA, AA, A, or BBB as issued by Standard and Poor's or Aaa, Aa, A, or Baa as issued by Moody's;
 - ii. Tangible net worth at least six times the sum of the current Site Restoration cost estimates;
 - iii. Tangible net worth of at least ten million dollars; and
 - iv. Assets in the United States amounting to at least ninety percent of its total assets or at least six times the sum of the current Site Restoration cost estimates.

The guarantor entity's chief financial officer shall provide a corporate guaranty that the corporation passes the financial test at the time the Initial Site Restoration Plan is filed. This corporate guaranty shall be reconfirmed annually ninety days after the end of the corporation's fiscal year by submitting to EFSEC a letter signed by the guaranteeing entity's chief financial officer that:

- i. Provides the information necessary to document that the entity passes the financial test;
- ii. Guarantees that the funds to finance required Site Restoration activities are available;

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- iii. Guarantees that required Site Restoration activities will be completed;
 - iv. Guarantees that within thirty days if written notification is received from EFSEC that the entity no longer meets the above financial criteria, the entity shall provide an alternative form of financial assurance consistent with the requirements of this section;
 - v. Guarantees that the entity's chief financial officer will notify in writing the Certificate Holder or Transferee and EFSEC within fifteen days any time that the entity no longer meets the above financial criteria or is named as debtor in a voluntary or involuntary proceeding under Title 11 U.S.C., Bankruptcy;
 - vi. Acknowledges that the corporate guaranty is a binding obligation on the corporation and that the chief financial officer has the authority to bind the corporation to the guaranty;
 - vii. Attaches a copy of the independent certified public accountant's report on examination of the entity's financial statements for the latest completed fiscal year; and
 - viii. Attaches a special report from the entity's independent certified public accountant (CPA) stating that the CPA has reviewed the information in the letter from the entity's chief financial officer and has determined that the information is true and accurate.

If the Certificate Holder or any Transferee fails to perform Site Restoration covered by the guaranty in accordance with the approved Initial or Final Site Restoration plan, the guarantor will be required to complete the appropriate activities. The guaranty will remain in force unless the guarantor sends notice of cancellation by certified mail to the Certificate Holder or Transferee and EFSEC. Cancellation may not occur, however, during the one hundred twenty days beginning on the date of receipt of the notice of cancellation by the Certificate Holder or Transferee and EFSEC. If the Certificate Holder or Transferee fails to provide alternate financial assurance as specified in this section and obtain the written approval of such alternate assurance from EFSEC within ninety days after receipt of a notice of cancellation of the guaranty from the guarantor, the guarantor will provide such alternative financial assurance in the name of the Certificate Holder or Transferee.

3. If the SCA is transferred after its effective date pursuant to applicable EFSEC laws and regulations, EFSEC has the right to require, consider, and approve other financial security that would provide for the Certificate Holder's performance of its Site Restoration obligations pursuant to Articles VIII.C and VIII.D of this Site Certification Agreement.

APPENDIX C

COST ESTIMATE OF DECOMMISSIONING AND SITE RESTORATION

Goose Prairie Solar, LLC

Cost estimates for decommissioning and site restoration for the Goose Prairie Solar site is included in Attachments C-1 and C-2.

Decommissioning of the Facility was broken into individual tasks that were each estimated separately. Each task includes labor requirements, equipment needs, and duration. Production rates were established using professional experience and published standards that include RS Means (www.rsmeans.com). Labor rates prevalent to the geographic area of the Facility were obtained by referencing United States Department of Labor wage determinations. Typical average markups that are industry standard were applied for contingency, overhead, and fee. Detailed cost estimates are outlined below in Attachment C-1, and a Decommissioning Estimate Summary can be found in Attachment C-2.

As summarized in the table above, the estimated cost of decommissioning the Project including the scrap credit is \$3,790,352 in 2022 dollars. Alternatively, the estimated cost of decommissioning the Project excluding the scrap credit is approximately \$5,294,852 in 2022 dollars. The estimate is based on the overall site layout and experience preparing decommissioning plans and cost estimates on similar projects. Prior to any actual decommissioning of the Project, this estimate should be updated and revised to account for any technological evolutions and the as-built conditions of the Project to create the Final Estimate that is typically required to obtain the financial surety and decommissioning permits.

Estimating Methods and Assumptions

Estimating methods and assumptions specific to this estimate are as follows:

- Labor costs are developed by reviewing United States Department of Labor wage determinations and rates published by RS Means. An average rate is developed that includes base wage, fringe, and payroll tax liability. The final rate used in the estimate is an average of 40 hours standard time and 10 hours overtime per week, assuming a 50-hour work week for the duration of decommissioning.
- Equipment (commonly referred to as yellow iron) rates used in the estimate are developed by reviewing rates published by RS Means and historical vendor quotes. Rates include fuel, maintenance, and wear and tear of ground engaging components. Rates assume the use of rented equipment.
- Mobilization and demobilization costs are estimated to be approximately 15% of the overall contractor's costs. These reflect the actual costs to mobilize equipment, facilities, and crew to the Facility Site. This amount does not include the front loading of cost from other tasks.
- Work was estimated on a unit cost basis and priced by task, following the progression of work from start to finish. Unit costs were developed by including the labor, equipment, and production rate required for each individual task. RS Means and estimator's experience were used to establish the crew, equipment, and production for each individual task.
- Roads will be restored so that they become a part of the natural surroundings and are no longer recognizable to the furthest extent possible. Road gravel will be used to backfill foundation locations to within 6 inches of final grade. It is expected that the remaining road gravel will be

accepted by local receivers with no additional disposal cost. Roads that existed on private land prior to installation of the Facility, if any, will be restored at the request of the current landowner.

- All concrete foundations will be fully removed or to a depth of 4 feet below grade whichever is more cost effective at the time of removal. Gravel from road removal will be used as backfill to bring the top of grade to within 6 inches of final grade and then completed with an additional 6 inches of topsoil.
- Concrete foundation removal will be accomplished using excavators with concrete breakers.
- Processed concrete will be transported off site under the same assumptions as road gravel.
- Oil from transformers will be drained prior to removal, and the oil disposed of following state and federal regulations. Oil disposal cost was assumed to be \$4 per gallon.
- Transmission Gen-Tie line and towers are assumed to be steel and will be processed on site and shipped as scrap.
- Final restoration will include the placement of 6 inches of topsoil on all disturbed areas, with a final seeding. It is assumed that 50% of the topsoil required for restoration is available on site because of the original installation.
- The costs for temporary facilities were included in the restoration cost. These include one office trailer, two Conex storage units, portable toilets, first aid supplies, and all necessary utilities.
- Field management during construction activities was added to the estimate. These costs include one superintendent, one health and safety representative, and two field engineers. These positions are critical to the safe and successful execution of work.
- The contractor's home office, project management, overhead, and fee can vary widely by contractor. As such, averages were developed for the estimate and added as a percentage of total cost. These include 5% for home office and project management and 13% for overhead and fee.
- Contractor contingency costs are not included.
- Other miscellaneous costs were approximated, including permits, engineering, signage, fencing, traffic control, utility disconnects, etc. In the context of the overall estimate, these are incidental costs that are covered in the estimate markups
- Costs for damages to public roads are not included in the decommissioning estimate. Transportation services requiring use of public roads would be performed by subcontractors. If the subcontractor causes damage to public roads because of their work on this Facility, they would be responsible for repair of any damages.

Goose Prairie Solar, LLC

Table C-1. Summary of decommissioning costs

CBS Position Code	Description	Forecast (T/O)	Quantity	Unit of Measure	Unit Cost	Total Cost (Forecast)
1	GOOSE PRARIE SOLAR RETIREMENT		1.00	Lump Sum	\$3,790,351.93	\$3,790,351.93
1.1	Equipment & Facilities Mob / Demob		1.00	Lump Sum	\$70,605.09	\$70,605.09
1.1.1	Equipment Mob		1.00	Lump Sum	\$40,600.00	\$40,600.00
1.1.2	Site Facilities		1.00	Lump Sum	\$2,200.00	\$2,200.00
1.1.3	Crew Mob & Site Setup		2.00	Day	\$6,951.27	\$13,902.54
1.1.4	Crew Demob & Site Cleanup		2.00	Day	\$6,951.27	\$13,902.54
1.2	Project Site Support		4.00	Month	\$55,790.18	\$223,160.73
1.2.1	Site Facilities		4.00	Month	\$1,305.00	\$5,220.00
1.2.2	Field Management		4.00	Month	\$54,485.18	\$217,940.73
1.3	Substation & T-Line Retirement		1.00	Lump Sum	\$261,389.45	\$261,389.45
1.3.1	Substation Retirement		1.00	Lump Sum	\$212,764.22	\$212,764.22
1.3.2	Transmission Line Retirement		1.00	Lump Sum	\$48,625.23	\$48,625.23
1.4	Inverter / Transformer Removal		23.00	Each	\$5,306.00	\$122,038.02
1.4.1	Disconnect Electrical		23.00	Each	\$1,085.59	\$24,968.53
1.4.2	Loadout Inverter & Transformer		23.00	Each	\$2,845.41	\$65,444.49
1.4.3	Trucking - Per Load		23.00	Each	\$1,375.00	\$31,625.00
1.5	Remove Foundations To Subgrade		23.00	Each	\$416.05	\$9,569.10
1.5.1	Excavate / Remove Foundation		345.00	Cubic Yard	\$15.71	\$5,421.01
1.5.2	Concrete Transport Offsite		345.00	Cubic Yard	\$12.02	\$4,148.08
1.6	Solar Array Retirement		1.00	Lump Sum	\$3,481,008.54	\$3,481,008.54
1.6.1	Fence Removal		31,588.00	Linear Feet	\$1.25	\$39,382.31
1.6.2	Solar Panel Removal & Disposal		193,200.00	Each	\$5.36	\$1,035,425.29
1.6.3	Solar Rack (Trackers) & Post Removal		7,431.00	Each	\$283.31	\$2,105,267.32
1.6.4	Above Grade Cable Removal		1,857,750.00	Linear Feet	\$0.16	\$300,933.63
1.7	Site Restoration - Partial Site Seeding		1.00	Lump Sum	\$294,809.65	\$294,809.65
1.7.1	Strip & Decomact Roads		45,095.00	Linear Feet	\$1.43	\$64,316.30
1.7.2	Spot Grade Disturbed Areas		295.00	Acre	\$281.33	\$82,993.35
1.7.3	Re-Seed With Native Vegetation - Roads & Areas Disturbed By Construction		295.00	Acre	\$500.00	\$147,500.00
1.8	Contractor Markups		1.00	Lump Sum	\$832,271.35	\$832,271.35
1.8.1	Home Office, Project Management (5% Of Cost)		1.00	Lump Sum	\$223,129.05	\$223,129.05
1.8.2	Contractor OH & Fee (13% Of Cost)		1.00	Lump Sum	\$609,142.30	\$609,142.30
1.9	Scrap Metal Credit		1.00	Lump Sum	-\$1,504,500.00	-\$1,504,500.00
1.9.1	Scrap Credit - Substation		180.00	Ton	-\$250.00	-\$45,000.00
1.9.2	Scrap Credit - T-Line Structures		45.00	Ton	-\$250.00	-\$11,250.00
1.9.3	Scrap Credit - Fence		127.00	Ton	-\$250.00	-\$31,750.00
1.9.4	Scrap Credit - Inverters / Transformers		460.00	Ton	-\$250.00	-\$115,000.00
1.9.5	Scrap Credit - Module Rack		3,718.00	Ton	-\$250.00	-\$929,500.00
1.9.6	Scrap Credit - Cable		93.00	Ton	-\$4,000.00	-\$372,000.00

Goose Prairie Solar, LLC

Table C-2. Detailed Accounting of Decommissioning Costs

Estimate Summary**TETRA TECH EC, INC.****Job Code: Goose Prairie Solar****Description: Decommissioning Estimate**

Cost Item								
CBS Position Code	Quantity UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost	Total Cost
1	1.00 Lump Sum	GOOSE PRARIE SOLAR RETIREMENT	839.59	0.00	Detail	U.S. Dollar	3,790,351.93	3,790,351.93
1.1	1.00 Lump Sum	Equipment & Facilities Mob / Demob	4.00	0.25	Detail	U.S. Dollar	70,605.09	70,605.09
1.1.1	1.00 Lump Sum	Equipment Mob	0.00	0.00	Detail	U.S. Dollar	40,600.00	40,600.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UERNTRLG	Rental Equip Transp-Large		4.00 Each		U.S. Dollar		10,000.00	40,000.00
UERNTRSM	Rental Equip Transp-Small		4.00 Each		U.S. Dollar		150.00	600.00
1.1.2	1.00 Lump Sum	Site Facilities	0.00	0.00	Detail	U.S. Dollar	2,200.00	2,200.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UOCONMOB	Connex Box Mob		2.00 Each		U.S. Dollar		300.00	600.00
UOTRLTRN	Trailer Trnsp/Setup/Trdwn		2.00 Each		U.S. Dollar		800.00	1,600.00
1.1.3	2.00 Day	Crew Mob & Site Setup	2.00	1.00	Detail	U.S. Dollar	6,951.27	13,902.54
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	240.00	12.00 Each (hourly)		U.S. Dollar		40.69	9,765.48
L010101	OPERATOR	80.00	4.00 Each (hourly)		U.S. Dollar		51.71	4,137.07
1.1.4	2.00 Day	Crew Demob & Site Cleanup	2.00	1.00	Detail	U.S. Dollar	6,951.27	13,902.54
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	240.00	12.00 Each (hourly)		U.S. Dollar		40.69	9,765.48
L010101	OPERATOR	80.00	4.00 Each (hourly)		U.S. Dollar		51.71	4,137.07
1.2	4.00 Month	Project Site Support	88.00	0.05	Detail	U.S. Dollar	55,790.18	223,160.73
1.2.1	4.00 Month	Site Facilities	0.00	0.00	Detail	U.S. Dollar	1,305.00	5,220.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
URCONNEX	Connex Box		4.00 Month		U.S. Dollar		150.00	600.00
UROFFTRL	Office Trailer -12x60		4.00 Month		U.S. Dollar		500.00	2,000.00
UO1STAD	1st Aid Supplies		4.00 Month		U.S. Dollar		300.00	1,200.00
UOOFFSUP	Office Supplies(\$/prs/mo)		4.00 Month		U.S. Dollar		55.00	220.00
URPRTAJH	Port-a-John Unit(s) (4)		4.00 Month		U.S. Dollar		300.00	1,200.00
1.2.2	4.00 Month	Field Management	88.00	0.05	Detail	U.S. Dollar	54,485.18	217,940.73
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L90FXX02	Field - Proj Superintendent	880.00	1.00 Each (hourly)		U.S. Dollar		83.18	73,200.16
RPUTRK05	F-250 4X4 3/4 TON PICKUP	2,640.00	3.00 Each (hourly)		U.S. Dollar		11.88	31,363.20
L90FEL00	Field - Engr. Tech	880.00	1.00 Each (hourly)		U.S. Dollar		39.57	34,825.14
L90FXX03	Field - SHSO	880.00	1.00 Each (hourly)		U.S. Dollar		89.26	78,552.23
1.3	1.00 Lump Sum	Substation & T-Line Retirement	33.06	0.03	Detail	U.S. Dollar	261,389.45	261,389.45
1.3.1	1.00 Lump Sum	Substation Retirement	22.95	0.04	Detail	U.S. Dollar	212,764.22	212,764.22
1.3.1.1	1.00 Day	Fence Removal	1.00	1.00	Detail	U.S. Dollar	1,276.73	1,276.73
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L010101	OPERATOR	10.00	1.00 Each (hourly)		U.S. Dollar		51.71	517.13
L060100	GENERAL LABORER	10.00	1.00 Each (hourly)		U.S. Dollar		40.69	406.89
RBACKH09	Deere 710J BACKHOE, 1.62CY	10.00	1.00 Each (hourly)		U.S. Dollar		35.27	352.70
1.3.1.2	1.00 Each	Transformer Removal	6.00	0.17	Detail	U.S. Dollar	132,217.02	132,217.02

Cost Item								
CBS Position Code	Quantity UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost	Total Cost
1.3.1.2.1	1.00 Each	Oil Removal & Disposal	1.00	1.00	Detail	U.S. Dollar	97,388.79	97,388.79
1.3.1.2.1.1	1.00 Each	Oil Removal	1.00	1.00	Detail	U.S. Dollar	813.79	813.79
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	20.00	2.00 Each (hourly)		U.S. Dollar		40.69	813.79
1.3.1.2.1.2	14,000.00 Gallon	Oil Disposal	0.00	0.00	Detail	U.S. Dollar	6.80	95,200.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USDISPOSAL	Disposal Fee's		56,000.00 Each		U.S. Dollar		1.70	95,200.00
1.3.1.2.1.3	1.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	1,375.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USTRUCKING	Trucking Sub		1,375.00 Each		U.S. Dollar		1.00	1,375.00
1.3.1.2.2	1.00 Each	Dismantle & Loadout Transformer	5.00	0.20	Detail	U.S. Dollar	34,828.23	34,828.23
1.3.1.2.2.1	1.00 Each	Dismantle, Cut & Size	5.00	0.20	Detail	U.S. Dollar	29,328.23	29,328.23
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	200.00	4.00 Each (hourly)		U.S. Dollar		40.69	8,137.90
L010101	OPERATOR	100.00	2.00 Each (hourly)		U.S. Dollar		51.71	5,171.34
*REXCAV06A	Excav 100K w/ Bucket & Grapple	50.00	1.00 Each (hourly)		U.S. Dollar		129.71	6,485.50
*REXCAV06E	Excav 100K w/ Shear	50.00	1.00 Each (hourly)		U.S. Dollar		190.67	9,533.50
1.3.1.2.2.2	4.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	5,500.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USTRUCKING	Trucking Sub		5,500.00 Each		U.S. Dollar		1.00	5,500.00
1.3.1.3	1.00 Each	Remove Control Building & Switchgear	1.00	1.00	Detail	U.S. Dollar	4,971.13	4,971.13
1.3.1.3.1	1.00 Each	Demo	1.00	1.00	Detail	U.S. Dollar	2,221.13	2,221.13
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	10.00	1.00 Each (hourly)		U.S. Dollar		40.69	406.89
L010101	OPERATOR	10.00	1.00 Each (hourly)		U.S. Dollar		51.71	517.13
*REXCAV06A	Excav 100K w/ Bucket & Grapple	10.00	1.00 Each (hourly)		U.S. Dollar		129.71	1,297.10
1.3.1.3.2	2.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	2,750.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USTRUCKING	Trucking Sub		2,750.00 Each		U.S. Dollar		1.00	2,750.00
1.3.1.4	1.00 Day	UG Utility & Ground Removal	1.00	1.00	Detail	U.S. Dollar	1,276.73	1,276.73
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L010101	OPERATOR	10.00	1.00 Each (hourly)		U.S. Dollar		51.71	517.13
L060100	GENERAL LABORER	10.00	1.00 Each (hourly)		U.S. Dollar		40.69	406.89
RBACKH09	Deere 710J BACKHOE, 1.62CY	10.00	1.00 Each (hourly)		U.S. Dollar		35.27	352.70
1.3.1.5	500.00 Cubic Yard	Remove Foundations To Subgrade	6.79	73.68	Detail	U.S. Dollar	27.74	13,868.25
1.3.1.5.1	500.00 Cubic Yard	Excavate / Remove Foundation - Various Depth	1.79	280.00	Detail	U.S. Dollar	15.71	7,856.54

Cost Item								
CBS Position Code	Quantity UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost	Total Cost
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	17.86	1.00	Each (hourly)	U.S. Dollar		40.69	726.60
L010101	OPERATOR	35.71	2.00	Each (hourly)	U.S. Dollar		51.71	1,846.91
*REXCAV06C	Excav 100K w/ Hammer	17.86	1.00	Each (hourly)	U.S. Dollar		166.14	2,966.79
*REXCAV06A	Excav 100K w/ Bucket & Grapple	17.86	1.00	Each (hourly)	U.S. Dollar		129.71	2,316.25
1.3.1.5.2	500.00 Cubic Yard	Concrete Transport Offsite	5.00	100.00	Detail	U.S. Dollar	12.02	6,011.72
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
RDUTRK06	CAT D350D, 18CY-24CY	50.00	1.00	Each (hourly)	U.S. Dollar		76.71	3,835.50
L080940	TEAMSTER	50.00	1.00	Each (hourly)	U.S. Dollar		43.52	2,176.22
1.3.1.6	1.00 Lump Sum	Misc. Material Disposal	0.00	0.00	Detail	U.S. Dollar	1,885.00	1,885.00
1.3.1.6.1	1.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	1,375.00
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
USTRUCKING	Trucking Sub		1,375.00	Each	U.S. Dollar		1.00	1,375.00
1.3.1.6.2	10.00 Ton	Disposal Cost	0.00	0.00	Detail	U.S. Dollar	51.00	510.00
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
USDISPOSAL	Disposal Fee's		300.00	Each	U.S. Dollar		1.70	510.00
1.3.1.7	1.00 Lump Sum	Restore Yard	7.17	0.14	Detail	U.S. Dollar	57,269.36	57,269.36
1.3.1.7.1	1.00 Acre	Backfill / Regrade	0.50	2.00	Detail	U.S. Dollar	1,626.25	1,626.25
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
L060100	GENERAL LABORER	10.00	2.00	Each (hourly)	U.S. Dollar		40.69	406.89
L010101	OPERATOR	10.00	2.00	Each (hourly)	U.S. Dollar		51.71	517.13
REXCAV06B	Gradall - Excavator	5.00	1.00	Each (hourly)	U.S. Dollar		79.62	398.12
*RDOZER08	CAT D6 LGP Dozer	5.00	1.00	Each (hourly)	U.S. Dollar		60.82	304.10
1.3.1.7.2	2,000.00 Cubic Yard	Vegetative Cover	6.67	300.00	Detail	U.S. Dollar	27.57	55,143.11
1.3.1.7.2.1	2,000.00 Cubic Yard	Topsoil, Delivered	0.00	0.00	Detail	U.S. Dollar	20.00	40,000.00
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
IMSOIL	Topsoil		2,000.00	Cubic Yard	U.S. Dollar		20.00	40,000.00
1.3.1.7.2.2	2,000.00 Cubic Yard	Placement	6.67	300.00	Detail	U.S. Dollar	7.57	15,143.11
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
L010101	OPERATOR	133.33	2.00	Each (hourly)	U.S. Dollar		51.71	6,895.11
RDOZER08	CAT D6N XL	133.33	2.00	Each (hourly)	U.S. Dollar		61.86	8,248.00
1.3.1.7.3	1.00 Acre	Re-Seed With Native Vegetation	0.00	0.00	Detail	U.S. Dollar	500.00	500.00
Resource Code	Description	Hours	Quantity	UM	Currency		Unit Cost	Total Cost
USLANDSCAPE	Landscape Sub		1.00	Acre	U.S. Dollar		500.00	500.00
1.3.2	1.00 Lump Sum	Transmission Line Retirement	10.11	0.10	Detail	U.S. Dollar	48,625.23	48,625.23
1.3.2.1	5.00 Each	Structure Removal	5.00	1.00	Detail	U.S. Dollar	4,892.61	24,463.04
1.3.2.1.1	5.00 Each	Cut / Lower Structure	2.50	2.00	Detail	U.S. Dollar	1,830.06	9,150.28

Cost Item								
CBS Position Code	Quantity	UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost Total Cost
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
L060100	GENERAL LABORER	100.00	4.00	Each (hourly)	U.S. Dollar	40.69	4,068.95	
L010101	OPERATOR	25.00	1.00	Each (hourly)	U.S. Dollar	51.71	1,292.83	
*RXMISC14	MAN LIFT GAS 125ft	25.00	1.00	Each (hourly)	U.S. Dollar	54.88	1,372.00	
*RXMISC23	GROVE RT 200 TON	25.00	1.00	Each (hourly)	U.S. Dollar	96.66	2,416.50	
1.3.2.1.2	5.00 Each Cut / Size Structure & Loadout	2.50	2.00	Detail	U.S. Dollar	1,962.55	9,812.76	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
L060100	GENERAL LABORER	150.00	6.00	Each (hourly)	U.S. Dollar	40.69	6,103.42	
L010101	OPERATOR	25.00	1.00	Each (hourly)	U.S. Dollar	51.71	1,292.83	
*RXMISC23	GROVE RT 200 TON	25.00	1.00	Each (hourly)	U.S. Dollar	96.66	2,416.50	
1.3.2.1.3	4.00 Each Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	5,500.00	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
USTRUCKING	Trucking Sub		5,500.00	Each	U.S. Dollar	1.00	5,500.00	
Notes: ***** Assume 9 ton per steel structure and cable span *****								
1.3.2.2	5.00 Each Remove Foundations To Subgrade	5.11	0.98	Detail	U.S. Dollar	4,832.44	24,162.19	
1.3.2.2.1	5.00 Each Excavate / Remove Foundation - Various Depth	5.00	1.00	Detail	U.S. Dollar	4,806.56	24,032.78	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
L060100	GENERAL LABORER	100.00	2.00	Each (hourly)	U.S. Dollar	40.69	4,068.95	
L010101	OPERATOR	100.00	2.00	Each (hourly)	U.S. Dollar	51.71	5,171.34	
*REXCAV06C	Excav 100K w/ Hammer	50.00	1.00	Each (hourly)	U.S. Dollar	166.14	8,307.00	
*REXCAV06A	Excav 100K w/ Bucket & Grapple	50.00	1.00	Each (hourly)	U.S. Dollar	129.71	6,485.50	
1.3.2.2.2	8.07 Cubic Yard Concrete Transport Offsite	0.11	75.00	Detail	U.S. Dollar	16.03	129.41	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
RDUTRK06	CAT D350D, 18CY-24CY	1.08	1.00	Each (hourly)	U.S. Dollar	76.71	82.56	
L080940	TEAMSTER	1.08	1.00	Each (hourly)	U.S. Dollar	43.52	46.85	
1.4	23.00 Each Inverter / Transformer Removal	46.00	0.50	Detail	U.S. Dollar	5,306.00	122,038.02	
1.4.1	23.00 Each Disconnect Electrical	23.00	1.00	Detail	U.S. Dollar	1,085.59	24,968.53	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
L010110	ELECTRICIAN	230.00	1.00	Each (hourly)	U.S. Dollar	55.99	12,877.55	
L060100	GENERAL LABORER	230.00	1.00	Each (hourly)	U.S. Dollar	40.69	9,358.58	
RPUTRK05	F-250 4X4 3/4 TON PICKUP	230.00	1.00	Each (hourly)	U.S. Dollar	11.88	2,732.40	
1.4.2	23.00 Each Loadout Inverter & Transformer	23.00	1.00	Detail	U.S. Dollar	2,845.41	65,444.49	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
L060100	GENERAL LABORER	920.00	4.00	Each (hourly)	U.S. Dollar	40.69	37,434.32	
L010101	OPERATOR	230.00	1.00	Each (hourly)	U.S. Dollar	51.71	11,894.07	
RHYDCR06	GROVE RT880 73 TON	230.00	1.00	Each (hourly)	U.S. Dollar	70.07	16,116.10	
1.4.3	23.00 Each Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	31,625.00	
Resource Code	Description	Hours	Quantity	UM	Currency	Unit Cost	Total Cost	
USTRUCKING	Trucking Sub		31,625.00	Each	U.S. Dollar	1.00	31,625.00	
1.5	23.00 Each Remove Foundations To Subgrade	4.68	4.91	Detail	U.S. Dollar	416.05	9,569.10	

Cost Item								
CBS Position Code	Quantity UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost	Total Cost
<div>Notes: *****</div> <div>Assumption: 10.5 x37x1 concrete pad per inverter/ transformer</div> <div>*****</div>								
1.5.1	345.00 Cubic Yard	Excavate / Remove Foundation	1.23	280.00	Detail	U.S. Dollar	15.71	5,421.01
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
L060100	GENERAL LABORER	12.32	1.00 Each (hourly)	U.S. Dollar	40.69	501.35		
L010101	OPERATOR	24.64	2.00 Each (hourly)	U.S. Dollar	51.71	1,274.36		
*REXCAV06C	Excav 100K w/ Hammer	12.32	1.00 Each (hourly)	U.S. Dollar	166.14	2,047.08		
*REXCAV06A	Excav 100K w/ Bucket & Grapple	12.32	1.00 Each (hourly)	U.S. Dollar	129.71	1,598.21		
1.5.2	345.00 Cubic Yard	Concrete Transport Offsite	3.45	100.00	Detail	U.S. Dollar	12.02	4,148.08
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
RDUTRK06	CAT D350D, 18CY-24CY	34.50	1.00 Each (hourly)	U.S. Dollar	76.71	2,646.50		
L080940	TEAMSTER	34.50	1.00 Each (hourly)	U.S. Dollar	43.52	1,501.59		
1.6	1.00 Lump Sum	Solar Array Retirement	608.94	0.00	Detail	U.S. Dollar	3,481,008.54	3,481,008.54
1.6.1	31,588.00 Linear Feet	Fence Removal	6.16	5,124.80	Detail	U.S. Dollar	1.25	39,382.31
1.6.1.1	31,588.00 Linear Feet	Fence Removal	6.16	5,124.80	Detail	U.S. Dollar	0.99	31,132.31
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
L010101	OPERATOR	184.91	3.00 Each (hourly)	U.S. Dollar	51.71	9,562.45		
L060100	GENERAL LABORER	369.83	6.00 Each (hourly)	U.S. Dollar	40.69	15,047.99		
RBACKH09	Deere 710J BACKHOE, 1.62CY	184.91	3.00 Each (hourly)	U.S. Dollar	35.27	6,521.87		
1.6.1.2	6.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	8,250.00
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
USTRUCKING	Trucking Sub		8,250.00 Each	U.S. Dollar	1.00	8,250.00		
1.6.2	193,200.00 Each	Solar Panel Removal & Disposal	107.38	1,799.29	Detail	U.S. Dollar	5.36	1,035,425.29
1.6.2.1	193,200.00 Each	Solar Panel Removal	107.38	1,799.29	Detail	U.S. Dollar	1.77	342,324.29
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
RLIFTS05	JCB 508C, 8,000lbs FRKLFT	1,073.76	1.00 Each (hourly)	U.S. Dollar	22.96	24,653.43		
L010101	OPERATOR	1,073.76	1.00 Each (hourly)	U.S. Dollar	51.71	55,527.50		
L060100	GENERAL LABORER	6,442.53	6.00 Each (hourly)	U.S. Dollar	40.69	262,143.36		
<div>Notes: *****</div> <div>Assumed production: 30 panels per laborer per hour, includes packaging and preparing for shipment offsite.</div> <div>*****</div>								
1.6.2.2	275.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	378,125.00
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
USTRUCKING	Trucking Sub		378,125.00 Each	U.S. Dollar	1.00	378,125.00		
<div>Notes: *****</div> <div>Assumption: 45,000 lbs per load</div> <div>*****</div>								
1.6.2.3	6,176.00 Ton	Disposal Cost	0.00	0.00	Detail	U.S. Dollar	51.00	314,976.00
Resource Code	Description	Hours	Quantity UM	Currency	Unit Cost	Total Cost		
USDISPOSAL	Disposal Fee's		185,280.00 Each	U.S. Dollar	1.70	314,976.00		
<div>Notes: *****</div> <div>Assumption: 193,200 modules x 63.93 lbs each</div> <div>*****</div>								
1.6.3	7,431.00 Each	Solar Rack (Trackers) & Post Removal	371.55	20.00	Detail	U.S. Dollar	283.31	2,105,267.32

Cost Item								
CBS Position Code	Quantity UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost	Total Cost
1.6.3.1	7,431.00 Each	Solar Rack (Trackers) & Post Removal	371.55	20.00	Detail	U.S. Dollar	252.59	1,877,017.32
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
L010101	OPERATOR	7,431.00	2.00 Each (hourly)		U.S. Dollar		51.71	384,281.90
L060100	GENERAL LABORER	7,431.00	2.00 Each (hourly)		U.S. Dollar		40.69	302,363.53
*REXCAV06A	Excav 100K w/ Bucket & Grapple	3,715.50	1.00 Each (hourly)		U.S. Dollar		129.71	481,937.51
*REXCAV06E	Excav 100K w/ Shear	3,715.50	1.00 Each (hourly)		U.S. Dollar		190.67	708,434.39
Notes: ***** Assumed production: .5 hour per rack per crew. Crew to include 1 excavator w/shear, 1 excavator w/grapple, 2 operators and 2 laborers. Includes post removal and sizing of steel for sale as scrap, and loadout to haul trucks. Quantity assumption: 26 modules per rack assembly *****								
1.6.3.2	166.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	228,250.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USTRUCKING	Trucking Sub		228,250.00 Each		U.S. Dollar		1.00	228,250.00
Notes: ***** Assumption: 45,000 lbs per load *****								
1.6.4	1,857,750.00 Linear Feet	Above Grade Cable Removal	123.85	15,000.00	Detail	U.S. Dollar	0.16	300,933.63
1.6.4.1	1,857,750.00 Linear Feet	Remove Cable From Rack	123.85	15,000.00	Detail	U.S. Dollar	0.16	294,058.63
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
RLIFTS05	JCB 508C, 8,000lbs FRKLFT	1,238.50	1.00 Each (hourly)		U.S. Dollar		22.96	28,435.96
L010101	OPERATOR	1,238.50	1.00 Each (hourly)		U.S. Dollar		51.71	64,046.98
L060100	GENERAL LABORER	4,954.00	4.00 Each (hourly)		U.S. Dollar		40.69	201,575.68
Notes: ***** Assume .10 lbs per lf, 250 lf per rack *****								
1.6.4.2	5.00 Each	Trucking - Per Load	0.00	0.00	Detail	U.S. Dollar	1,375.00	6,875.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USTRUCKING	Trucking Sub		6,875.00 Each		U.S. Dollar		1.00	6,875.00
1.7	1.00 Lump Sum	Site Restoration - Partial Site Seeding	54.91	0.02	Detail	U.S. Dollar	294,809.65	294,809.65
1.7.1	45,095.00 Linear Feet	Strip & Decomact Roads	18.04	2,500.00	Detail	U.S. Dollar	1.43	64,316.30
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
*RDOZER08	CAT D6 LGP Dozer	360.76	2.00 Each (hourly)		U.S. Dollar		60.82	21,941.42
L010101	OPERATOR	541.14	3.00 Each (hourly)		U.S. Dollar		51.71	27,984.16
*RFELWH08C	CAT 980 LOADER	180.38	1.00 Each (hourly)		U.S. Dollar		79.78	14,390.72
Notes: ***** Decompaction to include discing and regrading Assume removed road base transported offsite at no charge *****								
1.7.2	295.00 Acre	Spot Grade Disturbed Areas	36.88	8.00	Detail	U.S. Dollar	281.33	82,993.35
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
*RDOZER08	CAT D6 LGP Dozer	737.50	2.00 Each (hourly)		U.S. Dollar		60.82	44,854.75
L010101	OPERATOR	737.50	2.00 Each (hourly)		U.S. Dollar		51.71	38,138.60
Notes: ***** Assumption: 590 acres total property area. Assume that 50% of the area disturbed by construction will be regraded. *****								

Cost Item								
CBS Position Code	Quantity UM	Description	Days	UM/Day	Cost Source	Currency	Unit Cost	Total Cost
1.7.3	295.00 Acre	Re-Seed With Native Vegetation - Roads & Areas Disturbed By Construction	0.00	0.00	Detail	U.S. Dollar	500.00	147,500.00
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USLANDSCAPE	Landscape Sub		295.00 Acre		U.S. Dollar		500.00	147,500.00
Notes: ***** Assumption: 590 acres total property area. Assume that 50% of the area disturbed by construction will be re-seeded. *****								
1.8	1.00 Lump Sum	Contractor Markups	0.00	0.00	Detail	U.S. Dollar	832,271.35	832,271.35
1.8.1	1.00 Lump Sum	Home Office, Project Management (5% Of Cost)	0.00	0.00	Detail	U.S. Dollar	223,129.05	223,129.05
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USMARKUP5	5% Markup		4,462,581.00 Each		U.S. Dollar		0.05	223,129.05
1.8.2	1.00 Lump Sum	Contractor OH & Fee (13% Of Cost)	0.00	0.00	Detail	U.S. Dollar	609,142.30	609,142.30
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
USMARKUP	13% Markup		4,685,710.00 Each		U.S. Dollar		0.13	609,142.30
1.9	1.00 Lump Sum	Scrap Metal Credit	0.00	0.00	Detail	U.S. Dollar	(1,504,500.00)	(1,504,500.00)
1.9.1	180.00 Ton	Scrap Credit - Substation	0.00	0.00	Detail	U.S. Dollar	(250.00)	(45,000.00)
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UODCFERROUS	Ferrous Metal Scrap		180.00 Ton		U.S. Dollar		(250.00)	(45,000.00)
1.9.2	45.00 Ton	Scrap Credit - T-Line Structures	0.00	0.00	Detail	U.S. Dollar	(250.00)	(11,250.00)
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UODCFERROUS	Ferrous Metal Scrap		45.00 Ton		U.S. Dollar		(250.00)	(11,250.00)
Notes: ***** Assume 9 ton per steel structure and cable span *****								
1.9.3	127.00 Ton	Scrap Credit - Fence	0.00	0.00	Detail	U.S. Dollar	(250.00)	(31,750.00)
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UODCFERROUS	Ferrous Metal Scrap		127.00 Ton		U.S. Dollar		(250.00)	(31,750.00)
Notes: ***** Assume 8 lbs per ft fence & posts *****								
1.9.4	460.00 Ton	Scrap Credit - Inverters / Transformers	0.00	0.00	Detail	U.S. Dollar	(250.00)	(115,000.00)
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UODCFERROUS	Ferrous Metal Scrap		460.00 Ton		U.S. Dollar		(250.00)	(115,000.00)
Notes: ***** Assume 20 ton per inverter / transformer *****								
1.9.5	3,718.00 Ton	Scrap Credit - Module Rack	0.00	0.00	Detail	U.S. Dollar	(250.00)	(929,500.00)
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UODCFERROUS	Ferrous Metal Scrap		3,718.00 Ton		U.S. Dollar		(250.00)	(929,500.00)
Notes: ***** Assume 1000 Lbs per rack w/ piles *****								
1.9.6	93.00 Ton	Scrap Credit - Cable	0.00	0.00	Detail	U.S. Dollar	(4,000.00)	(372,000.00)
Resource Code	Description	Hours	Quantity UM		Currency		Unit Cost	Total Cost
UODCCOP	Copper Scrap		93.00 Ton		U.S. Dollar		(4,000.00)	(372,000.00)

Cost Item								
CBS						Cost		
Position Code	Quantity	UM	Description	Days	UM/Day	Source	Currency	Total Cost
Notes: *****								
Assume .10 lbs per lf								

Report Total:				839.59			3,790,351.93	

Category	Total
Labor	1,701,405.73
Rented Equipment	1,448,643.84
Supplies	1,420.00
Materials	40,000.00
Subcontract	2,101,182.35
ODCs	2,200.00
Scrap Credit	(1,504,500.00)

APPENDIX D

PRE-CONSTRUCTION VEGETATION PHOTOGRAPHS

Goose Prairie Solar, LLC

These are representative photos of the site. Pre-construction photos of the site will be taken to serve as a baseline for site restoration activities. This plan will be updated with those photos once they are complete.



Badger Mountain Solar Energy Project

December 2022 and January 2023
project update

[Place holder]

Whistling Ridge Energy Project

December 2022 and January 2023
project update

[Place holder]

High Top and Ostrea Solar Project

December 2022 and January 2023
project update

[Place holder]

Wautoma Solar

December 2022 and January 2023 project update

[Place holder]

Hop Hill Solar Project

January 2023 project update

[Place holder]



Hop Hill Solar and Storage Project

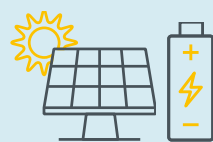
January 18th, 2023



BrightNight – A Renewable Power Solutions Company

BrightNight is a founder owned renewable independent power producer (IPP) focused on providing its customers and partners with differentiated solutions with a focus on safety, value, reliability and best-in-class execution

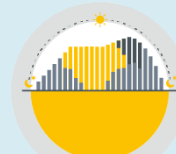
Differentiated customer solutions for renewable power
Operating under an integrated development & IPP model



Integrated solar & storage



Hybrid projects
(Complementary Resources)



Dispatchable Solutions

Well-capitalized with experienced partners



CORDELIO
POWER



CPP
INVESTMENT
BOARD



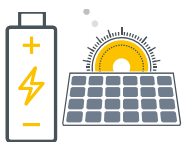
World-class team
Led by Martin Hermann



21 GW
project
portfolio



2 GW
project
portfolio



Renewable Dispatchable
Capacity

Meeting today's power demand
and sustainability goals



PowerAlpha

Our proprietary software provides a tailored analysis for customers to uncover the highest value project and to optimize asset management



Customer-centric

We learn about your goals and challenges to design a renewable solution not just a project



Single Point of Contact

Leading you through project design, contracting, development, operation, maintenance, and lifelong optimization

BrightNight's proprietary PowerAlpha™ enables differentiated renewable energy product offerings that are tailored to customer needs

Generation | Storage | Markets

Solar



Wind



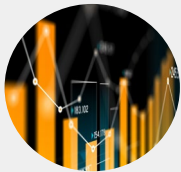
Nuclear, Hydro,
Thermal



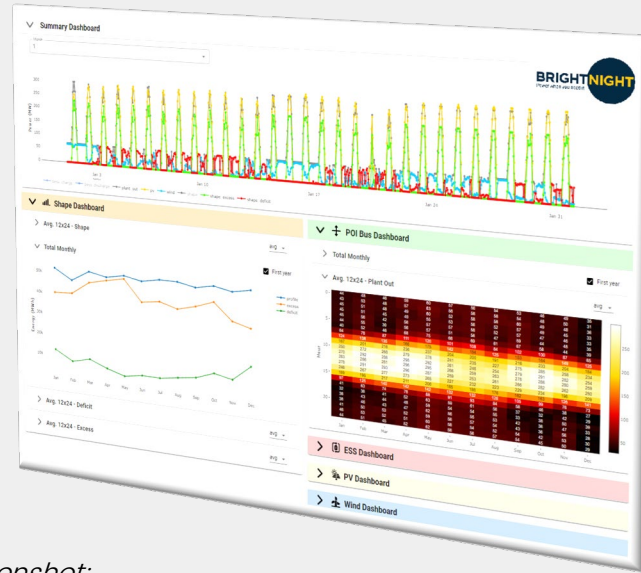
Storage



Markets



- Optimized product design
- Driven by customer needs and use-cases
- Meets sustainability, reliability, and market participation requirements
- Sourced from dispatchable renewable power plants at industry-leading costs



Screenshot:
BrightNight's PowerAlpha™ design, dispatch & control software

Customer and Value-Focused Solutions

Shaped product

PV+BESS to provide monthly, hourly load shape requirements



Block product *

PV+BESS provides firming of a fixed block



*Including 24x7

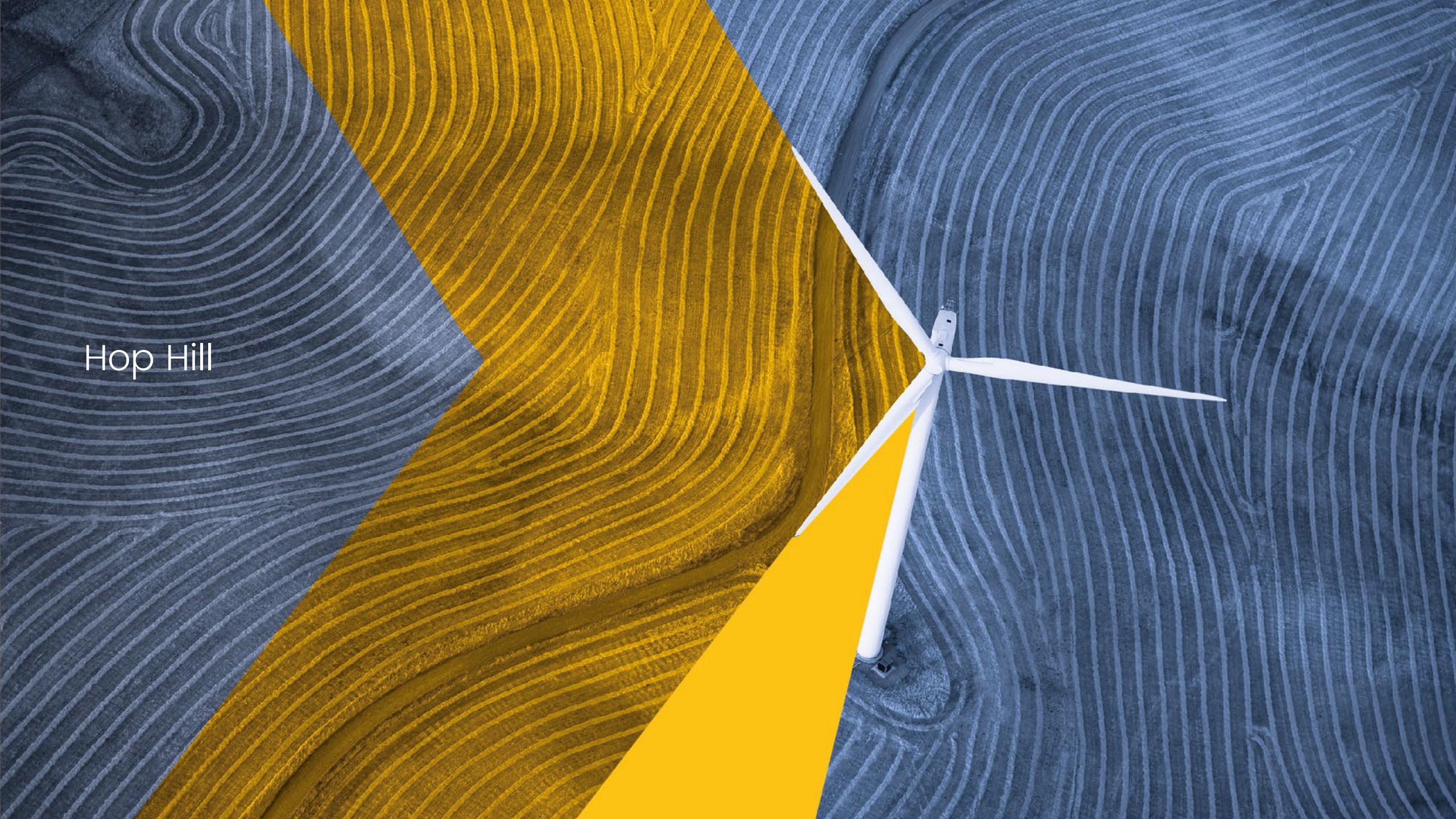
Full requirements

Market, PV+BESS products provide full load following requirements



- Cost-effective
- Carbon free
- Reliable
- Dispatchable options
- Volumetric and timing options

Hop Hill



Hop Hill Solar and Storage Project

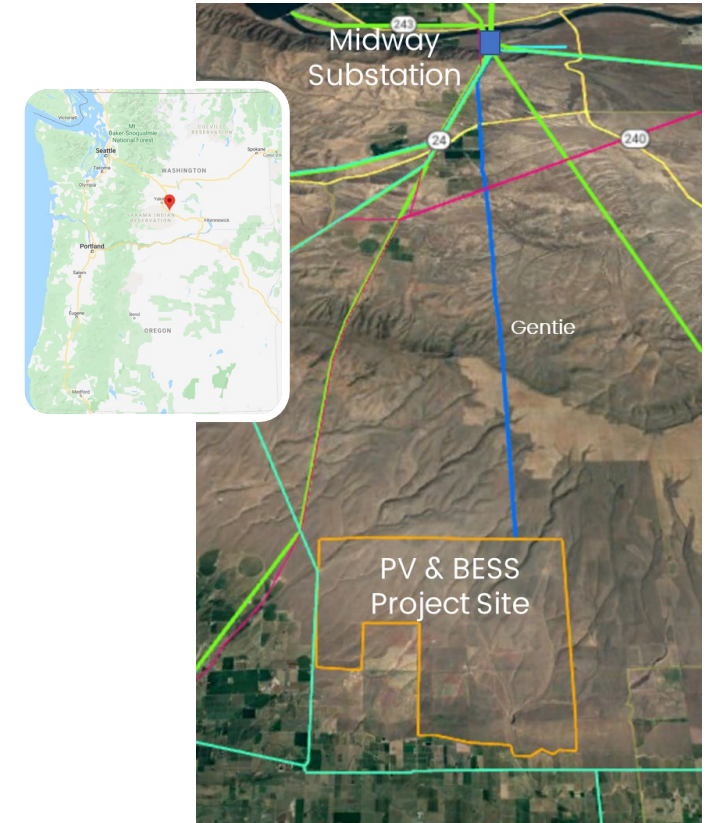
Central Washington, Benton County

> Project Size & Design

- 500MW Solar Photovoltaic System (PV) with Battery Energy Storage System (BESS)
- Fenced Area: ~5,000 acres
- Three BPA interconnection options

> The Project was developed with four main goals in mind

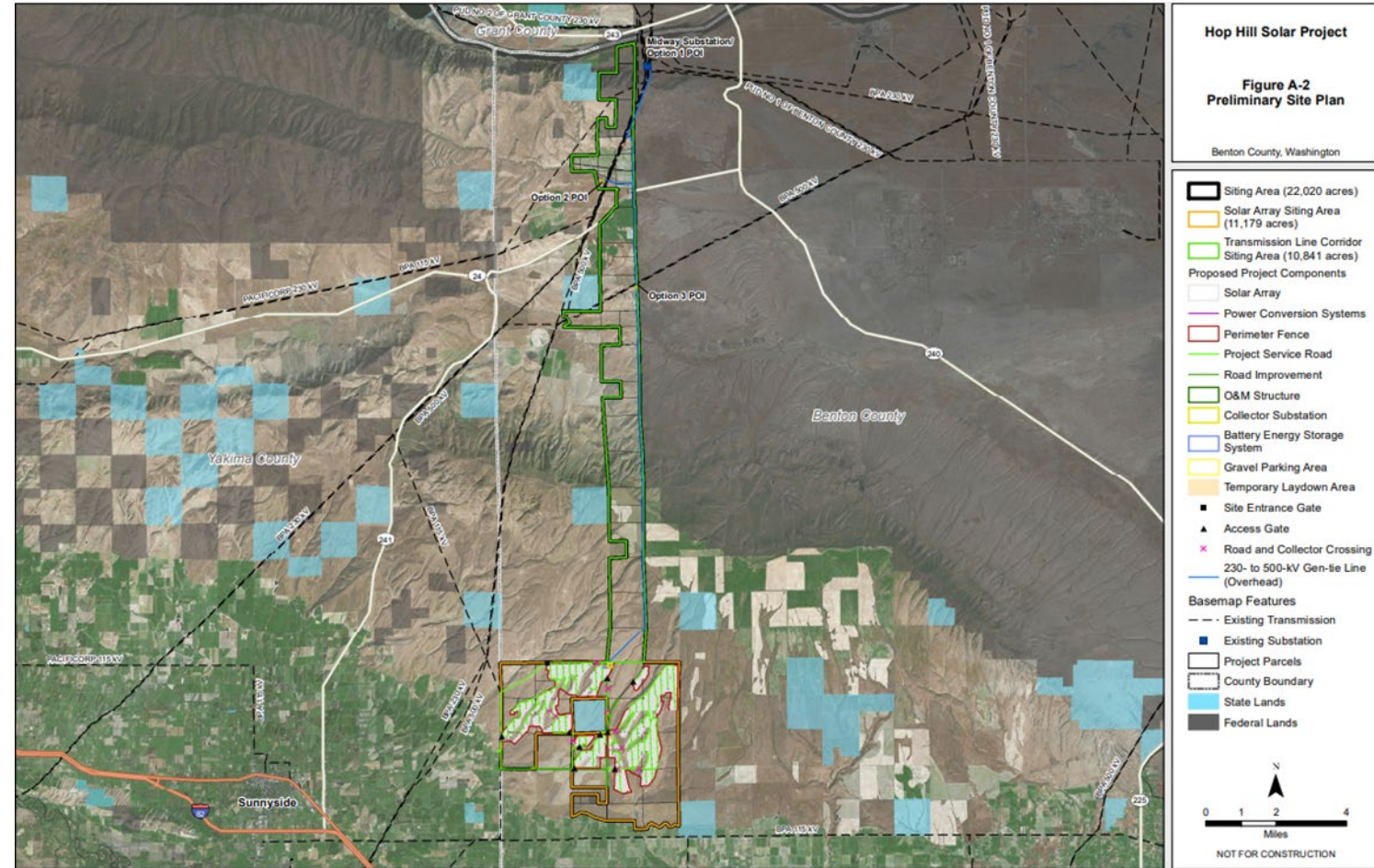
1. **Low-Cost Reliable Energy:** Deliver low cost and dispatchable renewable energy near the Columbia River's Northwest hub to complement existing hydroelectric and nuclear resources and help meet the region's growing electrical needs.
2. **Avoid Expensive and Lengthy Infrastructure Projects:** Utilize existing electrical infrastructure more wisely to reduce customer energy costs, minimize the need to build new large transmission lines throughout the region, and deliver energy to end customers in the near term instead of waiting for 10 to 15 years for transmission projects to be built.
3. **Minimizing Natural Resource Impacts while Maximizing Community Benefits:** Build on non-irrigated low productivity disturbed grazing land outside of high value habitat areas while generating long-term economic benefits.
4. **Maintain Productive Nature of Land:** Construct a project that help creates a new standard for Washington solar energy in which PV generation and agricultural production can work in concert with each other instead of conflict.



Hop Hill Layout

Design Considerations

- Natural Resources
- Cultural & Archeological Sites
- Water Resources
- Visual Impact
- Topography
- Agricultural Operations



Setting the new standard for renewable development: Agrivoltaics

“Solar panels are farm equipment, and the sun is a farm resource”

Improving the productive nature of the land

- Up to a 300% improvement in water conservation*
- Up to 2X plant growth*

Restoring historic sheep operation

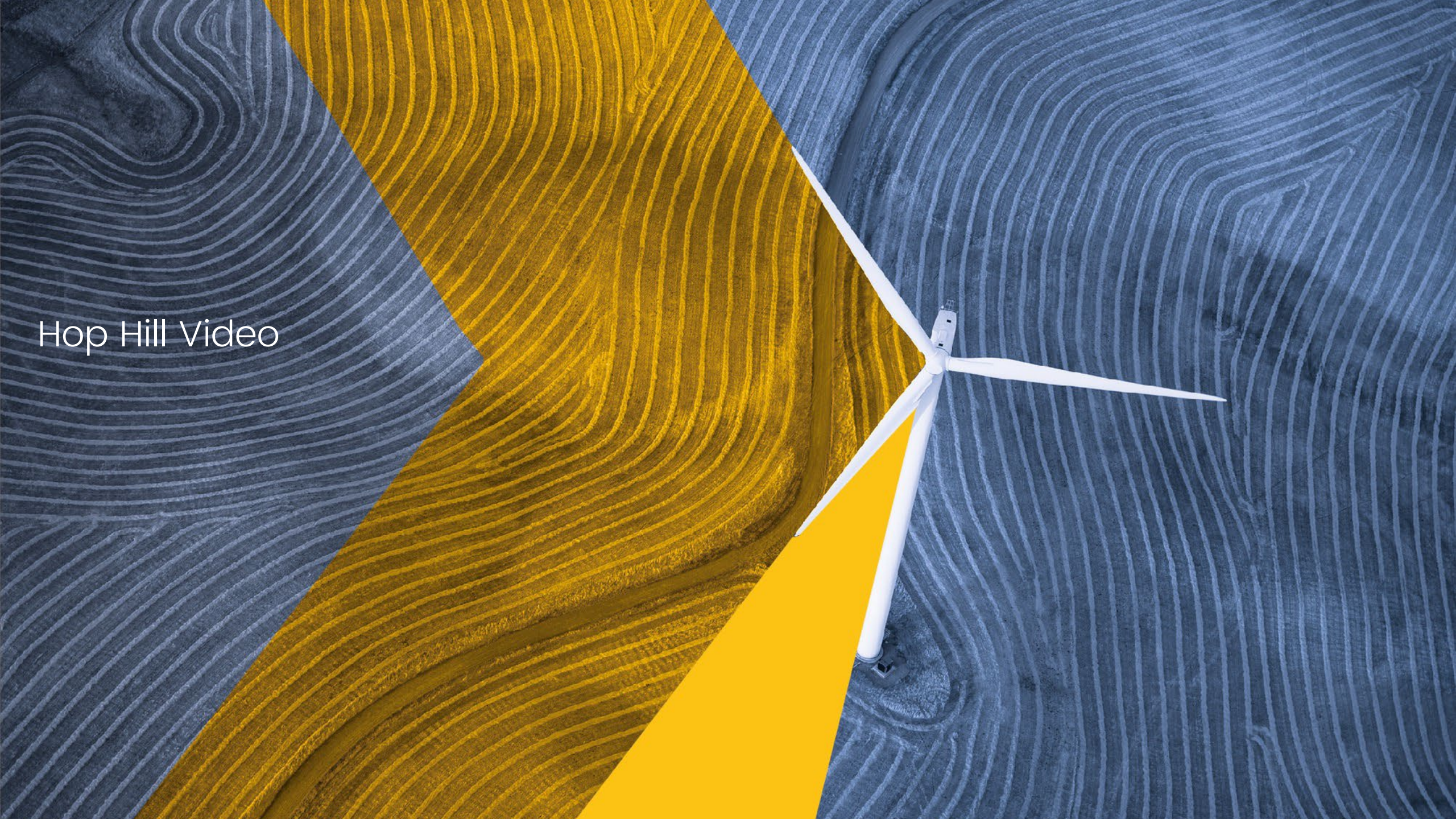
- Landowner's family has historically raised sheep since original homesteading of property
- Landowner will own and run the restored sheep grazing operation

Supporting future agrivoltaics in the PNW

- BrightNight will support and fund a research project through a local university to study the impact of co-use on plant nutrient transport



Hop Hill Video



Hop Hill Video

<https://www.youtube.com/watch?v=83ZqLGvuGyc>

Energy Facility Site Evaluation Council

Non-Direct Cost Allocation for 3rd Quarter FY 2023

Jan 1, 2023 – March 30, 2023

The EFSEC Cost Allocation Plan (Plan) was approved by the Energy Facility Site Evaluation Council in September 2004. The Plan directed review of the past quarter's percentage of EFSEC technical staff's average FTE's, charged to EFSEC projects. This along with anticipated work for the quarter is used as the basis for determining the non-direct cost percentage charge, for each EFSEC project.

Using the procedures for developing cost allocation, and allowance for new projects, the following percentages shall be used to allocate EFSEC's non direct costs for the 3rd quarter of FY 2023

Kittitas Valley Wind Power Project	4%
Wild Horse Wind Power Project	4%
Columbia Generating Station	21%
Columbia Solar	4%
WNP-1	3%
Whistling Ridge Energy Project	3%
Grays Harbor 1&2	8%
Chehalis Generation Project	7%
Desert Claim Wind Power Project	3%
Goose Prairie Solar Project	4%
Horse Heaven Wind Farm Project	15%
Badger Mountain	6%
Cypress Creek Renewables	6%
Wautoma Solar Project	6%
Hop Hill	6%


Sonia E. Bumpus, EFSEC Manager

Date: 1/4/2023