**Horse Heaven Wind Project EFSEC Review**

**Data Request No. 2**

**July 16, 2021**

| **Data Request 2**  **Item ID** | **Code Citation**  **Application Section** | **Item** | **Question or Information Request.** | **Applicant Response** |
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| **Earth-1** | WAC: 463-60-302  Section  3.1 | Topography | Provide topographic map (or equivalent) to show proposed changes to topography from construction. |  |
| **Earth-2** | WAC: 463-60-302  Section  3.1 | Aggregate Fill | Indicate the source(s) of any soil or aggregate fill materials needed for any ground improvement, access road base, foundations, and engineered fill. |  |
| **Earth-3** | WAC: 463-60-302  Section  3.1 | Seismic Requirements | Confirm whether the applicable seismic Standard is 2018 IBC/ASCE 7-16 or the IBC 2015/ASCE 7-10 Standard as referenced in the application.  Confirm compliance with Washington State Building Code for foundations and structures. |  |
| **Earth-4** | WAC: 463-60-302  Section  3.1 | Geotechnical | The Washington Department of Agriculture has requested the following: Given that this has a short-term (construction phase), long-term transitory (operations phase), and unknown after removal recovery phase that is primarily caused by the solar siting impact, provide a geotechnical report for the parcels and solar siting fields. |  |
| **Air-1** | WAC: 463-60-312  Section  3.2.1.3 | Background Air Quality | Provide background ambient air quality data for the Project Area or the nearest representative air monitoring station for the previous three (3) years. |  |
| **Air-2** | WAC: 463-60-312  Section  3.2.1.2 | Background Meteorological Conditions | Provide quarterly and annual wind and atmospheric stability roses for the Project Area or the nearest representative monitoring station for at least one full year. |  |
| **Air-3** | WAC: 463-60-225  Section  3.2.2.1 | Criteria Air Pollutant Emission Rates | For each distinct construction location (laydown area, turbine pads, solar cluster, switchyard, etc.), include an Excel spreadsheet with a list of all air pollution emitting equipment, equipment rating, expected duration of use, load factor, the applicable emission factor for each criterion air pollutant (NOx, SO2, PM10/2.5, CO, NMHC) and emission rate calculations in pounds/hour, pounds/day and tons/year.  Include diesel generators, batch plant, and blasting emission rate estimates.  Provide references for all emission factors and other assumptions used in all calculations.  Indicate which sources of emissions will be operating concurrently and provide a summary of maximum emission rates for each averaging period (e.g., hour, day. year) for each distinct construction location.  Provide requested Excel file including all calculations in an unprotected format allowing all fields to be displayed. |  |
| **Air-4** | WAC: 463-60-225  Sections  3.2.2.1  2.23.2.7 | Criteria Air Pollutant Emission Rates  Applicable Air Quality Permits | Provide Notice of Construction (NOC) applications for the concrete batch plant and the diesel generators.  Alternatively, for an existing portable concrete batch plant, provide the applicable order of approval from Benton Clean Air Agency (BCAA).  This data will aid in showing supporting location, emissions, and the mitigation proposed. |  |
| **Air-5** | WAC: 463-60-312  Section  3.2.2.1 | Fugitive Dust Emissions – Open Storage | Provide the number, size (pile height and diameter for piles), duration of open construction material stockpiles and open disturbed areas (acres), or other factors used to develop emission rate calculations.  Quantify PM10 and PM2.5 emissions.  Incorporate the control efficiency associated with the use of stockpile covers or other mitigation proposed to minimize or eliminate fugitive dust in the calculations.  Provide a reference for control efficiency used in calculations. |  |
| **Air-6** | WAC: 463-60-312  Sections  2.1.2  3.2.3 | Fugitive Dust Controls | Provide justification that the proposed fugitive dust mitigation measures are the highest and best practicable for treatment and control of emissions during construction. |  |
| **Air-7** | WAC: 463-60-312  Sections  2.1.2  3.2.3 | Emission Controls | Explain whether a speed limit lower than 25 miles per hour (mph) would further minimize fugitive dust during operation and construction. |  |
| **Air-8** | WAC: 463-60-312  Sections  2.1.2  3.2.3 | Emission Controls | Provide justification that proposed measures to control combustion emissions from construction equipment are the highest and best practicable for treatment and control of emissions during construction. |  |
| **Air-9** | 40 CFR Part 1039.101  WAC: 463-60-312  Sections  2.1.2  3.2.3 | Emission Controls | Explain whether compliance with Tier 4 emission standards (40 CFR 1039.101) for non-road equipment (including, if applicable, use of diesel particulate filters) to minimize emissions is feasible during construction and operation. |  |
| **Air-10** | 40 CFR Part 60, Subpart IIII  WAC: 463-60-312  Sections  2.1.2  3.2.3 | Emission Controls | Explain whether proposed diesel generators, used during construction, will be subject to federal New Source Performance Standards for diesel engines (40 CFR Part 60, Subpart IIII). |  |
| **Air-11** | WAC: 463-60-312  Section  3.2.2.1 | Criteria Air Pollutant Emission Rates | Calculate worst-case emissions for each criterion air pollutant for each averaging period for which there is an applicable ambient air quality standard (AAQS) used to support air quality modeling and AAQS compliance demonstration for construction emissions. |  |
| **Air-12** | WAC: 463-60-312  Section  3.2.2.1 | Air Quality Impacts | Provide an ambient air quality impact modeling analysis to demonstrate compliance during construction with all applicable ambient AAQSs using an EPA-approved guideline model (such as AERMOD) and the three (3) most recent years of available meteorological data.  Provide the rationale for model input parameters.  Provide the model input/output files, meteorological data files, and table(s) summarizing the modeling results for each applicable pollutant/averaging period combination. |  |
| **Air-13** | WAC: 463-60-312  Section  3.2.1 | Climate Change | Quantify Project Greenhouse Gas (GHG) emissions during construction and operation.  Compare GHG emissions to regional and statewide emissions and GHG reduction goals.  Describe any proposed GHG mitigation measures. |  |
| **Air-14** | WAC: 463-60-312  Section  3.2.2.1 | Cumulative Air Quality Impact Source Inventory | Provide a listing and criteria pollutant emission inventory for any proposed air quality emissions sources within a six-mile radius that would operate concurrently with the proposed construction.  Provide a cumulative air quality impact modeling analysis for criteria air pollutants in the construction period similar to the analysis requested or demonstrate that proposed emission sources within six (6) miles will not cause significant cumulative air quality impacts. |  |
| **Surface Water and Wetlands-1** | WAC: 463-60-322; 463-60-333  Sections  3.3.1-3.3.3  3.5.1-3.5.3  Appendix I | Unsurveyed Area for Surface Water and Wetlands | Provide results of the 2021 spring and wetland survey within the portion of the solar siting area along Sellards Road that had not been previously surveyed for wetlands during the 2020 field program due to access restrictions. |  |
| **Surface Water and Wetlands-2** | WAC: 463-60-215; 463-60-322  Sections  3.3.1-3.3.3 | Project ESCP and SWPPP | Provide a draft framework for the Erosion and Sediment Control Plan (ESCP) and the Stormwater Pollution Prevention Plan (SWPPP) for review that the application lists as mitigation for construction and operational activities. |  |
| **Surface Water and Wetlands-3** | WAC: 463-60-215; 463-60-322  Sections  2.11  3.1.3 | Surface Water Runoff Mitigation Measures | Provide a detailed list of mitigation measures for surface-water runoff and the associated monitoring programs that will enable an evaluation of the effectiveness of these mitigation measures. |  |
| **Surface Water and Wetlands-4** | WAC: 463-60-322  Sections  3.3.1.1  3.3.2.1  3.3.3 | Analysis of Effluent Distribution from Construction Water Discharge and Operation/Maintenance Water Discharge | Provide an analysis of effluent distribution from construction water discharge, including on-site concrete batch plant operations and dust control, on receiving environment to demonstrate the effectiveness of proposed mitigation measures.  Provide an analysis of effluent distribution from operation and maintenance water discharge, such as from washing of solar panels, on receiving environment to demonstrate the effectiveness of proposed mitigation measures. |  |
| **Surface Water and Wetlands-5** | WAC: 463-60-322  Sections  2.6.1.1  2.6.1.2  3.3.1.2  3.3.2.2  3.3.3 | Erosion and Sediment Control Mitigation for Surface Water Runoff during Operations and Maintenance | Provide details of erosion and sediment control mitigation measures as part of the ESCP related specifically to the surface water runoff generated during operation and maintenance activities, including those related to solar panel washing operations. |  |
| **Surface Water and Wetlands-6** | WAC: 463-60-322  Sections  3.3.1.3  3.3.2.3  3.3.3 | Temporary Impacts within the 100-year floodplain | Provide details of the source and extent of the "temporary impacts" to the 0.8-acres within the 100-year floodplain and provide mitigation measures to avoid and/or reduce temporary impacts to this area. |  |
| **Surface Water and Wetlands-7** | WAC: 463-60-540  Sections  2.23.2.6  5.3 | Notice of Intent | Provide applicable Notice of Intent (NOI) for sand and gravel operation. |  |
| **Surface Water and Wetlands-8** | WAC: 463-60-540 | Thirty-three non-wetland water features were discovered within the Project Area, 31 ephemeral streams and two intermittent streams. It is unclear in the application if stream crossings will be required or how the applicant anticipates traversing the stream features.  Ecology typically requires a Jurisdictional Determination (JD) from the U.S. Army Corps of Engineers (Corps) verifying the waters are non-federally jurisdictional prior to beginning the permitting process. | Describe each anticipated stream crossing and how the Project expects to traverse streams.  Confirm whether Corps has issued a Jurisdictional Determination (JD) for the Project. |  |
| **Water Supply-1** | WAC: 463-60-165  Section  2.6.1 | Water Conveyances | Confirm whether there will be on-site water conveyance systems. |  |
| **Vegetation-1** | WAC: 463-60-332  Section  3.4  Appendix A | Vegetation Type | Clarify the habitat subtype corresponding to the deciduous tree group selected in the SEPA checklist types of vegetation on-site. |  |
| **Vegetation-2** | WAC: 463-60-332  Section  3.4.1  Appendix K | A ranking system for plant species is used in the Tetra Tech Botany and Habitat Survey Report (2020). | Define the levels of the ranking system (unlikely, low, low to moderate). |  |
| **Vegetation-3** | WAC: 463-60-332  Section  3.4.1.1  Appendix A  Attachment A | Two (2) state-listed endangered, 11 state-listed threatened, and 15 state sensitive vascular plants are known or have the potential to occur in Benton County per the Tetra Tech Botany and Habitat Survey Report (2020). However, Attachment A only lists one (1) state-listed endangered species. | Confirm which is correct for state-listed endangered (1 or 2 species). |  |
| **Vegetation-4** | WAC: 463-60-332  Section  3.4.2 | Cumulative Effects to Shrub-steppe and dwarf shrub-steppe Priority Habitat. | Provide a discussion on the impacts of the additional loss of the shrub-steppe and dwarf shrub-steppe ecosystems in the broader context of cumulative effects (i.e., in areas adjacent to the Project site).  Confirm whether other shrub-steppe ecosystems occur in the Project’s vicinity or the additional loss constitutes some of the last remaining ecosystems around the Project Area.  Provide a discussion of the impacts of this habitat loss on species assemblages. |  |
| **Vegetation-5** | WAC: 463-60-332  Section  3.4.2  Appendix L | Priority Habitat mitigation | Provide more detailed information on the mitigation measures that will avoid and minimize impacts. |  |
| **Vegetation-6** | WAC: 463-60-332  Section  3.4.2 | Plant species at risk (vascular and non-vascular) in the remaining unsurveyed areas. | Discuss the impacts of the Project on populations of vascular and non-vascular plant species at risk, including:   * the number of individuals or populations that will be impacted by the Project; * the number of known populations adjacent to the Project boundary; * the type of habitats where plant species at risk may occur; and * the potential for plant species to occur in similar habitats within the Project. |  |
| **Vegetation-7** | WAC: 463-60-332  Section  3.4.2 | Potentially Hazardous Substances Storage and Protection of Vegetation and Wildlife | Identify all potentially hazardous substances that will be stored or used in the construction or operation of the Project, even in low quantities (lubricating oils and hydraulic fluid are the only ones mentioned in reference to “small quantities of a few hazardous materials may be used or stored” Section 2.10.1).  Include required minimum spill kit contents for equipment on-site and the temporary fuel storage facilities. |  |
| **Vegetation-8** | WAC: 463-60-332  Section  3.4.2.1  Table 3.4-14 | Permanent and Temporary Disturbance Calculations | Provide information on how temporary and permanent disturbance were calculated for the area shown as the micrositing corridor and the solar siting area. |  |
| **Vegetation-9** | WAC: 463-60-332  Section  3.4.2.1  Table 3.4-14 Appendix L | There are three (3) habitat offset design options, with a final option to be determined later. | Clarify how the Project proposes to “ensure no net loss of habitat function and value” for each of the options.  Outline the criteria that will be used to assess current habitat function and will be used to ensure no net loss.  Provide the plan for monitoring offset options to ensure no net loss. |  |
| **Vegetation-10** | WAC: 463-60-332  Section  3.4.2.1  Table 3.4-14  Appendix K | Botany and habitat survey reports indicate 44 of 244 proposed turbine locations were surveyed. | Explain why only a small proportion of the areas of direct disturbance are field verified.  Describe how baseline surveys inform Project layout.  Describe how the Project’s layout changed to avoid impacts to habitat and vegetation.  Explain how Priority Habitats (other than wetlands and riparian areas), such as dwarf shrub and shrub-steppe habitat, influenced the layout. |  |
| **Vegetation-11** | WAC: 463-60-332  Section  3.4.3 | Plant Mitigation Measures | Describe the proposed BMPs that will be followed.  Outline the specific documents that will be referenced and applied to the Project.  Identify the BMP/guidance documents if additional priority habitats or plant species at risk are identified during construction. |  |
| **Vegetation-12** | WAC: 463-60-332  Section  3.4.3 | Three proposed turbine locations that were surveyed overlap rare and/or high-quality dwarf shrub-steppe habitat. | Explain whether alternative locations were considered for these three turbine locations. Clarify why these potential alternatives are not included in the Application. |  |
| **Vegetation-13** | WAC: 463-60-332  Section  3.4.4  Appendix N | Detailed Site Preparation Prescriptions  The Revegetation and Noxious Weed Control Plan doesn’t include a soil salvage plan for the stockpiling of topsoil and subsoil. There is no erosion and sediment control plan for stockpiles. Site preparation doesn’t include information on microtopography creation. | Describe the erosion and sediment control plan for soil stockpiles.  Include how microtopography will be created on-site (i.e., rough mounding).  Explain how soil compaction will be managed.  Include which excavated or graded areas will include stockpiling of topsoil.  Clarify why other excavated or graded areas are not proposed for topsoil stockpiling. |  |
| **Vegetation-14** | WAC: 463-60-332  Section  3.4.3  Appendix N | Integrated Noxious Weed/Pest Management Plan | Develop and submit an integrated pest management plan as recommended by the Washington State Noxious Weed Control Board.  Include detailed treatment options for species observed in the Project Lease Boundary. |  |
| **Vegetation-15** | WAC: 463-60-332  Section  3.4.3  Appendix N | Revegetation Seed Source | Indicate whether seeds used for revegetation will be locally sourced and collected, if available. If so, explain what the plan is for the local sourcing of seeds. |  |
| **Vegetation-16** | WAC: 463-60-332  Section  3.4.3  Appendix N | Seed and Straw Mulch | Confirm whether seed and straw mulch used for site rehabilitation and revegetation will be certified free of noxious weed seed and propagules. |  |
| **Vegetation-17** | WAC: 463-60-332  Section  3.4.3 | Detailed Revegetation Monitoring Plan | Describe all actions associated with the remediation and monitoring. |  |
| **Vegetation-18** | WAC: 463-60-332  Appendix L | Habitat Mitigation Plan Option Analysis | Discuss how each option or combination of options used proposes to achieve equivalent or greater habitat quality, value, and function for those habitats being impacted, as well as for habitat being enhanced, created or protected through mitigation actions.  Indicate how habitat quality will be assessed for Priority Habitats lost.  Discuss how the measures will provide benefits to existing species and compensate for impacts beyond habitat loss. |  |
| **Vegetation-19** | WAC: 463-60-332  Section  Appendix L | Habitat Mitigation Plan Habitat Function and Value | Provide details in the Habitat Mitigation Plan describing how habitat function and value will be measured for the impacted habitat, both temporary and permanent.  Indicate the areas for the proposed conservation easement.  Describe the habitat function and value of all areas included in the conservation easement. |  |
| **Vegetation-20** | WAC: 463-60-332  Section  Appendix L  Appendix N | Mitigation Plans | Indicate when progressive revegetation will occur. Include the schedule for implementing the mitigation measures and plans. |  |
| **Vegetation-21** | WAC: 463-60-332  Section  Appendix N | Map Identifying Seeding | Provide a map that shows the seed mixes and where they will be applied during revegetation activities. |  |
| **Vegetation-22** | WAC: 463-60-362  Section  4.2.5 | Native Plant First Foods | Conduct an ethnobotanical study of the Project area that would include native plant First Foods. This information will be incorporated into the assessment of potential cultural impacts. |  |
| **Wildlife-1** | WAC: 463-60-332  Section  3.4.2.1  Appendix M | Wildlife | Provide information on regional wildlife population trends, including adjacent to the project.  Provide an analysis of potential effects to special status wildlife, including anticipated potential changes in populations, changes in behavior patterns, and changes in habitat use. Quantitative analysis of effects is preferred, where feasible. |  |
| **Wildlife-2** | WAC: 463-60-332  Section  3.4.2  Appendix M | Wildlife | Provide details regarding the anticipated risk of aerial turbine collisions based on season, day/night, and weather.  Identify specific mitigation measures that could be implemented to reduce collision risk during peak risk periods (i.e., inclement weather). |  |
| **Wildlife-3** | WAC: 463-60-332  Section  3.4.2  Appendix M | Wildlife | If hazardous materials may be used (including pesticides), provide a discussion of the potential effects on the availability of prey items for insectivorous wildlife species and potential effects to wildlife species from ingestion of prey items. |  |
| **Wildlife-4** | WAC: 463-60-332  Appendix M Appendix L | Wildlife | Provide further details on how sensitive wildlife features (i.e., nest, dens, roost sites) will be identified prior to construction and proposed setback distances. |  |
| **Wildlife-5** | WAC: 463-60-332  Appendix M Appendix L | Wildlife | Provide a list of guidance and BMP documents that will be implemented as part of the mitigation program.  Confirm how mitigation measures recommended in “US Fish and Wildlife Service Land-Based Wind Energy Guidelines” will be implemented (i.e., lighting type: flashing/strobe lights vs steady burning).  Confirm mitigation to reduce perching habitat on turbines.  Confirm if there is a plan to mitigate and/or compensate for wildlife mortality. |  |
| **Wildlife-6** | WAC: 463-60-332  Appendix L | Wildlife | Provide a detailed discussion of potential cumulative effects on wildlife species.  Provide a list of other projects occurring in the region that could contribute to a cumulative loss of habitat, habitat fragmentation, and mortality.  Provide a quantitative analysis of cumulative habitat loss and bird/bat mortality. |  |
| **Wildlife-7** | WAC: 463-60-332  Appendix L | Wildlife | Demonstrate how each option or combination of options used will achieve equivalent or greater habitat quality, value, and function for those habitats being impacted, as well as for habitat being enhanced, created or protected through mitigation actions. |  |
| **Wildlife-8** | WAC: 463-60-332  Section  3.4.2.1 | Wildlife | Provide a method to qualify the anticipated effectiveness of the proposed mitigation measures. Use examples from other projects or citations, where available. |  |
| **Wildlife-9** | WAC: 463-60-332  Appendix L,  Table 4 | Habitat | Confirm that the construction phase will not require developing temporary sediment ponds/water retention ponds or the creation of roadside ditching that could provide habitat for amphibians or other water-related species. |  |
| **Wildlife-10** | WAC: 463-60-332  Appendix L,  Table 4 | Wildlife | Provide a discussion on the potential use of features (turbines, solar arrays, wires) by wildlife (i.e., perching, roosting). |  |
| **Wildlife-11** | WAC: 463-60-332  Section  1.10.1  Appendix N Appendix L | Habitat | Provide a schedule for implementation and details on the selected approach for habitat mitigation provided in Appendix L. |  |
| **Wildlife-12** | WAC: 463-60-332  Section  3.4 | Wildlife | Provide a quantitative analysis of habitat and habitat loss for wildlife affected by the Project. Include State-listed species. |  |
| **Wildlife-13** | WAC: 463-60-332  Section  3.4  Appendix K | Wildlife | Provide additional information on how sampling sites for birds and bats were selected and whether the selection of the wildlife sampling sites included stratification of habitat or review of species distribution data. |  |
| **Wildlife-14** | WAC: 463-60-332  Section  3.4  Appendix K | Wildlife | Provide additional information on wildlife habitat associations so that the effects of habitat loss can be assessed.  Include a discussion on how the connectivity along and over the Horse Heaven Hills ridgeline (east/west and north/south) will be mitigated. |  |
| **Wildlife-15** | WAC: 463-60-332  Section  3.4.2  Appendix M | Wildlife | Provide further quantitative analysis of the potential effects from indirect habitat loss (i.e., disturbance, fragmentation) or avoidance on wildlife populations, including land-based species. An example could be quantifying habitat adjacent to the Project predicted to be affected by noise and night lighting thereby resulting in indirect habitat loss/alteration (i.e., Zone of Influence). |  |
| **Wildlife-16** | WAC: 463-60-332  Appendix N  Appendix M | Wildlife | Provide further information on post-construction monitoring or management surveys/programs that will be implemented to mitigate and monitor ongoing effects on non-aerial species (i.e., mammals, reptiles, amphibians, etc. --- species other than birds and bats). |  |
| **Wildlife-17** | WAC: 463-60-332  Section  1.10.1  Appendix L | Wildlife | Provide details on how all mitigation measures provided in guidance documents, cited in Appendix L, will be applied to the Project or rationale for why some measures are not applicable nor feasible. |  |
| **Wildlife-18** | WAC: 463-60-332  Section  3.4 | Wildlife | Provide further information based on surveys or habitat modeling of the occurrence and distribution of species and or groups of species (i.e., guilds) that could occur in the Project Area. |  |
| **Wildlife-19** | WAC: 463-60-332  Sections  4.2.6  3.4.1.1  4.2 | Animals | Confirm whether domesticated farm animals will be allowed to graze under the turbines.  Describe the impacts of fencing around solar arrays (if constructed) to wildlife or cattle grazing and proposed mitigation. |  |
| **Wildlife-20** | WAC: 463-60-332 | Prey Base and Food Webs | Provide further information on the prey base for all animals, such as Townsend’s ground squirrel (an important food source for listed Ferruginous hawk), the micrositing of the Project may impact. |  |
| **Wildlife-21** | WAC: 463-60-332 | WDFW Letters | Confirm that recommendations from letters dated March 31, 2021 and April 1, 2021 from WDFW to EFSEC were reviewed and taken into consideration.  Provide mitigation that has changed or has been added based on WDFW recommendations. |  |
| **Energy and Natural Resources-1** | WAC: 463-60-342; 463-60-165  Sections  2.6.1.1  2.6.2  2.6.3  3.6.2 | Construction Water Supply  Water Use Authorization | Provide a letter from the City of Kennewick indicating that water is available in the amounts required and that the City is willing to supply it to the Project for both construction and operation in the required timeline.  Provide a discussion of water supply alternatives for construction and O&M. Describe contingencies if source water from the District of Kennewick is curtailed during drought. |  |
| **Energy and Natural Resources-2** | WAC: 463-60-342; 463-60-165  Sections  2.6.1.1  2.6.2  3.6.2 | Construction and Operation Water Supply | Provide a discussion of water supply alternatives for construction and site operation and maintenance.  Explain how the identified water trucking company can provide 220,000 gallons per day of water with two 4,000-gallon capacity water trucks during construction.  If additional water trucking capacity is needed, provide a similar letter for each additional supplier. |  |
| **Energy and Natural Resources-3** | WAC: 463-60-342  Section  3.6.2 | Source/Availability of Resources | Provide information confirming the availability of energy and other resources to be used by the Project, such as letters from material and equipment suppliers confirming their interest to supply required materials/equipment and confirming the availability of the required material and equipment within the timeframe indicated for the Project. |  |
| **Energy and Natural Resources-4** | WAC: 463-60-342  Sections  3.6.2  3.6.3 | Efficiency of Use of Energy and Natural Resources | Describe the efficiency of consumption of energy and natural resources and measures proposed to improve the efficiency of use. |  |
| **Energy and Natural Resources-5** | WAC: 463-60-342  Sections  3.6.2  3.6.3 | Conservation and Renewable Resources | Describe conservation measures which would or could be used during construction and operation of the facility. |  |
| **Land and Shoreline Use-1** | WAC: 463-60-362  Sections  4.2.1  4.2.4 | Section 1.10.1 indicates that mitigation measures proposed for land-use plans and zoning ordinances are described in detail within Section 4.2.1 of the Application for Site Certification (ASC), including site-specific BMPs to minimize potential impacts to noise, traffic, and the visual surroundings, as described in the respective resource sections of this ASC. Details are not provided on site-specific BMPs within Section 4.2.1.  Section 1.10.1 also indicates mitigation measures proposed for recreation are described in detail within Section 4.2.4 of the ASC, including site-specific BMPs to minimize potential impacts to noise, traffic, and the visual surroundings, as described in the respective resource sections of the ASC. While it is acknowledged that these measures would minimize impacts to recreational users, details are not provided on site-specific BMPs within Section 4.2.4.3. | Provide details on site-specific BMPs to minimize potential impacts to noise, traffic, and the visual surroundings or provide references to the respective resource sections of this ASC where these are identified.  Provide details regarding the recreational paragliding that occurs in the vicinity of the Project area. |  |
| **Cultural/Historic-1** | WAC: 463-60-362  Section  4.2.5 | Tribal Consultation Reports  Lists of known resources within the areas surveyed have been provided to interested tribes and the Department of Archeology and Historic Preservation (DAHP). The Yakama Nation has identified multiple Traditional Cultural Properties (TCPs) within and adjacent to the Project Area. | Provide the (unredacted) Traditional Cultural Property (TCP) and Traditional Use Study (TUS) reports for the Project. |  |
| **Cultural/Historic-2** | WAC: 463-60-362  Section  4.2.5 | Archaeological Baseline Data | Provide the results of the spring 2021 archaeological field survey (i.e., the remainder of the micrositing corridor and the solar siting areas amounting to 57% of the total baseline survey area). |  |
| **Cultural/Historic-3** | WAC: 463-60-362  Section  4.2.5 | Isolate Testing Results | Provide results from the shovel probe testing required. Archaeological resource - isolate # 45BN2092. |  |
| **Cultural/Historic-4** | WAC: 463-60-362  Section  4.2.5 | Evidence of Appropriate Consultation  The Yakama Nation has contacted EFSEC to oppose the manner in which consultation has been conducted for the Project and request that tribal consultation take place on a government-to-government basis rather than with HRA (Yakama Nation letter dated March 2, 2021). The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Natural Resources has also contacted the EFSEC to request direct consultation with the State Department/EFSEC (CTUIR letter dated April 9, 2021).  This request is supported by the DAHP (letter dated March 9, 2021). | Provide evidence, if any, of ongoing coordination (with the Yakama Nation and other interested Tribes). |  |
| **Cultural/Historic-5** | WAC: 463-60-362  Section  4.2.5 | Response to State Historic Preservation Office (SHPO) Comments  A grain elevator (# 722995) was recorded by the Consultant (HRA) during the baseline field survey. HRA determined that the resource was not eligible for individual listing. However, comments from the SHPO (DAHP letter to EFSEC, dated March 9, 2021) request a reconsideration conclusion. | Provide the Consultant’s response to the SHPO request, dated March 9, 2021, regarding the grain elevator (#722995). |  |
| **Aesthetics-1** | WAC: 463-60-362  Section  4.2.3  Appendix Q | WAC 463-60-362 (3) identifies that the applicant shall describe procedures to be utilized to restore or enhance the landscape disturbed during construction. | Provide details on site-specific BMPs or site-specific mitigations related to construction to restore or enhance the disturbed landscape. |  |
| **Aesthetics-2** | WAC: 463-60-362  Section  4.2.3  Appendix Q | The selection of representative viewpoints for field survey, simulations, and analysis are predominately middle-ground viewing distance zone (0.5 to 5 miles) and do not represent foreground (less than 0.5 miles) viewing opportunities. Few of the viewpoints represent local communities or residential areas in the Tri-Cities area.  It is acknowledged in the ASC that there are 13 non-participating landowners within a foreground viewing distance that would be exposed to relatively near views of the Project. It’s illustrated in the ASC that there is potential visibility of the Project from nearby communities and residential areas (Figures 4.2.3-1 to 4.2.3-6). Comments received as part of the public scoping process identified a lack of representative viewpoints in nearby residential subdivisions or foreground areas. | Provide panoramic photos (similar to those provided in Appendix Q of the ASC) of the existing condition of the Project area from a representative viewing location in the following residential communities:   * Benton City * Badger * Kennewick (Canyon Lakes area) * Highland   These viewing locations should provide relatively unobstructed views towards the Project area and represent public viewing opportunities within these communities.  Provide panoramic photos of the existing condition of the Project area from the following representative rural residential viewing location within a foreground viewing distance zone (0 to 0.5 miles):   * Along County Well Rd (near the County Well Road Solar Array location) – view towards solar array and turbines * Near Sellards Rd and Travis Rd – view towards transmission line and turbines |  |
| **Aesthetics-3** | WAC: 463-60-362  Section  4.2.3  Appendix Q | Simulations of the Project features are needed to support an understanding and analysis the visual character and potential visual impact of the project on viewpoints representing local residential communities or rural residential areas within a foreground viewing distance, | Provide photographic simulations (similar to those provided in Appendix Q of the ASC) of Project features from the same locations established in response to Aesthetics-2 data request.  Include modelling of turbine layout options, solar array facilities and transmission line options within these simulations. |  |
| **Light and Glare-1** | WAC: 463-60-362  Section  4.2.2.2 | Construction Lighting – Nighttime | Nighttime construction is noted as a possibility. Address lighting mitigation if there are construction activities that may impact roadway traffic or nearby residences. |  |
| **Light and Glare-2** | WAC: 463-60-362  Section  4.2.3  Appendix Q  Appendix H | Light or glare from construction and operation of the Project were determined to not result in a safety hazard or other significant adverse impact, and as a result, no mitigation measures are proposed. However, mitigations identified in Section 4.2.3.4 are related to lighting. | Clarify why four of the mitigations identified in Section 4.2.3.4 are related to lighting if no mitigation measures are proposed in relation to light or glare. |  |
| **Environmental Health-1** | WAC: 463-60-352  Sections  2.10.2  4.1.2.1 | Risk of Fire | Provide additional design details for the fire suppression system associated with the Battery Energy Storage System (BESS). |  |
| **Heat Dissipation-1** | WAC: 463-60-175  Section  2.7 | Heat Dissipation Mechanisms | Provide information on why heat dissipation systems, in regards to BESS, are not being used for this Project.  Provide mechanisms or methods (and the alternatives) in the event, unlikely or not, that solar panels or turbines overheat. |  |
| **Heat Dissipation -2** | WAC: 463-60-175  Section  2.7 | Heat Dissipation Mechanisms: Operating Machinery | Describe operating machinery and the potential heat produced.  Provide information on what would occur if operating machinery overheated. |  |
| **Transportation-1** | WAC: 463-60-372  Section  4.3.1.4 | Location of existing Waterborne, Rail and Air Traffic | Provide map(s) and/or descriptions of local ports, airports, and railways mentioned in this section.  Provide details on the distance of locations relative to the proposed Project Area.  Determine if major roads used to access waterborne, rail, and air traffic transportation services use the same major roads as the proposed Project site. |  |
| **Transportation-2** | WAC: 463-60-372  Section  4.3.3 | Mitigation Measures: Distinguish Existing Road Improvements | Provide a list of all existing roads and intersections that will require improvements.  Provide details of improvements to each road/intersection necessary for the Project. |  |
| **Transportation-3** | WAC: 463-60-372  Section  4.3.3 | Mitigation Measures: Distinguish Existing Road Improvements | Describe how the applicant will restrict the general public from accessing roads used for the construction and operation of the proposed Project. |  |
| **Stormwater-1** | WAC: 463-60-537  Section  5.2  Appendix T | Stormwater Discharge Permit | Provide a discussion on the applicability of the National Pollutant Discharge Elimination System (NPDES) permit coverage post-construction for stormwater discharges to surface water. |  |
| **Wastewater-1** | WAC: 463-60-195  Section  2.17.3 | Batch Plant | Confirm if a temporary on-site concrete batch plant will be used.  If an on-site concrete batch plant will be used, provide the water source and wastewater treatment information. |  |