



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

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Memorandum

To: Sonia Bumpus, SEPA Responsible Official, Energy Facility Site Evaluation Council (EFSEC)
Manager, (360) 664-1363

From: Amí Kidder, EFSEC Siting and Compliance Manager, (360) 664-1305

Date: July 30, 2021

RE: Supplemental Memorandum Post SEPA Comment Period - Environmental Review and Staff Recommendation for State Environmental Policy Act (SEPA) Review and SEPA Determination for *Goose Prairie Solar*

PROPOSAL: Goose Prairie Solar (Facility) is an 80 megawatt (MW) solar photovoltaic project with an optional battery energy storage system proposed by OER WA Solar 1, LLC (Applicant). The proposed Facility would be constructed on up to 625 acres in rural Yakima County.

CASE NUMBER: EFSEC Docket No. EF-20012

APPLICANT: OER WA Solar 1, LLC

LOCATION: The Facility is located approximately eight miles east of the City of Moxee on parcels located just north of Washington Highway 24, between its intersections with Morris Lane and Desmarais Cutoff in Yakima County. See Attachment 1. *Figure 2-2: Regional Context Map.*

On June 24, 2021, EFSEC issued a Mitigated Determination of Non-Significance (MDNS) for public comment. The public comment period ended on July 8, 2021 during which EFSEC received 16 public comments. All of these comments have been reviewed and no new issues were raised that have not already been considered, except for one comment regarding wind erosion. That topic is discussed below and supplements the general discussion and mitigation measure for 1. Earth. One issue that was previously considered was found to merit further clarification of a mitigation measure, a specification to a mitigation measure has been identified for this issue. One issue was identified requiring a clarification of a commitment by the applicant in the Application for Site Certification, a specification to a commitment has been identified for this issue. These two issues are discussed below and supplement the general discussion and mitigation measures for 2. Water and 10. Animals and Habitat. Reference material, input, and recommendations used during the development of the revised MDNS are identified in Table 1.

1. EARTH

- Erosion caused by wind can occur on some sites, including solar project sites. Parts of Yakima County are known to experience high winds. Effective mitigation (e.g., vegetative screening,

geotextiles) is available and can be implemented should wind-caused erosion occur. (USDA 1985)

Mitigation: Monitoring for erosion, and response measures should erosion occur, would be addressed in the Vegetation and Weed Management Plan prepared prior to construction. Should erosion occur post construction, including wind-caused erosion, the erosion would be remediated and appropriate measures would be implemented to address the cause of the erosion. If mitigation is implemented for erosion, monitoring would occur to ensure it is successful.

2. WATER

Water Quality – Wetlands and Surface Waters

- Section 3.3 and 4.3 of the ASC identifies the establishment of a 50-foot buffer around identified Type 5 streams. As a result of a comment received during the MDNS public comment period, additional specification has been identified on the measurement of this buffer, directing that it be determined from the Ordinary High Water Mark (OHWM).

Mitigation:

Water Quality – Wetlands and Surface Waters

Stream Buffer.

- The 50-foot buffer for project activities occurring in the vicinity of the identified Type 5 Streams would be determined from the OHWM. A mitigation measure would not be required because the applicant has committed to using the OHWM for determining the buffer. (OE 7/21)

10. ANIMALS AND HABITAT

Site preparation

- A comment received by WDFW during the public comment period for the MDNS suggested a preference to install electrical collection lines above ground to minimize ground disturbances. Because a number of other structures would already provide avian predator perching opportunities, above ground electrical collection lines would not create a discernable additional impact to avian predator perching opportunity. However, above ground collection lines would minimize ground disturbance and adverse effects to top soil layers and existing vegetation. (WDFW 7/21)

Mitigation:

Site preparation

- Where practicable, collector lines would be installed above ground to minimize ground disturbance activities.

Table 1.

Acronym	Description	Date	Form of Comment
Eric Bartrand, WDFW WDFW 7/21	WDFW Clarification of Collector Line Impacts	7/15/2021	Written
OER Renewables 1 Solar OE 7/21	Applicant Clarification on Stream Buffer Measurement Criteria	7/13/2021	Written
Fryrear, Skidmore; USDA USDA 1985	Methods of Controlling Wind Erosion	1985	Report