



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Central Region Office**

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

May 31, 2023

Joanne Snarski
Energy Facility Site Evaluation Council
PO Box 47250
Olympia, WA 98504

RE: Badger Mountain Solar Energy Project: Shorelands, Wetlands and Waters of the State
Review and Site Visit Comments

Dear Joanne Snarski:

The Department of Ecology's (Ecology) Shoreline and Environmental Assistance (SEA) Program has performed the following activities:

Activity 1: Reviewed the March 14, 2023 *Badger Mountain Solar Energy Project: Response to Washington Department of Ecology Letter* from TetraTech.

Activity 2: Ecology met with you and the applicant on February 17, 2023 for the site visit requested to review 6 priority sites.

Activity 3: Reviewed the application materials EFSEC provided to Ecology, demonstrating site plan changes, and uploaded to sharepoint on April 17, 2023 and April 28, 2023.

As restated from Tetra-tech's letter on March 14, 2023, the Project is a 200-megawatt solar photovoltaic generation facility with an optional 200-megawatt battery energy storage system and associated 3.7-mile-long, 230-kilovolt overhead generation-tie transmission line corridor in unincorporated Douglas County, Washington.

The Badger Mountain Solar Energy Project is located approximately 3.5 miles east of the East Wenatchee city limits, located in unincorporated Douglas County, Washington. The project includes a 2,390-acre project study area.

Activity 1: March 14, 2023 *Badger Mountain Solar Energy Project: Response to Washington Department of Ecology Letter* from TetraTech. Site visits and surveys were made in March, April, May, and June of 2021. Please provide all Wetland Determination Data Sheets available for Ecology review whether they are determined upland or wetland.

Ecology expressed interest in reviewing the following photo points for the presence of wetland characteristics.

- Photo-point 508
- Photo-point 513. ST-513
- Photo-point 329a and b. ST-329

A response was provided for Site 227, WT-332, 508, 513, and 329a and 329b. A datasheet was provided for WT-332. Please provide any Wetland Determination Data Sheets for these areas specific to the highlighted in images 1- 5, provided below.

Activity 2: Site Visit on April 6, 2023 occurred to review 6 priority sites, as shown on Figure 3. The growing season indication for beginning, in a given year, is when two or more different non-evergreen vascular plant species growing in the wetland or surrounding areas exhibit one or more indicators of biological activity. Based on visual indicators, per the Regional Supplement, the growing season was active at the time of the site visit on April 6th. A brief summary is provided below:

EFSEC #1-6: Ephemeral features. 10 YR 3/2. Requesting additional information regarding frequency and duration of the hydrology present. Additional information regarding summer vegetation is requested.

We observed shallow bedrock in areas with hydrology, snow drifts in select locations with varied microclimates, mowed/maintained landscapes and evidence for seasonal hydrology. Ecology is requesting review of any completed determination forms with information regarding seasonal hydrology and vegetation as it relates to waters of the state.

On April 6, 2023, we observed that most the site appears to have on-going farming land-use. Select locations are considered disturbed or problematic sites. For sites where hydrology was noted, multiple site visits will be required to demonstrate if the hydrology indicator has or has not been met. More information regarding techniques can be found in Chapter 5 of USACE regional supplement for Arid West.

Activity 3: Additional information provided April 17, 2023 and April 28, 2023 provided site plan changes at DNR North parcel (Images 6 and 7).

In addition, it came to our attention at the site visit that Parcel 23211630001, referred to as site B in the maps below, is considered an area of interest for development.

Due to the scope of the property boundaries and the potential for site plan changes. Ecology recommends expanding the Waters of State critical area study to include a desktop review extending 250' beyond the property boundaries to accommodate wetland buffer widths consistent with Douglas County code *19.18B.020, Identification and rating* and *19.18B.050, General standards*.



Follow up on remaining requests:

Ecology requests hydrology, soils and vegetation information (Wetland Determination Data Forms) for the previous site visits and surveys made in March, April, May, and June of 2021 and the current 2023 growing season. If the information provided is not sufficient in demonstrating hydrology, soils and vegetation, then future additional growing seasons information is requested. Additional review of proposed impacts to the areas identified in Appendix A will be needed.

Ecology requests often and frequent site visits to observe the presence and absence with consideration of shifts in hydrology and vegetation. Wetlands subject to seasonal hydrology in the region often show substantial changes in species presence and abundance through the year. Shifts in the presence and species composition of herbaceous vegetation, however, can be rapid and dramatic. The Ephemeral landscape has a fleeting hydrology window. To adequately demonstrate presence or absence of wetland hydrology, shallow monitoring wells are requested to review and verify observations.

Impacts. Forty-four (44) ephemeral stream segments were identified and specific design elements to identify potential impacts to these were not determined at the time of this review. Upon finalization of the site plan, Ecology requests information regarding expected site impacts, such as stream and wetland crossings. Compensatory mitigation may be necessary and could involve the preservation of vernal pools, alkali wetlands, bogs, calcareous fens, and Wetlands of High Conservation Value.

A preliminary stormwater management plan was provided. Prior to the plan changes, it was proposed that grading will be minimal and existing drainage patterns will be maintained.

If project plans change, Ecology review is requested to determine if the State's water quality standards will be met.

Ecology looks forward to providing the Energy Facility Site Evaluation Council with technical assistance and expertise in the future. If you have any questions or would like to discuss these comments, please call me at (509) 379-4541.

Sincerely,



Alicia Schulz
Wetland/Shoreline/Federal Permit Specialist

Enclosures (1)

cc: Lori White, Department of Ecology
Loree' Randall, Department of Ecology
Ami Hafkemeyer, EFSEC



Appendix A

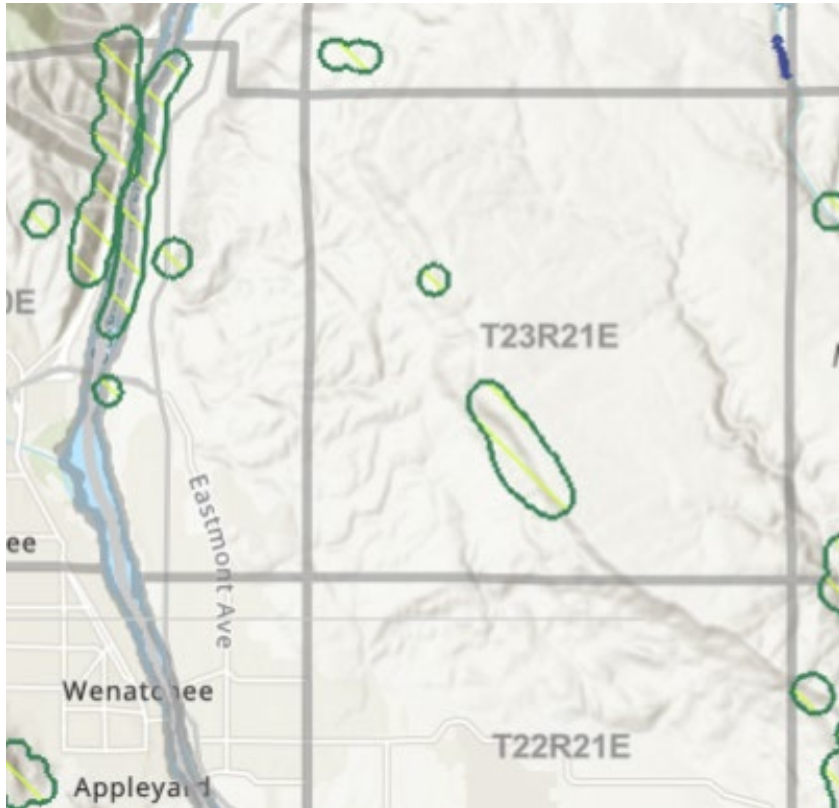


Image 1. General areas of interest – Elements of Occurrence (EO) Wetlands of High Conservation Value *Phacelia lenta*

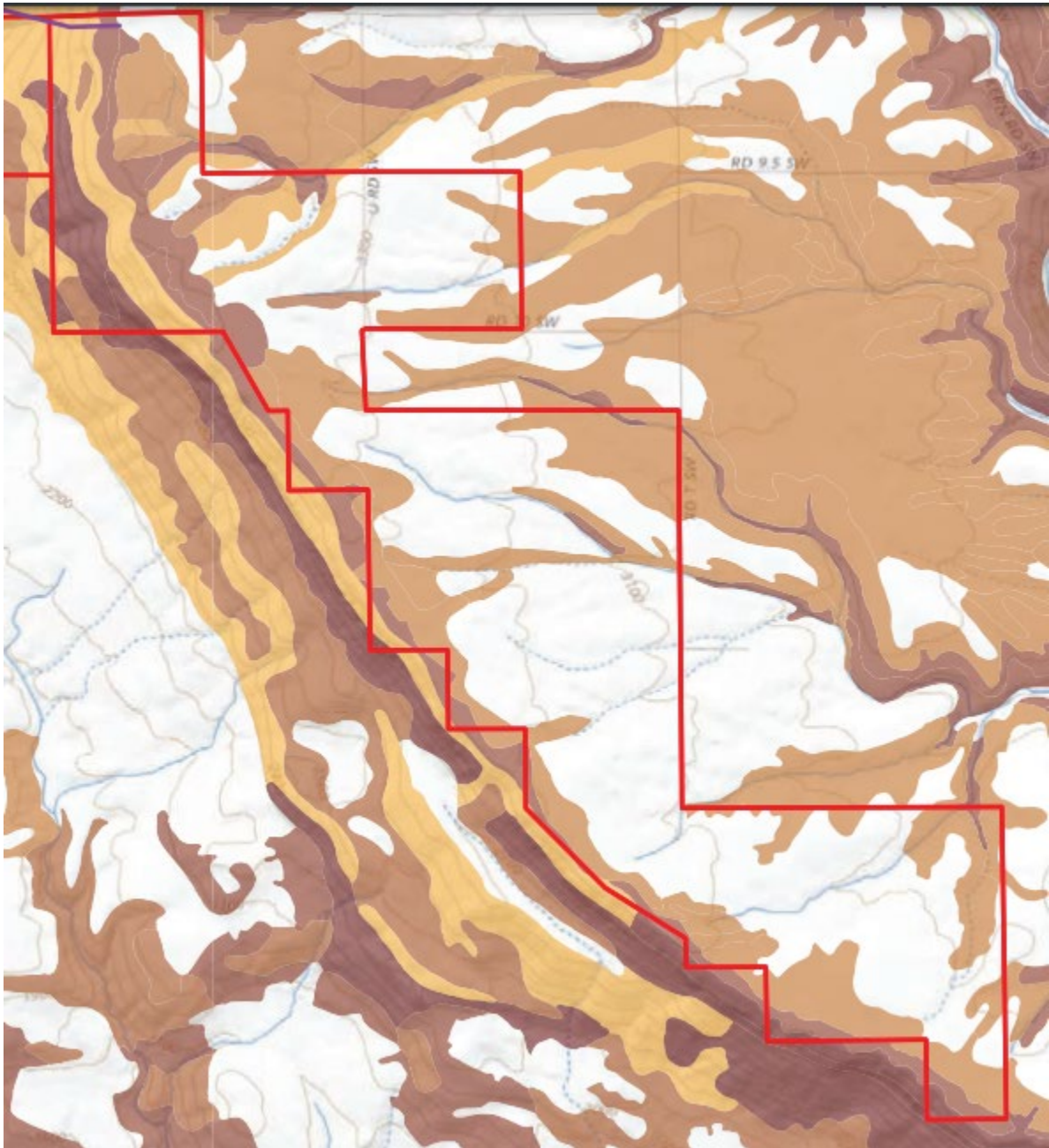


Image 2. General areas of interest – Shallow Aquitard

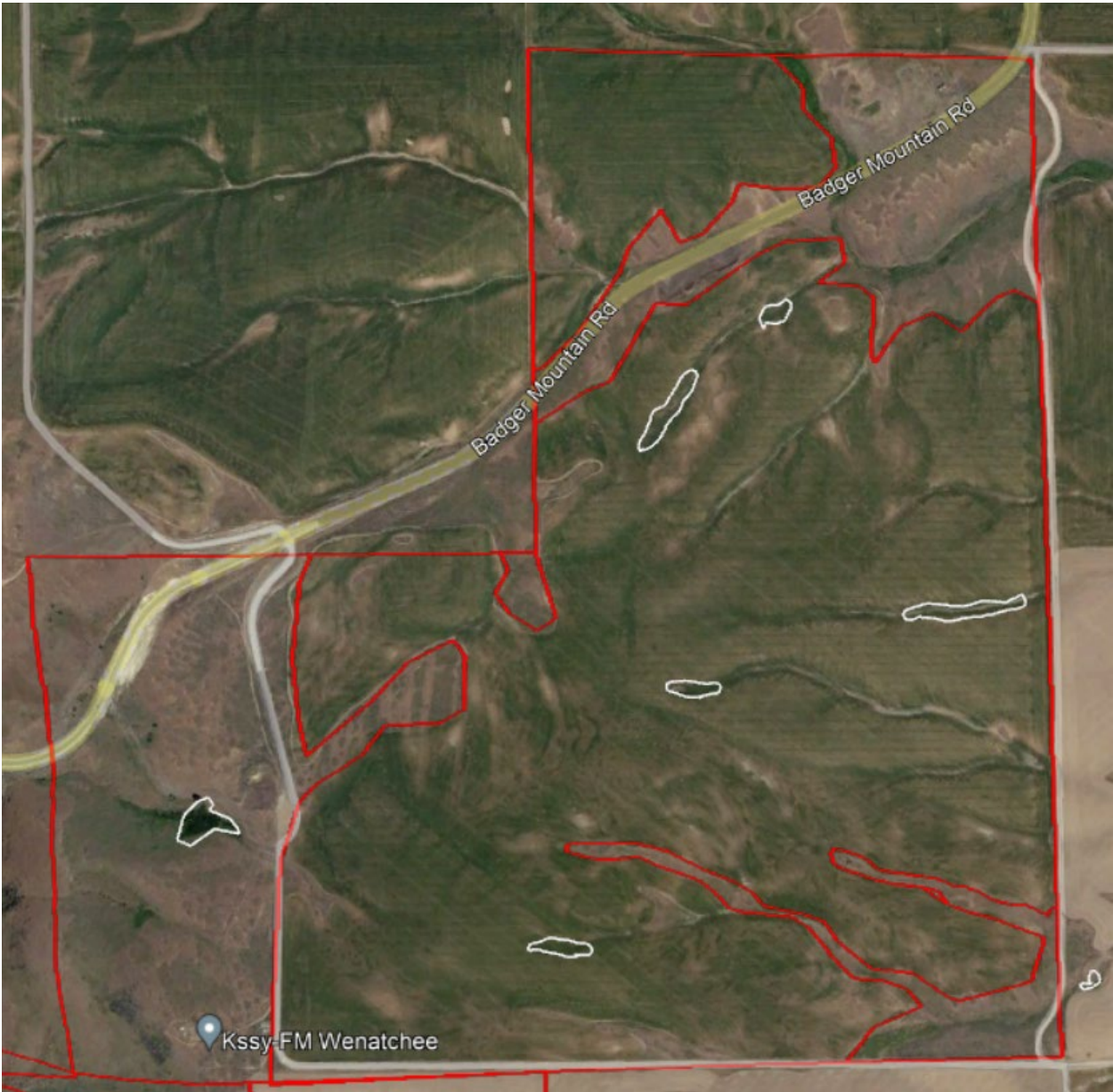


Image 3. Potential areas of interest - North



Image 4. Potential areas of interest - Central

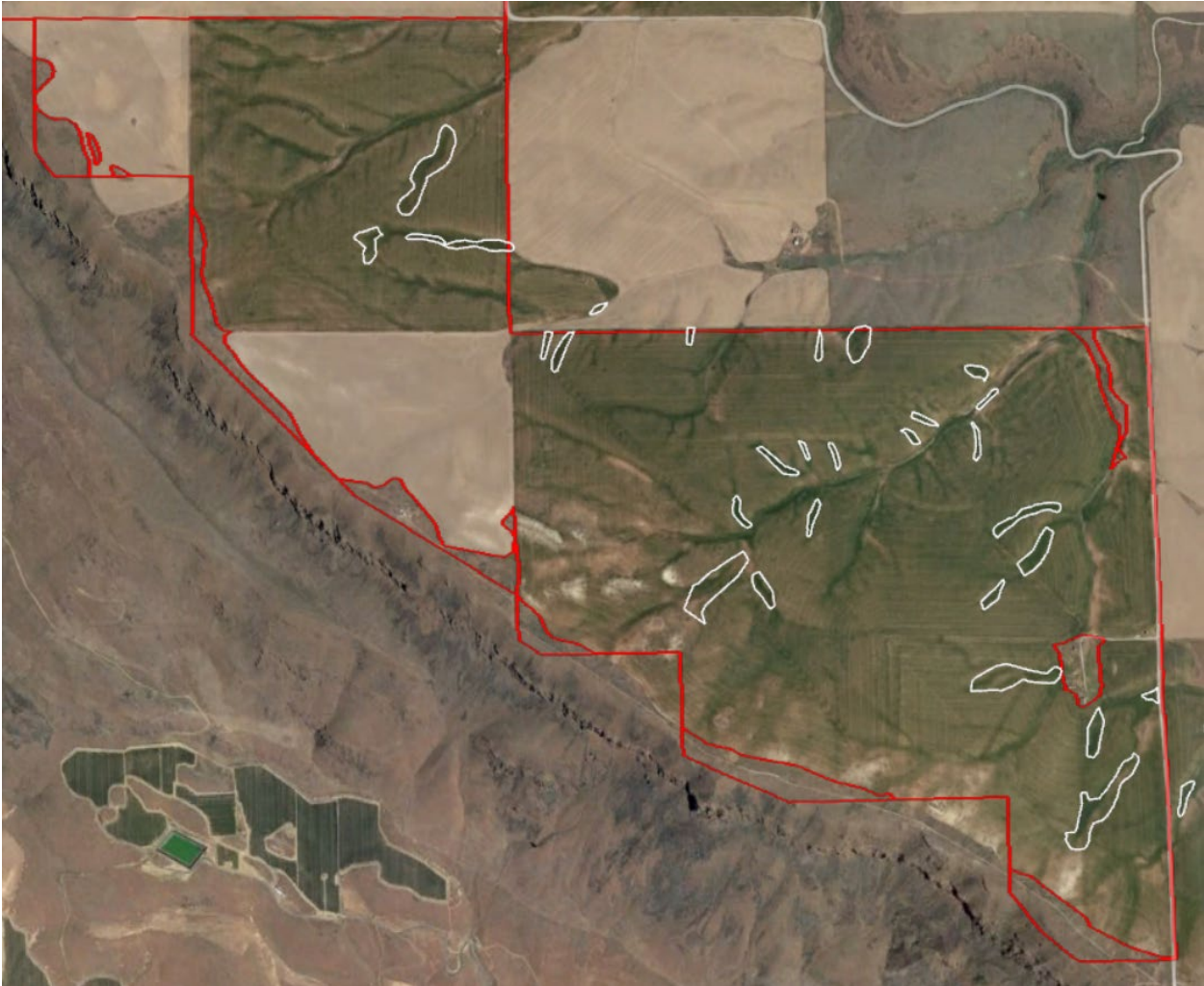


Image 5. Potential areas of interest – South

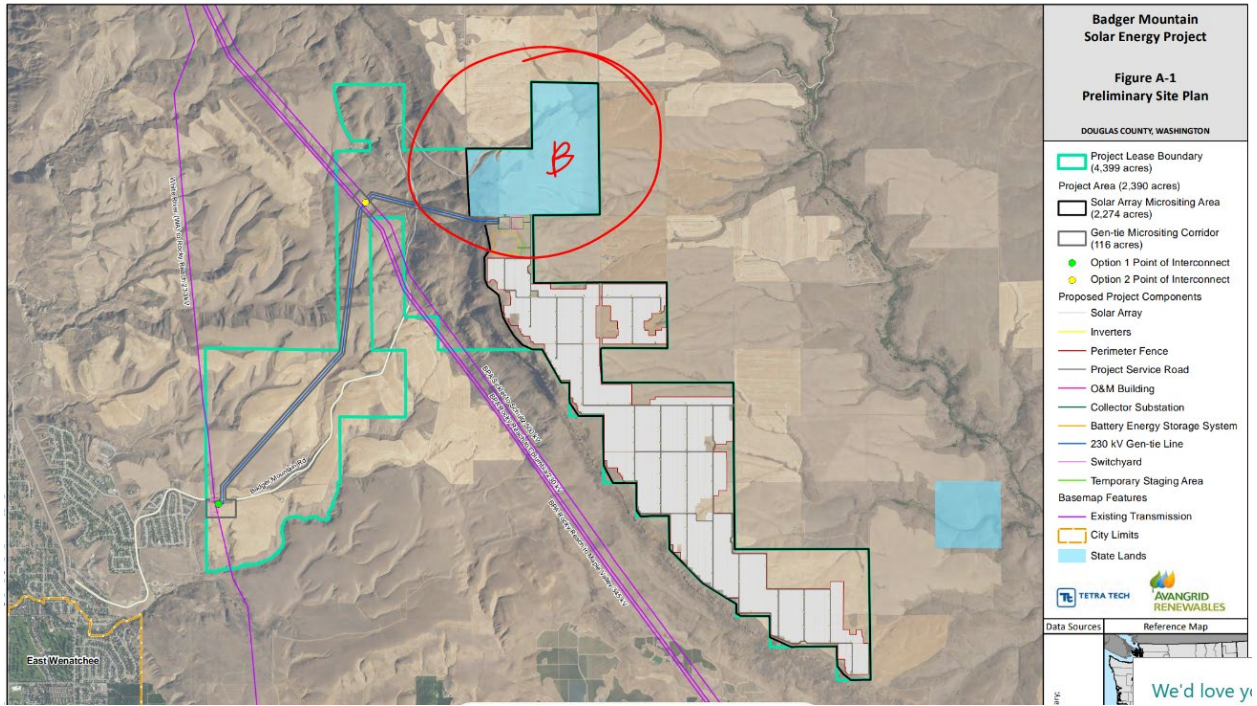


Image 6. Historic project scope



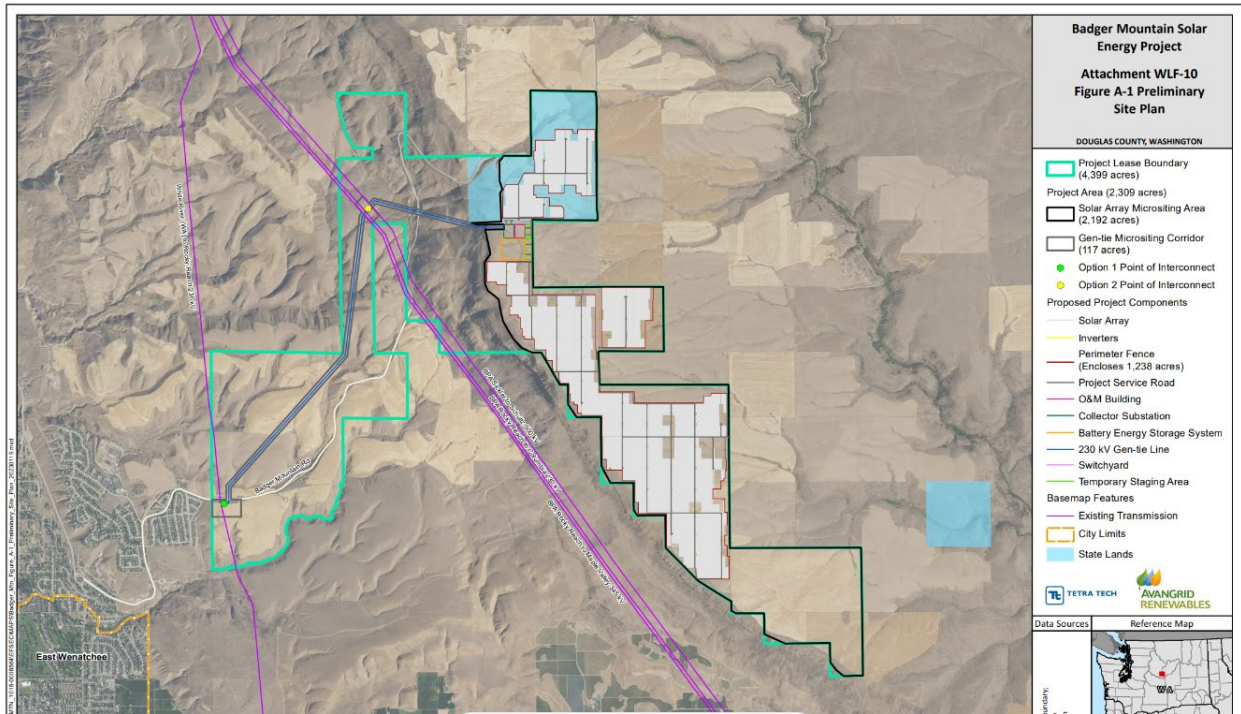


Image 7. Updated project scope



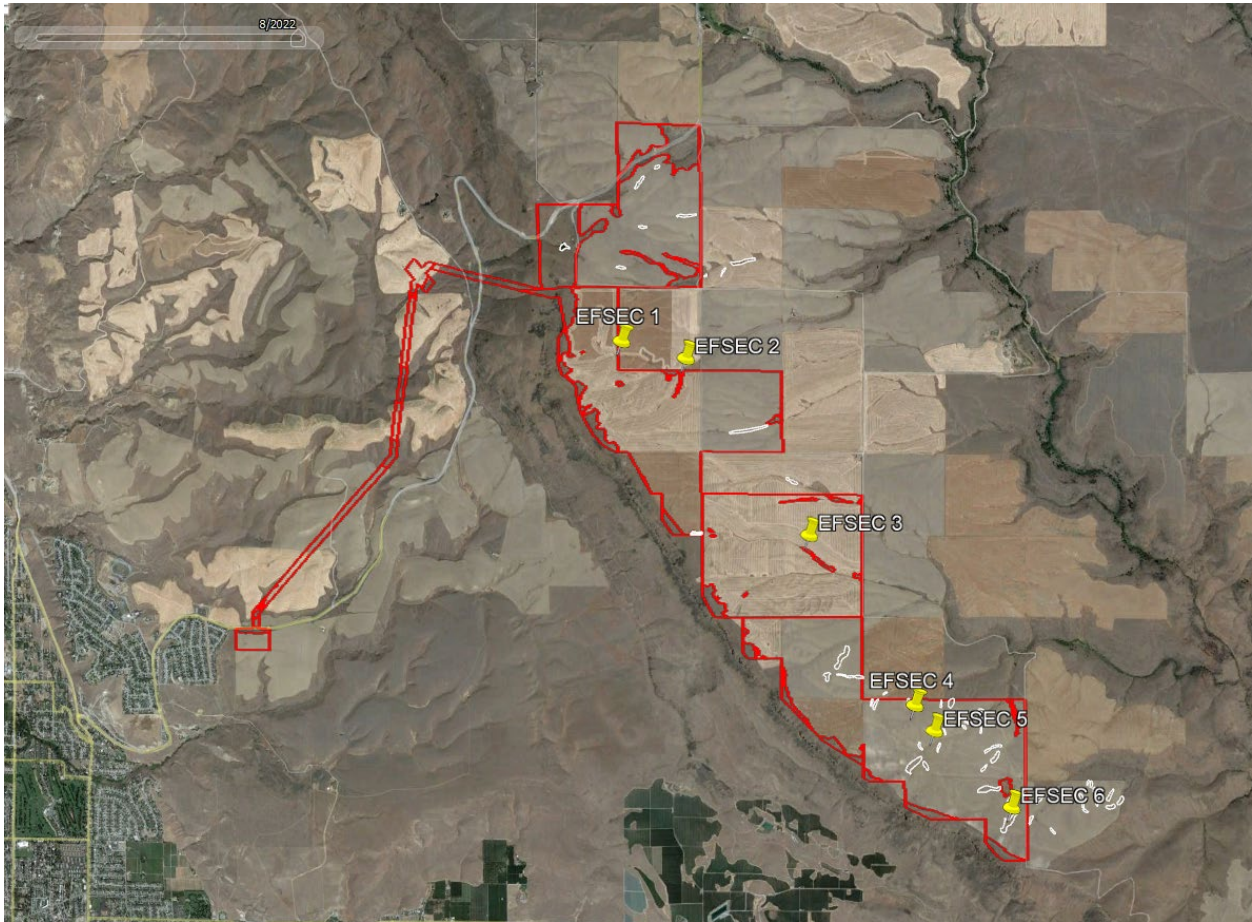


Image 8. April 6, 2023 Site Visit reviewed areas

