



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

October 23, 2023

Avangrid Renewables
120 South Sixth Street, Suite 1725
Minneapolis, MN 55104

Subject: Data Request 4 for Badger Mountain Solar Project Application for Site Certification

Dear Mr. DeRuyter,

Thank you for responding to our previous three data requests. I believe the only outstanding item from DR-3 is the preliminary jurisdictional determination with U.S. Army Corps of Engineers (USACE), which we understand is still in review. As a follow-up to DR-3, we would like to request additional field work be conducted to help fill in gaps that are needed to confirm the assertion in your October 5, 2021 Application for Site Certification (ASC) that there are no wetlands in the study area.

The ASC included a Wetland Delineation Report for the Project in Attachment I. Field work to support the Wetland Delineation Report was performed in April and June of 2021. The Wetland Delineation Report identified no wetlands and 46 stream segments in the study area.

On April 6, 2023, a site visit was performed by representatives Avangrid, the Avangrid's consultant (Tetra Tech), the Washington Energy Facility Site Evaluation Council (EFSEC), the Washington State Department of Ecology (Ecology), the Washington Department of Fish and Wildlife (WDFW), and EFSEC's consultant (WSP). The purpose of this site visit was to review six priority sites identified by Ecology to evaluate wetland conditions in portions of the study area where wetlands may occur. During the site visit, Ecology evaluated hydrology, soils, and vegetation at the six priority areas. Wetland hydrology was observed in some of the priority areas, although hydric soils were not observed. Tetra Tech explained to EFSEC during the site visit that they had additional USACE Wetland Determination Data Forms that were not provided in the Wetland Delineation Report.

As a follow-up to the site visit, on behalf of Ecology, EFSEC requested the following additional information:

Michael DeRuyter
Avangrid Renewables
October 23, 2023

- Provide all additional USACE Wetland Determination Data Forms for sample plots that were collected in the Project Area but not included with the submitted Wetland Delineation Report
- Provide maps showing the locations of the additional sample plots not included with the Wetland Delineation Report
- Provide the preliminary jurisdictional determination from USACE for the project
- Perform a desktop delineation of offsite wetlands outside of the Project Area that may have buffers extending into the Project Area. Include completed Ecology rating forms for these wetlands and the corresponding buffer widths. Please submit this in the form of a:
 - A memo summarizing methods used for the desktop delineation
 - Map(s) of the offsite wetlands and their corresponding buffers
 - And an Ecology rating form for each wetland

Avangrid provided a response to this information request on June 16, 2023. This response included all of the requested information, except the preliminary jurisdictional determination. This letter serves as a DR-4 for additional wetland data information. While you have provided the Wetland Determination Data Sheets recorded in 2021, documentation of wetland and upland conditions was not provided in numerous areas where wetlands may occur. These include areas in the northern portion of the Project Area managed by the Washington Department of Natural Resources, areas between ephemeral stream segments, and areas where vernal pools may be present.

Please see below the list for this data request. Note that this information is not necessarily needed for the Environmental Impact Statement process; however, it will be needed for EFSEC to comply with our procedures and to issue the Site Certificate Agreement.

Sincerely,



Amí Hafkemeyer
EFSEC Director of Siting and Compliance

Cc: Joanne Snarski, EFSEC
Sean Greene, EFSEC
Mark Eilers, Avangrid Renewables
Paul Hicks, Tetra Tech

Item	Section	Report	Information Request	Applicant Response
DR4-W-01	Water Resources	ASC Attachment I, Wetland Delineation Report	Provide additional sample plots with corresponding Wetland Determination Data Sheets in areas where wetlands may be present. These include areas between and adjacent to the mapped ephemeral stream segments, in the “potential areas of interest” identified by Ecology (see Attachment), and on the parcels managed by the Washington Department of Natural Resources in the northern portion of the Project Area (Parcel numbers 23211630001 and 23211630002).	
DR4-W-02	Water Resources	ASC Attachment I, Wetland Delineation Report	Perform often and frequent site visits to observe the presence and absence of wetlands with consideration of shifts in hydrology and vegetation. Recommendations include use of Indicator of Reduction in Soils (IRIS) tubes and shallow groundwater monitoring wells, where feasible, and application of the USACE Antecedent Precipitation Tool to determine if site observations occurred under normal climatic conditions.	