

BADGER MOUNTAIN SOLAR APPLICATION REVIEW - EFSEC COMMENTS TO ORIGINAL APPLICATION

Draft Avangrid Responses					
DR2-V-01	Vegetation	N.A.	Ground shading	How much of the ground will be shaded throughout the day by the solar panels?	As described in Part 2, Section A. 2. a 1 of the ASC, the solar modules, supporting components, and precise layout of the solar array have not yet been finalized, and the Applicant seeks to permit a range of technology to preserve design flexibility. Based on the preliminary layout, the Ground Cover Ratio (GCR) of the design is 30%, which will allow 70% of the ground below the panels to receive direct sunlight as modules tilt through the day.
DR2-V-02	Vegetation	N.A.	Ground shading	Will any of the ground be completely devoid of direct sunlight on a clear day?	As described in Part 2, Section A.2.a.1 of the ASC, the solar modules, supporting components, and precise layout of the solar array have not yet been finalized, and the Applicant seeks to permit a range of technology to preserve design flexibility. Based on the preliminary layout and solar array configuration described in the ASC, direct sunlight is anticipated to reach up to 70% of the ground beneath the panels as the sun angle changes throughout the day. All areas under the modules will receive indirect sunlight through the panels during portions of the day.
DR2-V-03	Vegetation	N.A.	Ground shading	How will moisture fall from the modules? Are there areas that will be barred from receiving moisture?	Moisture running off the bottom edge of a panel falls on the ground directly below the panel. The exact location of where the moisture falls depends on the time of day when the precipitation occurs, wind direction, and the resulting angle the tracking system is supporting the panel. Moisture also falls directly on the ground by falling between and from the sides and rear of the panels.
DR2-V-04	Vegetation	N.A.	Seeding	How will seeding occur relative to the module height (hand-seeding, broadcast seeding, etc.)?	The method of seeding will depend on the specific site conditions and the timing of seeding. If feasible, due to the seasonality of optimal planting dates (e.g., late fall to early spring), seeding will likely occur after grading is complete but before placement of Project components to provide more flexibility in seed application. Seeding methods will be based on site-specific factors such as slope, existing soils, and size of area being revegetated. Drill seeding is the preferred method for seeding of native species; however, this technique is more suited to deeper soils and gentle to moderate slopes. Broadcast seeding may be chosen for areas of shallow and rocky soils and hydroseeding may be chosen for areas of steeper slopes. In addition, drill seeding is more difficult after Project components have been installed, so it will primarily be used if seeding occurs before components are installed or in areas that were temporarily disturbed during construction that do not have any permanent infrastructure (e.g., temporary access roads, laydown areas). If seeding occurs after placement of Project components, seeding is anticipated to occur through either broadcast seeding, hydroseeding, or hand seeding.
DR2-V-05	Vegetation	N.A.	Water source	Where will water be extracted from to provide water to the site?	Project water use sources for construction and operation are addressed in Part 2, Section B.8.d and e, of the ASC, respectively.
DR2-V-06	Vegetation	N.A.	Water source	Will water be extracted from an off-site source? If so, from where?	See Applicant's response to DR2-V-05.
DR2-V-07	Vegetation	N.A.	Soil crusts	What is the role of soil crust in the undisturbed portions of the site? How will on-site impacts (dust generation, changes to hydrology) impact soil crusts?	Soil crust, or cryptobiotic crust, is a complex community of microscopic organisms that locks in moisture below the soil, increases soil fertility, provides soil stabilization, and minimizes erosion. Existing soil crusts will remain intact in undisturbed areas of the site. The Project is sited to avoid and minimize impacts to the ephemeral streams on site, and construction and operation of the Project are not expected to impact the hydrology, including groundwater, groundwater recharge, or streamflows either on or off-site. Therefore, no indirect impacts to soil crusts from changes in hydrology due to Project construction are anticipated. As noted in Part 4, Section 2.D of the ASC and following WAC 173-400-0940(9), the Applicant will implement best management practices (BMPs) and standard construction practices to prevent and minimize the creation of fugitive dust.
DR2-V-08	Vegetation	N.A.	Decommissioning	What are the areas of temporary disturbance required for project decommissioning?	Decommissioning activities will be similar in nature and location to those for Project construction.
DR2-WLF-01	Wildlife and Habitat	N.A.	GIS	Provide the following data in shapefile or feature class format from Figure A-5 (Attachment A): <ul style="list-style-type: none"> Habitat type data Area not Accessible Boundary 	The Applicant provided the requested information to EFSEC in a GIS map package on March 21, 2023. See "Figure_A-5_Habitat.zip" from the Applicant's March 21, 2023 email.
DR2-WLF-02	Wildlife and Habitat	Wildlife and Habitat Survey Report, ASC Attachment G	GIS	Provide the following data in shapefile or feature class format from Figure G-3 (Attachment G): <ul style="list-style-type: none"> Special Status Species Observation point data Active Nest Observation point data 	The Applicant provided the requested information to EFSEC in a GIS map package on March 21, 2023. See "Figure_G-3_Species.zip" from the Applicant's March 21, 2023 email.

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DR2-WLF-03	Wildlife and Habitat	Acoustic Assessment Report, ASC Attachment O	GIS	Provide the following data in shapefile or feature class format from Figure O-2 (Attachment O): <ul style="list-style-type: none"> Noise Sensitive Receptor point data Sound Level Contours (dBA) 	The Applicant provided the requested information to EFSEC in a GIS map package on March 21, 2023. See "Figure_O-2_Noise.zip" from the Applicant's March 21, 2023 email.
DR2-W-01	Water	N.A.	Water source	The ASC mentions a 10,000 gallon water cistern. Is this cistern existing, or proposed for the project? Would the water source for the cistern be precipitation or some other source?	Part 2, Section A.2.a.1 of the ASC, states that the Project's operations and maintenance (O&M) area may include a 10,000-gallon water cistern to store water for fire suppression needs. The cistern is proposed and is not existing. If included in the Project, initial and periodic refilling of the cistern may include one or a combination of the following such as from precipitation, be trucked in from off-site sources with existing water rights (i.e., a municipal water source or vendor with a valid water right), through a new, appropriately permitted individual on-site groundwater well, or using an on-site groundwater permit-exempt well that pumps no more than 5,000 gallons per day. Project water use sources for construction and operation are also addressed in Part 2, Section B.8.d and e, of the ASC, respectively.
DR2-W-02	Water	Wetland Delineation Report, ASC Attachment I	GIS	Provide shapefiles or feature class data for "Delineated Stream" and "Desktop-delineated Stream" from Attachment I, Figure set 5.	The Applicant provided the requested information to EFSEC in a GIS map package on March 21, 2023. See "Attach_I_Figure_5_Wetlands.zip" from the Applicant's March 21, 2023 email.
DR2-T-01	Transportation	N.A.	Traffic and capacity data	Provide PDFs of the sources used to determine ADT and LOS. Due to these changing on-time, it is difficult for the EFSEC to confirm the accuracy of the values used without the source information being provided in electronic format.	Section 2.2 of the Applicant's Traffic Impact Study identifies the available Douglas County and City of East Wenatchee data sources used to determine the average daily traffic and level of service in the analysis. The data sources are provided in PDF format in Appendix A to the Traffic Impact Study. Tables 2 and 3 of the Traffic Impact Study summarize the available traffic data and adjust the data to the estimated 2025 construction year, respectively.
DR2-T-02	Transportation	N.A.	GIS	<ul style="list-style-type: none"> Provide polylines from both the Port of Tacoma and the Port of Seattle showing the anticipated route for shipments to the Project Area Provide point locations and names for railroad crossings intersecting from the Ports to the Project Area. <ul style="list-style-type: none"> Provide polygons for any school zones that construction traffic may drive through during the transportation of materials. 	<p>Figure 1 (Transportation Routes) in the Applicant's Traffic Impact Study identifies the proposed transportation haul routes anticipated to be used by workers and delivery of materials and equipment necessary to develop the Project. Transportation Route 1 approaches the Project Area from Washington State Route 28 (WA-28) and Transportation Route 2 approaches the Project Area from U.S. Highway 2 (US 2). As described in Part 4, Section 20 of the ASC, WA-28 is the preferred route for limited oversize deliveries and the Applicant requests flexibility in the use of routes pending the need of the Applicant's contractor at final design.</p> <p>Figure 1 identifies a railroad crossing under US 2 on Transportation Route 2. Transportation Route 2 goes over the railroad via a bridge and does not cross the railroad tracks.</p> <p>Figure 1 identifies schools in Wenatchee and East Wenatchee. Figure 1 identifies a school zone on 15th Street NE in East Wenatchee along Transportation Route 1 and identifies an alternate route on 9th Street NE that avoids school zones. The Applicant provides the requested information to EFSEC in a GIS map package. See "Badger_Mtn_Figure_1_TransportationRoutes_mpk.mpk" attached to this Data Request.</p>

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<p>DR2-G-01</p>	<p>General</p>	<p>N.A.</p>	<p>GIS</p>	<p>Provide the following data in shapefile or feature class format from Figure A-1 (Attachment A):</p> <ul style="list-style-type: none"> • Project Lease Boundary • Solar Array Micrositing Area • Gen-tie Micrositing Corridor • Option 1 Point of Interconnect • Option 2 Point of Interconnect • Project Components: <ul style="list-style-type: none"> ○ Solar Array ○ Inverters ○ Perimeter Fence ○ Project Service Road ○ O&M Building ○ Collector Substation ○ Battery Energy Storage system ○ 230 kV Gen-tie Line ○ Switchyard ○ Temporary Staging Area • Base Map Features: <ul style="list-style-type: none"> ○ Existing Transmission 	<p>The Applicant provided the requested information to EFSEC in a GIS map package on March 21, 2023. See "Figure_A-1_Site_Plan.zip" from the Applicant's March 21, 2023 email.</p>
<p>DR2-G-02</p>	<p>General</p>	<p>N.A.</p>	<p>GIS</p>	<p>Provide the following data in shapefile or feature class format from Figure A-7 (Attachment A):</p> <ul style="list-style-type: none"> • Boundary/Points for Sensitive, Candidate, Threatened, or Endangered Plants or Wildlife as identified on the State or Federal list 	<p>The Applicant provided the requested information to EFSEC in a GIS map package on March 21, 2023. See "Figure_A-7_Buffers.zip" from the Applicant's March 21, 2023 email.</p>