

Data Requests Incorporated into Final Application for Site Certification, Wautoma Solar

Item ID	ASC Section	Question or Information request	Modifications to ASC	Location of Change in ASC
Animals-1	ASC 4.9.B beginning page 163	WDFW appreciates that the project illustrated the position of the project in relationship to important elk core areas and linkages (connectivity) but would like to point out that mule deer habitat concentrations areas are also within the project. Additionally, other data sets such as the Statewide Action Plan (WDFW 2015) identify that the proposed Wautoma Solar project is within the observed range of Burrowing Owl, Greater Sage-grouse, and Ferruginous Hawk. Please prepared additional maps showing that more than just elk are dependent on the area of the proposed project and surrounding	ASC Section 4.9 and the Draft Habitat Mitigation Plan have been updated to address this request. Additional information on sage grouse, burrowing owl, and non-special status species was added to Section 4.9.B.	Section 4.9.B, Draft HMP
Animals-2	4.9 Animals	The ASC notes that the Project is not predicted to impact fish within the project area; however, the application does not discuss the potential for impacts downstream in receiving waters. Please provide information on whether impacts in the project area, such as a spill, could impact fish downstream.	Additional information on fish and why the project would not adversely impact downstream fish was added to Section 4.9.B.	Section 4.9.B
SEPA-1	Attachment I, Figures 5-4; 5-5; 5-7 (When overlaid with Attachment A, Figure A-1 Preliminary Site Plans, sheets 4, 5 & 7)	Please address: It is unclear if two of the wetlands are located within the siting of the solar panels. The placement of solar panels over the wetlands could create shading that may alter the wetland's ecology and could be considered an impact. Should impacts be unavoidable, compensatory mitigation would be required. Documentation of mitigation sequencing (avoidance, minimization, rectifying the impact, reducing, or eliminating the impact over time, and compensation) should be provided.	ASC Section 4.3.C.1 was updated to explicitly state that no solar panels will be placed over wetlands or their buffers, and disturbance of wetlands and their buffers will be avoided during construction.	Section 4.3.C.1
SEPA-2	Attachment A - Project Maps	Please address wildlife habitat connectivity. Figure A-1 (Attachment A – Project Maps) illustrates the project layout with various fenced-in solar arrays but nowhere in any of the documents does the project address impacts to landscape connectivity and wildlife movement. Figure A-9 (Attachment A – Project Maps) shows information from 3 separate data sets: the Arid Lands Initiative, the Statewide Connectivity Analysis, and	Figure A-9 has been updated to include mule deer as well as information from the Arid Lands Initiative and Columbia Plateau Connectivity Analysis. Section 4.9.C.2 already addressed big game movement corridors that have been established within the project area.	Figure A-9
SEPA-3	4.14 Land Use, Natural Resource Lands & Shoreline Compatibility	Please provide more clarity on why the identified prime farmlands within the Project Area are isolated and explain why and how topography and drainage limitations result in low economic viability of these farmlands. Additionally, EFSEC recommends the Applicant provide an approximate area of land that would be lost for sheep grazing within the Project Area and an analysis of potential changes in forage quality which could indirectly affect patterns of agricultural use in the region.	Section 4.14 provides additional detail on factors limiting the economic viability of continued farming at this location, and affirms that the 30 acres currently used for sheep lambing will not be included within the project layout. Sheep grazing has and will continue to occur on adjacent parcels held by the same landowner (no sheep grazing area will be lost). Information on forage quality also was added to Section	Section 4.14
SEPA-4	4.9 Animals	The ASC provides a list of animal species observed during field studies as well as special status species with potential to occur in the vicinity of the Project. The ASC does not include information on non-special status species or guilds that could occur in the area. For example, the ASC does not provide information on the potential for bats or amphibians to use the vicinity of the Projects. Please provide information on wildlife guilds/species groups that could occur in the Project Area or provide rationale	Information on non-special status species was added to Section 4.9.B.	Section 4.9.B
SEPA-5	4.9 Animals	The ASC does not provide information on invasive animals documented or with potential to occur in the Project Area, which is a SEPA requirement. For a more definitive SEPA evaluation, please provide information on whether invasive animal species are known to or have the potential to occur in the Project Area.	No species listed by WDFW as invasive are known to occur in the vicinity of the project area. This information was added to Section 4.9.B.	Section 4.9.B
SEPA-6	4.8 Plants and Ecosystems	Please provide information on the plant species that would be used in the 'green strips' for potential fire protection, and whether these 'green strips' would include shrubs. Generalized information should be provided for location and extent of 'green strips' and clarification as to whether habitat loss calculations include loss associated	Information on green strips was added to the Habitat Mitigation Plan.	Attachment M
SEPA-7	4.8 Plants and Ecosystems	Kochia ( <i>Bassia scoparia</i> ), a state- and county-listed noxious weed, was documented during field surveys according to Appendix F and Section 3.8 but is omitted from Section 4.8, assumingly because it does not occur in the Project Area. The SEPA requires the Applicant to provide information on all noxious weeds and invasive species known to be on or near the site. Please confirm that Kochia occurs in the Project Lease Boundary but not the Project Area based on the revised Project Area and indicate whether there are other noxious weed and invasive species not documented in the Project Area but	Information on Kochia was added to Section 4.8.B. Additional information on measures to avoid and minimize the potential for the spread of weeds was added to Section 4.8.D.	Section 4.8.B, 4.8.D
Earth-1	Attachment I	Are wetland associated buffered areas shown on maps?	Buffers are not shown in the wetland delineation report. Project infrastructure avoids impacts to wetlands and the 40-foot buffers required under Benton County's Critical Areas Ordinance. This	Section 4.3.C.1
Env. Health-1	Part 4.13, Environmental Health	P. 182, Has well location and availability been verified?	The existing on-site well location is known but is not included in ASC maps. Water availability has been verified but the process of adjusting	No change
Light, Gare & Aesthetics-1	Attachment P, Visual Impact Assessment	Of the 5 KOPs, why are only 2 (KOP 3 & 4) provided with simulations?	KOPs 3 and 4 represent the greatest potential change to views from the project area.	

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L.U.-1	Part 4.14, Land Use, Natural Resource Lands, & Shoreline Compatibility	P. 197 identifies irrigated agricultural land use. Soil compaction on irrigated agricultural lands can result in permanent damage. Please address efforts to reduce permanent damage on the site during construction and operation as well as	Information on BMPs to limit soil compaction has been added to Section 4.14.C.	Section 4.14.C
L.U.-2	Part 4.14, Land Use, Natural Resource Lands, & Shoreline Compatibility	P. 193 states 524 acres are enrolled in the federal Conservation Reserve Program. Will all these acres be removed from this program for this project?	All or a portion of these acres could be removed from CRP depending on final design of the project. This information has been added to Section 4.14.B.	Section 4.14.B
Noise-1	Attachment O Acoustic Assessment Report	In Attachment O, it is unclear how the 500-kV transmission line was incorporated into the model or the final noise impact results from Project operations. Please clarify noise source inputs into the model or the calculated impacts from the transmission line are included along with the location of the line in the attachment's figures.	The 500 kV transmission line was incorporated as an elevated line source. Attachment O has been updated to clarify this source.	Attachment O
Noise -2	Attachment O Acoustic Assessment Report	Noise impacts from the tracking system motors during operations were omitted from the ASC as a possible source of noise. Please include this possible source of noise in the analysis of noise impacts.	Attachment O has been updated to include noise impacts from the tracking system motors.	Attachment O
Project Info.-1	Part 2, B. Project and Site Information	Part 2, B.2. Surface Types and Acreage, page 45, the table shows impervious surfaces, post construction, will be 161 acres. Part 4, Part 4.1.C, pages 115, 116 states impervious surfaces are anticipated to be 142 acres. Please explain the	Portions of the 142 acres included in the area to be developed by the project are already classified as impervious under existing conditions, so the net increase in impervious surface is 128 acres. This information	Section 4.1.C
Project Info.-2	Part 2, B. Project and Site Information	Part 2, B.2. Surface Types and Acreage, pages 45 46, the table show a reduction of 1 ephemeral stream, post construction. Please explain how we lost 1 stream.	This typo has been corrected in Section 2.B.2.	Section 2.B.2
Veg.-1	4.8 Plants & Ecosystems	The application notes that altered vegetation communities within the Project area would provide habitat for generalist wildlife species but not steppe-shrub specialists. Please provide a species-specific calculation of habitat loss for special status species	A total of 5 acres of shrub-steppe habitat would be removed or modified through project construction, including temporary impacts as well as enclosure within the fenced area. These calculations were	Section 4.8.C
Veg.-2	Attachments G & M	Attachment G (2021 Wildlife and Habitat Survey Report) and Attachment M (Habitat Management Plan) acknowledges the roll of fire in this landscape and its impact on shrub steppe habitat. Attachment M considers burned and recovering shrub steppe as shrub steppe habitat, but Attachment G maps these burned areas as Eastside (interior) Grasslands. Attachment G goes so far as to acknowledge "...remnant dead shrubs..." that "...were likely killed in the 2016 Range 12 Fire," and provides a picture (figure 7) of these burned shrubs. WDFW considers this priority shrub steppe habitat. Please revise the project maps for these areas and show them as priority shrub steppe	Attachment G and Attachment M were updated to classify these areas of burned shrub-steppe habitat as shrub-steppe. Calculations in Section 4.8 were updated accordingly.	Section 4.8.B, Section 4.8.C, Attachment G, Attachment M
Veg.-3	Plants & Ecosystems 4.8	The application notes that the project may include developing "green strips" as fire and fuel breaks that extend 100 to 150 meters (approximately 328 to 492 feet) beyond the Project Area; however, the application does not calculate the habitat changes created by these green strips. As such, it is unclear whether the habitat loss calculations in the ASC are correct. Please address the anticipated impacts of the green strips on wildlife	Fire strips would be considered a mitigation measure and would not be considered habitat loss based on recommendation from WDFW. Additional detail was added to Attachment M (Habitat Mitigation Plan) to clarify this approach.	Attachment M
Veg.-4	Plants & Ecosystems 4.8	Please further address the permanent and temporary impacts on vegetation from project construction and operation and alterations to vegetation within the solar arrays' perimeter fence for the life of the Project.	Additional detail has been added to the Habitat Mitigation Plan.	Attachment M
Veg.-5	Plants & Ecosystems 4.8	Please further address the detailed assessment of the loss of priority habitat, i.e., identification of plant types, quantities, locations, proposed mitigations...	This additional detail was subsequently confirmed by EFSEC not to be required (1/20/23).	N/A
Veg.-6	Plants & Ecosystems 4.8	Please provide a more detailed assessments of temporary impacts to occur within the two acres of shrub-steppe and the three acres of eastside (interior) grassland.	This additional detail was subsequently confirmed by EFSEC not to be required (1/20/23).	N/A
Veg.-7	Plants & Ecosystems 4.8	Please provide a more detailed assessment of permanent impacts to occur within less than one acre of shrub-steppe and eastside (interior) grassland each.	This additional detail was subsequently confirmed by EFSEC not to be required (1/20/23).	N/A
Veg.-8	Plants & Ecosystems 4.8	Please provide a more detailed assessment of the altered vegetation to occur within less than one acre of shrub-steppe and three acres of eastside (interior) grassland.	This additional detail was subsequently confirmed by EFSEC not to be required (1/20/23).	N/A

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Veg.-9	Plants & Ecosystems 4.8	Please provide more detail of mitigating measures addressing soil disturbance and vegetation removal during construction to counter the increase of the potential for the introduction or spread of non-native, invasive plant species. Public comments were received concerned with the spread of wind or animal born seeds from non-native, invasive vegetation into the Hanford National Monument.	A draft Vegetation and Weed Management Plan is now included as Attachment U to the ASC.	Attachment U
Veg.-10	Plants & Ecosystems 4.8	The risk of fire has the potential to affect vegetation resources and create conditions that could facilitate colonization or expansion of non-native, invasive plant species. Please provide a Site Restoration plan addressing measures to undertake in the event fire occurs to prevent the subsequent, non-native species invasion and restore area to	A draft Vegetation and Weed Management Plan is now included as Attachment U to the ASC.	Attachment U
Veg.-11	Plants & Ecosystems 4.8	Please provide a list of species under consideration for seeding in areas under the solar panel if passive revegetation was not successful.	A draft Vegetation and Weed Management Plan is now included as Attachment U to the ASC.	Attachment U
Veg.-12	Plants & Ecosystems 4.8	Please provide justification for why Class II habitat, which includes shrub-steppe and based on recommendations by WDFW, rabbitbrush, is offset at the temporary disturbance ratio for 'altered habitat'. The shrub-steppe and rabbitbrush ecosystems would be the most altered as shrubs are not compatible with solar arrays, resulting in a loss of shrub-steppe and rabbitbrush in the altered habitat for the life of the Project.	Mitigation ratios were proposed consistent with other habitat mitigation plans approved by WDFW for solar projects in Washington. No change made in response to this comment.	N/A
Veg.-13	Plants & Ecosystems 4.8	Provide information on how habitat offsets would be adjusted if areas of revegetation do not meet the success criteria.	The draft Vegetation and Weed Management Plan addresses success criteria, monitoring, and mitigation measures.	Attachment U
Veg.-14	Plants & Ecosystems 4.8	Applicant is requested to provide a Draft Vegetation and Weed Management Plan which should include: a clear description of the Applicant's plans for herbicide/pesticide use, measures for controlling the establishment or spread of invasive and weed plant species, and a proposed post-construction revegetation	A draft Vegetation and Weed Management Plan is now included as Attachment U to the ASC.	Attachment U

Miscellaneous text edits not associated with an EFSEC data request, Wautoma Solar

Location of Change in ASC	Nature of Change	Rationale
Part 1 Section A.2	Update preparer contact information	Preparer contact information has changed
Part 1 Section B	Update construction schedule	Construction schedule has changed
Part 1 Section E	Update list of studies to reflect current completion status and report titles	Additional studies have been completed
Part 2 Section A.2	Add detail regarding electrical circuit installation	Separate
Part 2 Section A.3	Update construction schedule	Construction schedule has changed
Part 2 Section A.4	Update title for Figure A-9	Figure A-9 was modified
Part 2 Section A.5	Add information on soil monitoring	Soil monitoring is proposed to address concerns from Benton County and Washington Department of Agriculture
Part 2	Correct typographical errors	Correct typographical errors
Part 2 Section A.5	Add EFSEC as expert agency for stream crossing BMPs, HPA, CSWGP, HMP, etc.	EFSEC request
Part 2 Section A.5	Add additional preventative measures to avoid spills	EFSEC request
Part 2 Section A.5	Add statement that Innergex is support of coordination on shared emergency response services.	Adjudication discussion
Part 2 Section A.5	Update site IDs and agency participation for sites to be protected	State ID numbers were issued by DAHP after the initial ASC was prepared and the interested tribe has been verified to be only Yakama Nation
Part 2 Section B.2 and Attachment G	Revise habitat classification for previously burned shrub-steppe habitat from grassland to shrub-steppe	Request from WDFW
Part 2 Section B.3, Part 4 Section 4.8.A, and Attachment F	Update to reflect supplemental 2022 surveys completed.	Supplemental botanical surveys were completed and the report has been added to Attachment F
Part 3 Section 3.3.a	Provide additional information on Washington Department of Ecology review of the wetland delineation report and site visit.	Comments from Washington Department of Ecology
Part 3 Section 3.6.a	Correct typographical errors	
Part 3 Section 3.8.a, Attachment F, Attachment G	Update to reflect supplemental 2022 surveys completed and to address changes to habitat mapping requested by WDFW.	Supplemental botanical and wildlife surveys were completed and the report has been added to Attachment F. The habitat survey report was updated to address comments provided by WDFW.
Part 3 Section 3.9.a, Part 4 Section 4.9.A, Attachment G	Update to reflect supplemental 2022 surveys completed.	Supplemental wildlife surveys were completed and the report has been added to Attachment G. WDFW coordination efforts have been updated to reflect comments and discussions that occurred after the initial ASC was submitted.
Part 3 Section 3.11.a	Incorporate additional detail on battery system options as described in Part 2.	Clarify that battery technology selection has not be finalized
Part 3 Section 3.13.a	Incorporate additional detail on battery system options as described in Part 2.	Clarify that battery technology selection has not be finalized
Part 3 Section 3.15.a	Insert the word 'temporary' before 'housing'	Clarify that the housing analysis for construction workers was focused on temporary housing availability
Part 3 Section 3.17.a	Provide additional detail on potential hunting that could occur during construction and operation of the facility	EFSEC request
Part 3 Section 3.19.a	Update information on cultural resource survey and status of tribal outreach.	Updated surveys were conducted and review of the cultural resource survey report resulted in DAHP approval.
Part 3, Section 3.22	Clarify location of stormwater discussion in Part 3	Clarification
Part 4, Section 4.9.C	Update setback distance from burrowing owl nests.	Required setback from burrowing owl nests was updated based on further discussion with WDFW.
Part 4, Section 4.9.C	Clarify approach for establishment of new artificial water sources outside of the fenced areas.	Clarification
Part 4, Section 4.9.C	Clarify avoidance and minimization measures for burrowing owl burrows.	Clarify based on discussions with WDFW after submittal of the initial ASC.
Part 4, Section 4.9.F	Add reference for Washington Invasive Species Council	Additional citation
Part 4, Section 4.13.D	Correct issuing agency for CSWGP	EFSEC request
Part 4, Section 4.16a.C	Editorial correction	Correct typographical errors
Part 4, Section 4.18.A and 4.18B	Update to reflect cultural resource survey and report status; replace temporary site IDs with permanent site IDs issued by DAHP	Updated surveys were conducted and review of the cultural resource survey report resulted in DAHP approval.
Part 4, Section 4.19.A	Update to reflect cultural resource survey and report status	Updated surveys were conducted and review of the cultural resource survey report resulted in DAHP approval.
Part 4, Section 4.19.B	Add information provided by Yakama Nation to EFSEC	
Part 4, Section 4.19.B	Clarify source of information for usual and accustomed areas	
Part 4, Section 4.19.D	Update information on agency participation	Interested tribes have been verified and updated
Attachment V	Add information on proposed soil monitoring	Provided to EFSEC in response to comments from Washington Department of Agriculture