

WAUTOMA SOLAR APPLICATION REVIEW - EFSEC COMMENTS TO ORIGINAL APPLICATION

Data Request No. 1

November 10, 2022

ID	Section	Comment	Applicant response
Gen-1	A.4 - Table of parcels and property owners	Wautoma Energy LLC is listed as the property owner for several parcels. Did Wautoma buy the land, or are they participating in leases for those properties? If they are leased, who is the land owner?	Wautoma Energy LLC is not an Innergex-related company, rather is a participating landowner. Innergex is leasing parcels of land from Wautoma Energy LLC.
Gen-2	D. Screening Summary	Some of the "Yes" and "N/As" are greyed out. Is this deliberate, or indicative of anything?	Yes, this was deliberate. Rows where the answer to question 1 ("Does screening trigger a Part 4 analysis?") is "No" were greyed out. All other rows were not greyed out.
Gen-3	E. List of studies	3 studies are listed (Habitat and General Wildlife Survey Report Addendum, Botanical Survey Addendum, and Phase 1 Environmental Site Assessment) are all listed as planned/pending. Is there additional information on the ECD of these studies?	The Habitat and General Wildlife Survey Report Addendum and Botanical Survey Addendum were submitted to EFSEC by email to Joe Wood on August 16, 2022. The Phase 1 Environmental Site Assessment will be completed prior to construction.
Gen-4	Part 2 A.2.a Project description, describe proposal 1. Introduction	It is not clear, when reviewing the description of the Project area and Fenced area, what the total number of disturbed acres would be to include the project, infrastructure, and fencing. The maps indicate placement, but is the 4,573 acres inclusive of the fencing acreage or not?	Yes, the 4,573-acre Project Area is inclusive of the 2,974-acre Fenced Area. Total disturbed acres within the Project Area are provided in Part 2.B.2.
Gen-5	Part 2 A.2.a Project description, describe proposal 2.1.4 AC Medium Voltage Collector Network	Would each circuit have its own 3'x4' trench, and how many of these trenches are anticipated project-wide?	Advanced electrical engineering, as well as further studies related to thermal dissipation, have not yet been performed. These studies will inform the number of circuits and trenches, as well as the distance between them. The estimate of 20 feet between circuits, as described in Part 2, A.2.a, 2.1.4 of the ASC, represents the greatest possible impact (most conservative estimate); following analysis from the thermal dissipation study and detailed electrical engineering, the distance between trenches may decrease. It is likely that, should this distance be decreased, the same trench could be used for several circuits (i.e. fewer, larger trenches throughout the site). Once these additional analyses have been completed, updates will be made to the impact assessments calculated to inform the Habitat Management Plan.
Gen-6	Part 2 A.2.a Project description, describe proposal 2.1.4 AC Medium Voltage Collector Network	Are the buried cables outside the perimeter fence already included in the disturbance area indicated in the project acreage?	Collection line corridors outside the fence lines are included in the temporary impact values.
Gen-7	Part 2 A.2.a Project description, describe proposal 2.1.6 Overhead Transmission Line	Is BPA going through NEPA for this connection? Please provide that analysis if so.	Yes, BPA will go through the NEPA process for the connection. The NEPA process has not yet commenced; Innergex will coordinate with BPA to provide the analysis, once available.
Gen-8	Part 2 A.2.a Project description, describe proposal 3.0 Construction	Is the 22 month proposed schedule inclusive of phased construction options or not? If not, please indicate what a sample schedule may be in the event of phased construction.	The proposed 22-month schedule was for the full project size of 400-470 MW. Phased construction (i.e. two phases of 200 MW each) would follow a modified schedule. See attached for a sample schedule for phased construction.
Gen-9	Part 2 A.5 Mitigation Measures	Point of clarification - required permits (e.g., HPA) and plans (e.g., CSWPPP) are regulatory requirements and not considered mitigation. Additionally, studies on their own are not mitigation. It would be better to identify options for mitigation based on the results of the indicated studies.	Noted.

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Gen-10	Part 2 A.5 Mitigation Measures	Point of clarification - EFSEC is the issuing agency for the construction SW general permit. This would not be obtained directly from Ecology. This is indicated correctly in A.6, but in A.5, it references obtaining the permit from Ecology.	Noted.
Transp -1	Part 2 B.10 Transportation	Please expand more on the estimated 225 round trips per day. Is this primarily anticipated to be construction crew?	<p>The estimated 225 round trips per day is primarily anticipated to be from the construction crew. It is likely that some carpooling will occur, which will reduce the number of trips generated by worker commutes.</p> <p>Equipment delivery and potentially water truck delivery trips would be in addition to construction crew trips.</p> <p>A detailed analysis of traffic and transportation can be found in Part 4.20.C of the ASC.</p>
Transp -2	Part 2 B.10 Transportation	Where will construction staff park. 10 spaces seems to be for operations and 225 round trips would need to be many more staff than would be accommodated by 10 spaces.	Correct, during operations there are 10 parking spaces designated. During construction, temporary laydown areas will be used for parking and equipment storage, and will be distributed throughout the site. The exact locations of the laydown areas will be finalized during detailed project design. While laydown areas will be temporarily disturbed during construction, these areas will eventually have solar arrays built on them and will be revegetated in accordance with the Vegetation and Weed Management Plan.
Earth-1	3.1/4.1 Earth, erosion	Is there a reference you can provide that demonstrates why soils in the project area are rated low to moderate for wind erodibility?	Soil wind and water erodibility details are provided in Attachment E, Table E-1. The soils information citation is: Natural Resources Conservation Services. 2022. Web Soil Survey Application: Benton County Area, Washington (WA605). Available online at: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm .
Veg-1	4.8.C.1 Plants, Changes to the Existing Condition from the Project - Fire	Has DNR or the local fire response agency given any comment on the preventative measures planned, and/or the use of the potential cistern?	<p>Innergex's understanding is that DNR had been provided a copy of the ASC by EFSEC and would be providing comments directly to EFSEC, if they had any. Innergex has not been contacted directly by DNR.</p> <p>While the project site is in a remote area that isn't part of a tax-supported fire protection district, Innergex has had preliminary communication with the Benton County Fire Marshall, who provided suggestions on fire response measures that could be taken and agreed to further communications as the project develops. The Fire Marshall's advice was consistent with measures described in the ASC (installation of a 10,000 gallon water cistern, fire breaks/buffers throughout and around the perimeter of the site).</p> <p>Innergex has also reached out to the Bureau of Land Management and the Hanford Fire District and engaged in ongoing discussions with participating and adjacent landowners on potential fire response measures that could be employed by the Project, which could also provide a community benefit to the surrounding area.</p>

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Wild-1	4.9.C.1 Animals, Changes to the Existing Condition from the Proposal - Big Game Habitats and Migration Routes	Please provide any update on moving the existing water sources designed for livestock.	Innergex and the Washington Department of Fish and Wildlife have been engaged in discussions on the Habitat Management Plan (Attachment M of the ASC). Relocating an existing water source (currently used for livestock watering) to a location outside of the project area in order to maintain wildlife access to the source, was identified as a potential mitigation measure against project impacts. While a mitigation plan has not been finalized, we anticipate that one pond will be relocated to a location outside of the project area, likely sited within a conservation easement to be established as part of the Habitat Management Plan.
EH-1	4.13.D Environmental Health - Hazardous Materials, Proposed Mitigation and Monitoring	Point of clarification - further references to plans required by regulation as mitigation included here, as well as reference to obtaining CSWGP from Ecology. Please ensure that appropriate parties are aware that EFSEC would be the issuing agency for this permit.	Noted.
Rec-1	3.17.a Recreation	Can you please provide an example of times where hunting would be permitted during construction that would not incur health and safety risks?	During construction of the project, permission for hunting may be considered, on a case-by-case basis, if it would occur far enough from active construction zones as to not incur health and safety risks to personnel or equipment. Hunting within the fenced project area will not be permitted at any time during operation of the project.
Rec-2	3.17.a Recreation	Please describe, if any, measures taken to prevent damage to facility or O&M staff from hunting activities.	Hunting within the fenced project area will not be permitted at any time during operation of the project. Adjacent parcels, which will not be leased for the project, will remain under the control of their respective landowners, and hunting may occur in these areas. To ensure the safety of personnel and equipment, Innergex will communicate with the landowners of adjacent parcels to ensure they are aware of routine and scheduled maintenance activities by O&M staff, as well as requesting that the landowners inform Innergex of scheduled hunting activities.