



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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June 7, 2024

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

SENT VIA ELECTRONIC MAIL

RE: Carriger Solar Project, Shorelands, Wetland and Waters of the State Site Visit

Dear Joanne Snarski:

Thank you for meeting the Department of Ecology's (Ecology) Shoreline and Environmental Assistance (SEA) Program staff, Lori White, Heather Durkee, and Ryan Anderson, and representatives of Cyprus Creek Renewables and Tetrattech onsite April 16, 2024, to review the project area. Ecology staff were specifically reviewing areas of interest for potential wetland characteristics.

While on site, we visited areas near AOI 23, DP-3, the wetland complex near Wetland O, and AOI 1. Several characteristics of wetlands were observed on site requiring further field work and investigation.

Near AOI 23 and in areas along nearby stream 4, Ecology staff observed standing water, a high water table, algal matting, and hydrophytic vegetation. Ecology requests further field work to characterize these areas and to determine if they meet wetland criteria.

Ecology staff observed wetland indicators suggesting a complex of vernal pools near DP-3, including a vernal pool to the NE of DP-3 and an arm east of DP-3. These areas require additional field work and investigation. While on site, Ecology staff observed surface water, algal matting, *Branchinecta* sp. (fairy shrimp), hydrophytic vegetation, and surface cracks.

Vernal pool ratings can be determined using [Washington State Wetland Rating System for Eastern Washington: 2014 Update](#) and the 2014 Eastern Washington Rating Form. A vernal pool would be rated Category II if it is part of a complex or near other water resources, or Category III if it is isolated.

Based on Table 8D-5 and Table 8D-6 in [Wetlands in Washington State - Volume 2: Guidance for Protecting and Managing Wetlands](#) (2005), Ecology recommends a buffer width of 80 feet for Category III isolated vernal pools and 200 feet for Category II vernal pools.

If field work confirms the presence of additional wetlands, mitigation sequencing should be applied to the project design (avoidance, minimization, and mitigation) prior to accepting that impacts are unavoidable. If impacts are unavoidable, impacts must be minimized to the extent practical and compensatory mitigation would be required.

If impacts to wetland buffers are unavoidable, Ecology guidance recommends that impacts to buffers be evaluated as indirect impacts to wetlands. If indirect impacts are proposed, agencies typically require compensation at one-half of the recommended ratio for permanent impacts. More information can be found in Ecology's mitigation guidance document [Wetland Mitigation in Washington State Part 1: Agency Policies and Guidance Version 2](#), Table 6B-1. See also Chapter 3.4.5 for examples of indirect impacts.

Section 6B.5.5 of Ecology's mitigation guidance document discusses mitigation ratios for impacts to vernal pools. Ecology's preferred mitigation for vernal pools is preservation, with 16 acres of vernal pools to be preserved for every 1 acre impacted. The guidance document also provides options for compensation in some cases, through creation, re-establishment, or rehabilitation of one or more seasonally ponded wetlands, with ratios of 3:1 for creation or re-establishment, and 6:1 for rehabilitation.

Conclusion

An addendum to the *Amendment to the 2020, 2022, and 2023 Carriger Solar, LLC Project Wetland and Waterbodies Delineation Reports (December 15, 2023)* should be provided to EFSEC to address wetland indicators observed during the site visit and delineate any additional wetlands found on site.

If project plans change, details should be provided for review 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) 379-4530.

Sincerely,



Heather Durkee
EFSEC Federal Permit Manager



Energy Facility Site Evaluation Council

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Shorelands and Environmental Assistance Program

ec: Lori White, Department of Ecology

Loree' Randall, Department of Ecology

