

Attachment B10
Preliminary Results of Threatened, Endangered and
Sensitive Species (TESS) Surveys for the
Rattlesnake Flat Wind Project

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MEMORANDUM

Date: June 4, 2018

To: NRG Renew LLC

From: WEST, Inc.

Subject: Preliminary Results of Threatened, Endangered and Sensitive Species (TESS) Surveys for the Rattlesnake Flat Wind Project, Adams County, Washington.

Introduction

Western EcoSystems Technology, Inc. (WEST) completed an initial survey for threatened, endangered, and sensitive species (TESS) at the proposed Rattlesnake Flat Wind Project (Project) in Adams County, Washington, in accordance with recommendations in the US Fish and Wildlife Service (USFWS) *Land-Based Wind Energy Guidelines* (WEG; USFWS 2012) and the Washington Department of Fish and Wildlife (WDFW) *Wind Power Guidelines* (WDFW 2009). An additional survey is planned for June 2018.

Study Area

The Project consists of approximately 9,169 hectares (22,656 acres) of private and state-owned land within Adams County in southeastern Washington; although, the Project boundary has not been finalized and may change from that presented herein. The Project is located within the Loess Islands and Channeled Scablands ecological subsections of the Columbia Plateau Ecoregion (Pater et al. 1998). Topography within the Project is generally flat, with elevations ranging from approximately 500 to 522 meters (m; 1,640 to 1,713 feet [ft]) above sea level. Based on National Land Cover Database (NLCD) data (US Geological Survey [USGS] NLCD 2011, Homer et al. 2015) land use within the Project is primarily dry-land agriculture, with the majority of the Project (approximately 96%) composed of cultivated crops and developed areas. Only 4% of the Project contains grasslands and shrub-steppe habitat.



Methods

Desktop TESS Review

WEST reviewed current publically available data on federally and state-listed plant and wildlife species that have potential for occurrence within Adams County, Washington. The US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) data were reviewed for threatened and endangered plant and wildlife species (USFWS 2018). In addition, WEST reviewed the Washington Department of Natural Resources (WDNR) rare plant list (WDNR 2018) and the Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) list (WDFW 2016) for threatened, endangered, and sensitive plant and wildlife species.

The likelihood of a TESS occurring in the Project area was conservatively determined by considering the species' range, habitat suitability in the Project area, species' mobility, population size, and records of occurrence in or adjacent to the Project area. Based on these factors, the likelihood of occurrence was defined for each species using the following categories:

- None – Project area outside the species' known range, no suitable habitat in the Project area, restricted mobility or small population size
- Unlikely – Project area outside the species' known range and suitable habitat appears absent in the Project area, may have restricted mobility and population size; however, species may occur in the Project area during migration or other times of the year
- Possible – Project area in the species' known range, but contains marginal suitable habitat; or species highly mobile and may occur year-round
- Likely – Project area in the species' range and contains suitable habitat; records of species' occurrence in the surrounding area, but no records from the Project area
- Occurs – Records of species' occurrence in the Project area based on USFWS, WDFW, or other survey data

TESS Survey

A TESS field survey was conducted on May 20, 2018 to identify the presence of any threatened, endangered, or sensitive species utilizing the proposed turbine corridors within the Project area. Areas of grasslands and shrub-steppe habitat within 305 m (1,000 ft) of the centerline of proposed turbine corridors were surveyed for threatened, endangered, and sensitive plants and wildlife (Figure 1). Tilled agricultural lands and developed areas were not surveyed. Surveys consisted of walking transects spaced approximately 50 m (164) apart, and were conducted between dawn and 1230 hours. Locations of TESS were recorded with a GPS. While the focus was on the TESS list generated in the desktop review, a species list of all wildlife encountered during surveys was compiled. This includes



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observations of small mammals, particularly rabbits and ground squirrels which are primary prey for golden eagles and other raptors.

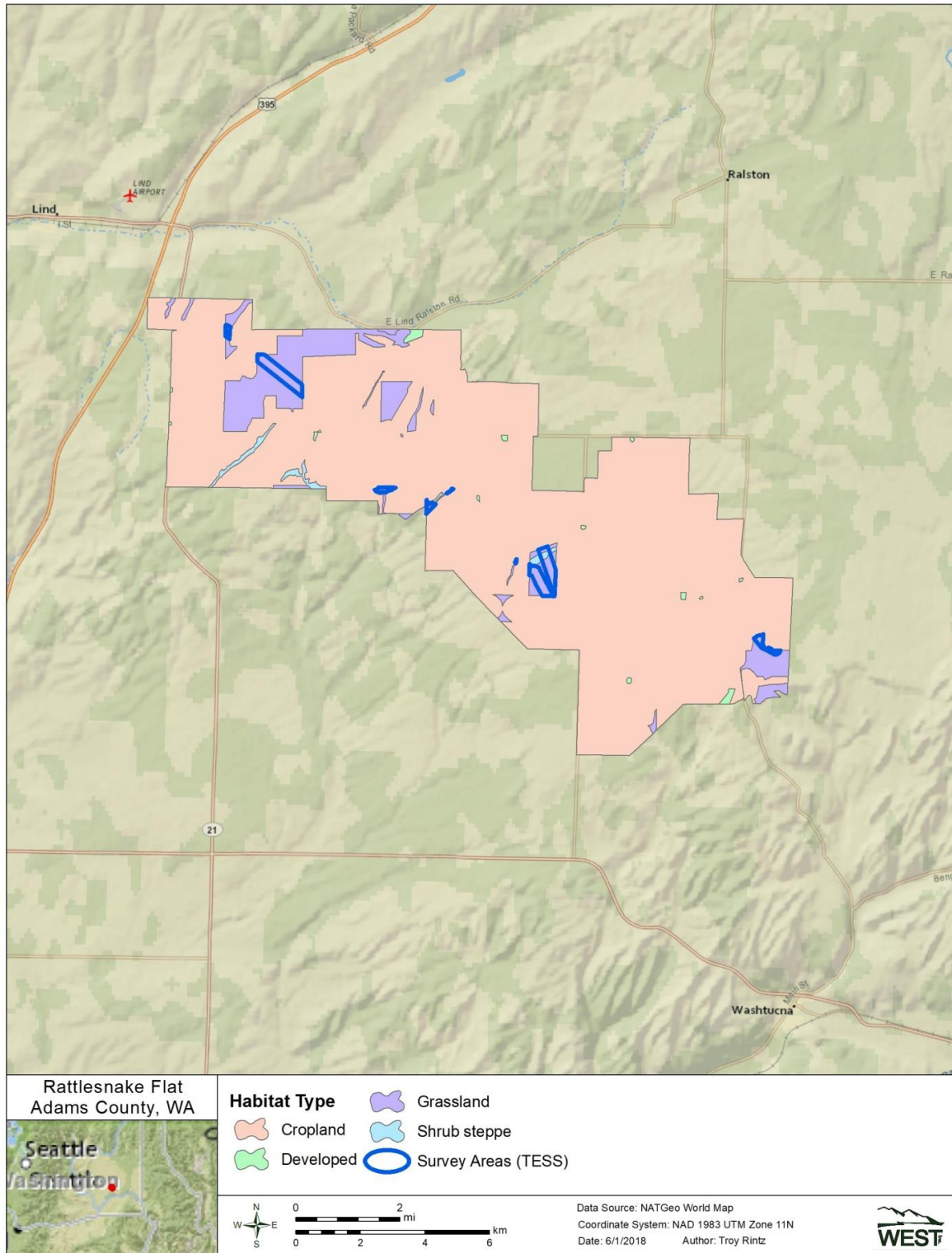


Figure 1. Habitat types and TESS survey areas in the Rattlesnake Flat Wind Project, Adams County, Washington.



Results

Desktop T&E Review

The USFWS IPaC (2018) identified two mammals, one bird, and two plants that are federally listed and may potentially occur in Adams County, Washington. Of these, it was determined that one federally endangered mammal could potentially occur in the Project area (Table 1).

Table 1. Federally and state-listed plants and wildlife potentially occurring in the Rattlesnake Flat Wind Project, Adams County, Washington.

Common Name	Scientific Name	State Status	Federal Status	Likelihood of Occurrence
Birds				
Yellow-billed cuckoo ¹	<i>Coccyzus americanus</i>	E	E	Unlikely
American white pelican	<i>Pelecanus erythrorhynchos</i>	E		Unlikely
Ferruginous hawk	<i>Buteo regalis</i>	T		Possible
Greater sage-grouse	<i>Centrocercus urophasianus</i>	T		Possible
Columbian sharp-tailed grouse	<i>Tympanuchus phasianellus</i>	T		Possible
Sandhill crane	<i>Grus canadensis</i>	E		Possible
Upland sandpiper	<i>Bartramia longicauda</i>	E		Possible
Mammals				
Columbia Basin pygmy rabbit	<i>Brachylagus idahoensis</i>	E	E	Possible
Gray wolf ¹	<i>Canis lupus</i>	E	E	Unlikely
Plants				
Snake River cryptantha	<i>Cryptantha spiculifera</i>	S		Possible
Suksdorf's monkeyflower	<i>Erythranthe suksdorfii</i>	S		Possible
Washington polemonium	<i>Polemonium pectinatum</i>	T		Possible
Spalding's silene	<i>Silene spaldingii</i>	T	T	Possible
Inch-high rush	<i>Juncus uncialis</i>	T		Unlikely
Mousetail	<i>Myosurus clavicaulis</i>	T		Unlikely
American pilwort	<i>Pilularia americana</i>	T		Unlikely
Downy butter-cup	<i>Ranunculus hebecarpus</i>	T		Unlikely
Prairie cordgrass	<i>Spartina pectinata</i>	S		Unlikely
Water howellia ¹	<i>Howellia aquatilis</i>	T	T	None

Source: US Fish and Wildlife Service IPaC (USFWS 2018); Washington Department of Fish and Wildlife Priority Habitats and Species (WDFW 2016); Washington Department of Natural Resources (2018).

E=Endangered, T=Threatened, S=Sensitive

¹Species identified by the US Fish and Wildlife Service as federally threatened or endangered and potentially occurring in Adams County, Washington, but not identified by the Washington Department of Fish and Wildlife or Washington Department of Natural Resources as state-listed and potentially occurring in Adams County, Washington.



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The WDFW (2016) and WDNR (2018) identified six birds and nine plant species that were state listed and may potentially occur in Adams County, Washington. Of these, it was determined that five state-listed birds and four state-listed plant species could potentially occur in the Project area (Table 1). The USFWS IPaC (2018) identified three state-listed species as potentially occurring in Adams County that the WDFW and WDNR did not list (Table 1).

TESS Survey

A field survey was conducted on May 20, 2018 to document the presence of TESS in the Project area survey corridors. Nineteen bird and one mammal species were observed during surveys (Appendix A). None of the species observed were classified as TESS. Evidence of badger (*Taxidea taxus*) activity was observed at three locations in the Project, indicating the presence of semi-fossorial small-mammal prey. A vernal (ephemeral) pool was observed and inspected for the presence of TESS, but none were found.

Conclusion

Development associated with the proposed Project is anticipated to disturb mostly cultivated croplands which make up approximately 96% of the Project area. Grasslands (native or planted) and shrub-steppe make up approximately 4% of the Project area, thereby providing very limited habitat suitable for most TESS. Based on this initial survey, development of the Project would have minimal impacts on TESS. A second TESS survey is planned for June 2018 to corroborate the results of this initial survey.

References

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**Appendix A. Wildlife species observed during TESS surveys on May 20, 2018 at the
Rattlesnake Flat Wind Project, Adams County, Washington.**



**Appendix A. Wildlife species observed during TESS surveys on May 20, 2018 at the
Rattlesnake Flat Wind Project, Adams County, Washington.**

Common Name	Scientific Name
Birds	
American kestrel	<i>Falco sparverius</i>
Red-tailed hawk	<i>Buteo jamaicensis</i>
Swainson's hawk	<i>Buteo regalis</i>
Common raven	<i>Corvus corax</i>
Ring-necked pheasant	<i>Phasianus colchicus</i>
Canada goose	<i>Branta canadensis</i>
Mourning dove	<i>Zenaida macroura</i>
Red-winged blackbird	<i>Agelaius phoeniceus</i>
Brewer's blackbird	<i>Euphagus cyanocephalus</i>
Western meadowlark	<i>Sturnella neglecta</i>
European starling	<i>Sturnus vulgaris</i>
Western kingbird	<i>Tyrannus verticalis</i>
Grasshopper sparrow	<i>Ammodramus savannarum</i>
Savannah sparrow	<i>Passerculus sandwichensis</i>
Vesper sparrow	<i>Pooecetes gramineus</i>
White-crowned sparrow	<i>Zonotrichia leucophrys</i>
American goldfinch	<i>Spinus tristis</i>
House finch	<i>Haemorhous mexicanus</i>
Horned lark	<i>Eremophila alpestris</i>
Mammals	
White-tailed deer	<i>Odocoileus virginianus</i>