

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background

1. Name of proposed project, if applicable:

Rattlesnake Flat Wind Project

2. Name of applicant:

Rattlesnake Flat, LLC, a subsidiary of NRG Renew LLC

3. Address and phone number of applicant and contact person:

Applicant:

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4. Date checklist prepared:

June 14, 2018

5. Agency requesting checklist:

Adams County Planning and Community Development

6. Proposed timing or schedule (including phasing, if applicable):

Construction is anticipated to begin following Conditional Use Permit (CUP) approval by Adams County and once suitable project financing is obtained and is anticipated to last approximately twelve to eighteen months. Groundbreaking activities (site preparation, road and laydown yard installation, foundation excavation, underground collection line trenching, and overhead transmission (gen-tie) installation) will last for approximately the first four months; the remainder of the Project construction duration will largely consist of turbine component delivery and erection of wind turbines. Construction of the Neilson switching station, Project substation, and O&M Facility will occur several months after commencement of groundbreaking. Energization of the Neilson switching station, transmission line, Project substation, collection system, and turbines will occur between 12 and 18 months after the start of construction.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The Applicant does not have any plans for future addition to, or expansion of, the Project.

The impacts of the Project in its entirety are addressed in this expanded SEPA checklist. The Applicant may choose to construct the Project in its entirety, or to delay construction for a portion of the turbines based on market conditions at a later date. However, as stated above, the entire Project has been analyzed for SEPA review in this document.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

In addition to the information contained herein, all environmental field surveys and technical reports have studies which have been, or will be prepared, directly related to this proposal, are listed in Table 1 below. All completed study reports are provided as attachments to this expanded SEPA checklist, as noted in Table 1. Additional survey reports which are currently pending or in progress, and are planned for completion in spring/summer 2018, will be submitted to Adams County upon their completion, for their use in evaluating the Project prior to the County’s issuance of its SEPA threshold determination. Although some survey reports are still pending or in progress, where field survey efforts are indicated as complete in the Table below, preliminary survey results have been summarized and considered in the analysis presented in this expanded SEPA checklist.

Table 1. Surveys and Field Reports

Environmental Resource (Applicable Checklist section)	Study Name	Description	Assessment Status	Study Report Status
Water Resources (Section B.3)	Wetland/Waterbody Assessment	Combination of desktop assessment and field surveys to determine presence/absence of wetlands or waterbodies within study area. The study area consisted of 200-foot-wide offset from all project all project features such as the proposed locations for turbines, transmission lines, meteorological monitoring sites and access roads.	Completed in Spring 2018.	Complete <i>Wetlands and Waters Delineation Report (Attachment B1)</i>
Plants (Section B.4) and Animals (Section B.5)	Threatened, Endangered, and Sensitive Species (TESS) Survey	Surveys for threatened, endangered, and sensitive species, including both plant and wildlife species with potentially suitable habitat in micrositeing corridor.	In Progress. Planned for June 2018 to correspond with flowering periods for rare plants	In progress. A progress report <i>Preliminary Results of Threatened, Endangered and Sensitive Species (TESS) Surveys for the Rattlesnake Flat Wind Project, Adams County, Washington</i>) is attached as Attachment B10. A final report will be provided to

				County in July 2018.
Animals (Section B.5)	Baseline Avian Use Studies	<p>Fixed-point bird use surveys (including eagles, raptors, and sensitive species) to characterize pre-construction avian use and evaluate potential risk to avian species.</p> <p>The study area in the 2011-2012 report was the area proposed for Project development plus the surrounding area in consideration of existing ecological conditions supporting the habitat baseline in the Project Area.</p> <p>The study area for the 2015-2016 report consisted of 11 points located throughout of the Project Area.</p>	Three years of survey have been completed (2011- 2012, 2015-2016, and 2017-2018)	<p>Complete.</p> <p><i>Site Evaluation and Baseline Avian Surveys for the Rattlesnake Flat Wind Project Adams County, Washington, September 2011 – March 2012 (Attachment B2)</i></p> <p>and</p> <p><i>Baseline Avian Use Surveys for the Rattlesnake Flat Wind Project Adams County, Washington, May 2015 – April 2016 (Attachment B3)</i></p>
Animals (Section B.5)	Eagle/raptor nest surveys	<p>Aerial (helicopter) field surveys for eagle nests. The survey area included the Project with a 10-mile buffer for eagles and a 2-mile buffer for other nesting raptors</p>	Surveys have been completed for 2015, 2017, and 2018 nesting seasons.	<p>Complete.</p> <p>Attachment B4 includes:</p> <p><i>March 2015 Eagle Nest Survey at Rattlesnake Flat, 2017 Golden Eagle and Raptor Nest Surveys For the Rattlesnake Flat Wind Energy Facility Adams County, Washington, November 2017,</i></p> <p>and</p> <p><i>2018 Raptor Nest Surveys Rattlesnake Flat Wind Project Adams County, Washington</i></p>

Animals (Section B.5)	Bat Acoustic Study	Acoustic surveys to determine pre-construction bat use of project area and evaluate potential risk to bat species.	Complete-as of fall 2017	Complete. <i>Final Bat Acoustic Survey</i> (Attachment B5).
Animals (Section B.5)	Large Bird Survey	Fixed-point surveys targeted at large birds (i.e., eagles/raptors) to determine pre-construction eagle/raptor use and evaluate potential impacts. The study area consisted of 11 to 14 survey points located throughout the Project Area.	Surveys completed.	Complete. Attachment B6 includes: <i>2017-2018 Large Bird Surveys for the Rattlesnake Flat Wind Project Adams County, Washington, April 2017 – July 2017 (Interim Report)</i> <i>Year 2 Large Bird Use Surveys for the Rattlesnake Flat Wind Project Adams County, Washington, Final Report April 2017-April 2018</i>
Noise (Section B.7.b)	Noise Impact Assessment	Noise modelling analysis to estimate noise levels at nearby sensitive receivers during construction and operational of the Project. The study area consisted of locations located within 2 miles of the proposed turbine locations and within 1,000 feet of construction areas.	Complete-desktop analysis	Complete. <i>Noise Impact Assessment Technical Memorandum, April 23, 2018</i> (Attachment B7)
Visual Resources (Section B.10)	Visual Simulations	Visual simulations of proposed turbines from key observation points (KOP)	Complete - desktop analysis	Complete. Attachment C includes visual simulations and a map of KOP locations, completed April 2018
Cultural Resources (Section B.13)	Work Plan for Archaeological and Architectural Inventories	Presents proposed methods for archaeological and architectural field inventories. Also included a cultural resources record search study area within 5 miles of the Project Area to determine the types of	Complete-desktop analysis	Complete. <i>Archaeological and Architectural Inventories for the Rattlesnake Flat Wind Project, Adams County, Washington,</i>

		cultural resources that may be encountered.		March 16, 2018 (Attachment B8)
Cultural Resources (Section B.13)	Cultural Resources Survey	Field surveys for cultural resources, per methods outlined in work plan. The field survey study area consisted of a 200-foot-wide buffer along each side of the centerline of the turbine strings, the O&M building footprint, the laydown area, and substations.	Complete- as of May 2018	Complete. <i>Cultural Resources Survey Report</i> (Attachment B9)
Water Resources (Section B.3), Plants (Section B.4), and Cultural Resources (Section B.13)	Pre-Construction Surveys (as needed)	Following final design of the Project and prior to construction, additional pre-construction surveys for wetlands/waterbodies, habitat, rare plants, and cultural resources will occur, as needed, in areas which were not previously assessed.	Planned for pre-construction.	Incomplete; pre-construction survey results will be included as supplements to previously prepared reports.

As indicated in Table 1 above, additional pre-construction surveys will be completed for the Project following final design of the Project and prior to construction. The objective of pre-construction surveys will be to survey and identify potential impacts in areas where Project component locations have been modified as a result of final design refinements. Prior to beginning construction, the Applicant will identify the final locations for turbines, meteorological towers, all access roads, electrical collection system lines, gen-tie line, and the second laydown area and will complete pre-construction surveys (i.e., wetland and waterbodies, cultural, and TESS surveys) for any portions of these locations which have not previously been surveyed to identify protected resources potentially affected by construction of the Project.

Pre-construction survey results will be incorporated as supplements into any previously prepared survey reports, including completed reports which are attached to this expanded SEPA checklist and additional reports which are planned for completion in spring/summer of 2018. Survey results will identify potential impacts, and describe measures that will be incorporated into the project to avoid and minimize potential impacts. The supplements will also update coordination efforts with applicable agencies as necessary for their approval. Environmental impacts which are described in this expanded SEPA checklist reflect the maximum anticipated impacts associated with the Project, and no new impacts beyond what is described in this expanded SEPA checklist are anticipated to occur since any resources identified during pre-construction surveys will be avoided to the maximum extent practicable and where potential impacts are identified, the Applicant will reduce impacts to a level of insignificance through micrositing of Project facilities and design refinements. Pre-construction surveys for wetlands/waterbodies, habitat, and rare plants will only be completed if any new areas are added to the survey area as a result of final design refinements. Surveys will occur within the newly added areas only.

- Pre-construction wetland and waterbody surveys will be completed if any new areas are added to the survey area as a result of final design refinements. Surveys will occur within the newly added areas only.

- Pre-construction surveys for habitat and rare plants will be completed if any new areas are added to the survey area as a result of final design refinements. Surveys will occur within the newly added areas only.

Pre-construction cultural resource investigations will be completed in areas which were not previously surveyed. Areas to be surveyed include the underground electrical collector system corridor outside of the micrositing corridor, the gen-tie line corridor, Neilson switching station, and areas of public road improvements. In addition, some parcels along the micrositing corridor which were not previously surveyed due to access restrictions will need to be surveyed prior to construction.

Should any protected resources be present and potentially impacted within areas which have not been surveyed as reported in the expanded SEPA checklist and reports submitted prior to the County's SEPA threshold determination, the Applicant will avoid, minimize, mitigate, and receive all needed local, state, or federal permits relative to impacts to such resources. As necessary, the Applicant will consult with local, state and federal agencies relative to impacts identified, and will prepare supplements to reports attached to the expanded SEPA checklist incorporating any new survey information and mitigation measures required. The Applicant will mitigate impacts to resources in compliance with applicable regulations and CUP conditions approved for the Project. For example, the Applicant will prepare a critical areas report(s) consistent with the requirements of ACC 18.06 for any critical areas impacted.

The Applicant will consult with the County, DAHP and potentially affected tribes if any additional cultural resources are identified; should any such resources be eligible for listing on the NRHP and cannot be avoided, the Applicant will consult with DAHP to develop and implement appropriate mitigation measures.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

The Applicant is not aware of applications pending for governmental approvals of other proposals directly affecting the property covered by the proposal.

10. List any government approvals or permits that will be needed for your proposal, if known.

In order to implement the proposal (and pending additional proposal design), the Applicant may require the following approvals or permits:

Regulatory Authority	Regulatory Citation	Permit/ Approval
Federal Aviation Administration	49 USC 44718	Notice of Proposed Construction (Form 7460-1) Hazard Determination
United States Army Corps of Engineers (USACE)	Clean Water Act [33 USC 1344]	Section 404 Permit, if required
United States Environmental Protection Agency (USEPA)	Oil Pollution Act [33 USC 2701 et seq.]	Spill Prevention Control and Countermeasure (SPCC) Plan
United States Fish and Wildlife Service (USFWS)	Endangered Species Act [16 USC 1531-1544]	Section 7 Consultation, if required as a result of permits or approvals to be obtained from a federal agency
USFWS	Migratory Bird Treaty Act	Coordination with USFWS and possible preparation of a Bird and Bat Conservation Strategy (BBCS)

Regulatory Authority	Regulatory Citation	Permit/ Approval
USFWS	Bald and Golden Eagle Protection Act (BGEPA) of 1962	Coordination with USFWS and possible preparation of Eagle Conservation Plan and Eagle Take Permit
Washington State Department of Ecology (Ecology)	Section 401 of the Clean Water Act (CWA)	Coordination with Ecology and possible preparation of a Section 401 Certification
Ecology	Section 402 of the CWA	Construction Storm Water General Permit
Ecology	Washington State Water Pollution Control Act	Wetland permit, if needed
Ecology	WAC 173-400-560	General Order Application (Concrete Batch Plants and Diesel Powered Emergency Generator)
Ecology	WAC 173-400-035	Temporary Air Quality Permit (Rock Crushing/Asphalt Production)
Ecology	WAC 173-201A	Sand and Gravel General Permit
Washington State Department of Archaeology and Historic Preservation (DAHP)	Section 106 of National Historic Preservation Act [16 USC470] and WAC 197-11-920(11)	Consultation with federal agency (federal action) and/or compliance with Washington State Executive Order 05-05 (non-federal action)
Washington State Department of Transportation (WSDOT)	RCW 46.44 WAC 468-38 WAC	Permits for transportation of oversize or overweight loads
Washington State Department of Fish and Wildlife (WDFW)	WAC 220-110	Hydraulic Project Approval (HPA), Habitat Management Plan (HMP), if required
Washington State Department of Natural Resources (DNR)	79.13	Leasehold/License Agreement
Adams County	Chapter 17.70 of the Adams County Zoning Ordinance, Commercial Wind Energy Facility Standards	Conditional Use Permit (CUP)
Adams County	Section 17.70.070, Development Standards and Criteria	Compliance with Development Standards for Commercial Wind Energy Facility
Adams County	Chapter 18.06 of the Adams County Code (ACC), Critical Areas and Resource Lands	Coordination and possible assessment of Critical Areas and Resource Lands Ordinance
Adams County	Chapter 18.04 of the Adams County Code and WAC 197-11	State Environmental Policy Act (SEPA), Expanded Environmental Checklist
Adams County	Chapter 12.04 of the Adams County Code, County Roads and Bridges	Required roadway permits may include: Road Approach, Oversize Vehicle, and Road-Use Agreement
Adams County	Title 15 of the Adams County Code, Buildings and Construction	Commercial building permit, grading permit, and state mandated groundwater well form
Adams County	Chapter 13.04 of the Adams County Code, Sewer System Service	Onsite Sewage System Permit
Adams County	Chapter 17.68.140 Adams County Code	All activities associated with rock quarries will be conducted in accordance with the

Regulatory Authority	Regulatory Citation	Permit/ Approval
		conditional standards for gravel pits and other surface and subsurface mining

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The Project is described in detail in Attachment A, Project Description. Figures depicting the proposed Project location and overall layout are included in Attachment A, Project Description, and additional figures showing environmental resources within the Project Area are included in Attachment D. The Project is a commercial-scale wind energy generation facility. The Project Area, consisting of the parcels upon which the Project will be constructed, spans approximately 23,000 acres (see Figures PD-1 and PD-2 in Attachment A, Project Description).

The facilities, equipment, and features that will be installed as part of the Project include the following (see Figure PD-2 in Attachment A, Project Description):

- **Wind Turbine Generators:** The Project consists of up to 90 turbines located in 3 arrays oriented northwest to southeast into the prevailing wind to maximize the energy produced by the project.

The primary component of the Project will be the wind turbines. Each of the potential 90 wind turbines will have the capacity to generate up to approximately 4.0 megawatts of electricity. Each turbine includes a freestanding, tubular-steel tower supporting a nacelle that houses a generator, gear box, and hub that attaches the blades and three blade rotors.

The Project's turbine towers will measure up to 328.0 feet (100 meters) from ground to nacelle hub. Three blades, affixed to the nacelle, will each be up to 220 feet (67 meters) in length. The maximum total rotor diameter will be 492.1 feet (150 meters). The maximum total height of the turbines (ground to tip of blade at highest point) will be 499 feet (152 meters). The towers will be anchored to steel and concrete foundations that extend approximately 12 feet below the ground surface.

The turbines will be sited within a micro-siting corridor that extends the length of the Project and is approximately 400 feet wide (200 feet on either side of the proposed turbine strings and meteorological towers). The micro-siting corridor is shown in Attachment A, Figure PD-2. In general, ground-focused technical studies prepared for the Project analyzed conditions within the micro-siting corridor.

As with any proposed wind power project, the precise layout of turbines cannot be finalized at the planning stage. The number of turbines, the spacing between turbines, and their precise locations within the micro-siting corridor may vary and will be determined prior to construction based on the turbine models commercially available at the time of Project implementation and other criteria such as constraints posed by terrain and sensitive resources. In the event that micro-siting determines a turbine needs to be placed outside of the micro-siting corridor, existing studies will be supplemented as appropriate.

In compliance with Federal Aviation Administration (FAA) lighting guidelines, some of the turbines will be equipped with warning lights. The number of turbines with lights and the lighting pattern of the turbines will be determined in consultation with the FAA.

- **Access roads:** The Project will require a network of private roads providing access to all of the Project facilities within the site. During construction, private site access roads will be designed to a width of up to 60 feet to accommodate crane paths, turning radii, or cuts to accommodate

terrain slope. However, in some locations access roads may be wider to accommodate the turning radius of cranes or oversize loads. At the end of the Project's construction, internal Project access roads will be reduced in width to an approximately 16-foot drivable surface with 2 to 3-foot tapered shoulders. The length of new roads to be constructed is approximately 25 miles. The exact location of Project access roads will be finalized based on final Project design once actual turbine types are selected. An illustrative Project access road location is shown in Attachment A, Figure PD-2 and is used for purposes of impact analysis. Prior to construction, a final road layout will be provided to the County, along with demonstration that appropriate surveys have been conducted and impacts to regulated resources have been avoided, mitigated or permitted as required by local, state and federal requirements.

- Power collection system: Electrical power generated by the turbines will be transmitted underground by a 34.5-kilovolt (kV) electrical collection system to the Project substation. Approximately 53 miles of underground power cables will be installed. The exact location of the collector system corridors will be finalized based on final Project design once actual turbine types are selected. An illustrative Project collector system location is shown in Figure PD-2 in Attachment A and is used for purposes of impact analysis. Prior to construction, a final collector system layout will be provided to the County, along with demonstration that appropriate surveys have been conducted and impacts to regulated resources have been avoided, mitigated, or permitted as required by local, state, and federal requirements.
- Project substation: The Project substation will transform, or "step up" generated electricity from the wind turbines from 34.5 kV to 115 kV, at which point the electricity will be delivered via an overhead 115-kV transmission line (gen-tie line) for delivery to the Neilson switching station (see below). The Project substation will occupy an approximately 2-acre parcel near the intersection of Suko Road and Phillips Road.
- Operation and Maintenance (O&M) Facility: An approximately 6,000-square-foot O&M Facility will be constructed to house the Project controls and maintenance activities on an approximately 3-acre fenced parcel near Suko Road and Phillips Road. The O&M building will include office and workshop areas, control room, kitchen, bathroom, and parking facilities. Water for the bathroom and kitchen will either be acquired from a state water right-exempt domestic onsite well, constructed and permitted by a licensed contractor according to local and state requirements or will be trucked in from an offsite source.
- Gen-tie line: Electricity generated at the Project will be transmitted along a new overhead 115-kV gen-tie line to the Neilson switching station. The overhead line will be supported by free-standing or guyed steel or wooden poles and will span a total length of up to 10 miles from the Project substation to the Neilson switching station. Permanent roads are not anticipated to be constructed along the length of the gen-tie route.
- Meteorological towers: Up to five permanent meteorological towers will be constructed to provide ongoing data during the lifetime of Project operations. The permanent meteorological towers will be free-standing, affixed via a concrete footing and will measure up to 92 meters in height; the height of the permanent meteorological towers will be the same as the hub height of Project turbines.
- Neilson switching station: a new switching station, to be owned by Avista Utilities, will be constructed to interconnect the gen-tie line to Avista's regional transmission grid on the Lind/Washtucna 115 kV transmission line¹. The Neilson switching station will be located on up to 5 acres of land at the northwest corner of the intersection of Smart Road and Lind Kahlotus Road.

¹ The reader should note that as a result of the scale of the illustrations appearing in the figures included in this expanded SEPA checklist, the existing Avista 115kV line appears to be located within the SR 21 road prism. This is an artefact of figure scaling; the transmission line is in fact located outside of the road prism.

- Temporary staging and laydown areas: There will be two, 12-acre laydown areas within the Project Area. One will be located near the O&M Facility, as shown in Figure PD-2 in Attachment A. The location of the second laydown area will be selected based on the final Project layout and construction drawings in order to facilitate access to construction areas while minimizing impacts to natural resources. Prior to final selection of the location of the second laydown area, the Applicant will conduct appropriate surveys of the location to document that impacts to regulated resources have been avoided, mitigated, or permitted as required by local, state, and federal requirements.
- Rock quarries, temporary concrete batch plants, and temporary rock crushers: Up to two temporary concrete batch plants and rock crushers may be used to provide concrete and gravel for Project construction. This equipment will be located at a temporary locations selected in the vicinity of construction activity. Up to three rock quarries could be established on properties participating in the Project or otherwise leased to the Applicant to supply crushed rock and gravel for the Project. Each quarry will likely disturb up to 3 acres. The specific locations of rock quarries will be determined following geological surveys of the Project Area to determine if there are suitable locations in the Project Area. The onsite locations proposed for the quarries and batching operations, if not already assessed for protected resources, will be surveyed or otherwise assessed as described in Sections 3.d (waterbodies and wetlands), 4.d (plants), and 13.d (archeological and historic resources) below. Most of the crushed rock will be used for road building during early construction phases, with a smaller amount of gravel transported to the concrete batch plant for use in fabrication of concrete slurry used for construction of turbine and Project building foundations. All activities associated with rock quarries will be conducted in accordance with the conditional standards for gravel pits and other surface and subsurface mining in Chapter 17.68.140 of the Adams County zoning code. Following the end of Project construction, the quarries will either be reclaimed or transferred for longer term operation by the underlying landowner. The Applicant or its construction contractor may also source crushed rock and gravel and concrete offsite from existing permitted quarries and batching facilities or from new facilities provided that they obtain all necessary permits to be constructed and operated.

The following elements of the Project may be constructed on DNR managed property, subject to DNR's approval through a lease agreement being in place prior to any construction and operation of the following Project elements on their land:

- Wind Turbines: Up to three (out of the proposed 90 turbines) in the westernmost turbine string are proposed to be constructed on DNR property. The turbines installed on DNR land will have the same features, electrical generation capacity, and dimensions as described above for the overall Project.
- Power collection system: approximately 0.8 mile of underground collector cable (of the proposed 53 miles) is proposed to be constructed on DNR property to collect and transmit power generated by up to three turbines on DNR property. The collector cable installed on DNR property will have the same features and dimensions as described above for the overall Project.
- Access roads: approximately 0.8 mile of a new, permanent access road (of the proposed 25 miles) is proposed to be constructed on DNR property. The access road will have the same features and dimensions as described above for the overall Project. As stated above, the exact location of Project access roads will be finalized based on final Project design once actual turbine types are selected. An illustrative Project access road location is shown in Attachment A, Figure PD-2 and is used for purposes of impact analysis. Prior to construction, a final road layout will be provided, along with demonstration that appropriate surveys have been conducted and impacts to regulated resources have been avoided, mitigated or permitted as required by local, state and federal requirements.

For illustrative purposes only 2 turbines are shown on Figure 1 in Attachment D. Impacts expected and mitigation proposed on DNR lands are explained in Section B of this expanded SEPA checklist.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The Project is located in Adams County in east-central Washington (see Figure PD-1 in Attachment A, Project Description). The Project is located approximately 15 miles south of Ritzville, Washington in a rural, lightly populated area that is characterized primarily by agricultural use. Highways near the Project include Highway 21 to the west, Highway 261 to the east, Highway 26 to the south, and Highway 395 to the north. The Project occurs in portions of the following PLSS township/range/sections:

Township 16 N, Range 34 E, Section 1 and 12
Township 16 N, Range 35 E, Sections 1-16, 22-26, 35-36
Township 16 N, Range 36 E, Sections 7, 17-21, 29-30
Township 17 N, Range 34 N, Sections 20-21, 25-28, 33-35
Township 17 N, Range 35 N, Sections 30-32

B. Environmental Elements

1. Earth

a. General description of the site:

(circle one): **Flat** rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

Most of the Project Area is generally flat with average slopes ranging less than 5 percent. The a small area in northwestern portion of the Project Area – principally along the gen-tie route - has slightly more topographic relief with slopes that reach up to 80 percent where coulees and gullies are present (See Figure 1 in Attachment D). However, turbines have been sited to avoid these steep slope areas and are optimally located on flat ground for ease of construction; Project roads typically are not installed on slopes greater than 8 to 12 percent to allow for delivery of wind turbine components.

Slopes within the DNR parcel generally range from 0 to 20 percent, with the majority of the parcel being flat, (approximately 0 to 5 percent slopes).

Slopes at the Neilson switching station site are generally flat, with approximately 0 to 5 percent slopes.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Per the NRCS Web Soil Survey, the Project Area consists of the following soil types:

- Emdent silt loam, 0 to 5 percent slopes, not prime farmland

- Esquatzel silt loam, 0 to 2 percent slopes, prime farmland if irrigated
- Farrell very fine sandy loam, 0 to 5 percent slopes, Prime Farmland if irrigated
- Farrell very fine sandy loam, 5 to 30 percent slopes, Farmland of Statewide Importance
- Farrell fine sandy loam, 0 to 30 percent slopes, Farmland of Statewide Importance
- Ritzcal silt loam, 15 to 30 percent slopes, Farmland of Statewide Importance
- Ritzcal silt loam, 30 to 40 percent slopes, not prime farmland
- Ritzville silt loam, 0 to 1 percent slopes, Prime Farmland if irrigated
- Ritzville silt loam, 1 to 5 percent slopes, Prime Farmland if irrigated
- Ritzville silt loam, 2 to 30 percent slopes, Farmland of Statewide Importance
- Ritzville silt loam, 30 to 40 percent slopes, not prime farmland
- Ritzville silt loam, 5 to 30 percent slopes, Farmland of Statewide Importance
- Ritzville silt loam, moderately shallow, 0 to 15 percent slopes, Farmland of Statewide Importance
- Ritzville silt loam, moderately shallow, 0 to 5 percent slopes, Prime Farmland if irrigated
- Ritzville silt loam, moderately shallow, 30 to 40 percent slopes, not prime farmland
- Ritzville silt loam, moderately shallow, 5 to 30 percent slopes, farmland of statewide importance
- Roloff silt loam, 0 to 15 percent slopes, Farmland of Statewide Importance
- Roloff-Starbuck stony silt loams, 10 to 30 percent slopes, Farmland of Statewide Importance
- Roloff-Starbuck very rocky silt loams, 10 to 30 percent slopes, Farmland of Statewide Importance
- Shano silt loam, 0 to 5 percent slopes, Prime farmland if irrigated
- Shano silt loam, 30 to 45 percent slopes, not prime farmland
- Shano silt loam, 5 to 30 percent slopes, farmland of statewide importance
- Starbuck silt loam, 0 to 15 percent slopes, farmland of statewide importance
- Stratford cobbly silt loam, 0 to 15 percent slopes, farmland of statewide importance
- Stratford very stony silt loam, 0 to 15 percent slopes, not prime farmland
- Wacota silt loam, 0 to 30 percent slopes, eroded, farmland of statewide importance.

Of the soils types listed above, the following soils are found within the DNR parcel:

- Ritzville silt loam, moderately shallow, 0 to 15 percent slopes, eroded
- Ritzville silt loam, moderately shallow, 5 to 30 percent slopes
- Ritzville silt loam, 5 to 30 percent slopes
- Ritzville silt loam, 1 to 5 percent slopes
- Esquatzel silt loam, 0 to 2 percent slopes
- Ritzcal silt loam, 15 to 30 percent slopes, eroded.

Of the soils types listed above, the following soils are found within the Neilson switching station site:

- Shano silt loam, 0 to 5 percent slopes, Prime farmland if irrigated

- Shano silt loam, 5 to 30 percent slopes, farmland of statewide importance.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Based on review of DNR² Natural Hazards data, there are no historic landslides or unstable soils in the Project Area.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Grading, filling, and excavating activities are anticipated for constructing roads, excavating foundations, constructing temporary crane pads and permanent surfaces, and installing the underground collection system. Specific fill and grade volumes and locations will be determined as engineering design advances, and detailed grading drawings and cut/fill quantities will be submitted to the County as part of building permit application submittals. The approximate limits of disturbance are included in Table PD-3 in Attachment A, Project Description.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

As the Project Area is generally located on a flat plateau, the anticipated potential for natural erosion is limited. However, roads constructed in the northwestern portion of the Project could experience erosion from stormwater runoff. Project roads are constructed with tapered shoulders and blade cuts to hold and absorb runoff; in areas of slopes above a certain percentage, small swales and other stormwater control facilities will be installed to reduce and control runoff and limit erosion.

During construction, exposed soils could be eroded. This potential will be limited by adhering to a stormwater pollution prevention plan (SWPPP) and dust and erosion control and suppression requirements of Chapter 17.70 of the Adams County zoning ordinance during construction and operations.

g. About what percent of the site will be covered with impervious surfaces after Project construction (for example, asphalt or buildings)?

Construction of permanent access roads, turbine foundations, substation, switching station, and O&M Facility will result in additional permanent impervious surfaces, totaling approximately 80 acres. The acreage of new impervious surfaces represents a small proportion (less than 0.006 percent) of the Project Area overall.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

The Applicant will prepare a SWPPP and obtain coverage under Washington State Department of Ecology's (Ecology's) Construction General National Pollutant Discharge Elimination System (NPDES) permit, which will identify erosion control measures. Best Management Practices (BMPs) and temporary erosion control measures will be identified in accordance with the Ecology's Stormwater Management Manual for Eastern Washington, including, but not limited to, installation of silt fences, straw mulch, and seeding as required.

In accordance with Adams County Code (ACC) 17.70.070 (I) Stormwater, the Applicant will design and implement stormwater drainage systems in consultation with a professional engineer to ensure that minimal erosion will occur.

² Washington State Department of Natural Resources (DNR). 2018. Washington Geologic Information Portal. Available online: https://geologyportal.dnr.wa.gov/#natural_hazards. Accessed February 26, 2018.

Implementation of the following measures will reduce or control erosion caused by construction activities:

- A SWPPP will be prepared along with a detailed Project grading management plan in compliance with Adams County requirements.
- A temporary erosion and sediment control plan (TESC) will be established that relies on structural measures (e.g., silt fences, straw bale barriers, and sediment ponds) and non-structural measures (e.g., good design, routine inspection and maintenance, and employment and enforcement of BMPs). All TESC measures for a given area to be graded or otherwise worked will be installed prior to commencement of construction activity within the area.
- When possible, roads, collector lines, cabling trenches, and communication lines will share construction corridors to minimize ground disturbance.
- Private access roads will be designed and constructed to ensure stability and to minimize dust emissions resulting from wind erosion.
- Surface runoff will be controlled during construction. Runoff will not be allowed to flow uncontrolled over significant slopes.
- Stockpiled soils will be stored in such a manner as to reduce erosion from the stockpile. Protective measures could include covering with plastic sheeting, the use of low stockpiles in flat areas, or the use of straw bales/silt fences around pile perimeters.
- Clearing, excavation, and grading will be limited to the minimum area necessary for construction, and original vegetation will be retained to the greatest extent feasible. Buffer strips could be included between disturbed areas and receiving waters or steep slopes to the extent feasible.
- The construction site entrance, roads, and parking areas used by construction traffic will be stabilized with rock pads or gravel to minimize erosion and tracking of sediment offsite.
- After construction, disturbed areas which are not permanently occupied by the proposed Project's features will be revegetated, as necessary, to restore the area as closely as possible to its original condition and intended use. Areas not intended for active agricultural use will be reclaimed as soon after construction activities as possible to limit the amount of time soils are exposed to rain, snowmelt, and wind.
- Measures to control wind erosion and fugitive dust creation will include watering or covering exposed soils and will be discussed in a dust control plan as required by ACC 17.70.070 (E). Fugitive dust is discussed in more detail in the air section.
- The proposed access roads will be constructed consistent with the 2004 Ecology Stormwater Management Manual for Eastern Washington and based on recommendations developed during a site specific geotechnical investigation.
- Explosives, if required, will be limited to the smallest amount needed to conduct the excavation. The blasting professional will consider the distance to existing structures and design blasting event to ensure minimal emissions of ground vibrations. All blasting activities will comply with the Blasting Guidance Office of Surface Mining U.S. Department of Interior, Blasting Guidance Manual (1987). Safety standards related to the use of explosives are also regulated by the Washington State Explosives Act, WAC 296-52 (Safety Standards for Possession, Handling and use of Explosives).

During operations, erosion potential will not differ greatly from current conditions. The total creation of impervious surface relative to the Project Area is small (less 0.006 percent). In addition, the Applicant will monitor the site for erosion on a regular schedule and after large rainfall or snowmelt events and take corrective action as necessary. Further, all Project facilities will be designed,

operated, and maintained to minimize erosion potential; permanent stormwater BMPs will be installed to control runoff and maintained for the life of the Project.

In accordance with ACC 17.70.070 (J) Geologic and Flood Hazards, the Applicant will design structural foundations and buildings in accordance with applicable Uniform or International Building Code requirements for the relevant seismic zone.

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Based on the Applicant's experience constructing similar types of projects and their knowledge of typical sources of air emissions, fugitive dust and tailpipe emissions are anticipated to be the primary sources of air emissions during construction. Fugitive dust and tailpipe emissions are caused by ground surface disturbance and from the use of vehicles and construction equipment. Construction dust or vehicle emissions will be localized and temporary and will be further minimized through implementation of avoidance, minimization, and mitigation measures described below (Section 2.c)). In addition, construction activities may require the use of a portable concrete batch plant, which could be locally supplied or, if a local, permitted concrete batch plant is not used, the Applicant will require the construction contractor to submit an application for a temporary air permit for approval by Ecology (WAC 173-400-035). Temporary permits are issued for a limited period of time (1 year or less). The application must be submitted at least 30 days prior to starting operation. It must supply sufficient information to enable Ecology to determine that the operation will comply with the emissions standards for a new source and will not cause a violation of applicable Ambient Air Quality Standards (AAQSs) and, if in a non-attainment area, will not interfere with scheduled attainment of ambient standards. The permit will specify emission control requirements for the temporary equipment.

The primary air pollutant generated by the rock crusher and batch plant will be particulate matter (PM), which will be generated by activities such as rock crushing and storing, moving, and loading sand and other aggregate materials used to make cement. In addition, both facilities will be powered by diesel generators, which will emit NO_x, hydrocarbons, carbon monoxide, PM, and a small amount of sulfur dioxide.

During Project operation, the generation of electricity will not result in direct air emissions. However, limited emissions will occur during operations as a result of routine maintenance activities which typically require use of motor vehicles and other equipment. Operational emissions associated with routine maintenance activities will be minor, localized, and further reduced through implementation of avoidance, minimization measures described below.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The Project Area is primarily used for agriculture. These activities may generate odors from confined animal feeding operations or applications of fertilizers/manures or other types of air emissions from the use of farm equipment; however, these types of emissions or odors are not expected to affect construction or operation of the proposed Project.

Specific to the DNR parcel, the parcel is also used for agriculture and generates the same, minor sources of emissions and odors associated with agricultural production.

Specific to the Neilson switching station site, the area is also used for agriculture and generates the same, minor sources of emissions and odors associated with agricultural production.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

The following measures will be implemented to reduce or control emissions during construction and operation:

- All vehicles used during construction will comply with applicable federal and state air quality regulations for exhaust emissions.
- Vehicles and equipment used during construction will be properly maintained to minimize exhaust emissions.
- Carpooling among construction workers will be encouraged.
- Vehicle operators will minimize engine idling time, and equipment will be shut down when not in use.
- Vehicle speeds on graveled County access roads used for the Project will comply with any posted speed limits and in accordance with RCW 46.61.400.
- Vehicle speeds on graveled private access roads will not exceed 20 mph to minimize dust emissions.
- The use of alternative, paved roads, where available, will be encouraged.
- Truck beds will be covered in accordance with local, state, and federal requirements when transporting dirt or soil on public roads.
- Construction materials that could be a source of dust will be managed to minimize fugitive dust emissions.
- Dust-suppressant chemicals will be applied only when needed, and the application will be timed to avoid or minimize wash-off by rainfall.
- The Applicant will abide by the terms outlined in a Road-Use Agreement with Adams County.
- Dust emissions resulting from use of County roads will be controlled according to the requirements of the County Road-Use Agreement.
- Private access roads will be maintained to minimize dust emissions during construction, operation, and decommissioning of the Project.
- In accordance with ACC 17.70.070 (E) Air Quality, all applicable air emission permits will be obtained and all conditions complied with.
- After construction, disturbed areas which are not permanently occupied by the proposed Project's features will be revegetated, as necessary, to restore the area as closely as possible to its original condition and intended use. Areas not intended for active agricultural use will be reclaimed as soon after construction activities as possible to limit the amount of time soils are exposed to rain, snowmelt, and wind.
- The Applicant will maintain a water truck onsite during construction for dust suppression.
- Emissions units employed during construction (e.g., temporary concrete batch plant, temporary crush rasher) will be operated in accordance with the general requirements of WAC 173-400-040, or the requirements of air emissions permits under which the equipment is permitted to operate.

3. Water

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

To verify the presence of jurisdictional waterbodies, including wetlands and streams within the project area, a two-phased assessment was conducted (see Attachment B1). The study assessment area for wetland and waterbodies encompassed the proposed locations for project features as currently identified including the micrositing corridor for turbines, gen-tie line, meteorological tower locations and project access roads, as well as a 400-foot-wide buffer (i.e., 200-feet off-center of linear features) for linear features. The assessment also encompassed portions of the Project area which were upgradient from the location of Project elements described above. The area assessed is shown on Figure 3 of Attachment D.

The first phase of the assessment included a review of pertinent existing information, including: U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) data, Washington State Department of Department of Fish and Wildlife (WDFW) Wildlife Priority Habitats and Species (PHS) data, NRCS Web Soil Survey, and recent aerial photographs. Any areas which did not contain any mapped resources based on review of the above-listed data sources were eliminated from further review (see green areas in Figure 3 of Attachment D). In addition, a significant portion of the waters and wetlands study area includes parcels of land that are at the crest of rolling hills, are actively farmed, and have no mapped features. These areas were eliminated from further field review due to their landscape position, lack of mapped resources, and lack of expected resourced as seen on recent aerial photographs (see green areas in Figure 3 of Attachment D).

The second phase of assessment involved targeted field surveys, which involved field verification of all waterbodies, including mapped streams or wetlands, which were identified in the desktop review of the above-listed data sources (see brown areas in Figure 3 of Attachment D). Within the wetlands and waters study area, any areas that intersected with potential streams or wetlands, as identified in the desktop review, were evaluated in the field. Areas targeted for field verification along turbine strings, gen-tie lines, meteorological tower sites, and access roads, were buffered by 400 feet (i.e., 200 feet off-center of linear features) to create the final survey area for assessments (see brown areas in Figure 3 of Attachment D).

The evaluation of mapped streams from the NWI dataset included walking to the location where the wetlands and waters study area intersected the mapped stream and determining if the drainage depicted in the mapping was present on the ground. While accessing the wetlands and waters study area, field evaluators looked for areas of standing water, wetland vegetation, or other areas that may represent wetlands. In addition, to qualify as an actual jurisdictional stream, field evaluators looked for signs of surface water flow, a defined stream bed and stream banks per WAC 220-660-030 which defines:

"Watercourse," "river" or "stream" means any portion of a stream or river channel, bed, bank, or bottom waterward of the ordinary high water line of waters of the state. Watercourse also means areas in which fish may spawn, reside, or pass, and tributary waters with defined bed or banks that influence the quality of habitat downstream. Watercourse also means waters that flow intermittently or that fluctuate in level during the year, and the term applies to the entire bed of such waters whether or not the water is at peak level. A watercourse includes all surface-water-connected wetlands that provide or maintain habitat that supports fish life. This definition does not include irrigation ditches, canals, stormwater treatment and conveyance systems, or other entirely artificial watercourses, except where they exist in a natural watercourse that has been altered by humans.

If no defined bed or bank could be discerned in the field, a mapped stream was determined to not actually be a surface water drainage under present climactic conditions. If there was physical indicators of surface water flow such as a natural scour line impressed on the bank, distribution of upland and water tolerant vegetation, and the resource had a defined bed and bank, field evaluators also reviewed the resource to determine if it met the definition as a stream or a ditch and if it resembled a ditch if this ditch was in-fact a channelized stream. Jurisdictional ditches were determined by based on criteria described in the joint memorandum, "Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in "Rapanos v. United States & Carabell v. United States," (signed December 2, 2008) issued by the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA). Ditches are considered jurisdictional if a significant nexus can be identified using the following criteria:

"Ditches excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water generally are not jurisdictional under the CWA, because they are not tributaries or they do not have a significant nexus to Traditional Navigable Waters (TNWs). If a ditch has relatively permanent flow into waters of the U.S. or between two (or more) waters of the U.S., the ditch is jurisdictional under the CWA. Even when not themselves waters of the United States, ditches may still contribute to a surface hydrologic connection between an adjacent wetland and a TNW."

When in the field, field evaluators concentrated on the downstream reaches of the potential streams because these areas will be more likely to display a stream bed and bank and will have the capacity to collect the most water from the associated drainage basin. If a stream crossing of the waters and wetlands study area was evaluated and the area did not meet the definition as a stream, all upstream portions of this drainage were also considered to not meet the criteria. This assumption was verified while in the field with a review of recent aerial photography and general terrain. Figure 3 in Attachment D depicts the following assessment areas: 1) areas assessed through direct observation in the field, 2) areas assessed and eliminated through review of background data and aerial photographs, 3) areas discounted and eliminated from further review based on downstream reach assessments, background review, and review of aerial photographs.

Results of the waters and wetlands field surveys, which were performed for the Project in March 2018, did not identify any streams or wetlands within the micro-siting corridor, as reported in Attachment B1. None of the mapped streams or wetlands which were identified during desktop review were found to intersect the waters and wetlands study area during targeted field surveys.

Pending confirmation of the final Project layout outside the micro-siting corridor inclusive of only roads, the overhead gen-tie line, and underground collection system, and areas upgradient where the presence of waters and wetlands has been discounted, additional surveys will occur within any unsurveyed portions of the Project Area, as needed, to confirm that no wetlands or waters are present where Project facilities are proposed to be sited.

Based on review of DNR hydrology data, there are no lakes or ponds that occur within the Project Area. In addition, there are no shoreline master program designated areas that occur within the Project Area³.

Although no seasonal or perennial streams or wetlands have been identified within the micro-siting corridor, there is potential for surface water runoff to occur during rain or snow events. Surface runoff generated within the Project Area drains eastward to Cow Creek (and then to the Palouse River) and drains westward and southward to the Snake River associated with the Upper and Lower Sand Hills Coulees.

³ Adams County. 2018. Adams County Shoreline Web Map. Available online: <http://arcg.is/14bSPO>

Specific to the DNR parcel, no wetlands or waters were identified within the DNR portion of the micro-siting corridor during field surveys. Surface water runoff within the parcel drains eastward into natural drainages that flow into Cow Creek and then to the Palouse River.

Specific to the Neilson switching station site, no wetlands or waters were identified during field surveys. Based on existing topography, surface runoff which does not infiltrate on-site within the parcel is expected to drain northwards to a small natural drainage located on the parcel (see Attachment D, Figure 2).

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

All Project features will be designed to avoid placement of project facilities within any wetlands or waters and their associated buffers, to the maximum extent possible. Preliminary survey results indicate that impacts to wetlands, waters, or their associated buffers are not expected to occur since none were identified within the micro-siting corridor. Pending confirmation of the final Project layout outside the micro-siting corridor inclusive of roads, the gen-tie line, and underground collection system, additional surveys will occur within any unsurveyed portions of the Project Area, as needed, to confirm that no wetlands or waters are present where Project facilities are proposed to be sited. If impacts cannot be avoided, the Applicant will obtain any necessary permits or approvals for work activities within wetland, waters, or their associated buffers from applicable local, state, or federal agencies. Any construction within 200 feet of the described waters will utilize BMPs to avoid or minimize potential impacts.

Specific to the DNR parcel, no work activities are planned within or adjacent to (within 200 feet) of any wetlands or waters. The same measures described above to perform additional surveys, as needed, and verify impacts prior to construction apply to the DNR parcel.

Specific to Neilson switching station site, no work activities are planned within or adjacent to (within 200 feet) of any wetlands or waters.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

As described above, to the extent possible, Project facilities will be sited in a manner to avoid placement of fill in jurisdictional waterbodies or their buffers. Since no wetland or waters were detected during field surveys within the micro-siting corridor, no excavation or fill activities within wetlands or waters are currently anticipated. Once final design of the Project is complete, the Applicant will perform additional surveys for wetlands and waters, as needed in any unsurveyed areas, to verify that no wetlands or waters will be impacted by the Project. If fill or dredge material will be temporarily or permanently placed or removed from surface waters or wetlands, the Applicant will obtain local, state, or federal permits and provide appropriate mitigation in accordance with regulatory requirements.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

Surface water withdrawals or diversions are not anticipated during construction or operation of the Project. Construction water will be obtained from an existing water supplier with appropriate water rights and trucked into the Project Area via water trucks. Operational water for the O&M Facility will be acquired from a state water right exempt domestic well onsite, constructed and permitted by a licensed contractor according to local and state requirements, or alternatively, water may also be trucked in from an offsite source, as needed.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs)⁴ indicate that some 100-year floodplains (flood zone 'A') are present within portions of the Project Area, primarily in the northwest portion of the Project Area where natural drainages cross the gen-tie line alignment. However, no structures (i.e., turbines, transmission towers, or meteorological towers) will be constructed directly in the mapped floodplain; the gen-tie line will aerially cross the mapped floodplains, and any roads constructed through the floodplain will be designed to withstand flood waters and minimize flood water elevation changes. The facility will be designed in accordance with ACC 17.70.070 (J) Geology and Flood Hazards, ACC 15.16 Flood Damage and Prevention, and ACC 18.08.560 Flood Hazard Reduction.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

Discharges of waste materials to surface waters are not anticipated during construction or operation of the Project.

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

Construction water will be obtained from an existing water supplier with appropriate water rights.

The O&M Facility will require minimal amounts of water per day for domestic purposes. The O&M Facility will source water from a new onsite exempt well or trucked in from an offsite source, as needed. The well will withdraw less than 5,000 gallons per day for domestic use and will therefore qualify as an exempt well under RCW 90.44. Sanitary wastewater will be discharged to a new septic system constructed near the O&M Facility. In accordance with ACC 17.70.070 (K) Water Resources, water required for onsite use (construction-phase work, restroom facilities, and general maintenance) will be obtained in accordance with state and local requirements.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

The O&M Facility will require a septic system. The septic system will handle disposal of water from sinks, showers, toilets, and the emergency eye wash. The exact size of the system has not been determined; however, the system will be installed in accordance with Washington State (WAC 246-272) and Adams County (Adams County Ordinance No.01-0-1) regulations.

⁴ Federal Emergency Management Agency. 2018. FEMA Flood Map Service Center. Available online: <https://msc.fema.gov/portal>.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The source of runoff within the Project Area is mainly stormwater. The Project site will be designed to collect stormwater and discharge it into natural drainages to avoid erosion. Stormwater that is generated within the Project Area flows into established natural drainages, which drain eastward to Cow Creek (and then to the Palouse River) and drains westward and southward to the Snake River associated with the Upper and Lower Sand Hills Coulees.

The construction site will be designed to capture and discharge stormwater while minimizing erosion and sedimentation. Stormwater capture and control will implement BMPs developed according to the Eastern Washington Stormwater Management Manual. Following construction, areas of temporary impact will be returned to their previous condition where natural stormwater flows will continue.

Following construction, the site will be stabilized, and permanent stormwater control BMPs will be implemented around Project facilities and monitored for effectiveness for the life of the Project.

Specific to the DNR parcel, surface water runoff within the parcel drain eastward into natural drainages that flow into Cow Creek and then to the Palouse River. The same BMPs described above be implemented within the DNR parcel to manage stormwater during construction and operation.

Specific to the location of the Neilson switching station, surface water runoff within the parcel drain northwards to a small natural drainage located on the parcel (see Attachment D, Figure 2). The same BMPs described above for the Project would be implemented within the switching station site to manage stormwater during construction and operation.

2) Could waste materials enter ground or surface waters? If so, generally describe.

Waste materials generated during construction or operation activities will be managed to prevent their entry into ground or surface waters. Measures to prevent and control discharges to ground or surface water will be identified in the Spill Prevention Control and Countermeasures (SPCC) Plan.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

The proposal is not anticipated to affect drainage patterns within the Project Area. However, any alterations to existing drainage patterns will be addressed during design of the Project. The Project will be designed to convey stormwater into natural or engineered drainages to minimize erosion.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

As identified in Section 3.c above, the Applicant will obtain coverage under the Washington Department of Ecology construction stormwater general NPDES permit. Under the requirements of this permit, the Applicant will implement an SWPPP and an Erosion and Sediment Control Plan (ESCP). The Applicant will implement BMP selection and design, monitoring, inspection, and reporting practices as required by the permit. Following construction, disturbed areas will be

stabilized, and permanent BMPs will be installed in locations where the ground surface is not returned to agricultural uses. As deemed necessary, stabilization could include reseeded to re-establish temporary or permanent vegetation.

In addition, the following measures will be implemented to reduce or control stormwater runoff and water quality impacts:

- Pre-construction wetlands and waterbodies surveys will be completed if any new areas are added to the survey area as a result of final design refinements. Surveys will occur within the newly added areas only. Should any protected resources be present and potentially impacted within areas which have not been surveyed as reported in the expanded SEPA checklist and in reports submitted prior to the County's SEPA threshold determination, the Applicant will avoid, minimize, mitigate, and receive all needed local, state, or federal permits relative to impacts to such resources. As necessary, the Applicant will consult with local, state and federal agencies relative to impacts identified, and will prepare supplements to reports attached to the expanded SEPA checklist incorporating any new survey information and mitigation measures required. The Applicant will mitigate impacts to resources in compliance with applicable regulations and CUP conditions approved for the Project. For example, the Applicant will prepare a critical areas report(s) consistent with the requirements of ACC 18.06 for any critical areas impacted. Pre-construction survey results will be incorporated as supplements into any previously prepared survey reports, including completed reports which are attached to this expanded SEPA checklist. Survey results will identify potential impacts and describe measures that will be incorporated into the Project to avoid and minimize potential impacts. The supplements will also update coordination efforts with applicable agencies as necessary for their approval.
- Facility design will be conducted to maintain existing natural surface drainage patterns to the maximum extent practicable.
- Stormwater runoff from constructed private access roads will be designed to minimize surface water runoff and maximize infiltration into the ground.
- Water crossings by Project facilities, if necessary, will be designed to be in compliance with Adams County Critical Area Ordinances, WDFW guidelines, and applicable local, state, and federal regulations.
- An SPCC Plan will be prepared for each of the construction and operation phases of the Project.
- Per Adams County Code 17.70.070, the Applicant will design and implement stormwater drainage systems in consultation with a professional engineer to ensure that minimal erosion will occur. After construction, the Applicant will monitor the site for erosion on a regular schedule, as approved by Ecology or Adams County, and after large rainfall or snowmelt events and take corrective action as necessary.
- Per Adams County Code 17.70.070, water required for onsite use (construction-phase work, restroom facilities and general maintenance) will be obtained in accordance with state and local requirements.

4. Plants

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass

- pasture
- crop or grain
- orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

Specific to the DNR parcel, existing vegetation includes crop or grain only or is left fallow between farming seasons.

Specific to the Neilson switching station site, existing vegetation includes crops or grains.

b. What kind and amount of vegetation will be removed or altered?

Vegetation and land cover within the Project Area were determined through a combination of desktop analysis and field surveys. The following data sources were reviewed during the desktop analysis: National Land Cover database (NLCD) and Environmental Protection Agency (EPA) Level III and IV Ecoregion maps.

Field habitat surveys were completed within the majority of the Project Area in 2017 and involved general characterization of habitat types observed within the Project Area based on the composition of plant communities. Habitat types were characterized in the field as either cropland, developed or grassland habitat types, as defined in the WDFW Wind Power Guidelines.

The Project Area is located within the Columbia Plateau Ecoregion⁵. Land cover within the Project Area is representative of the historical and ongoing agricultural use of the Project location. According to the NLCD, approximately 94 percent of the Project Area consists of cultivated crops (Figure 4, in Attachment D). The remaining portion of the Project Area is shrub-scrub (4 percent), developed area (2 percent) and herbaceous/grassland (<0.01 percent).

Habitat surveys were completed within the Project Area between 2017 and 2018, and results indicate that NLCD habitat types accurately represent habitat within the Project Area. The majority of the Project Area is comprised of cropland, with only a small portion at the southern tip of the northern most turbine string mapped as grassland (Figure 5 in Attachment D). A TESS report is currently in progress and will be provided to the County upon its completion in summer 2018. A progress report is included as Attachment B10.

Based on review of NLCD habitat types that occur within temporary and permanent impact areas for the Project, the permanent impact of the Project associated with the operational footprint of turbines, transmission towers, switching station, substation, access roads, and the O&M Facility will result in the permanent removal of approximately 70 acres of agricultural habitat, approximately 2.5 acres of developed habitat, and approximately 2.2 acres of shrub/scrub habitat. In addition, construction of the Project will temporarily remove or alter approximately 442 acres of agricultural land, 23 acres of developed habitat, and approximately 13 acres of shrub/scrub habitat. However, following construction, agricultural land uses will be able to resume within areas temporarily impacted by Project construction.

The Applicant will confirm whether Project facilities will be constructed in grasslands enrolled in the U.S. Department of Agriculture Conservation Reserve Program. For example, most of the western half of T16N-R35E-S15 (parcel No. 2635150200001) is known to be CRP-enrolled. Under USDA

⁵ EPA. 2010. Level III and Level IV Ecoregions of Washington. Available online: ftp://newftp.epa.gov/EPADDataCommons/ORD/Ecoregions/wa/wa_eco.pdf

regulations wind turbines are permitted on CRP land, provided that wind turbines are installed in numbers and locations as determined appropriate by USDA Commodity Credit Corporation programs⁶.

In accordance with ACC 17.70.070 (F) Vegetation and Wildlife Construction Limitations, the Applicant will limit construction disturbance by flagging sensitive areas and conduct ongoing environmental monitoring during construction to assure that flagged areas are avoided, and cover within the DNR portion of the micro-siting corridor is entirely mapped as agricultural habitat by NLCD. Within the DNR parcel, approximately 12.8 acres of agricultural habitat will be temporarily disturbed and approximately 2.5 acres will be permanently removed from production as a result of the two turbines and their associated facilities (access roads). Similar to the rest of the Project Area, agricultural land uses will be able to resume within temporary impact areas following construction.

c. List threatened and endangered species known to be on or near the site.

There are two ESA-listed plant species that are known to occur within Adams County⁷, including: Spalding's catchfly (*Silene spaldingii*; federally threatened) and Water howellia (*Howellia aquatilis*; federally threatened). According to the USFWS Information for Planning and Consultation (IPaC), Spalding's catchfly is the only ESA-listed plant species with the potential to occur in the Project Area. No designated critical habitat is found in or near the Project Area, and no Natural Heritage Program-listed plants were identified within the Project Area⁸.

Spalding's catchfly inhabits bunchgrass grasslands and sagebrush-steppe, and occasionally open-canopy pine stands⁹. Within Adams County, all of the known occurrences for this species are located in the extreme northeastern corner of the County within the channeled scablands habitat type that extends north and northwest into adjacent counties in eastern Washington¹⁰. Some of the main threats to this species stem from the conversion of native grasslands to agricultural and urban land uses, as well as the spread of invasive nonnative plant species¹⁰. Given the pervasiveness of agricultural and developed habitat types within the Project Area, it is unlikely that Spalding's catchfly will occur within the Project Area.

Water howellia is an aquatic plant species restricted to small vernal wetlands which are typically located in forested areas¹¹. Within Adams County, the species is only thought to occur in forested areas of the channeled scablands, which begin in the far northeastern corner of the County and extend north and northwest into adjacent counties in eastern Washington. Given the lack of forested habitats in the Project Area, it is unlikely that water howellia will occur within the Project Area. In addition, results of wetland surveys did not identify any wetlands within the micro-siting corridor.

Field surveys for threatened, endangered and sensitive species (TESS) are currently underway and will be completed prior to ground-disturbance activities to determine if any special status plant species, including Spalding's catchfly and Water howellia, are present within the micro-siting corridor and need to be avoided by Project design and micro-siting. As Project design advances, additional

⁶ Department of Agriculture, Farm Service Agency, 7 CFR Part 718 Commodity Credit Corporation and 7 CFR Part 1410 RIN 0560-AI30 Conservation Reserve Program; Federal Register 41987, Vol. 80, No. 136, Thursday, July 16, 2015.

⁷ USFWS Environmental Conservation Online System (ECOS). Species by County Report for Adams County, WA. Accessed online at: <https://ecos.fws.gov/ecp0/reports/species-by-current-range-county?fips=53001>

⁸ DNR 2018. WA Natural Heritage Program Element Occurrences – Current. Available online: [https://data-wadnr.opendata.arcgis.com/datasets/washington-natural-heritage-program-element-occurrences-current](https://data.wadnr.opendata.arcgis.com/datasets/washington-natural-heritage-program-element-occurrences-current)

⁹ USFWS ECOS Species profile for Spalding's Catchfly (*Silene spaldingii*). Available online: <https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=Q1P9>

¹⁰ USFWS. Recovery Plan for *Silene spaldingii*, September 2007.

¹¹ Shelly and Gamon. 1996. Water Howellia (*Howellia aquatilis*) Recovery plan. Prepared for USFWS. Sept 1996.

TESS surveys will occur if any new areas are added to the micro-siting corridor that have not already been surveyed.

Specific to the DNR parcel, the ESA plant species listed above are not expected to occur within the DNR parcel for the same reasons concerning lack of suitable habitats. TESS surveys will be completed to confirm their absence.

Specific to Neilson switching station site, the ESA plant species listed above are not expected to occur for the same reasons concerning lack of suitable habitats. TESS surveys will be completed to confirm their absence.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Additional landscaping is not proposed. However, the following measures will be implemented to reduce or control impacts to vegetation and native plants:

- Pre-construction surveys for habitat and rare plants will be completed if any new areas are added to the survey area as a result of final design refinements. Surveys will occur within the newly added areas only. Should any protected plant species be present and potentially impacted within areas which have not been surveyed as reported in the expanded SEPA checklist and in reports submitted prior to the County's SEPA threshold determination, the Applicant will avoid, minimize, mitigate, and receive all needed local, state, or federal permits relative to impacts to such resources. As necessary, the Applicant will consult with local, state, and federal agencies relative to impacts identified and will prepare supplements to reports attached to the expanded SEPA checklist incorporating any new survey information and mitigation measures required. The Applicant will mitigate impacts to resources in compliance with applicable regulations and CUP conditions approved for the Project. Pre-construction survey results will be incorporated as supplements into any previously prepared survey reports, including completed reports which are attached to this expanded SEPA checklist and additional reports which are planned for completion in spring/summer of 2018. Survey results will identify potential impacts, and describe measures that will be incorporated into the project to avoid and minimize potential impacts. The supplements will also update coordination efforts with applicable agencies as necessary for their approval.
- As needed, the Applicant will limit construction disturbance by flagging protective areas and their applicable buffers and conduct ongoing environmental monitoring during construction to assure that flagged areas are avoided.
- The Applicant will develop a reseeded/restoration and weed management plan in consultation with the Adams County weed control board.
- Best Management Practices (BMPs) to protect vegetation will be implemented, for example: Protect trees, shrubbery, and other vegetation not designated for removal from damage caused by the Project construction, and implement erosion control and dust emission BMPs to prevent siltation of vegetation.
- The Applicant will implement habitat mitigation actions in accordance with the WDFW Wind Power Guidelines for disturbance in natural habitats.
- If avoidance or minimization of impacts to protected vegetation or protected plant species is not possible, mitigation measures may include the following:
 - Removal, conservation, and replanting of protected individual plants (if rare plants are present).
 - Replanting of areas temporarily disturbed by construction activities with seed obtained from a qualified cultivator of rare plants.

- Seeding of additional approved area(s) with the same species.
- Following construction, disturbed areas will be regraded to preconstruction contours and restored to their previous agricultural use or for natural habitat, restored with a native seed mix as appropriate.

e. List all noxious weeds and invasive species known to be on or near the site.

According to the Adams County Noxious Weed Control Board¹², the following noxious weeds are found in Adams County:

- | | | |
|----------------------|------------------------|----------------------|
| ● Camelthorn | ● Jointed Goatgrass | ● Puncturevine |
| ● Canada Thistle | ● Kochia | ● Rush Skeletonweed |
| ● Common Reed | ● Leafy Spurge | ● Saltcedar |
| ● Common Tansy | ● Longspine Sandbur | ● Scotch Thistle |
| ● Dalmatian Toadflax | ● Musk Thistle | ● Spiny Cocklebur |
| ● Diffuse Knapweed | ● Perennial Pepperweed | ● Swainsonpea |
| ● Field Bindweed | ● Poison-Hemlock | ● White Bryony |
| ● Hoary Cress | ● Purple Loosestrife | ● Yellowstar Thistle |

The presence of noxious weeds at or near the Project site will be verified in discussions with the Adams County Noxious Weed Control Board. The Applicant will develop a weed management plan in consultation with the Adams County weed control board.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:
 mammals: deer, bear, elk, beaver, other bats
 fish: bass, salmon, trout, herring, shellfish, other _____

b. List any threatened and endangered species known to be on or near the site.

Based on a review of the USFWS IPaC database for occurrence of federal and state endangered, threatened, or candidate species, two federally listed wildlife species (yellow-billed cuckoo [*Coccyzus americanus*] and pygmy rabbit [*Brachylagus idahoensis*]) and two candidates for federal listing (greater sage-grouse [*Centrocercus urophasianus*] and Washington ground squirrel [*Urocitellus washingtoni*]) have the potential to occur in Adams County. However, the data indicates that no designated critical habitat is found in or near the Project Area for any of these species.

Potentially suitable habitat does not occur within or near the Project Area for the yellow-billed cuckoo, greater sage grouse, or pygmy rabbit. Yellow billed cuckoo inhabits large, contiguous patches of riparian woodlands¹³ whereas greater sage grouse and pygmy rabbits inhabit native sagebrush and

¹² Adams County 2016. Adams County 2016 Noxious Weed List. Available online: <https://www.nwcb.wa.gov/pdfs/Adams-County.pdf>

¹³ US Department of Interior. Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Western Distinct Population Segment of the Yellow-Billed Cuckoo; Proposed Rule. FR Vol 79, No 158, Aug 15, 2014.

shrub-steppe habitats, respectively^{14,15}. Due to the crop land habitat comprising most of the Project Area, suitable habitat for the Washington ground squirrel (sagebrush grasslands¹⁶), pygmy rabbit (sagebrush and deep loam soils), and greater sage grouse (big sagebrush) is lacking within the Project Area, although a limited amount of such habitat may occur in the vicinity of the Project Area. Given the pervasiveness of agricultural and cropland habitat types within the Project Area and the general lack of sagebrush or riparian woodland habitats, none of these species are likely to occur the Project Area. Field surveys for threatened, endangered, and sensitive species (TESS) are currently underway and will be completed prior to ground-disturbance activities to determine if any special status plant or animal species are present within the micro-siting corridor and need to be avoided by Project design and micro-siting.

Avian studies performed in 2015-2016 resulted in two detections of endangered or threatened avian species within the Project Area: American white pelican (*Pelecanus erythrorhynchos*; state threatened) and sandhill crane (*Grus canadensis*; federally threatened). These species were detected in low numbers, and their use of habitats within the Project Area is similarly expected to be low (see Attachment B6, 2015-2016 Baseline Avian Use Report, November 2017, pages 18 and 30).

In addition, there has been one additional sighting of American white pelican during currently ongoing 2017-2018 avian surveys, but no additional sightings of sandhill crane (see 2017-2018 Large Bird Interim Report in Attachment B6). Final results of these additional avian surveys will be submitted to Adams County, in the form of a final survey reports. Avian survey reports are planned for completion sometime between May and July 2018.

Specific to the DNR parcel, the ESA animal species listed above are not expected to occur within the DNR parcel for the same reasons as outlined above concerning the lack of suitable habitats.

Specific to the Neilson switching station site, the ESA animal species listed above are not expected to occur for the same reasons as outlined above concerning the lack of suitable habitats.

c. Is the site part of a migration route? If so, explain.

The Project Area is located within the Pacific Flyway, which a broad band area that stretches from the North Slope of Alaska to Central and South America and from offshore areas of the Pacific Coast to eastern areas of the west coast states.

d. Proposed measures to preserve or enhance wildlife, if any:

The Applicant will obtain all necessary approvals from the USFWS. In accordance with ACC 17.70.070 (H) Avian and Bat Studies and Requirements, the Applicant will consider recommended conditions listed in the current, and as amended, WDFW Wind Power Guidelines¹⁷. However, any recommended conditions taken from the guidelines or recommended by WDFW must be reasonable and objective and address Project activity. The following mandatory requirements will be met, as required under ACC 17.70.070.H:

- Requirement ACC 17.70.070 (H) 1: The Applicant has conducted several Project pre-assessment studies consistent with the WDFW Wind Power Guidelines and the USFWS Land-Based Wind Energy Guidelines (WEG) and Eagle Conservation Plan Guidance (ECPG). Baseline avian use surveys were performed in 2011– 2012, 2015 – 2016, and 2017-2018 (Attachments B2, B3, and

¹⁴ USFWS. Greater Sage-Grouse-Species information. Nov 2017. Accessed Online:

<https://www.fws.gov/greatersagegrouse/speciesinfo.php>

¹⁵ WFWO. 2018. Pygmy Rabbit (Columbia Basin DPS). Accessed online:

<https://www.fws.gov/wafwo/articles.cfm?id=149489590>

¹⁶ WFWO. 2018. Washington Ground Squirrel. Accessed Online: <https://www.fws.gov/wafwo/articles.cfm?id=149489591>

¹⁷ Washington Department of Fish and Wildlife. 2009. Wind Power Guidelines. Available online:

<https://wdfw.wa.gov/publications/00294/wdfw00294.pdf>.

B11) and acoustic bat surveys in fall 2017 (Attachment B5). In addition, raptor/eagle nest surveys have been conducted for the 2017 -2018 season, and an eagle/raptor nest report summarizing preliminary results is included in Attachment B4; the final report will be provided to the County upon its completion in summer 2018. The Applicant will continue to consult with WDFW and local habitat/wildlife experts regarding turbine siting before making final site decisions. The Applicant will continue to coordinate with both WDFW and USFWS on the development of any appropriate mitigation measures, as required.

- Requirement ACC 17.70.070 (H) 2: The facility will use bird flight deflectors on unguyed permanent meteorological towers with a lattice structure to reduce collision risk. Unguyed lattice structures will be more visible to avian species than guyed met towers.
- Requirement ACC 17.70.070 (H) 3: The Applicant completed raptor nest surveys in 2015, 2017, and 2018 to gather information on nesting eagles within a 10-mile buffer of the Project and other nesting raptors, inclusive of potential federal or state listed species (e.g., ferruginous hawk) within a 2-mile buffer of the Project. Raptor and eagle nest survey reports are included as Attachment B4. The surveys were conducted to determine the location and species of active nests that may be subject to potential disturbance during construction and identified both active and potentially active nests with the highest likelihood of impacts from operations of the Project. Based on survey results, the Applicant will modify construction timing and activities to avoid impacts to nesting raptors in accordance with ACC.
- Requirement ACC 17.70.070 (H) 4: Baseline avian use surveys were performed for the Project in 2011 – 2012, 2015 - 2016, and 2017-2018 using the most up-to-date protocols, to estimate the use of the Project site by avian species/groups of interest during the season of most concern. The 2015 - 2016 avian use surveys conducted at the Project were designed to address Tier 3 of the WEG and Stage 2 of the ECPG, providing site-specific data on bird use at the Project site, and supplementing other baseline wildlife surveys completed for the Project. To be consistent with current USFWS guidance related to assessing risk to eagles, another year of large bird surveys was conducted in the spring of 2018. Completed reports for these surveys are included as Attachments B2, B3, and B11. Due to a lack of local preexisting avian data, avian surveys have been conducted year round (i.e., in all seasons) to fully address seasonal use of the Project site by avian species. This information will be used to predict impacts and refine the Project layout.
- Requirement ACC 17.70.070 (H) 5: The Applicant understands that it will be required to identify and remove, from within the proposed Project Area and to the extent possible, all carcasses of livestock, big game, etc. that might attract scavenging bald eagles or other raptors. The Applicant will implement monitoring plans to ensure establishment of these post-construction protocols.
- Requirement ACC 17.70.070 (H) 6: Avian and bat monitoring will be undertaken for at least one year following Project startup to estimate bird and bat fatality rates using standard monitoring protocols. The Applicant will report bird fatalities observed for the life of the Project to WDFW and will report the same to USFWS quarterly unless and until such agencies waive or reduce this reporting requirement.
- Requirement ACC 17.70.070 (H) 7: Prior to construction of the Project, the Applicant will form a Technical Advisory Committee (TAC) likely comprised of invitees with local knowledge of avian use and species: environmental groups, wind project owners and/or developers of the project, landowners, and County representatives, tribes, state and federal resource agencies. A TAC, which is typically comprised of no more than seven members, will consider wildlife impact and mitigation issues and will serve for the life of the Project or until TAC members determine that ongoing involvement of the TAC is not meaningful for Project operation. The TAC will examine information relevant to assessing Project impacts to avian and bat species and will consider whether further mitigation measures will be appropriate. In considering the appropriateness of future mitigation measures, the TAC will consider factors such as the species involved, the nature of the impact, monitoring trends, and new scientific findings regionally or at a nearby wind power

facility. If, in the TAC's judgment, such mitigation measures are appropriate in light of the significance of the impact identified, the TAC may recommend mitigation measures. The ultimate authority to implement additional mitigation measures, including any recommended by the TAC, will reside with The Applicant.

- Requirement ACC 17.70.070 (H) 8: The Applicant will also prepare and implement a Bird and Bat Conservation Strategy (BBCS), which will summarize the studies conducted to date and provide reasoning and support for how the Project has adhered to the tiered approach of the WEG during Project development and plans to apply the WEG during construction and operations.

In addition to the USFWS and WDFW recommended conditions listed above, the following measures will be implemented to reduce or control impacts to wildlife:

- After decommissioning, the Project footprint will be restored to the extent restoration is desired by the landowners (and consistent with Adams County Code and permit requirements) and in order to reflect adjacent cropland or habitat communities existing at the time of restoration to the reasonable extent possible and to minimize permanent impacts to fish and wildlife habitat.
- Proper drainage, erosion control plans, and stormwater management practices will be implemented during the operation of the Project, avoiding impacts on aquatic habitat downstream of the Project Area.
- Prior to final site plan approval by Adams County, any raptor nests identified during the raptor nest surveys will be verified so that species- and lifecycle-appropriate construction buffers can be established to minimize disturbance.
- The Applicant will consult with appropriate local, state, and federal agencies to establish timing of and extent of construction buffers for protected species. Construction personnel will be instructed to avoid driving over or otherwise disturbing areas outside the designated construction areas.
- Unguyed permanent meteorological towers will be installed, minimizing adverse avian impacts from these structures as recommended by the 2009 WDFW Wind Power Guidelines.
- At riparian crossings, if any, the Project gen-tie line will include markers and other protection devices to increase visibility of lines to birds.
- Exterior lighting of the Project will be minimized and full cut-off lighting will be used (except for lighting required by the FAA). Motion sensors and timers will be used for exterior security and substation lighting.
- Travel speeds on private, graveled access roads will be limited to 20 mph to minimize the risk of collisions with wildlife.
- The overhead gen-tie line that is constructed to transmit power from the Project substation to the Neilson switching station will be constructed in a manner that is consistent with both the existing Avian Power Line Interaction Committee (APLIC) recommendations for the protection of raptors using collector and generator lines, and will also be developed in accordance with any other commonly accepted industry or regulatory standards in effect at the time of design of such lines.

e. List any invasive animal species known to be on or near the site.

Based on review of information concerning the distribution of known invasive animal species in Washington, there are no invasive animal species known to be on or near the site.¹⁸¹⁹

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Gasoline and diesel fuel will be consumed during construction to operate construction equipment and during both construction and operations by workers traveling to and from the construction site. Re-fueling of construction equipment will occur onsite or a local approved service station. Operation of the turbines will produce electricity from the wind; however, turbines will be connected to the local utility for backup electricity for general electrical services when the wind is not blowing. The O&M Facility will have a connection to the local utility for electricity used for lighting, heat, and general electrical service.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The Project is not anticipated to affect the potential use of solar energy by adjacent properties.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

During construction, conservation measures will include construction waste recycling when feasible and promoting carpooling between construction workers to reduce energy consumption.

The following conservation measures will be undertaken during operations:

- Carpooling among workers and 20 mph speed limits within the Project Area will be encouraged
- High-efficiency electrical fixtures and appliances may be incorporated into the O&M Facility
- Low flow toilets may be used in the O&M Facility
- Recycling of materials will be encouraged.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

1) Describe any known or possible contamination at the site from present or past uses.

¹⁸ Washington Invasive Species Council, 2018. List of Invasive Species in Washington. Accessed March 5, 2018. <https://wise.wa.gov/invasivespecies/index.aspx>

¹⁹ Washington State Department of Agriculture, 2017. Exotic Pests Found in Washington. Updated Nov 21, 2017. Accessed March 5, 2018. <https://agr.wa.gov/plantsinsects/InsectPests/Exotics/surveys.aspx>

No known or possible contamination sites have been identified in the Project Area²⁰; however, a Phase I Environmental Site Assessment (ESA) will be conducted prior to construction to identify any potentially contaminated sites in the Project Area.

Specific to the DNR parcel, no known or possible contamination sites have been identified in the parcel and similar to the rest of the Project area, a Phase I ESA will be completed prior to construction to confirm their absence.

Specific to the Neilson switching station site, no known or possible contamination sites have been identified at that location and similar to the rest of the Project area, a Phase I ESA will be completed prior to construction to confirm their absence.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

No hazardous chemicals/conditions that might affect Project development and design are anticipated in the Project Area. There are two natural gas pipelines that run from the southwest to the northeast within the northwest portion of the Project Area (See Figure 1 in Attachment D). Turbines have been setback from these pipelines, and construction of the turbines is not anticipated to impact or be impacted by either pipeline. However, the underground collector system and overhead gen-tie line will cross both pipeline corridors. The poles for the gen-tie line will avoid the pipelines, and the Applicant will get permission to cross the right-of-way prior to installation of the gen-tie line. Where underground collector lines cross the pipelines, the cables will be bored under the pipelines, and an access road crossing the pipelines will be built with approval from the pipeline owner.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Construction of the Project requires the use of some hazardous materials. Types of hazardous materials that may be present include fuels and lubricant oils from construction vehicles and equipment. Diesel fuel is the primary potentially hazardous substance that will be used in any significant quantity during construction for operating equipment and vehicles. Fuel storage will occur at a pre-selected laydown location where turbines will be constructed or at the O&M Facility.

Project operations generate very small quantities of hazardous materials from turbine maintenance. Waste will include used filters, spent grease, and materials to clean turbines.

Hazardous materials, including wastes, will be stored for short periods of time during Project operations at the O&M Facility. Substation transformers are filled with mineral oil.

4) Describe special emergency services that might be required.

No special emergency services will be required.

5) Proposed measures to reduce or control environmental health hazards, if any:

The following measures will be implemented to reduce or control environmental health hazards:

²⁰ Washington Department of Ecology. 2018. Hazardous Sites List, as of March 2018. Accessed Mar 5, 2018. <https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

- The Applicant will develop and implement a Construction and an Operations SPCC Plans in accordance with local, state, and federal requirements. Any hazardous waste material generated by Project construction and operation will be disposed of in a manner specified by local and state regulations or by the manufacturer.
- The Applicant will provide hazardous materials awareness training for all staff conducting grading or excavation and a contingency plan to identify, segregate, and dispose of contaminants in accordance with the Model Toxics Control Act.

The following measures will be implemented to reduce or control worker and public health and safety impacts:

- Construction and operations phase emergency plans will be prepared and submitted to the County prior to beginning of each of construction and commercial operation. These plans will be developed in coordination with emergency service providers. The emergency plans will include fire prevention plans.
- Construction and operation staff will be appropriately trained to conduct rescues at elevated heights.
- Project components will comply with applicable setback requirements outlined in ACC 17.70.070 (A1) and (A4) Setbacks as adequate setback is an important factor in minimizing many safety concerns (see Figure 6, Attachment D).
- Turbines will be equipped with rotor and overspeed controls.
- Turbines will be equipped to remotely switch off when site personnel detect ice accumulation.
- Staff will be trained to recognize icing conditions and specific approach protocols will be in place should work near turbines be required while these conditions exist. While ice remains on the turbine structures, access to turbines by site personnel will be restricted based on manufacturer's recommendations.
- The turbines will include several inherent safety features (that is, fully independent braking systems) that provide increased fire protection and reduce the possibility of health and safety risks.
- The wind turbines will meet international design and manufacturing safety standards for tower, blade, and generator design, and be certified by a professional engineer. Quality assurance/quality control inspections will be conducted according to industry standard practices.
- Turbine blades will be feathered, as needed, in response to exceedances of the manufacturer's recommended maximum wind speeds, or for emergency shut-downs.
- The Project will comply with all applicable local, state, and federal safety, health ordinances, regulations, and standards.
- In accordance with ACC 17.70.070 (O) Public Safety, the Applicant will develop and maintain an onsite health and safety plan that informs employees and others onsite what to do in case of emergencies, including the locations of fire extinguishers and nearby hospitals, telephone numbers for emergency responders, and first aid techniques.
- If required, blasting activities will be conducted by professionally trained and certified explosives experts and will employ industry standard techniques. Additionally blasting activities will follow federal regulations promulgated by the Department of Homeland Security and state regulations promulgated by Department of Labor and Industries.
- The Applicant will coordinate with regional fire districts regarding fire response and protection and emergency services applicable during construction, operation, and decommissioning

phases of the Project; information provided to the fire districts will include elements such as hazardous materials stored onsite and their locations, maps showing placement of access roads, emergency response communication information (contacts and phone numbers) and emergency evacuation routes.

- The Applicant will comply with applicable Occupational Safety and Health Administration (OSHA) requirements.
- Per Adams County Code 17.70 070:
 - The Applicant will develop and maintain an onsite health and safety plan that informs employees and others on site what to do in case of emergencies, including the locations of fire extinguishers and nearby hospitals, telephone numbers for emergency responders, and first aid techniques. Employees will be trained to address health and safety emergencies, and to safely operate and maintain the turbines and other mechanical equipment.
 - For projects in which hazardous substances are stored or used, a spill prevention and emergency cleanup plan will be designed to assist onsite workers with accidental releases. Any large spill will require emergency response through the local fire departments or designated contractor.
 - During Project construction and all Project welding operations, the Applicant will have a readily accessible water truck and chemical fire suppression materials available on site to allow immediate fire response.
 - The Applicant will provide Project staff with cellular or onsite phones to enable timely communication with the fire departments and other emergency services.
 - The Applicant will fence site entrances as appropriate and post signs warning of electrical dangers with emergency contact numbers, e.g., phone numbers of emergency responders.
 - The Applicant will monitor the site for evidence of unauthorized use and provide additional security as appropriate.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

A noise impact analysis was prepared for the Project including typical existing noise levels within the noise impact study area and an analysis of noise levels from construction and operation of the Project (see Noise Impact Analysis in Attachment B7). The analysis then compared these levels with limits set by Washington State in WAC 173-60. Applicable thresholds include a daytime limit of 60 dBA at receptors and 70 dBA at property lines, and a nighttime limit of 50 dBA at receptors and 70 dBA at property lines. With the exception of intermittent noise from agricultural activity, current noise levels in the Project Area are low given the rural nature of the site. The predominant noise in the area is from nearby roadways and highways and from agricultural activities during planting, harvesting, spraying, and tilling. Typical background noise levels for rural residential areas include daytime noise levels of 40 dBA and nighttime noise levels of 34 dBA²¹ (see Noise Impact Analysis in Attachment B7). Table 2 presents typical sound levels of familiar noise sources and activities.

²¹ American National Standards Institute (ANSI) / Acoustical Society of America (ASA). 2013. ANSI/ASA S12.9-2013/Part 3, Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-term Measurements with an Observer Present.

Table 2. Typical Sound Levels Measured in the Environment and Industry

Noise Source	A-Weighted Sound Level in Decibels
Threshold of Pain	140
Jet taking off (200 feet away)	130
Operating heavy equipment	120
Night club (with music)	110
Construction site	100
Boiler Room	90
Freight Train (100 feet away)	80
Classroom Chatter	70
Conversation (3 feet away)	60
Urban Residence	50
Soft Whisper (5 feet away)	40
North Rim of Grand Canyon	30
Silent Study Room	20
Threshold of hearing	0

Source. OSHA Technical Manual Section 3, Chapter 5. August 15, 2013.

Specific to the DNR parcel, existing noise levels are also low and sources of noise are similar to the rest of the Project Area (e.g., roads, highways, and agricultural activities).

Specific to the Neilson switching station site existing noise levels are also low and sources of noise are similar to the rest of the Project Area (e.g., roads, highways, and agricultural activities).

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Noise levels resulting from construction and operation of the Project were modeled and results are documented in the Noise Impact Analysis (included in Attachment B7). The noise impacts study area for the noise impact analysis included areas within 2 miles of the proposed turbine locations, as well as areas within 1,000 feet of construction areas, which includes all turbine sites and access roads, the Project substation, O&M Facility, gen-tie line, collector lines, and Neilson switching station.

Modelling results indicate that elevated levels of short-term noise will occur during construction and will typically be generated by the use of construction equipment (e.g., trucks, dozers, graders, cranes, portable generators) and haul trucks delivering materials. However, the noise generated during construction will be short term, temporary, and either localized or transitory (haul trucks) in nature, which reduces the potential for noise impacts to occur.

Noise-generating construction activities, including blasting if required, conducted during the hours of 7 a.m. and 10 p.m. are exempt from the limits per WAC 173-60-050. To the maximum extent feasible, blasting activities, if necessary, will be conducted between the hours of 7 a.m. and 10 p.m. In order to ensure the lowest practical noise levels during construction, all vehicle traffic will be restricted in speed while onsite. Construction contractors will also be required to maintain their

equipment in a state of good repair and to use mufflers that meet original equipment manufacturer specifications or better. Furthermore, construction noise is temporary in nature, and construction activities will generally be limited to daytime hours (for practical purposes) when some residents are not at home or are less sensitive to noise from construction activities. All applicable noise standards for non-exempt construction periods will be met. Therefore, construction noise is not expected to be a significant impact.

Operational noise generated by the Project will have several sources including the turbines, the Project substation, corona noise associated with the proposed gen-tie line, noise associated with activities at the O&M Facility, and noise generated by Project-related vehicles conducting onsite maintenance activities. Corona noise is generally audible only in close proximity to the gen-tie line and will be at levels similar to normal human conversation; therefore, noise impacts from corona noise are not anticipated. Results of the modeled noise contours for wind turbine noise show that Project-related noise levels at the nearest receivers are projected to comply with the local noise regulations.

Modeled noise levels at the receivers range from less than 20 dBA to as high as 46 dBA, with four receptors showing a modeled level of 46 dBA. In addition, modeled noise did not exceed 65 dBA at any point on the ground; therefore, the 70-dBA limit which applies to the modeled receivers (property lines) will not be exceeded. All modeled wind turbine noise levels are more than 4 dBA below the applicable environmental noise limits for each receptor during the daytime and 14 dBA below the standard at night. Therefore, the Project will maintain sound levels at receptors and Project boundaries at levels in compliance with applicable noise control and abatement standards, as required under ACC 17.70.070 (A3 and D), and no adverse noise impacts are anticipated during operations (see Attachment B7).

3) Proposed measures to reduce or control noise impacts, if any:

Noise modeling results have confirmed that the Project will maintain sound levels at Project boundaries that are below the maximum levels for the adjacent receiving properties based on the receiving properties' environmental designation for noise abatement in accordance with state regulations. The Project will at all times comply with applicable noise control regulations adopted by the Washington Department of Ecology in accordance with Adams County Code (Section 17.70.070 (A3 and D)).

The following BMPs will be implemented to minimize construction noise:

- Disallow haul trucks to park and idle within 100 feet of a residential dwelling
- Conduct blasting, if any, during daylight hours
- Maintain equipment in good working order and use adequate mufflers and engineer enclosures to reduce equipment noise during operation
- Coordinate construction vehicle traffic routes to minimize the number of passes by residences
- Implement construction and maintenance work-hour controls so that most noise-generating activities occur between 7 a.m. and 10 p.m., which will reduce the impact during sensitive nighttime hours
- Minimize the number of heavy-duty haul trucks traveling through the area during nighttime hours.

During operations, the Project will comply with applicable state noise standards.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The Project site and adjacent properties are used for agriculture (Figure 4 in Attachment D). The primary agriculture is dry land wheat with a few irrigated parcels and a few parcels under CRP. Several residences associated with agricultural activity are located in the Project Area. The proposal will permanently remove a small portion of agricultural lands from production (approximately 70 acres); however, agricultural uses will resume within areas temporarily impacted by Project construction (approximately 442 acres) and will continue throughout most of the Project Area following Project construction.

Specific to the DNR parcel, agriculture is the current land use. There is one residence approximately 0.8 mile north of the northwest portion of the parcel. Within the parcel, the Project permanently removes approximately 2.5 acres from agricultural production and temporarily impact approximately 12.8 acres. Agricultural uses will resume within temporarily impacted areas following construction.

Specific to Neilson switching station site, agriculture is the current land use. There is one residence approximately 1 mile south of the Neilson switching station site. At the Neilson switching station site, the Project permanently removes approximately 5 acres from agricultural production.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The majority of the Project site is currently used as working farmlands. The acreage of agricultural land permanently affected by Project facilities will be identified once the Project layout has been finalized. The permanent footprint of the Project represent less than 0.01 percent of the total Project Area.

Specific to the DNR parcel, the site is used for working farmlands and only a small portion of the site (approximately 2.5 acres) be permanently converted by the Project, which represents less than 0.01 percent of a percent of the total parcel area.

Specific to the Neilson switching station site, the site is used for working farmlands. Five acres would be permanently converted by the Project.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

The proposal is not anticipated to be affected or affect surrounding working farm lands. Following construction, areas temporarily impacted will be returned to agricultural use. The Applicant is working with landowners to minimize impacts to their ongoing agricultural operations.

c. Describe any structures on the site.

There are no existing structures within the micrositing corridor or the areas proposed for Project construction; however, there are residences and agricultural-related structures in the broader Project Area.

Specific to the DNR parcel, there are no residences onsite. One residence is located approximately 0.8 mile north of the northwest corner of the DNR parcel.

Specific to the Neilson switching station site, there are no residences onsite. One residence is located approximately 1 mile south of the Neilson switching station site.

d. Will any structures be demolished? If so, what?

No structures are anticipated to be demolished.

e. What is the current zoning classification of the site?

The majority of parcels within and immediately adjacent to the Project boundary are zoned Prime Agriculture (Figure 7 in Attachment D). Turbines are a conditional use within these zoning designations and per ACC 17.70.020 A, commercial wind facilities are allowed within these zoning designations with a CUP (Adams County Zoning Ordinance Section 17.08.040 - District use chart).

f. What is the current comprehensive plan designation of the site?

The Adams County Comprehensive Plan²² designation of the Project Area is primarily Prime Agriculture.

Specific to the DNR parcel, the comprehensive plan designation is primarily Prime Agriculture.

Specific to the Neilson switching station, the comprehensive plan designation is Prime Agriculture.

g. If applicable, what is the current shoreline master program designation of the site?

No shoreline master program designated areas are in the Project Area²³.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

The Adams County Critical Areas Ordinance (ACC Chapter 18.06) defines critical areas to include: Critical Aquifer Recharge Areas (CARAs), frequently flooded areas, geologically hazardous areas, fish and wildlife habitat conservation areas, and wetlands. The presence or absence of each type of critical area within the Project Area is described below. While some critical areas do occur within the Project Area, the Project has been designed to avoid direct placement of facilities within these areas to the maximum extent possible. If during final design disturbance is necessary in these areas a critical areas permit will be obtained from Adams County if it is needed.

- **CARAs:** CARAs are defined under ACC 18.06 320 to include areas identified in the Columbia Basin Groundwater Management Area (GWMA) plan as “being exposures above-ground of the top of the highest recognized basalt complex basalt flows”. Based on review of DNR CARA data, there are no CARAs that occur within the Project Area.
- **Geologically Hazardous Areas:** Geologically hazardous areas are defined under ACC18.06.420 to include: slopes in excess of 45 percent; areas with Ringfold formation soils, potential for water loading, and slopes in excess of 15 percent; soils subject to wind erosion as a result of land clearing; slopes in excess of 80 percent and subject to rock fall during seismic events; and areas highly susceptible to liquefaction from seismic activity. Based on review of DNR data for slopes and liquefaction susceptibility, and review of NRCS data for soil types and erosion factors, there are no geologic hazards that occur within the Project Area, with the exception of some steep slope areas which will be avoided through micrositing and design refinements. Slopes within the Project Area typically range from 0 to 5 percent, with some steeper slopes associated with drainages in

²² Adams County. 2005. Adams County Comprehensive Plan. February 2005. Available online: http://www.co.adams.wa.us/document_center/Building/Adams%20County%20Comprehensive%20Plan.pdf

²³ Adams County. 2018. Adams County Shoreline Web Map. Available online: <http://arcg.is/14bSPO>

the northwestern portion of the Project Areas that reach up to 80 percent (see Figure 1 in Attachment D). However, none of the proposed turbines will be sited within areas containing slopes in excess of 45 percent and associated facilities (e.g., access roads, electrical collector system) will avoid these areas to the maximum extent possible. Liquefaction susceptibility within the Project Area is predominantly mapped by DNR as “low” (95 percent of Project Area), followed by “very low” (3.5 percent of Project Area), “moderate to high” (<1 percent of Project Area); and “N/A (bedrock)” (<1 percent of Project Area). Areas with “moderate to high” liquefaction ratings corresponding with the same natural drainages in the northwestern portion of the Project Area where steep slopes also occur. None of the proposed turbines will be sited within these areas, and there are no areas mapped as having a “high” susceptibility to liquefaction that occur within the Project Area. Ringfold formation soils do not occur within the Project Area, and soils that are subject to land clearing during construction will be managed to minimize dust through the implementation of dust and erosion control BMPs, described below (Section B.8.I) as well as in the Air section (B.2) and Earth section (B.1).

- **Frequently Flooded Areas:** Frequently flooded areas are defined under ACC 18.06.230 to include 100-year floodplain designations shown on FEMA FIRMs for Adams County, Washington. Review of FEMA FIRMs²⁴ indicate that some 100-year floodplains (flood zone ‘A’) are present within portions of the Project Area, primarily in the northwest portion of the Project Area where natural drainages cross the gen-tie line alignment. However, no structures (i.e., turbines, transmission towers, or meteorological towers) are proposed to be constructed directly in the mapped floodplain; the gen-tie line will aerially cross the mapped floodplains, and any roads constructed through the floodplain will be designed to withstand flood waters and minimize flood water elevation changes.
- **Wetlands:** As described under ACC 18.06.63, the presence of wetlands within a development area is typically determined through a site inspection by a qualified wetland biologist. Wetland surveys were completed for the Project in March 2018 by a qualified wetland biologist, and no wetlands were found to occur within the wetlands and waters survey area. Project facilities will be sited to avoid placement within the 100-year floodplain and wetlands and waters, or their associated buffers, to the maximum extent possible. The wetlands and waters survey report is included as Attachment B1.
- **Fish and Wildlife Conservation Areas:** Fish and wildlife conservation areas are defined under ACC 18.06.520 to include: areas where federal or state endangered, threatened, sensitive, candidate or monitor species or species with high recreational value (game, etc.) have a primary association; naturally occurring ponds under 20 acres that provide fish or wildlife habitat; waters of the state; lakes, ponds, streams and rivers planted with game fish; or federal, state, and private natural area preserves and natural resource conservation areas. Based on desktop analysis of agency-provided datasets concerning fish and wildlife resources, as well as consideration of preliminary findings for wetland/water and avian use surveys within the Project Area, fish and wildlife conservation areas are not known to occur within the Project Area. Based on review of USFWS and Ecology data concerning known distributions and habitat associations for protected species, there are no state or federal threatened, endangered, sensitive, candidate, or monitor species that are expected to have a primary association with habitats found within the Project Area. As previously described under Section B.4 and B.5, the Project Area generally lacks suitable habitat for any state and federal ESA-listed species that are known to occur within Adams County. Field surveys for threatened, endangered, and sensitive species (TESS) are currently underway and will be completed prior to ground-disturbance activities to determine if any special status plant or animal species are present within the micro-siting corridor and need to be avoided by Project design and micro-siting. A progress report is included as Attachment B10. As project

²⁴ Federal Emergency Management Agency. 2018. FEMA Flood Map Service Center. Available online: <https://msc.fema.gov/portal>.

design advances, additional TESS surveys will occur if any new are added to the micro-siting corridor that have not already been surveyed.

Avian surveys that have been completed within the Project Area resulted in several observations of bird species which are listed as threatened, candidate, or monitor species. These include: American white pelican (*Pelecanus erythrorhynchos*; state threatened), sandhill crane (*Grus canadensis*; state endangered), as well as two state candidates (golden eagle, [*Aquila chrysaetos*] and loggerhead shrike [*Lanius ludovicianus*]), and six state monitored species (grasshopper sparrow [*Ammodramus savannarum*], long-billed curlew [*Numenius americanus*], osprey [*Pandion haliaetus*], prairie falcon [*Falco mexicanus*], Swainson's hawk [*Buteo swainsoni*], and turkey vulture [*Cathartes aura*]). With the exception of the American white pelican, all of these species were observed during 2015-2016 avian use surveys only and have not been subsequently observed during the 2017-2018 surveys (see Attachments B3 and B11)). The American white pelican is the only sensitive species which has been observed during currently ongoing 2017-2018 avian surveys (see 2017-2018 Large Bird Interim Report in Attachment B6). All observations of sensitive species have been in very low numbers, and as a result, the use of the Project Area by these species is expected to be low and will not be considered a "primary association". The final large bird survey and TESS Survey reports are planned for completion between May and July 2018 and will be provided to County. Interim reports are included as Attachments B6 and B10 respectively.

Specific to the DNR parcel, there are no CARAs, geologically hazardous areas, frequently flooded areas, wetlands, or fish and wildlife conservation areas that occur within the parcel. The same data sources and survey reports described above were reviewed to evaluate the presence or absence of critical areas within the DNR parcel.

Specific to the Neilson switching station site, there are no CARAs, geologically hazardous areas, frequently flooded areas, wetlands, or fish and wildlife conservation areas that occur within the parcel. The same data sources and survey reports described above were reviewed to evaluate the presence or absence of critical areas for the Neilson switching station site.

i. Approximately how many people would reside or work in the completed project?

No persons will reside at the completed project. Regular operation of the Project will require 8 to 12 employees. Employees will commute to and from the Project and will not reside at the proposed facility. Operations will also require routine maintenance from contractors providing a variety of office and field services.

j. Approximately how many people would the completed project displace?

No one will be displaced by the Project.

k. Proposed measures to avoid or reduce displacement impacts, if any:

No one will be displaced by the Project.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The proposed Project will be consistent with the standards outlined in Chapter 17.70 (Commercial Wind Energy Facility Standards) of the Adams County Code.

The Applicant will design and construct the turbines to be consistent with setback requirements of ACC 17.70.070. Figure 6 of Attachment D illustrates the spatial relationship of the micro-siting corridor

with respect to existing residences. In accordance with ACC 17.70.060 (A) residences located within a 1 mile buffer from the perimeter of the micrositing corridor are shown. The figure also shows the area located within 1.1 times turbine height (549 feet) and 4 times turbine height (1,996 feet) from the perimeter of the micrositing corridor, each measured from the ground to the maximum extent of the turbine blade and assuming a maximum total turbine height (ground to tip of blade at highest point) of 499 feet.

- The Applicant will secure any necessary consents related to setback requirements from participating landowners.
- In accordance with ACC 17.70.070 (A1), the Applicant will site turbines a minimum of 1.1 times the height of the turbines away from all existing residential structures. Measured from the ground to the maximum extent of the turbine blade and assuming a maximum total turbine height (ground to tip of blade at highest point) of 499 feet, the minimum turbine setback of 1.1 times the maximum height equates to 549 feet (see Figure 6, Attachment D).
- In accordance with ACC 17.70.070 (A2) the Applicant will site turbines a minimum of four times the height of the turbine away from all residential structures, whether they are participating or nonparticipating. Measured from the ground to the maximum extent of the turbine blade and assuming a maximum total turbine height (ground to tip of blade at highest point) of 499 feet, the minimum turbine setback of four times the maximum height equates to 1,996 feet (see Figure 6, Attachment D). Prior to construction, in accordance with ACC 17.70.070 (A6), the Applicant will obtain consents from nonparticipating landowners whose residence is situated closer than the 4 times turbine height, documented by a fully executed, notarized agreement by the fee title owner, in a format that can be recorded on the affected real property title.
- In accordance with ACC 17.70.070 (A4), the Applicant will site turbines a minimum of 1.1 times the height of the turbine away from the property line of any nonparticipating landowner. Measured from the ground to the maximum extent of the turbine blade and assuming a maximum total turbine height (ground to tip of blade at highest point) of 499 feet, the minimum turbine setback of 1.1 times the maximum height equates to 549 feet (see Figure 6, Attachment D). Prior to construction, in accordance with ACC 17.70.070 (A6), the Applicant will obtain consents from nonparticipating landowners whose property line is situated closer than the 1.1 times turbine height, documented by a fully executed, notarized agreement by the fee title owner, in a format that can be recorded on the affected real property title.
- The Applicant will obtain DNR approval through a lease agreement to construct the elements of the Project located on DNR land prior to any construction and operation of the Project elements proposed on DNR land.

The following measures will also be implemented to ensure the Project is compatible with surrounding land uses:

- In accordance with ACC 17.70.070 (B1 and 2) Height Limits, the maximum height will be evaluated by the FAA and building structure height limitations will be in accordance with the standards established for the applicable zoning district.
- In accordance with ACC 17.70.030 (C), onsite quarries and temporary concrete batch plants are considered an accessory use supporting the Project. All onsite activities associated with rock quarries will be conducted in accordance with the conditional use standards for gravel pits and other surface and subsurface mining in Chapter 17.68.140 of the Adams County zoning code.
- Should the Applicant or its construction contractor chose to obtain crushed rock and gravel and concrete off-site, they will obtain such materials from existing permitted facilities or will obtain all necessary permits to develop and operate new such facilities.

- The Applicant will coordinate with landowners regarding co-location of Project facilities on farmland, thereby leading to better placement and minimizing impacts to farming activities.
- The Applicant will communicate with participating landowners throughout all phases of the Project.
- The Applicant will use commercially reasonable efforts to time construction of facilities so as to minimize impacts to active agricultural practices.
- The facility will be designed in accordance with ACC 17.70.070 (J) Geology and Flood Hazards, ACC 15.16 Flood Damage and Prevention, and ACC 18.08.560 Flood Hazard Reduction. Any roads constructed through the floodplain will be designed to withstand flood waters and minimize flood water elevation changes.
- Measures to control wind erosion and fugitive dust creation will include watering or covering exposed soils and will be discussed in a dust control plan as required by ACC 17.70.070 (E). Fugitive dust is discussed in more detail in the air section (B.2) and erosion control BMPs are discussed more in the Earth section (B.1). Public roads to be utilized by the Applicant will be identified and a qualified third party engineer will document road conditions prior to construction and again within thirty days after construction is complete or as weather permits. The Applicant will enter into a County Road-Use Agreement for the repair of damage to public roads resulting from Project activities after construction. On a regional level, trucks are anticipated to access the general Project vicinity via I-84 to WA-395 (from the south), via SR 26 from the east, or via I-90 to WA-395, via SR 261 or SR 21 (from the north). From there, trucks will access the direct Project Area via County roads that connect with these highways. including
- During operations, the Project will comply with applicable state noise standards.
- Per Adams County Code 17.70.070, prior to commencing operations, the Applicant will prepare a decommissioning plan in a form acceptable to the County. A bond, letter of credit, or other security acceptable to the Applicant and the County is required to ensure proper decommissioning of each wind turbine generator and other equipment. The amount of the security will be determined on the basis of the site-specific conditions affecting the costs of decommissioning, access, depth of foundation, terrain, etc., to include credit for salvage value of the equipment. The timing for supplying the security will be determined in consultation with the department.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Except for small areas within the final construction footprint, the majority of the Project Area will return to agricultural use following construction; therefore, no mitigation measures are proposed. The proposed measures listed above to ensure the Project is compatible with adjacent land uses will also serve to limit impacts to the surrounding agricultural land uses by promoting active coordination and communication with landowners and farmers.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

The Project will not provide any housing units.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

The Project will not eliminate any housing units.

c. Proposed measures to reduce or control housing impacts, if any:

As housing impacts will not occur, mitigation measures are not proposed.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The proposed turbines are expected to have a maximum hub height of up to 328.0 feet (100 meters) with up to 220-foot (67-meter) rotor blades extending from a central nacelle. The maximum total rotor diameter will be 492.1 feet (150 meters). However, the maximum total height of the turbines (ground to tip of blade at the highest point) will not exceed 499 feet (152 meters). Turbine dimensions and spatial configurations are preliminary estimates based on manufacturer specifications, which are subject to change pending selection of turbines to be used for the Project.

Specific to the DNR parcel, turbines proposed within the parcel have the same maximum dimensions as those described above for the overall Project.

b. What views in the immediate vicinity would be altered or obstructed?

The Project Area is located in a rural area on topography (flat to gently rolling) consistent to the surrounding region reducing the prominence of the Project and limiting the ability to see the Project as the earth's surface curves out at 3.1 miles away. In coordination with Adams County, the Applicant identified four Key Observation Points (KOPs) from which the public will be expected to be able to observe the Project once constructed (Table 2)^{25,26,27}. These locations were selected from known vantage points of the Project Area along public transportation routes and from public gathering locations from which the Project will be visible (e.g., local parks). These KOPs have been vetted and approved by Adams County reviewers. In particular, Adams County staff requested that KOP 4 be included on the basis of the presence of a historic barn which is popular with photographers visiting the area.²⁸ This barn is also described in Section 4.2.8 of Attachment B9 to this expanded SEPA checklist.

See Table 3 below and the KOP Figure in Attachment C for location and description of the KOPs. Photographs of the existing conditions were taken from the selected observation points towards the proposed location of the turbines. Existing condition photographs from KOPs 1 through 3 were taken using standard focal lengths ranging from 53mm to 70mm to represent a panoramic view. The existing condition photograph of KOP 4 was taken using a wide angle focal length to capture the existing barn as a dominant element in the foreground as might be viewed by a person wishing to photograph the barn.

The presence of turbines in the background was then simulated based on a representative wind turbine with a maximum total height of 499 feet. A 3D model of the site representative of the modelled turbine layout was placed in the photographic view, taking into consideration site topography and distance from the observation point. Simulated wind turbines were aligned to the photographs and the model rendered and composited to create the visualizations shown in Attachment C.

²⁵ E-mail from Aarty Joshi, NRG to Barbara Kincaid, BHC Consultants, regarding proposed key observation points for visual simulations. October 16, 2017.

²⁶ Gifford, M, and Makarow I, HDR. Key Observation Points. December 1, 2017.

²⁷ Emails from Barbara Kincaid, BHC Consultants, and Stephen McFadden, Adams County, to Aarty Joshi, NRG, approving selection of key observation points. Re: Key Observation Points. December 1, 2017.

²⁸ Id.

Table 3. KOPs in Project Area

KOP #	KOP Name	Location	Description	Viewer Types and Viewer Sensitivity
1	Town of Lind Park	Northeast corner of North S St/East 2nd Avenue in Lind, WA	<ul style="list-style-type: none"> View of the Project Area looking east/southeast Approx. 6.5 miles from nearest wind turbine Offers representative views from Town of Lind (nearest town to Project Area) 	Local residents – moderate to high sensitivity to changes in the landscape
2	Palouse to Cascades State Park Trail ²⁹ (formerly the John Wayne Pioneer Trail ³⁰)	Along trail south of East Lind-Ralston Rd, approx. 1 mile from intersection of Trail and Paha Rd.	<ul style="list-style-type: none"> View of the Project Area looking south/southeast Approx. 1 mile from nearest wind turbine 	Recreationists – high sensitivity to changes in the landscape.
3	Hwy 26/Hwy 21	Intersection of Hwy 26 and Hwy 21/Lind-Kahlotus Rd	<ul style="list-style-type: none"> View of the Project Area looking northeast Approx. 8 miles from nearest wind turbine Highly used roadway (annual average daily traffic in 2015 travelling west/east was 1,200 vehicles) 	Motorists – low sensitivity to changes in the landscape Local residents – moderate to high sensitivity to changes in the landscape
4	Hwy 261/Providence Rd	Just west of Hwy 261/ Providence Rd intersection	<ul style="list-style-type: none"> View of the Project Area looking south/southwest Approx. 1.5 miles from nearest wind turbine Moderately used roadway (annual average daily traffic in 2015 was 320 vehicles¹) View includes farm with large red barn popular with photographers 	Motorists – low sensitivity to changes in the landscape Local residents and Tourists – moderate to high sensitivity to changes in the landscape

The analysis also then assessed visual sensitivity that is the general impact on the quality of views from the selected observation points, based on three criteria: number and type of viewers; viewing conditions; and quality of the view.

Unobstructed views of a regionally important and notable scene will be very sensitive to objects or structures that will appear in views; as such, recreating viewers using the Palouse to Cascades State Park Trail will have a high sensitivity to visual impacts. Conversely, a view from a seldom-traveled rural road where motorists have only distant, oblique views of turbines in an otherwise unremarkable setting will qualify as an area of low sensitivity. For purposes of the impact analysis, three levels of visual sensitivity are defined:

²⁹ The Palouse to Cascades State Park Trail extends 285 miles through Washington from North Bend to east of the town of Tekoa on the Washington-Idaho border. See: <http://friendsofjohnwaynepioneertrail.org/maps.html>.

³⁰ Bonar, Kayla. New name for cross-state train: Palouse to Cascades State Park. May 18, 2018 https://www.dailyrecordnews.com/news/new-name-for-cross-state-trail-palouse-to-cascades-state/article_a558893d-d751-59a6-b0a3-2c2cc2967530.html

- Low: Viewer types representing low visual sensitivity include agricultural workers. Compared with other viewer types, the number of viewers is generally considered small and the duration of view is short. Low levels of sensitivity are assigned to areas 5 miles or more from the closest turbine, where Project wind turbines will be a distant and a relatively minor element in the overall landscape.
- Moderate: Viewer types representing moderate visual sensitivity include highway and local travelers, and viewers from nearby residences. The number of viewers can vary depending on location. Viewer awareness and sensitivity are also considered moderate because destination travelers often have a focused orientation. Moderate levels are representative of areas where turbines will be visible from 0.5 mile to 5 miles within the primary view of residences and roadways.
- High: Residential, recreational, and viewers congregating in public gathering places (churches, schools, trails, designated scenic viewpoints, etc.) tend to be representative of high visual sensitivity. A high level of sensitivity is generally assigned in locations where turbines will be potentially visible within 0.5 mile or less from residential properties, heavily traveled roadways, or heavily used recreational facilities.

Taking into consideration the quality of the scenic landscape, impact levels were attributed from high to low. Significant levels of impact are representative of situations where turbines will be highly visible in areas with a high number of sensitive viewers and where turbines will greatly alter levels of vividness, unity, and intactness, decreasing the level of visual quality. Moderate levels of impact are representative of situations where turbines will be visible in areas with moderate levels of visual sensitivity and viewers, where the presence of the turbines will moderately alter levels of landscape vividness, unity, and intactness. Finally, less than significant levels of visual impact are representative of situations when the Project will have relatively small effects on the overall landscape levels attributes, where existing levels of landscape aesthetic quality are low, or where there are low levels of visual sensitivity and a low number of viewers.

Visual simulations and anticipated impacts at each of the KOPs are described below.

KOP 1: The nearest turbine to KOP 1 is approximately 6 miles away, making it very difficult for local Lind residents to see the turbines from this distance as a result of intervening topography between the viewing location and the turbines and vegetation which shrouds the horizon, particularly during cloudy conditions. Therefore, the level of visual impact at this KOP is not anticipated to be significant.

KOP 2: The nearest turbines are approximately 1 mile away from KOP 2, making several of the turbines (approximately 5) clearly visible to recreationists at this location. Some turbines will be visible to persons recreating on the linear Palouse to Cascades State Park Trail from some locations of the trail in direct vicinity of the Project Area based on intervening topography between the viewer and the turbines³¹. The overall 285 miles of trail traverse a variety of natural areas and built environment, including elements such as timber harvest, agriculture, and other human development. Views of constructed and operating wind projects already occur from the trail in the vicinity of Ellensburg and Vantage in Kittitas County, and east of Rosalia (topography permitting) in Whitman County. Views of wind turbines from the trail near the Project Area will therefore not be a unique experience to users of the trail state-wide. The turbines will be finished in a neutral finish to minimize contrast with the sky. Therefore, although some of the turbines will be periodically visible from this KOP, the impacts are not anticipated to be significant.

³¹ Approximately 14.4 miles of the trail extend north of the project area between the trails intersection with HWY 395 and SR 261. See Friends of the John Wayne pioneer Trail, MapMyRide at <https://ridewithgps.com/routes/11847954>

KOP 3: The nearest turbines to KOP 3 are approximately 8 miles away, making them somewhat difficult for motorists and local residents to see, particularly during cloudy conditions. Therefore, the level of visual impact at this KOP are not anticipated to be significant.

KOP 4: The nearest turbines to KOP 4 are approximately 1.5 miles away, making several of the turbines visible to local residents, tourists, or motorists. However, this viewpoint is most frequently utilized by motorists who have a low sensitivity to changes in the landscape. A wide-angle focal length (17 mm) was utilized for the photograph taken of the existing landscape and visual simulation of turbines to highlight the shorter range view of the barn and the turbines in the background³². In addition, turbines will be finished in a neutral finish to minimize contrast with the sky. Therefore, although some of the turbines will be periodically visible from this KOP, the impacts are not anticipated to be significant.

Specific to the DNR parcel, given the parcel's central location within the Project Area, turbines proposed within the DNR parcel will be approximately 5 miles from KOPs 2 and 4, and even further from KOPs 1 and 3 (approximately 10 and 8 miles, respectively). As described above, visual impacts at all KOPs be minor and insignificant given the distance of KOPs to the nearest turbines and the topography of the region.

Specific to the Neilson switching station site, visual impacts at all KOPs be minor and insignificant given the distance of KOPs to the Neilson switching station site and the topography of the region.

c. Proposed measures to reduce or control aesthetic impacts, if any:

The Applicant will incorporate the following measures into the Project's design to further minimize the Project's potential for minor aesthetic impacts:

- The only exterior lighting on the turbines will be aviation warning lights required by the FAA.
- Lighting for security at the O&M building will be minimized, and lighting fixtures will be directed away from adjacent properties, to the maximum extent practicable.
- The Applicant will provide a clean-looking facility free of debris and unused or broken down equipment by storing equipment and supplies offsite (post-construction) and promptly removing damaged or unusable equipment from the site.
- Sensors and switches will be used to keep Project lights off when not required.
- Active dust suppression will be implemented during construction.
- Temporarily disturbed areas during construction will be returned to their previous conditions once construction is complete.
- The turbines will be uniform in design to present a trim, uncluttered, aesthetically attractive appearance.
- Turbines will be finished in a neutral finish to minimize contrast with the sky.
- A low-reflectivity finish will be used for all surfaces of the turbines to minimize reflections off of the turbines.

In accordance with ACC 17.70.070 (A2) – Residential Visual and Aesthetic Setbacks, the Applicant will site turbines a minimum of four times the height of the turbine away from all residential structures, whether they are participating or nonparticipating. Measured from the ground to the maximum extent

³² As a result of using this wide-angle focal length, turbines as simulated in KOP4 appear larger than turbines simulated in KOPs 2 and 3. Standard focal lengths of 53mm, 64mm, and 70mm were used in the photographs of KOPs 1, 2 and 3 respectively.

of the turbine blade and assuming a maximum total turbine height (ground to tip of blade at highest point) of 499 feet, the minimum turbine setback of four times the maximum height equates to 1,996 feet (see Figure 6, Attachment D). Prior to construction, in accordance with ACC 17.70.070 (A6), the Applicant will obtain consents from nonparticipating landowners whose residence is situated closer than the 4 times turbine height, documented by a fully executed, notarized agreement by the fee title owner, in a format that can be recorded on the affected real property title.

In view of the low density, rural/agricultural nature of the zoning districts deemed to be suitable for commercial wind energy facilities, the minimum residential structure visual and aesthetic standard has been considered sufficient to address any visual and aesthetic impacts.

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Generally, the Project will not introduce substantial new sources of light or glare. The O&M Facility and substation will be lighted for safety and security. The turbines and meteorological towers will be marked and lighted in accordance with FAA Advisory Circular 70/7460 – 1K and any additional requirements established by FAA. FAA “obstruction lighting” for wind facilities generally require one red blinking light, which federal studies show is easier for pilots to see. Under the recommendations, nacelles at the ends of turbine rows will be lit with the remaining nacelles lit at half-mile intervals. In areas with less air traffic, the white paint typically used for turbines is sufficient for daytime marking when combined with a 24-hour blinking red light. Requirements for lighting and marking are specified in a formal FAA Determination of No Hazard to Air Navigation; this determination by the FAA will occur after the Applicant files notices of construction for specific turbine and meteorological tower locations.

Aviation safety lights installed on Project turbines will be visible to varying degrees within the surrounding area. Because the lights will be installed on nacelles, the visibility of the Project at night will be less extensive than during the day (for which visibility is calculated based on the blade-tip height).

Safety and security lighting will be included at both the Project, the Neilson switching station, and O&M Facility. Glare (light reflecting off the surface of a turbine) impacts are not anticipated to result from surfaces associated with turbines (towers and blades). Towers will be painted a neutral color to blend in with the Project Area. Gen-tie line poles and structures will be steel or wood and will be finished with non-reflective paint or surface treatments.

Specific to the DNR parcel, the turbines proposed within the parcel be equipped with the same features and lights, etc. as those described above for the overall Project.

Specific to the Neilson switching station site, the facility will be equipped with safety and security lighting and finished with non-reflective paint or surface treatments.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

As stated above, the Project will not introduce substantial new sources of light or glare, and therefore, a safety hazard is not expected. The Project includes a number of components that will introduce new sources of visual contrast into the existing setting.

c. What existing off-site sources of light or glare may affect your proposal?

Given the Project’s rural location and agricultural setting, there are no existing offsite sources of light or glare which may affect this proposal.

Specific to the DNR parcel, there are no existing off-site sources of light or glare.

Specific to the Neilson switching station site, there are no existing off-site sources of light or glare.

d. Proposed measures to reduce or control light and glare impacts, if any:

The Project will be designed to minimize potential light and glare impacts, including directing lighting downward, incorporating a non-reflective finish into turbines, and constructing any facilities in muted tones.

Lighting for security will be minimized and lighting fixtures will be directed away from adjacent properties, to the maximum extent practicable. FAA lights will be minimized to the extent practicable in consultation with the FAA. The Applicant will ensure the facility is free of debris and unused or broken down equipment by storing equipment and supplies offsite (post-construction) and promptly removing damaged or unusable equipment from the site. In addition, to the extent practicable, and subject to industry standards and requirements to meet the FAA's daytime lighting and marking standards, the Applicant will chose paint colors and use nonreflective paints to reduce glare.

Additionally, in accordance with ACC 17.70.070 (M) Visual Resources, the Applicant has prepared visual simulations of turbines from key viewpoints, chosen in consultation with the Adams County (see Attachment C).

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

Based on review of Washington State Parks and Recreation Commission regional maps, as well review of mapped parks and recreation areas on publically available information sources³³ there are no parks or recreational opportunities in the Project Area (see Figure 8 in Attachment D). The closest parks to the Project Area are the Palouse to Cascades State Park Trail immediately north of the Project Area; Pasco Fish Lake Trail, Pioneer Park, Snyder Park, Bassett Park and Stark Park in Washtucna; the Town of Lind Park in Lind; the Columbia Plateau Trail about 8 miles southwest of the Project Area; and Palouse Falls State Park about 9 miles south of the Project Area (see Figure 8 in Attachment D)

Specific to the DNR parcel, there are no recreational opportunities within the parcel. The closest recreational opportunities to the DNR parcel are the Palouse to Cascades State Park Trail; Pasco Fish Lake Trail, Pioneer Park, Snyder Park, Bassett Park and Stark Park in Washtucna; the Town of Lind Park in Lind; the Columbia Plateau Trail; and Palouse Falls State Park (see Figure 8 in Attachment D).

Specific to the Neilson switching station site, the nearest recreational opportunity is the Palouse to Cascades State Park Trail, approximately 1.3 miles north of the Neilson switching station site.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No parks or recreational opportunities will be displaced.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

³³ Google maps, accessed April 20, 2018.

There are no parks or recreational opportunities in the Project Area; therefore, no measures to reduce or control impacts on recreation are anticipated.

13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.**

In accordance with ACC 17.70.070 (L) Cultural Resources, the Applicant completed a cultural resources study of the Project Area. The study began with a desktop analysis which included a review of site records, previous cultural resources studies and historical map sources for the project vicinity to determine the types of resources that may be encountered in the Project Area and surrounding vicinity. The study area for the desktop portion of the analysis extended 5 miles in all directions from the Project Area.

A proposed Work Plan was then developed and submitted to DAHP and applicable tribes for comment. The Work Plan is included in Attachment B8. The plan outlined pedestrian survey methods to be used during field surveys which were completed in spring 2018. The survey area for cultural resources included the micro-siting corridor (200 feet to either side of the turbine strings), as well as the anticipated area of disturbance for the O&M Facility, Project substation, Neilson switching station, and laydown area. The survey area is shown on Figure 9 in Attachment D. To assess potential indirect impacts to historic resources, a viewshed analysis of buildings and structures within a 3-mile distance of Project turbine locations was also completed.

Based on the desktop study, archival research, and survey, a Cultural Resources Inventory Report was prepared (Attachment B9). Because the report contains restricted and confidential information, it is protected from public disclosure under RCW 27.53 Archaeological Sites and Records. Due to the confidential nature of the report, it has been submitted to Adams County for its consideration under separate cover. However, the sections of this expanded SEPA checklist that follow provide a summary of survey findings, a discussion of potential impacts to these resources, and measures suggested to avoid impacts to identified resources (if applicable).

Archeological resources identified by the study are addressed in the following section of this expanded SEPA checklist.

The survey identified 15 architectural historic-period resources including their contributing elements, which were evaluated for their significance for their architectural character, including a determination as to whether or not if these resources retained sufficient integrity of location, setting, design, materials, workmanship, feeling, and association to qualify for listing in the National Register of Historic Places (NRHP), as well as in the Washington Heritage Register, for architectural character. These resources are listed on Table 4 and include the following resources as defined by the National Park Service³⁴:

1. Districts – which is an area that possess a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.
2. Structure – the term "Structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.
3. Building – such as a house, barn, church, hotel, or similar construction, is created principally to

³⁴ National Parks Service. 1997. Guidelines for Completing National Register of the Historic Places Forms.

shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.

Table 4. Architectural Resources Identified in the Study Area

Adams County Parcel # on Which Resource is Located	Resource Type	Period of Significance
2735080300001	District	circa 1920 – ca. 1940
2735180402505	District	circa 1890 – 1954
2735200240699	Structure	1952 – 1954
2735240100001.	District	circa 1900 – 1950
2636060120001	District	circa 1920 – 1950
2636090200001	Building	circa 1900 – 1940
2636190120001	Structure	circa 1970 – circa 1973
2635100100001	Building	circa 1900
2635020100001	District	circa 1920
2635060100001	District	circa 1920 – 1945
2634020000001*	Building (NHRP No 79002524)	1905 – 1910
2535040300001**	Building	N/A
2535150100002	District	circa 1929 – 1971
2635340002603	District	circa 1930 – circa 1940
2535020200001	District	circa 1940 – 1950

* This resource was previously listed in the NRHP

**This resource was recommended not eligible for listing in the NRHP, but is listed in the WHBR.

Only one historically significant resource, the Seivers Brothers Ranch, was identified within the study area. It was last evaluated in 1979.

Specific to the DNR parcel, the records search and survey did not identify any architectural historic resources within the parcel.

Specific to the Neilson switching station site, the records search and pedestrian survey did not identify any architectural historic resources within the site.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

During the desktop study, no previously known archaeological resources were identified within the Project Area or within a 5 mile buffer of the Project Area. However, three historic archaeological resources were identified during the 2018 pedestrian field survey. No pre-historic archeological resources were identified during the pedestrian field survey. NRHP eligibility recommendations for and potential impacts to eligible resources are presented below. Although none of the sites identified are recommended eligible for listing in the NRHP, the sites will be avoided until such time that the DAHP and the affected tribes have concurred with the recommendations regarding eligibility.

1. Site 2767-A-1 consists of a historic-period debris scatter located along Turbine String A. The site was identified during pedestrian survey and contains at least 52 artifacts distributed over an

area measuring approximately 83 feet north-northwest–south-southeast by 455 feet west-southwest–east-northeast. The site lacks integrity and appears to represent multiple dumping events of primarily domestic debris without context or information on age of disposal. HRA recommends that Site 2767-A-1 is not eligible for listing in the NRHP under: Criterion A, as it is not associated with events that have made a significant contribution to the broad patterns of local, state, or national history; Criterion B, as it is not associated with the life of a significant person; Criterion C, as the site does not embody the distinctive characteristics of a type of construction; and Criterion D, as it is unlikely to yield further information important in understanding local, regional, or national history. The area has been plowed for several years, and the site does not appear to retain most of the seven aspects of integrity the resource needs to be eligible for listing in the NRHP. Design, materials, workmanship, feeling, and association have all been compromised.

2. Site 2767-B-1 consists of a historic-period debris scatter located along Turbine String B. The site was identified during pedestrian survey and contains at least 39 artifacts distributed over an area measuring approximately 235 feet north–south by 108 feet east–west. The site lacks integrity and appears to represent multiple dumping events of primarily domestic debris without context or information on age of disposal. HRA recommends that Site 2767-B-1 is not eligible for listing in the NRHP under: Criterion A, as it is not associated with events that have made a significant contribution to the broad patterns of local, state, or national history; Criterion B, as it is not associated with the life of a significant person; Criterion C, as the site does not embody the distinctive characteristics of a type of construction; and Criterion D, as it is unlikely to yield further information important in understanding local, regional, or national history. The area has been plowed for several years, and the site does not appear to retain most of the seven aspects of integrity the resource needs to be eligible for listing in the NRHP. Design, materials, workmanship, feeling, and association have all been compromised.
3. Site 2767-C-1 consists of a historic-period debris scatter located along Turbine String C. The site was identified during pedestrian survey and contains at least 96 artifacts distributed over an area measuring approximately 235 feet north–south by 315 feet east–west. The site lacks integrity and appears to represent multiple dumping events of primarily domestic debris without context or information on age of disposal. HRA recommends that Site 2767-C-1 is not eligible for listing in the NRHP under: Criterion A, as it is not associated with events that have made a significant contribution to the broad patterns of local, state, or national history; Criterion B, as it is not associated with the life of a significant person; Criterion C, as the site does not embody the distinctive characteristics of a type of construction; and Criterion D, as it is unlikely to yield further information important in understanding local, regional, or national history. The area has been plowed for several years, and the site does not appear to retain most of the seven aspects of integrity the resource needs to be eligible for listing in the NRHP. Design, materials, workmanship, feeling, and association have all been compromised.

Specific to the Neilson switching station site, the records search and pedestrian survey did not identify any archeological (historic or prehistoric) resources within the site.

- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the Project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

The Applicant's cultural resources evaluation methodology to address potential impacts on historic and cultural preservation is described in section 13(a) above and is documented in Attachment B8. A Cultural Resources Inventory Report was completed in spring 2018 and has been submitted to the County with this expanded SEPA checklist (Attachment B9). The report will also be circulated to

DAHP and applicable tribes for their review and comment regarding recommended conclusions to be made as to the resources' eligibility for listing on the National Register of Historic Places (NRHP).

Tribal consultation has been conducted to help identify areas of cultural importance. Tribes have been consulted regarding survey methodology and have been invited to view survey activities. See Attachments B8 and B9 for more details.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

Architectural (Historic) Resources:

Mitigation is not proposed for architectural historic resources identified and evaluated in the cultural resources study conducted for this Project. The construction and operation of the Project will not cause any probable significant adverse impacts to such resources.

Cultural resources:

Three archaeological historic resources were identified during the 2018 survey. Although none of the sites identified are recommended eligible for listing in the NRHP, the sites will be avoided until such time that the DAHP and the affected tribes have concurred with the recommendations regarding eligibility. No prehistoric archeological resources were identified as a result of the cultural resources inventory.

The following measures will be implemented during construction to reduce or control impacts to cultural resources:

- Pre-construction cultural resource investigations will be completed in areas which were not previously surveyed. Areas to be surveyed include the underground electrical collector system corridor outside of the micrositing corridor, the gen-tie line corridor, Neilson switching station, and areas of public road improvements. In addition, some parcels along the micrositing corridor which were not previously surveyed due to access restrictions will need to be surveyed prior to construction. Should any protected archeological or historical resources be present and potentially impacted within areas which have not been surveyed as reported in the expanded SEPA checklist and in reports submitted prior to the County's SEPA threshold determination, the Applicant will avoid, minimize, mitigate, and receive all needed local, state, or federal permits relative to impacts to such resources. The Applicant will consult with the County, DAHP and potentially affected Tribes if any additional cultural resources are identified; should any such resources be eligible for listing on the NRHP and cannot be avoided, the Applicant will consult with DAHP to develop and implement appropriate mitigation measures. The Applicant will prepare supplements to reports attached to the expanded SEPA checklist incorporating any new survey information and mitigation measures required. The Applicant will mitigate impacts to resources in compliance with applicable regulations and CUP conditions approved for the Project.
- Should pre-construction investigations described above identify the presence of pre-historic resources, such prehistoric resources will be protected regardless of NRHP eligibility. Prior to the disturbance of any prehistoric resource, a permit from DAHP will be obtained per RCW 27.53. If DAHP deems the historic resource to be ineligible, ground disturbance in the area will still be avoided to the extent practical. If DAHP deems the resource to be eligible, additional consultation will take place with DAHP and applicable tribes.
- During construction, the Applicant will flag and avoid cultural resources, and monitor construction activities during ground disturbance to ensure that flagged cultural properties are avoided.

- The Applicant will train construction workers on the need to avoid cultural properties and procedures to follow if previously unidentified cultural properties, including Indian graves, are encountered during construction.
- The Applicant will develop an Unanticipated Discovery Plan (UDP) prior to ground-disturbing activities. This document will be submitted for review to the DAHP potentially affected Tribes.
- If human remains were to be encountered during construction, work within 200 feet of the discovery will cease, the local law enforcement, applicable State Historic Preservation Officer, and County coroner will be notified in the most expeditious manner possible (RCW 27.44, 68.50, and 68.60).
- If human remains are determined to be associated with an archaeological site, the DAHP, and any affected Tribes will be notified. Appropriate measures will be taken to ensure the site is protected from further disturbance until a treatment plan is agreed upon by all involved parties.
- If any previously unidentified cultural resource properties are encountered during construction, the Applicant will cease construction activities in the immediate vicinity of the site pending evaluation by a qualified archaeologist and consultation with DAHP to identify appropriate mitigation measures such as avoidance or scientific data recovery.

Operation of the Project is not expected to result in any new ground disturbance and is therefore unlikely to result in any impact to archeological resources.

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

On a regional level, trucks are anticipated to access the general Project vicinity via I-84 to WA-395 (from the south), via SR 26 or via I-90 to WA-395 (from the north). From there, trucks will access the direct Project Area via SR 261, SR 21, and County roads in the Project vicinity. These existing roads include Providence Road, Dewald Road, Phillips Road, Seivers Road, Presnel Road, Marcellus Road, Foley Road, Lee Road, Bauer Road, and Sutton Road. These public roads which will be used to access the Project are shown on Figure 1 in Attachment D.

Specific to the DNR parcel, access will be provided primarily off of Bauer Road, Sutton Road, Marcellus Road, and Foley Road.

Specific to the Neilson switching station, access will be provided off of Smart Road and Lind Kahlotus Road.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No public transit serves the Project Area.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The O&M Facility will have parking for operations vehicles. No existing parking will be eliminated.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

Approximately 25 miles of new private access roads within the Project Area will be constructed with compacted gravel and will be located along and between each turbine string to provide construction access to each turbine site. The exact location of Project access roads will be finalized based on final Project design once actual turbine types are selected; however, the majority of access roads will follow the micrositing corridor with indicative project access road locations shown in Figure 1 in Attachment D and used for purposes of impact analysis. Prior to construction, a final road layout will be provided to the County, along with demonstration that appropriate surveys have been conducted and impacts to regulated resources have been avoided, mitigated, or permitted as required by local, state and federal requirements.

Specific to the DNR parcel, approximately 0.8 mile of new access roads (of the 25 miles for overall Project) are anticipated.

Specific to the Neilson switching station site, no new access roads are anticipated.

Existing roads may require improvements to support transportation of heavy haul trucks carrying turbine components during construction. Access to the Project Area is provided by existing roads off of SR 21, Lind-Ralston Road, SR 261, and SR 26. These existing roads include Providence Road, Dewald Road, Phillips Road, Seivers Road, Presnel Road, Marcellus Road, Foley Road, Lee Road, Bauer Road, and Sutton Road. Prior to construction, all public roads to be utilized by the Applicant will be identified, and a qualified third party engineer will document road conditions prior to construction and again within thirty days after construction is complete or as weather permits. The Applicant will enter into a County Road-Use Agreement for the repair of damage to public roads resulting from Project activities after construction. Should temporary or permanent removal of obstructions or improvements to county or state roads (and their associated shoulders) be necessary to facilitate the movement of Project-related oversize or overweight loads, the Applicant or its construction contractor will conduct necessary surveys to identify or discount the presence of protected resources at the location of the work to be conducted, and will obtain the necessary permits to remove obstructions or improve roads.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No water, rail, or air transportation is located in the Project Area. The closest airport is the Lind Municipal Airport, which is two miles northeast of Lind in Adams County and about 10 miles from the northwestern portion of the Project Area.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

Project construction is anticipated to last approximately 12 to 18 months. Groundbreaking activities will occur during the first four months, during which construction traffic is expected to peak at about 300 vehicles per day. This will include truck trips for delivery of water, construction materials, and turbine components, and construction worker trips in personal vehicles. The remaining 8 months of construction will primarily consist of delivery of turbine components and erection of the wind turbines. Local roads are lightly used, and it is anticipated that the additional trips will be within the capacity of the local road network.

Water delivery will require approximately 20 trips per day; construction materials approximately 25 trips per day; and turbine components approximately 20 trips per day. Construction will require on average of about 100 staff, with a peak of 250. Although unlikely to occur simultaneously, during peak traffic up to 250 inbound AM trips to the Project Area and 250 outbound PM trips will be anticipated.

Once operational, up to 5 to 10 vehicle trips per day will be anticipated to and from the O&M Facility. Periodic maintenance trips will be expected to the operating turbines.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The proposal will result in a minor increase in traffic on local roadways when compared to existing traffic. Movement of construction components or vehicles during operations will be coordinated with the local agricultural community to ensure that Project-related traffic does not interfere with movement of agricultural products at sensitive times of the year.

h. Proposed measures to reduce or control transportation impacts, if any:

In accordance with ACC 17.70.070 (A5) Public Roads, access to the Project Area will be provided by existing roads off of SR 21, Lind-Ralston Road, SR 261, and SR 26. These existing roads include Providence Road, Dewald Road, Phillips Road, Seivers Road, Presnel Road, Marcellus Road, Foley Road, Lee Road, Bauman Road, and Sutton Road.

The following measures will be implemented to reduce or control transportation impacts:

- Prior to commencement of construction, the Applicant will consult with the Washington State Department of Transportation (WSDOT) and Adams County on the development of a construction-phase traffic management plan.
- Ingress and egress points will be located and improved (if needed) in order to assure adequate capacity for existing and projected traffic volumes and to provide efficient movement of traffic, including existing and anticipated agricultural traffic.
- All applicable governmental permits or approvals will have been obtained, including access or driveway permits to state or County roads (if needed), construction within state or County highways, and overweight or oversize loads.
- All-weather access roads (including graveled roads), suitable to handle emergency equipment, will be provided to within one hundred fifty feet of any built structure or surface activity area.
- The Applicant will obtain all necessary WSDOT permits to access, modify ingress and egress to, or transport regulated loads on state managed roadways.
 - The Applicant will consult with WSDOT while developing the Traffic Management Plan required by Adams County.
 - The Applicant will obtain trip permits for oversize and overweight loads.
- The Applicant and Adams County will coordinate to identify a qualified third-party engineer that will document road conditions prior to construction and again within thirty days after construction is complete or as weather permits.
- The Applicant will enter into a County Road-Use Agreement for the repair of damage to public roads resulting from Project activities after construction. Also, in accordance with ACC 17.70.070 (C), the Applicant will prepare and implement a construction phase traffic management plan.

In addition, the following measures will be implemented when and where appropriate, to minimize impacts to local traffic during construction and ensure access for emergency vehicles:

- The Applicant or its contractor and County staff will meet prior to final site plan approval by Adams County to outline steps for minimizing construction traffic impacts, including conflicts where state-imposed roadway restrictions could affect transporter routes.

- The Applicant or its contractor will provide advance notification to adjacent landowners and farmers through mailing, informal meeting, open house or other similar methods, when construction takes place in the vicinity of their homes and farms to help minimize access disruptions.
- All construction vehicles will yield to school-related vehicles (such as school busses) and will lower their speed when approaching a school bus or bus stop along the transporter route.
- Advanced warning and proper roadway signage will be placed on major state and County roads to warn motorists of potential Project-related vehicles entering and exiting the roadway.
- When slow or oversized wide loads are being hauled, appropriate vehicle and roadside signing and warning devices will be deployed. Pilot cars will be used as WSDOT dictates, depending on load size and weight.
- Carpooling among the construction workers will be encouraged to reduce traffic volume to and from the Project site.
- Detour plans and warning signage will be provided in advance of any planned traffic disturbances.
- Flaggers will be employed as necessary to direct traffic when large equipment is exiting or entering public roads to minimize risk of accidents. Should the County receive notice during Project construction of transportation events that give rise to a safety concern, the County will advise the County engineer and Project construction manager, who will review the Traffic Management Plan and address additional safety measures, including flagging, as may be appropriate for the situation.
- If lane closure must occur, adequate signage for potential detours or possible delays will be posted.
- Advance notification will be provided to emergency providers and hospitals when public roads may be partially or completely closed.
- Emergency vehicles will be given the right-of-way as required by local, state, and federal requirements.
- Site access roads and an entrance driveway to the O&M Facility onsite will be constructed to service truck movements of legal weight and provide adequate sight distance.
- Traffic control requests will be coordinated through the WSDOT traffic engineer and the County public works department abiding by seasonal County road restrictions.
- A haul and approach route will be developed in coordination with the appropriate jurisdictional authorities.
- Permanent private Project access roads will be maintained by the Applicant for the life of the Project.
- Tracked vehicles and heavy trucks will be restricted to approved transporter roads to prevent damage to surface and base of County roads.
- Turbines and permanent meteorological towers will be lit according to a plan approved by FAA and in the case of meteorological towers, comply with ACC 17.70.070 (M).
- The Applicant will obtain Determinations of No Hazard (DNH) to Air Navigation from the FAA.
- Advanced warning and proper roadway signage will be placed on highways and County roads to warn motorists of potential vehicles entering and exiting the roadway.

15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

The Project will be in the service area of the Ritzville Police Department; Adams County Sheriff's Office; Washington State Patrol, Adams County Fire Department Districts 1, 2, and 7; East Adams Rural Hospital; and Lind School District. As a result of the temporary presence of construction workers, the Project could create a short-term increase in the need for emergency services, including police, fire, and medical response during construction. However, the Applicant will coordinate with local emergency responders to ensure that the Project does not exceed their response capacity or ability.

Construction workers from outside the local area are not anticipated to relocate their families to the Project Area for the short duration of the construction period. Therefore, no demand for additional local school facilities, teachers, or other personnel are anticipated during the construction period. During operations, the addition of 8 to 12 permanent employees and their families will represent a minimal impact to local schools and other public services.

- b. Proposed measures to reduce or control direct impacts on public services, if any.**

The following measures will be implemented to reduce or control impacts to public service providers:

- The Applicant will coordinate with emergency and fire response providers during the preparation of an Emergency Action Plan, a Fire Prevention Plan, and an Operational Safety Plan to establish the appropriate preventive safety measures on site.
- The Applicant will enter into fire services agreements with Adams County Fire Department Districts 1, 2, and 7. The fire services agreements will include an emergency response and fire prevention plan that addresses notification and coordination protocols and requirements for the Project.
- The Applicant will develop and implement a construction-security plan during Project construction to reduce the potential need for increased police services to the Project Area.
- In accordance with ACC 17.70.070 (O) Public Safety, the Applicant will develop and maintain an onsite health and safety plan that informs employees and others onsite what to do in case of emergencies, including the locations of fire extinguishers and nearby hospitals, telephone numbers for emergency responders, and first aid techniques. Employees will be trained to address health and safety emergencies and to safely operate and maintain the turbines and other mechanical equipment.
- A spill prevention and emergency cleanup plan will be designed to assist onsite workers with accidental releases and will be documented in each of the construction and operations phase SPCC Plans.
- During Project construction and all Project welding operations, the Applicant will have a readily accessible water truck and chemical fire suppression materials available onsite to allow immediate fire response.
- The Applicant will provide Project staff with cellular or onsite phones to enable timely communication with the fire departments and other emergency services.
- The Applicant will fence site entrances as appropriate and post signs warning of electrical dangers with emergency contact numbers, e.g., phone numbers of emergency responders.

- The Applicant will monitor the site for evidence of unauthorized use and provide additional security as appropriate.

16. Utilities

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other
Specific to the DNR parcel, no utilities are currently available within the parcel. Specific to the Neilson switching station site, no utilities are currently available at the site.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The completed Project will generate electricity. The Project O&M Facility will require water, wastewater, electricity, and telephone service. An exempt water well will be constructed to provide water to the facility, or alternatively, water may also be trucked in from an offsite source, as needed. It will be installed by a well contractor licensed pursuant to WAC 173-162, and in compliance with the requirements and standards of WAC 173-160. Electricity for the O&M Facility will be provided by Big Bend Electric Cooperative, Inc. or Avista. CenturyLink will be used for telephone service and additional telecommunications. A septic system at the O&M Facility will be installed to handle sanitary wastewater. The Applicant will comply with all County and state well installation and septic tank and subsurface disposal field design, installation, and maintenance requirements.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____

Name of signee Craig Cornelius

Position and Agency/Organization President, Rattlesnake Flat, LLC

Date Submitted: 6/14/18