PART ELEVEN – FORMS

RCW 197-11-960 Environmental checklist.

ENVIRONMENTAL CHECKLIST

Purpose of Checklist:
The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instruction for Applicants
This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can. You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply". Complete answers to the questions now may avoid unnecessary delays later. Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designation. Answer these questions if you can. If you have problems, the governmental agencies can assist you. 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.

Use of checklist for nonproject proposals:
Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

A. BACKGROUND

1. Name of proposed project, if applicable:
   Innovative Solar 211

2. Name of applicant:
   - Applicant: Innovative Solar 211, LLC
   - Property Owners: Neil R. Telecky and Sandra L. Telecky

3. Address and phone number of applicant and contact person:
   - 1095 Hendersonville Road, Asheville, NC 28803
     Phone: (828) 232-7191

Contact: Mr. Lance Roddy, Land Development Manager for
Innovative Solar Systems, LLC; Member-Manager for the Project

4. Date checklist prepared:
   - 6/16/2017, revised 06/05/2018

5. Agency requesting checklist:
   - Adams County Building and Planning Department

6. Proposed timing or schedule (include phasing, if applicable):
   - Tokio POI Substation Construction 115 kV side- Nov 1, 2020 to Nov 1, 2021
   - Avista Communications Check-Out/Complete- September 1, 2021
   - Commercial Operation- February 1, 2022

7. Do you have any plans for future additions, expansions, or further activity related to or connected with this proposal? If yes, explain.
   - No

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.
   - Phase I Environmental Assessment- Exhibit E
   - Wetland Delineation Report with Jurisdictional Delineation- Exhibit E
   - Threatened and Endangered Species Report- Exhibit E
   - Cultural Resources Survey- Exhibit E
   - Geotechnical Analysis will be completed prior to permitting to evaluate subsurface conditions at the site and provide conclusions and recommendations for seismic design considerations, site preparation and grading, foundation support, substation and access road surfacing, and utility construction

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.
   - To the best of our knowledge, there are no applications pending for other proposals that would affect the subject property.

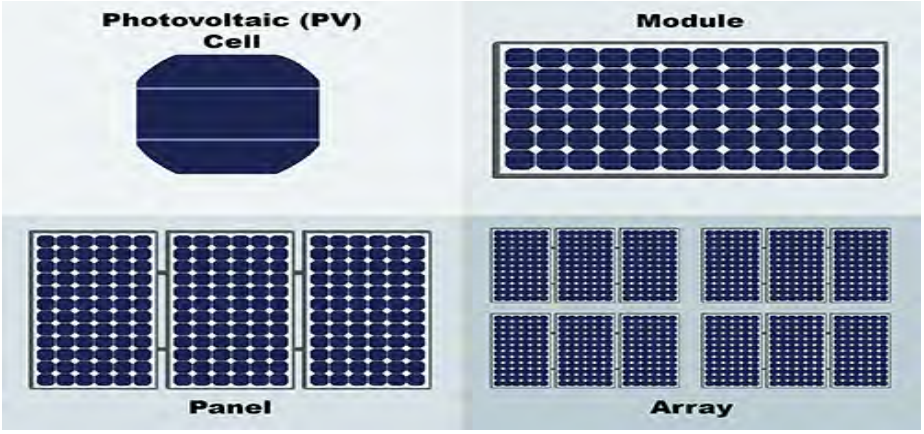
10. List any government approvals or permits that will be needed for your proposal, if known.
    - Conditional Use Permit from Adams County
    - Grading Permit from Adams County
    - Building Permit from Adams County
    - Road Approach (Commercial) from Adams County Public Works
    - Construction Stormwater General Permit (CSWGP) from Department of Ecology
    - Short subdivision approval for utility company sub-station

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions 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 subject site consists of approximately 318 acres of privately-owned land in Adams County, Washington, located at the northeast corner of the intersection of North Hills Road and Griffith Road. The site will be developed into a photovoltaic (PV) utility-scale solar energy collection farm generating approximately 40 Megawatts. Final design is pending; however, the site will include the following components:

  - Solar Arrays- See Exhibit C for a single Panel Profile
    - Solar cells are the smallest component of a solar array and are composed of layers of polysilicon that are treated to move electrons. The cells are connected via conductive copper ribbons and encapsulated in a flexible adhesive solution, covered in non-reflective glass and arranged in an aluminum anodized frame to form modules. Modules are further combined into solar panels; grouping of modules on racking forms arrays. Solar modules contain no moving parts or liquids and are primarily composed of a pure form of silicon, an abundant element that makes up 28% of the earth's crust. The electrical components used to connect solar cells are virtually identical to those used in everyday electronics, such as a cell phone. Panels will be UL (Underwriters Laboratories) certified to conform to proven, tested safety standards.



    - The mounting system for the solar panels used on site will be ultimately determined by the soil conditions. However, the preferred and most commonly used method is driven-pile, consisting of galvanized steel posts supporting panels mounted on single-axis tracking systems. The tracking system will continuously adjust the position of the panels throughout daytime hours as the sun moves across the sky to increase generating efficiency. No concrete will be needed for the driven piles, and the system will be designed to meet snow and wind loads. Depth will be determined by these considerations but is generally less than 8 feet. If shallow bedrock or a high rate of refusal for driven piles is encountered, other methods of installation may be used, such as drills in lieu of pile drivers or grouted micro pile.
    - Solar panels generate electricity directly. They are unlike Concentrated solar thermal generation systems, which utilize a large field of mirrors to focus and concentrate sunlight on a single point to create steam to spin a turbine generator to produce electricity. Because they concentrate heat energy to create steam, thermal

solar systems can create "micro-climate" effects. Solar panels do not create such an effect. They use non-reflective glass to absorb sunlight and the panels convert the sunlight directly into electricity. They do not rely on the heat energy of sunlight at all and do not focus it or concentrate it. No more sunlight falls on the solar panels than would fall on the ground beneath the panels.

- Electrical Inverters
  - Field inverters and transformers for blocks of arrays will also be placed on driven piers throughout the site. Underground medium-voltage collection lines will connect inverters to the substation. These will be trenched to a depth of approximately 3 feet and backfilled with native soil. Approximately 20 inverters will be needed.

- Electrical Substations and Related Equipment
  - There will be two fenced yards containing electrical and control equipment for the project. One will be operated by the developer/operator of the solar farm. On the Site Plan that general area is identified as "Laydown Yard/Customer Substation", but only the smaller separately fenced area will contain the control equipment, transformers, etc. necessary to increase the voltage to the level required for transmission. The combined Laydown Yard/Customer Substation is planned to have an area of about 5.4 acres, but this interior fenced Customer Substation will be about 0.9 acres in size. The second substation, located close to the first, will be operated by the utility company (Avista) and is identified as "Avista Substation" on the Site Plan. It is planned to have an overall area of about 6.6 acres, with a fenced area containing equipment of about 1.8 acres. Adding together the area measurements of the Avista Substation and the Laydown Yard/Customer Substation, the total area of the project that will be devoted to the substations and related equipment and temporary materials storage during construction is estimated at about 12 acres but could be up to a maximum of 15 acres, depending on final engineering and design. The utility company's substation will be owned and constructed by the utility, but for purposes of environmental review, all elements of the utility company's substation (up to the point of interconnection with the utility's existing transmission line) are proposed as part of the project. The utility company's substation will resemble Avista's other existing substations in the area. Components will include, but are not limited to, substation security fence, various steel structures to hold electrical circuit breakers, switches, cables, capacitor banks, and one or two control buildings (each about 10'X15') to house computers and other equipment to control the operation of the substation. A final grading plan will be developed, and minor grading may be necessary within the 12 acres, please see question 1f. The interior fenced substation areas will be staked, stripped of topsoil, shallowly excavated, concrete will be poured in certain areas for structure foundations, equipment pads and any utility-specified underground containment basins, and a grounding grid will be installed. For grounding purposes, these interior fenced areas (a combined area of 2.7 acres/118,00 square feet) containing electrical equipment shall be graveled to a depth of approximately six inches and kept vegetation free. All components of Avista's substation shall meet Avista's construction specifications. Control buildings will be pre-fabricated off-site and will be built to applicable building and electrical code requirements. The Customer Substation will be similar in design to the Avista Substation. Electrical cables will carry electricity from the Customer Substation to Avista's Substation.

- 80-foot Wireless Communication Tower

- A Wireless Communication Facility (WCF) will also be constructed within the Avista substation area. According to Avista, it will utilize a tower measuring approximately 80 feet in height, consisting of a metal monopole or lattice support structure, with a microwave dish mounted on the tower. The WCF will enable Avista to remotely control the operation of Avista's substation. An appropriate fall zone will be maintained surrounding the WCF tower and the communications equipment will be monitored and controlled remotely.

- Laydown Yard / Construction Staging Area
  - 3 acres of the approximately 5.4-acre area in which the Customer Substation will be located will be designated and used during construction as a "Laydown Yard" and as a staging area for construction preparations. Supplies, such as solar panels, racking materials, inverters, cabling, etc., for building the solar farm will be temporarily stored in this area prior to being incorporated into the solar farm. This staging area will be located close to where solar arrays will eventually be constructed. No special site preparation or grading will be needed for this area, and it will be revegetated after construction is completed. No fueling area or concrete batching plant will be on site. A solid waste recycling disposal area will be designated within the Laydown Yard and appropriate methods will be used to collect and consolidate waste for recycling or disposal, as applicable.

- Access/maintenance roads
  - Approximately 7,400 linear feet of native-surface interior access road with a width of 10 feet will be built to access the solar panel arrays. Roads will be infrequently used after construction, mostly for maintenance activities every few weeks. Equipment that may be used on site will be limited to ATVs, mowing equipment, tractors and a water truck for cleaning solar panels.

- Surrounding chain link security fence
  - The solar farm and substation area will be surrounded by a six-foot tall chain link fence with three strands of barbed wire at top, with the position of the fence to be approved by County. Access to the site will be controlled by a security gate. However emergency access will be provided via a Knox Box rapid entry system or other security system in accordance with review and final approval by the Public Works Department and/or the local fire district.

- Temporary Unsurfaced Parking Areas

  An area or areas will be established for parking the vehicles that will transport workers to and from the project site during construction. Efforts will be made to use vans and carpooling in order to reduce the number of vehicles. The primary location of such parking will be in the northwest corner of the parcel, outside of the project site boundaries. The property owner has given consent to allow the use of the northwest corner for such parking. The parking area will be approximately 6.6 acres/288,000 square feet in size. Water trucks will be used to dampen temporary parking areas as needed to minimize dust, and additives will be used in the water if necessary to increase its effectiveness in preventing dust production. The temporary parking areas will be graveled if the application of water to unsurfaced parking areas is not successful in controlling dust. Any portion of the temporary parking area in the northwest corner of the property will be de-graveled and re-vegetated with approved and certified weed-free seed mix after construction is completed.

Typical equipment the construction contractor is likely to use during construction includes pickup trucks, line trucks, graders and bulldozers, backhoes, boring equipment, pile drivers, tractor-trailers, drum pullers and tensioners, harrows, and broadcast seeders. A water truck for dust control and concrete trucks will be on site as needed.

12. Location of 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.
    - Adams County Parcel: 2036110200001
    - Section -Township – Range: S11 T20N R36E
    - Lat-Long: 47.242729, -118.251800
    - ALTA Survey, Site Plan, and Topographic Map are included at the end of this application (See attached Exhibit A)

B. ENVIRONMENTAL ELEMENTS

1. Earth

a) General description of the site (circle one): Flat, rolling, (hilly), steep slopes, mountainous, other.
    - Flat to rolling

b) What is the steepest slope on the site (approximate percent slope)?
    - 2.8%, please see 5-foot contour survey as part of Exhibit A

c) What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)?
    - Silt Loams (Anders-Kuhl stony silt loam, Benge gravelly and stony silt loam, and Walla Walla silt loam). The dominant soil mapped is Benge gravelly silt loam at over 55% of the site, and is classified as "deep, well drained soils formed in glacial outwash with a mixture of loess in the upper part". Geotechnical analysis will be completed to confirm soil profile. Auger investigation for wetland soil delineation matched soil mapping.

d) If you know the classification of agricultural soils, specify them and note any prime farmland.
    - No soil is designated as prime farmland when not irrigated and no part of the site is irrigated. See Exhibit B for Web Soil Survey map.

e) Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe:
    - Per the Washington state Geologic Information Portal published by the Department of Natural Resources, no part of the project site is mapped "Moderate or High Susceptibility to Landslides and Shaking Intensity (Modified Mercalli Intensity Scale Value)". The area is mapped as "Light" for a Cascadia Magnitude 9.0 Seismic Scenario. See Exhibit B for map. Geotechnical analysis will be completed to confirm seismic design considerations.

f) Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

- Minimal fill and grading would be needed for the project overall due to the relatively flat topography. Driven pile foundations for solar arrays do not require grading and the inverters will be placed on piers with no grading.
- The graveled road approach may require grading to meet the Adams County Road Standards
- Both substation areas (maximum of 12 acres/533,000 square feet) will require grading to remove topsoil and prepare a level pad for the yard. All earthwork will be completed to the Avista 31 2000 EARTHWORK specification. Any structural fill needed will meet the Avista standard and will be imported based on soil survey, but geotechnical study will confirm.
- A grading plan will be developed and submitted prior to issuance of a building permit.

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

- Mapped soils are of moderate erodibility for sheet and rill erosion by water, see Exhibit B. Current vegetation would resist erosion and during use as a utility-scale solar farm. Sheet and rill erosion is not anticipated to substantially increase due to retention of most of the existing vegetation, reseeding of disturbed areas and relatively flat topography. No gully erosion was observed on site meaning any flows that currently leave the site are un-concentrated.
  However, clearing of the vegetation during construction of roads and substation and use of staging areas will increase susceptibility to erosion.
  Wind erosion is rated low to moderate, please see Exhibit B.

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

- Concrete footings and buildings in both substations will be considered impervious. The remainder of the yard surfaces within the fenced areas will be covered with 6 inches of uncompacted crushed rock, which will allow for drainage. Even at the conservative estimate of 25% of the fenced areas being considered impervious, this would account for approximately 2 acres, or less than 1% of overall acreage.
- The compacted gravel access road to the facility and compacted native-surface internal access roads will be considered impervious and would represent less than 3 acres or 1%.
- Foundations for the solar panel mounting are impervious, but exact area is unknown until geotechnical analysis is completed. Foundational support represents a small area spread among the 318 acres. Single access trackers such as the Soltech SF7 use approximately 225-250 piles per MW, which would total 10,000 piles for a 40 MW facility. Even at a conservative estimate of 1 square foot per pile, the acreage covered would be less than 1%.
- Panel surfaces are impervious. However due to native vegetation underneath, they are considered as disconnected impervious surfaces, if configured such that they promote sheet flow of storm water from the panels and natural infiltration of storm water into the ground beneath the panels. Considerations include slopes of less than 8%, avoiding soil compaction, limiting lowest vertical clearance to less than 10 feet and allowing sufficient distance between rows of panels. Final site design for Innovative Solar 211 will meet these considerations.
- Impervious area over site would total approximately 3%.

i) Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

- Prior to issuance of grading and building permits and part of the Washington Construction Stormwater General Permit (CSWGP), a Construction Storm Water Pollution Prevention Plan (SWPPP) describing and analyzing drainage patterns, hydraulic calculations, change in off-site flows (if any) will be prepared and stamped by a WA licensed engineer. It will include the design of BMPs used to maintain natural drainage patterns, manage stormwater, and minimize erosion and sediment transport such as those described in the Stormwater Management Manual for Eastern Washington. These may include BMPC101 (Preserving Natural Vegetation), installation of BMP C233 (Silt Fences) around site entrances, BMPC105 (Stabilized Construction Entrances) and BMPC120 (Temporary and Permanent Seeding) in disturbed areas. As required, a Washington State Certified Erosion and Sediment Control Lead (CESL) will inspect the construction site to confirm effectiveness of installed BMPs.

2. Air

a) What types of emissions to the air would result from the proposal (i.e., dust, automobile odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

- Construction activities may produce dust (PM10 material). However, based on low wind erodibility of soil and implementation of BMPs such as temporary and permanent reseeding, minimal amounts are anticipated, and reduction methods will be deployed as needed. Construction vehicles will contribute usual emissions such as CO2, Sulfur Dioxides and Nitrogen Oxides in typical amounts. However due to the limited duration for construction and limited number of vehicles compared to transportation or residential projects, the overall contribution can be considered non-significant. Project is not located within a non-attainment area for any criteria pollutants.
- No emissions after construction is completed and site has been revegetated.

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

- No

c) Proposed measures to reduce or control emissions or other impact to air, if any.

- Dust producing areas will be sprayed with water during construction. WSDOT approved dust control additives will also be used if conditions require.

3. Water

a) Surface:

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, or wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

- There is no surface water body on or in the immediate vicinity of the site. The nearest surface water is the Lower Crab Creek, approximately 1.5 miles north of the site. A USACE Approved Jurisdictional Delineation has been obtained confirming Waters of the US are not present onsite and no Clean Water Act permitting is required. Wetlands, considered as critical areas and defined under the Growth Management Act (GMA; RCW 36.70A.030) were also delineated using the

USACE Wetland Delineation Manual (1987) and regional supplement. Delineation of a wetland requires the presence of hydrophytic vegetative species, hydric soils, and hydrologic conditions of permanent or periodic inundation, or soil saturation during the growing season of the prevalent species of vegetation. Per the Wetland Delineation Report included in Exhibit E, no wetlands exist on site.

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.
   - No

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.
   - None

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
   - No

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
   - No

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.
   - No

b) Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.
   - No, and no wells exist on site.

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.
   - No septic on site. During construction portable facilities will be provided to meet Adams County health department regulations.

c) Water Runoff (including storm water):

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.

Prior to issuance of grading and building permits, a Stormwater Site Plan will be submitted for approval to the Washington State Department of Ecology. The Plan will address compliance with 8 Core Elements outlined in Chapter 2 in the SWMMEW when applicable. Exemptions exist for each Core Element and

vary depending on requirements that must be met. The Core Elements are listed below in relation to the proposed development of the Innovative Solar 211 project, and exemptions are noted when applicable.

1. Preparation of a Stormwater Site Plan:
Will be completed and approved prior to issuance of building permits.

2. Construction Stormwater Pollution Prevention:
Will be included in the Stormwater Site Plan; see question 1(i) for more detail.

3. Source Control Pollution
All impervious surfaces on site are considered Non-Pollution Generating (NPGIS). Panels and infrequently used maintenance access roads are classified as NPGIS, and thus are exempt from basic treatment requirements.

4. Preservation of Natural Drainage Systems
Minimal grading (primarily the substation area) will occur on site and natural drainage patterns will be maintained. Currently all stormwater infiltrates, no channels exist on site.

5. Runoff Treatment
All impervious surfaces on site are considered Non-Pollution Generating (NPGIS). The access roads do not meet the threshold for high use and the site satisfies the requirement for full dispersion, making them exempt from runoff treatment.

6. Flow Control
Per Exemption 1 in chapter 2.6.6 of SWMMEW, the site will use full dispersion as described in BMP F6.42. to control the 2 and 25-yr flows. Full calculations will be included in the Stormwater Site Plan, but the site meets the "sliding scale" of native vegetation to impervious surface outlined in Chapter 6.

7. Operation and Maintenance
No on-site maintenance is required for full dispersion. Details of vegetation management will be included as part of the Stormwater Site Plan. These will include maintaining an appropriate level of cover to resist erosion.

8. Local Requirements
There are no local ordinances above and beyond what is outlined in SWMMEW.

2) Could waste material enter ground or surface water? If so, generally describe:
   - Panels and infrequently used maintenance access roads will not contribute any waste materials. Transformers may contain mineral/coolant oil.

d) Proposed measures to reduce or control surface, ground and water impacts, if any:
   - If transformers feature coolant oil for operation, a Spill Prevention, Control and Countermeasure (SPCC) plan will be developed that features secondary containment and/or an Oil Spill Contingency Plan to protect ground and surface water. All construction debris will be removed from site once completed and maintenance equipment will be stored off site.

4. Plants

a) Check or circle 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
wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
water plants: water lily, eelgrass, milfoil, other
other types of vegetation

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

- The area surrounding the substation of approximately 12-15 acres found in the upper NW corner will have the current rangeland removed for grading. The laydown/staging area will most likely cause death of current range vegetation due to compaction. The area will be re-planted after construction has been completed.

c) List threatened or endangered species known to be on or near the site:

- There are no threatened or endangered species known to be on the site.
- The list for Threatened or Endangered species for Adams County includes: Spalding's Catchfly (Silene spaldingii) and Water Howellia (Howellia aquatilis), however, these species are not known to be near the site nor is suitable habitat found on site. Please see Threatened and Endangered Species Survey in Exhibit E.

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

- Existing vegetation will be preserved to maximum extent possible, as the driven pile foundations do not require vegetation removal. Any disturbed areas not covered in gravel in the substation area will be reseeded as part of a revegetation plan included in the CSWGP, specifically BMP C120. Use of certified seed and proper seedbed preparation will prevent the spread of weeds and the revegetation plan will include ongoing weed control.
  Final seeding rates may vary but the mix will be similar to the mix described in the AVISTA 31 500 Slope Protection Specification. For Dry sites, this consists of 40% Ryegrasses, 40% Sheep Fescue and 20% Hard Fescue. Seed will be applied as part of a hydroseed slurry with fertilizer and mulch during the fall or early spring to ensure establishment without irrigation on unfrozen ground. All reseeded areas will be inspected to ensure uniform coverage.

5. Animals

a) Check or circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, songbirds, other: Hawks
mammals: deer, bear, elk, beaver, other: Mule Deer
fish: bass, salmon, trout, herring, shellfish, other: None

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

- There are no threatened or endangered species known to be on the site and no critical habitat present. Please see Threatened and Endangered Species Survey in Exhibit E.
- Threatened or endangered species for Adams County includes: Yellow-billed Cuckoo (Coccyzus americanus); Bull Trout (Salvelinus confluentus); Gray Wolf (Canis lupus); Columbia Basin Pygmy Rabbit (Brachylagus idahoensis), however, these species are not known to be near the site and due to the agricultural nature of the site, no suitable habitat exists for these species on site.
- The Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) database does not show any species occurrence on site. Sections to the west and south indicate presence of Washington Ground Squirrel, however they were not observed onsite.

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

- Not designated as such but may be used by raptors for hunting during migration. Per the Washington State Mule Deer Management Plan, the site is outside any winter Concentration Areas or other important habitat. Habitat and occurrence of several species, including mule deer are mapped to the west near Sprague Lake per PHS, but project site does not exhibit any signs of serving as a wildlife corridor.

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

- Existing habitat found on site will be preserved due to retention of current vegetation.

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.

- Connection to existing power electric grid for general office use during construction.

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

- The project will not affect private use of solar energy by adjacent properties. However, utility-scale solar power generation by adjacent properties are likely to be affected to some degree, at least temporarily. The power generated by the project may cause the electric utility company to refrain from developing solar farms on adjacent properties until there is further demand for electricity.

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:

- N/A

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.

- Substation will contain high voltage equipment. Mineral Oil may be utilized in transformers as part of the operation of the new substation. A Phase 1 ESA confirmed no hazardous chemicals or conditions exist on site currently.

1) Describe special emergency services that might be required:

- None. In event of a fire, fire department will have access to site via Knox Box or other approved method.

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

- Site and substation area fenced to prevent unauthorized access to electrical components and will be monitored by Avista. Substation will meet National Electric Safety Code for ground clearance. The project shall comply with all relevant aspects of the International Fire Code. A spill control plan for any mineral oil used will be developed and approved prior to final approval of the project according to Avista's construction specifications.

b) Noise

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

- None

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.

- Short Term (6-15 months) – During construction there will be noise from the construction from the site. Hours for construction noise would be limited, typically 7 AM to 9 PM, though efforts will be made to follow a 7 AM – 5 PM schedule whenever possible.
- Long Term – Noise generated from inverters is not expected to be audible from 150 feet away. The inverters will be placed such that they are at least 150 feet from property lines.

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

- Construction noise will remain within standards established by Washington Administrative Code (WAC) 173-60.

8. Land and shoreline Use

a) What is the current use of the site and adjacent properties?

- Undeveloped Land, agriculture/produce growing and harvesting and cattle grazing

b) Has the site been used for agriculture? If so, describe.

- Rangeland and Farmland for the past 20+ years per Landowner questionnaire found in the Phase 1 ESA in Exhibit E.

c) Describe any structures on the site.

- No structures exist on site

d) Will any structures be demolished? If so, what?
- N/A

e) What is the current zoning classification of the site?
- Prime Agriculture

f) What is the current comprehensive plan designation of the site.
- Resource- Agriculture

g) If applicable, what is the current shoreline master program designation of the site?
- N/A

h) Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.
- No

i) Approximately how many people would reside or work in the completed project.
- During construction, a maximum crew of 175-200 people will be onsite during daylight hours. Positions for electricians, general laborers, carpenters, solar panel installers and heavy equipment operators will be created during construction. During long-term operation of the plant, a maintenance crew will visit site every few weeks which will consist of a 2-person crew.

j) Approximately how many people would the completed project displace?
- N/A

k) Proposed measures to avoid or reduce displacement impacts, if any:
- N/A

l) Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans.
- The project site is located in an area of open cropland and shrubland used mostly for grazing. There are only a few widely dispersed residences in the surrounding area. The nearest residence (other than that of the Teleckys, who are the owners of the project site) is over 1,500 feet south of the project site. With so few people in the area, there will be very little visual impact from the project, and there are already electrical transmission lines and towers at the project site and in the vicinity. If the County receives any comments from the public expressing concerns about visibility of the project, neutral-colored, opaque strips could be used in the security fencing to block the view of the project, or/and some landscaping could be added at strategic points along the perimeter of the site. Consequently, the project will be compatible with the context of the existing residential uses in the area. Additionally, it should be noted that the Light Industrial zoning district begins only 2,500 feet to the south of the project site and includes portions of Sections 14, 22, and 23. The proposed solar farm will be compatible with conforming future development in that area.

9. Housing

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

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

c) Proposed measures to reduce or control housing impacts, if any:
   - N/A

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?
   - Tallest proposed height is the wireless communication Facility at 80 feet. In the project substation, structures are expected to be at or near 70 feet above grade. Inverter stations are expected to be at or near 20 feet above grade. Solar panel modules are expected to be at or near 15 feet above grade.

b) What views in the immediate vicinity would be altered or obstructed?
   - The existing viewshed is open, with no designated scenic byways or landmarks, and contains some existing industrial properties. The project site already contains transmission towers, which are the highest and most visible structures currently. The surrounding area is cropland and shrubland. Residences are very widely dispersed. Except for the residence owned by the Teleckys (owners of the project site), no residences exist within 1,500 feet of the project site. The nearest residentially-zoned area is over 8 miles away, northeast of the City of Ritzville, where there are significant numbers and concentrations of houses. Because the area surrounding the project site is so lightly populated, the project would affect very few people visually. Relative to the surrounding area, only a small section of the view might be obstructed. As noted above, if the County receives any comments expressing concerns about visibility of the project, neutral-colored, opaque strips could be used in the security fencing to block the view of the project, or/and some landscaping could be added at strategic points along the perimeter of the site. Additionally, it should be noted that the Light Industrial Zone begins only 2,500 feet to the south of the project site and includes portions of Sections 14, 22, and 23. Future conforming development in that area is likely to create visual obstructions of much greater visibility than the proposed project.

c) Proposed measures to reduce or control aesthetic impacts, if any?
   - If the County deems that visual shielding is necessary to address any public concerns, opaque slats can be used in the chain link fencing to block views of the solar panels and lend visual appeal. Also, landscaping could be incorporated into the site design if required. Panels will be arranged in a neat and orderly fashion, all construction debris will be removed from the site, and maintenance equipment will be stored off site. Any exterior lighting fixtures will be controlled by photocells and motion detectors, so they will come on only at night when there is activity in the vicinity. Otherwise they will remain off at night. The fixtures will be shielded and downcast to minimize light trespasss.

11. Light and Glare

a) What type of light or glare will the proposal produce? What time of day would it mainly occur?
   - No glare/glint is anticipated as non-reflective coating is standard on solar panels. Solar installations are currently being placed on military bases and airports without detrimental results.
   - Light fixtures within the switchyard/substation are expected to be few, as determined by the utility's final design. A light fixture may be required at the access gate as well. Fixtures will be motion-activated and photo-cell controlled, so they will be on only when needed. Light fixtures will be shielded to direct light downward and prevent light trespass off of the site.

b) Could light or glare from the finished project be a safety hazard or interfere with views?
   - FAA has jurisdiction over off-airport solar installations per (14 CFR) Part 77. The FAA Notice Criteria Tool evaluates for impact on final approach, usually within 2 miles from the runway. The North Carolina Solar Center *Template Solar Energy Development Ordinance for North Carolina* includes a section on airports and recommends aviation notification steps for installations within 5 nautical miles of an airport. The nearest airport to Innovative Solar 211 is Pru Field at a distance of approximately 10 miles, which is well beyond the distance at which FAA regulations would reasonably anticipate any effect from the project on flights at Pru Field .
   - Please see Exhibit D for the Department of Defense (DoD) Siting Clearinghouse Review correspondence which states the facility will have minimal impact on military operations.

c) What existing off-site sources of light or glare may affect your proposal?
   - None

d) Proposed measures to reduce or control light and glare impact, if any:
   - Non-reflective coating will be used on the solar panels, and all light fixtures will meet county code.

12. Recreation

a) What designated and informal recreational opportunities are in the immediate vicinity?
   - Surrounding area is agricultural to the north, east and west with no designated or informal recreation uses. South is zoned light industrial with no recreational uses or opportunities.

b) Would the proposed project displace any existing recreational uses? If so, describe.
   - No

c) Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.
   - N/A

13. Historic and Cultural Preservation

a) Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so generally describe.

- Per the Cultural Resources Survey completed by Archaeological and Historical Services at Eastern Washington University, none exist. See Cultural Resources Survey in Exhibit E for further information.

b) Generally, describe any landmarks or evidence of historic, archaeological scientific, or cultural importance known to be on or next to the site. Proposed measures to reduce or control impacts, if any.

- No known landmarks or evidence of historic, archaeological scientific, or cultural importance on site per Cultural Resources Survey.
  An Archeological Monitoring and Inadvertent Discovery Plan, in accord with all applicable state and federal laws will be provided to the County prior to the start of construction work. Archaeological monitoring will include an orientation for the construction crew and machine operators. All persons engaged in ground disturbing activities will be apprised of their obligations in the case of an inadvertent discovery and they will be made aware of the inadvertent discovery plan and protocol. Monitoring and investigation into any discoveries will be completed by a "professional archaeologist" who meets the Secretary of the Interior's qualifications (36 CFR Part 61; RCW 27.53.030 (8)).

14. Transportation

a) Identify public streets and highways serving the site and describe proposed access to the existing street system. Show on site plans, if any:

- The anticipated access routes for construction equipment, materials deliveries, and construction and operation crews to access the project sites consist of I-90, Danekas Rd and N Hills Rd. I-90 is a four-lane divided highway with limited-access on- and off-ramps and an average daily traffic (ADT) count of 18,000 vehicles in 2016 at the E Danekas Rd-N Durry Rd interchange per the 2016 WSDOT Annual Traffic Report. Approximately 15% were counted as tractors with trailers at the permanent traffic recorder within 10 miles.
- Once exiting the interstate, traffic will use approximately 3.5 miles of paved county roads (Danekas Road and N Hills Rd) to access the site.

b) Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

- No

c) How many parking spaces would the completed project have? How many would the project eliminate?

- No permanent parking spaces will be needed, as no on-site staff will be employed. During construction, an area of the site will be designated for parking of equipment and transport vehicles. This area will be revegetated once construction is complete.

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

-

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

- No, all materials will be shipped overland by truck.

f) How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.
    - Completed project will generate weekly or biweekly visits for Operation and Maintenance, consisting of 1-2 vehicles and a water tanker periodically. During construction, truck traffic will temporarily increase by approximately 15-20 trips daily, but due to the site location near I-90, the trips are primarily interstate bound and constitute a non-significant increase in interstate and exit traffic based on current traffic counts. Also, during construction, there is likely to be a temporary increase in passenger vehicle traffic of anywhere from about 40 to 150 trips per day, depending on how many workers are needed for the various phases of construction and whether vans and shuttle buses can be used efficiently to transport workers to and from their temporary living quarters in local hotels, motels and RV parks to the project site. Efforts will be made to consolidate workers in vans and buses, and to encourage carpooling by those who drive themselves to the site. If increased traffic levels warrant additional signage or manpower to control and direct traffic, any such measures deemed necessary by Public Works to reduce traffic impacts will be supplied. It is not anticipated that any road surface improvements will be needed to North Hills Road or other area roads. Access aprons leading to the proposed substation areas will constructed in accordance with County DPW specifications, and graveled on-site roads will be constructed to DPW and Fire Department specifications provide access to the substations and will include a turnaround area for fire-fighting apparatus. Efforts will be made to utilize an existing access road off North Hill Road to serve the proposed temporary parking area.

g) Proposed measures to reduce or control transportation impacts, if any:
    - Although some heavy construction equipment and materials will be hauled to the site during construction only, they will have direct access to parking/staging areas on site and should not have impacts on area roads and access. The site location directly off a main interstate allows for little disruption to local traffic flows. Water trucks will be used to dampen temporary parking areas as needed to minimize dust, and additives will be used in the water if necessary to increase its effectiveness in preventing dust production. The temporary parking areas will be graveled if the application of water to unsurfaced parking areas is not successful in controlling dust. Any portion of the temporary parking area in the northwest corner of the property will be de-graveled and re-vegetated with approved and certified weed-free vegetative seed mix after construction is completed.

15. Public Services

a) Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so generally describe.
    - No

b) Proposed measures to reduce or control direct impacts on public services, if any.
    - N/A

16. Utilities

a) Circle utilities currently available at the site: (electricity, natural gas, water, refuse services, telephone, sanitary sewer, septic system, other.
   - There is a high-tension power line crossing the northwest corner of 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 site will be connected to the existing grid and will input electricity into the grid.

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: Lana Reddy

Date Submitted: 8/10/2018

References

Template Solar Energy Development Ordinance for North Carolina, Table 1. North Carolina Sustainable Energy Association and North Carolina Solar Center, December 2013.

Washington State Department of Transportation. (2016) *2016 Annual Traffic Report.*

Soltech Trackers. "SF Utility Single-Axis Tracker by Soltec." YouTube, YouTube, 29 July 2015, www.youtube.com/watch?v=mcs8VxqLlxY.

"Cells, Modules, and Arrays." How a PV System Works, Florida Solar Energy Center , 2014, www.fsec.ucf.edu/en/consumer/solar_electricity/basics/cells_modules_arrays.htm.

Exhibit A- Site Information

- Site Plan
- ALTA Survey
- Contour Map

1. EXISTING PROPERTY INFORMATION
   - APPLICANT: INNOVATIVE SOLAR 211, LLC
   - OWNER: NEIL R. TELECKY
   - PARCEL: 2036110200001 / APPROX. 317 ACRES
   - GENERAL LEGAL DESCRIPTION: A PORTION OF THE W 1/2 SECTION II, T. 20N, R 36 E
   - LAND USE / ZONING DESIGNATION: PRIME AGRICULTURE
   - SETBACKS REQUIREMENTS:

     FRONT 50'
     SIDE 50'
     REAR 50'
2. CURRENT FLOOD ZONE - X
3. PROPOSED FENCE SHALL BE 6' TALL WITH 3 STRANDS BARBED WIRE
4. ALL FENCE ACCESS GATES SHALL BE IN COMPLIANCE WITH LOCAL FIRE DISTRICT REQUIREMENTS

INNOVATIVE SOLAR 211, LLC

CONCEPTUAL SITE PLAN

40 MW SOLAR FARM PROJECT
OFF OF NORTH HILLS ROAD
RITZVILLE, WA 99169
(ADAMS COUNTY)

LEGEND

0 100 200 300 400 500

IP_# INVERTER

SOLAR PANELS

FENCE LINE

Innovative Solar Systems

1. THE BASIS OF BEARINGS FOR THIS SURVEY IS THE EAST LINE OF SECTION 13, TOWNSHIP 20 NORTH, RANGE 36 EAST, W.M. AS MEASURED BETWEEN FOUND POINTS SET PER SURVEY NUMBER 195767, ADAMS COUNTY RECORDS.

2. THE PROPERTY HAS A GROSS AREA OF 13,820,147 SQUARE FEET (317 ACRES)
THE PROPERTY HAS A NET AREA OF 13,609,806 SQUARE FEET (312 ACRES) WHEN THE RIGHTS-OF-WAY ARE SUBTRACTED
THE LEASE AREA HAS AN AREA OF 13,273,563 SQUARE FEET (305 ACRES)

AREAS WERE CALCULATED BY THE COORDINATE COMPUTATION METHOD.

3. THIS PROPERTY IS DESIGNATED BY ADAMS COUNTY AS TAX PARCEL WITH IDENTIFICATION NUMBER 2036110200001

4. THE PROPERTY HAS ACCESS VIA NORTH HILL ROAD AND GRIFFITH ROAD WHICH ARE PUBLIC RIGHTS-OF-WAY.

5. NO WETLAND MARKERS WERE OBSERVED DURING THE SURVEY.

SCHEDULE B – TITLE EXCEPTION NOTES

1. PATENT

FROM: UNITED STATES OF AMERICA
TO: NORTHERN PACIFIC RAILROAD COMPANY
FILED: NOVEMBER 7, 1895
RECORDED IN: BOOK 8 OF DEED, PAGES 48-97

2. DEED

GRANTOR: NORTHERN PACIFIC RAILROAD
GRANTEE: JOHN H. TELECKY
RECORDING DATE: APRIL 3, 1903
RECORDED: VOLUME 19, PAGE 10
AFFECTS: SOUTHWEST 1/4

3. DEED

GRANTOR: NORTHERN PACIFIC RAILROAD
GRANTEE: JOHN H. TELECKY
RECORDING DATE: JULY 16, 1906
RECORDED: VOLUME 19, PAGE 303
AFFECTS: NORTHWEST 1/4

4. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

IN FAVOR OF: INTERMOUNTAIN POWER COMPANY
PURPOSE: RIGHT-OF-WAY EASEMENT
RECORDING DATE: OCTOBER 28, 1918
RECORDING NO.: BOOK 55, PAGE 382-383

DESCRIBED AS THE NORTH WEST 1/4 OF NORTH WEST QUARTER OF SECTION 11, TOWNSHIP TWENTY NORTH RANGE THIRTY SIX E.W.M.
(NW 1/4 OF NW 1/4 OF SEC 11 TP. 20 N. R. 36 E.W.M.)

ASSIGNED TO WASHINGTON WATER POWER COMPANY BY DEED RECORDED FEBRUARY 10, 1931 UNDER VOLUME 63, PAGE 523

5. QUIT CLAIM DEED

FROM: NORTHERN PACIFIC RAILROAD COMPANY
TO: THE OWNERS
RECORDED: JULY 5, 1946
IN: VOLUME 73, PAGES 377-387

6. TERMS, COVENANTS AND CONDITIONS CONTAINED IN APPLICATION FOR CURRENT USE CLASSIFICATION, ENTERED INTO PURSUANT TO RCW 84.34 (INCLUDING POTENTIAL LIABILITY FOR FUTURE APPLICABLE TAXES, SPECIAL BENEFIT ASSESMENTS LEVIED BY LOCAL GOVERNMENTS, PENALTIES AND INTEREST UPON BREACH OF, OR WITHDRAWAL FROM SAID CLASSIFICATION);
NOTICE OF APPROVAL BEING RECORDED UNDER VOLUME 97, PAGE 161

7. QUIT CLAIM DEED

FROM: ROBERT G. TELECKY AND BETTY J. TELECKY
TO: NEIL R. TELECKY
RECORDED: NOVEMBER 20, 1990
RECORDING NO. 222882 IN VOLUME 172, PAGES 161-162

8. RELINQUISHMENT OF LIFE ESTATE

RECORDED: MARCH 16, 2004
RECORDING NO.: 273023

GENERAL NOTES

UNDERGROUND TELEPHONE LINE

T TELEPHONE PEDESTAL

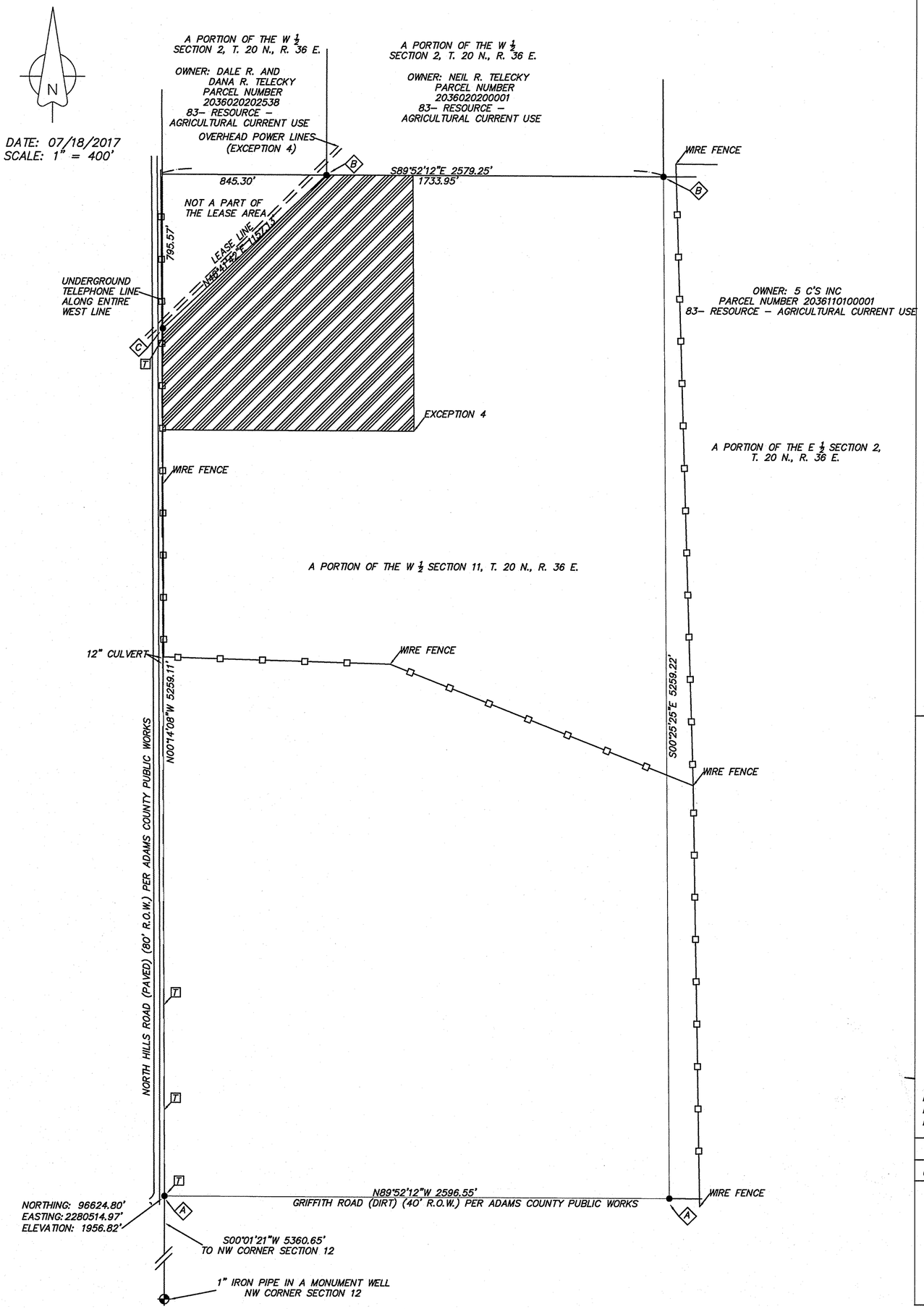
● SET MONUMENT AS NOTED

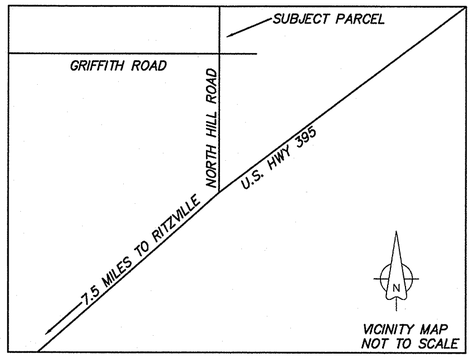
A SET 1" X 24" IRON PIPE WITH A YELLOW PLASTIC CAP STAMPED "AXIS MAPPING AND SURVEYING"

B SET 3/4" X 24" SMOOTH IRON ROD WITH A YELLOW PLASTIC CAP STAMPED "AXIS MAPPING AND SURVEYING"

C SET 5/8" X 24" REBAR WITH A YELLOW PLASTIC CAP STAMPED "AXIS MAPPING AND SURVEYING"

1. THERE WERE NO BUILDINGS OBSERVED.
2. THERE WERE NO VISIBLE SIGNS OF RECENT EARTHWORK.
3. THE RELATIVE POSITIONAL ERROR IN THE SET MONUMENTS IS 0.03 FEET.
4. CURRENT ZONING – PRIME AGRICULTURE
5. CURRENT FLOOD ZONE – X





LEGAL DESCRIPTION

A LEASE BOUNDARY SURVEY FOR INNOVATIVE SOLAR 211, LLC

RECORDED IN QUIT CLAIM DEED VOLUME 172, PAGES 161-162, ADAMS COUNTY RECORDS

A LEGAL DESCRIPTION FOR A TRACT OF LAND LOCATED IN THE WEST ONE-HALF OF SECTION 11, TOWNSHIP 20 NORTH, RANGE 36 EAST, W.M.

BEGINNING AT THE NORTHEAST CORNER OF THE WEST ONE-HALF OF SECTION 11, TOWNSHIP 20 NORTH, RANGE 36 EAST, W.M.; THENCE, S00°25'25"E, 5259.22 FEET ALONG THE EAST LINE OF THE WEST ONE-HALF OF SAID SECTION 11 TO A POINT ON THE NORTH RIGHT-OF-WAY OF GRIFFITH ROAD; THENCE, ALONG SAID NORTH RIGHT-OF-WAY, N89°52'12"W, 2596.55 FEET TO THE INTERSECTION OF THE EAST RIGHT-OF-WAY OF NORTH HILLS ROAD; THENCE, ALONG SAID EAST RIGHT-OF-WAY, N01°14'08"W, 5259.11 FEET TO THE NORTH LINE OF SECTION 11; THENCE, ALONG SAID NORTH LINE, S89°52'12"E 2579.25 FEET TO THE POINT OF BEGINNING.

ALTA/NSPS LAND TITLE SURVEY

SURVEYOR'S CERTIFICATE

TO INNOVATIVE SOLAR SYSTEMS, LLC

THIS IS TO CERTIFY THAT THIS MAP AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2016 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 1, 3, 4, 6A, 7A, 8, 10A, 11, 13, 18, AND 19 OF TABLE A THEREOF.

FIELD WORK WAS COMPLETED ON: 07/11/2017
DATE OF MAP: 07/18/2017

John K. Lucey
SURVEYOR'S SIGNATURE

JOHN K. LUCEY
STATE OF WASHINGTON
45791
REGISTERED
PROFESSIONAL LAND SURVEYOR
Renew 6/18/18

REGISTERED SURVEYOR: JOHN K. LUCEY
REGISTRATION NUMBER: 45791
IN THE STATE OF WASHINGTON

COUNTY: ADAMS STATE: WASHINGTON

AXIS MAPPING AND SURVEYING COMPANY
70 SW CENTURY DRIVE, #375, BEND, OR 97702
SURVEYS@AXISMAPPING.COM
541.728.8474

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TELEPHONE PEDESTAL

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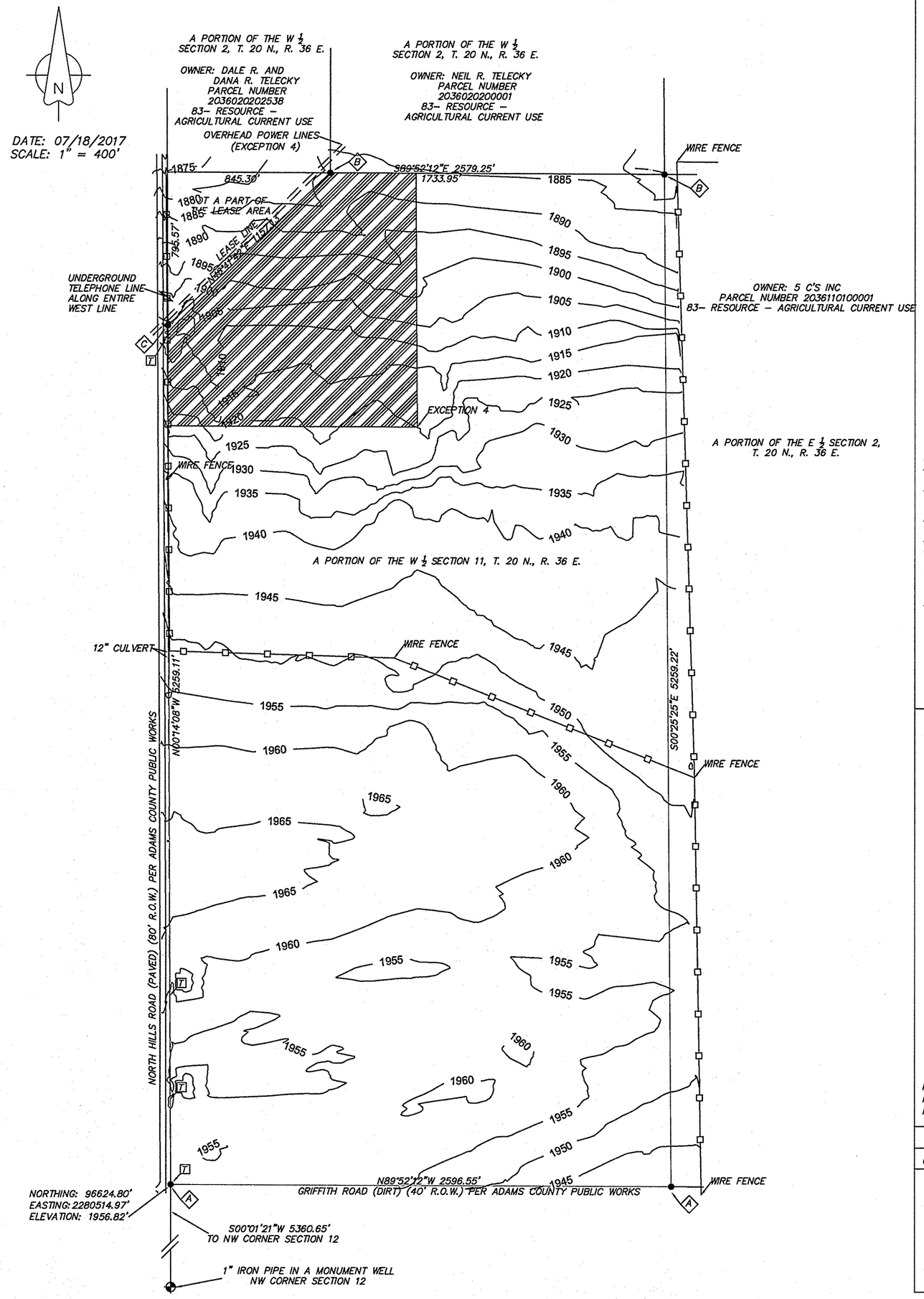

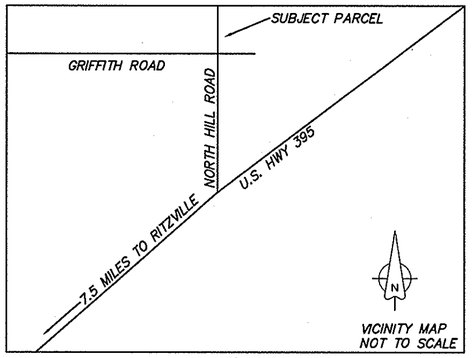

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70 SW CENTURY DRIVE, #375, BEND, OR 97702
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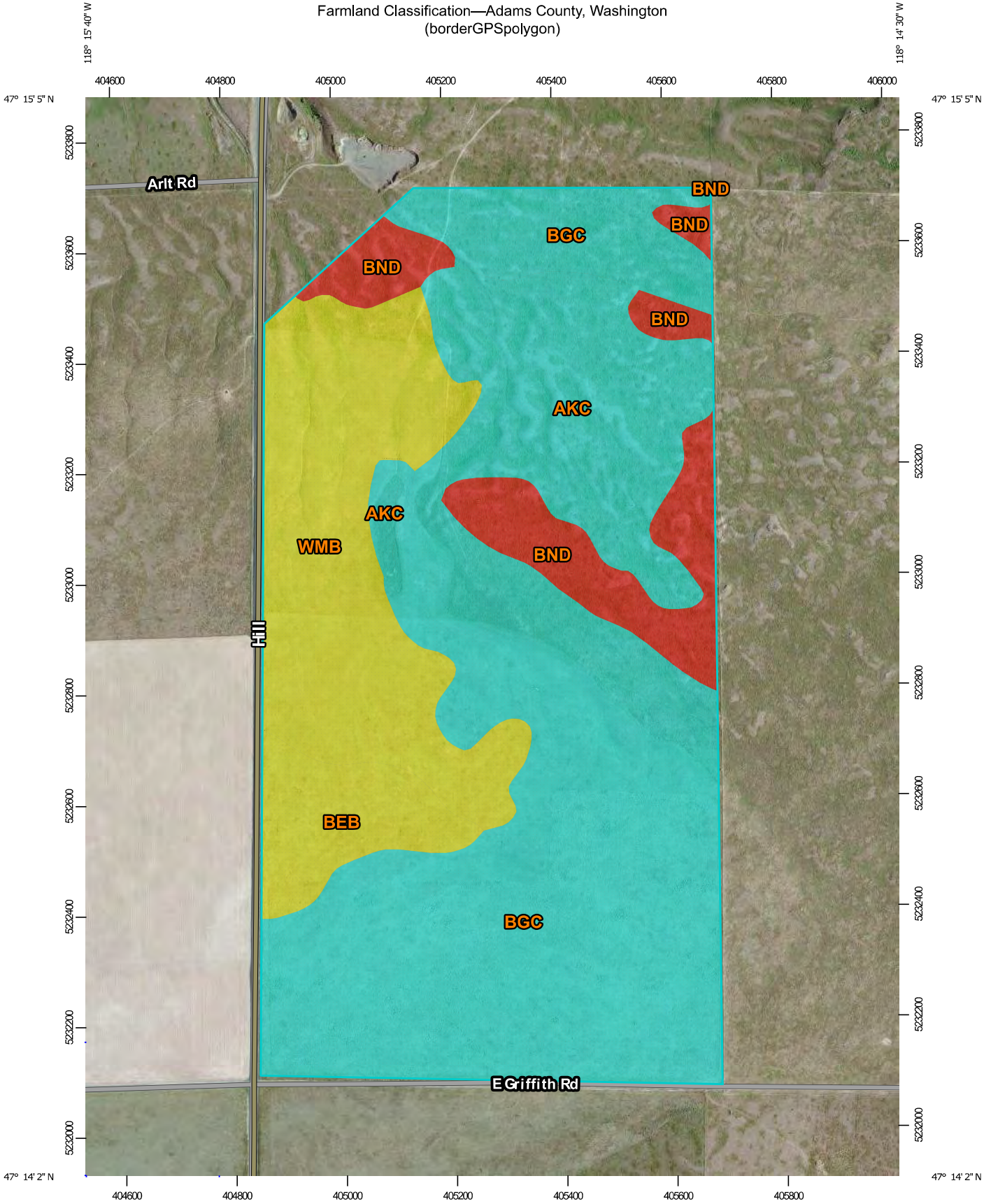
Exhibit B- Soils Information

- Prime Farmland
- Water Erodibility
- Wind Erodibility
- Suitability for Roads (Natural Surface) Map
- Hazard Susceptibility

Farmland Classification—Adams County, Washington
(borderGPSpolygon)



Map Scale: 1:9,490 if printed on A portrait (8.5" x 11") sheet.

N

Meters: 0 100 200 400 600

Feet: 0 450 900 1800 2700

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 11N WGS84

MAP LEGEND

Area of Interest (AOI)

- Area of Interest (AOI)

Soils

Soil Rating Polygons

- Not prime farmland
- All areas are prime farmland
- Prime farmland if drained
- Prime farmland if protected from flooding or not frequently flooded during the growing season
- Prime farmland if irrigated
- Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
- Prime farmland if irrigated and drained
- Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season
- Prime farmland if subsoiled, completely removing the root inhibiting soil layer
- Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
- Prime farmland if irrigated and reclaimed of excess salts and sodium
- Farmland of statewide importance
- Farmland of local importance
- Farmland of unique importance
- Not rated or not available

Soil Rating Lines

- Not prime farmland
- All areas are prime farmland
- Prime farmland if drained
- Prime farmland if protected from flooding or not frequently flooded during the growing season
- Prime farmland if irrigated
- Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
- Prime farmland if irrigated and drained
- Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season
- Prime farmland if subsoiled, completely removing the root inhibiting soil layer
- Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
- Prime farmland if irrigated and reclaimed of excess salts and sodium
- Farmland of statewide importance
- Farmland of local importance
- Farmland of unique importance
- Not rated or not available

Soil Rating Points

- Not prime farmland
- All areas are prime farmland
- Prime farmland if drained
- Prime farmland if protected from flooding or not frequently flooded during the growing season
- Prime farmland if irrigated
- Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
- Prime farmland if irrigated and drained
- Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season
- Prime farmland if subsoiled, completely removing the root inhibiting soil layer
- Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
- Prime farmland if irrigated and reclaimed of excess salts and sodium
- Farmland of statewide importance
- Farmland of local importance
- Farmland of unique importance
- Not rated or not available

Water Features

MAP INFORMATION

Streams and Canals

Transportation

Rails

Interstate Highways

US Routes

Major Roads

Local Roads

Background

Aerial Photography

The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Adams County, Washington
Survey Area Data: Version 17, Sep 8, 2016

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Data not available.

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Farmland Classification— Summary by Map Unit — Adams County, Washington (WA001)				
Map unit symbol	**Map unit name**	**Rating**	**Acres in AOI**	**Percent of AOI**
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	Farmland of statewide importance	50.7	15.8%
BEB	Benge silt loam, 0 to 5 percent slopes	Prime farmland if irrigated	17.5	5.5%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	Farmland of statewide importance	158.1	49.2%
BND	Benge very stony silt loam, 0 to 30 percent slopes	Not prime farmland	30.3	9.4%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	Prime farmland if irrigated	64.4	20.1%
Totals for Area of Interest			**321.1**	**100.0%**

Description

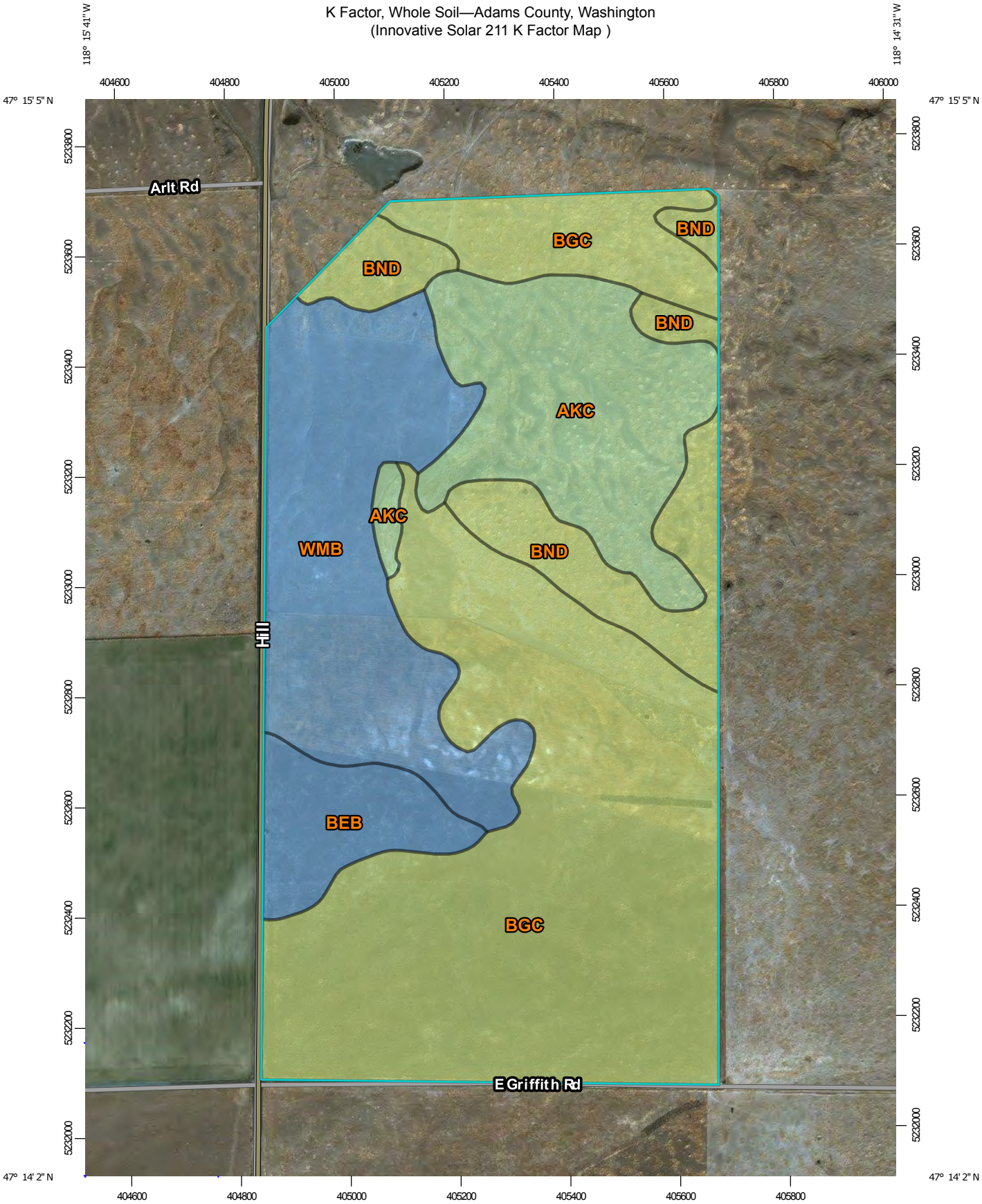
Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower

K Factor, Whole Soil—Adams County, Washington
(Innovative Solar 211 K Factor Map)



Map Scale: 1:9,510 if printed on A portrait (8.5" x 11") sheet.

N

Meters: 0 100 200 400 600

Feet: 0 450 900 1800 2700

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 11N WGS84

MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils

Soil Rating Polygons

.02
.05
.10
.15
.17
.20
.24
.28
.32
.37
.43
.49
.55
.64
Not rated or not available

Soil Rating Lines

.02
.05
.10
.15
.17
.20
.24
.28
.32
.37
.43
.49
.55
.64
Not rated or not available

Soil Rating Points

.02
.05
.10
.15
.17
.20
.24
.28
.32
.37
.43
.49
.55
.64
Not rated or not available

Water Features

Streams and Canals

Transportation

Rails
Interstate Highways
US Routes
Major Roads
Local Roads

Background

Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Adams County, Washington
Survey Area Data: Version 18, Sep 5, 2017

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Aug 6, 2015—Aug 12, 2016

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

K Factor, Whole Soil

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	.28	50.9	15.7%
BEB	Benge silt loam, 0 to 5 percent slopes	.43	18.0	5.6%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	.24	157.8	48.7%
BND	Benge very stony silt loam, 0 to 30 percent slopes	.24	31.6	9.8%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	.43	65.5	20.2%
Totals for Area of Interest			**323.9**	**100.0%**

Description

Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. Factor K is one of six factors used in the Universal Soil Loss Equation (USLE) and the Revised Universal Soil Loss Equation (RUSLE) to predict the average annual rate of soil loss by sheet and rill erosion in tons per acre per year. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity (Ksat). Values of K range from 0.02 to 0.69. Other factors being equal, the higher the value, the more susceptible the soil is to sheet and rill erosion by water.

"Erosion factor Kw (whole soil)" indicates the erodibility of the whole soil. The estimates are modified by the presence of rock fragments.

Rating Options

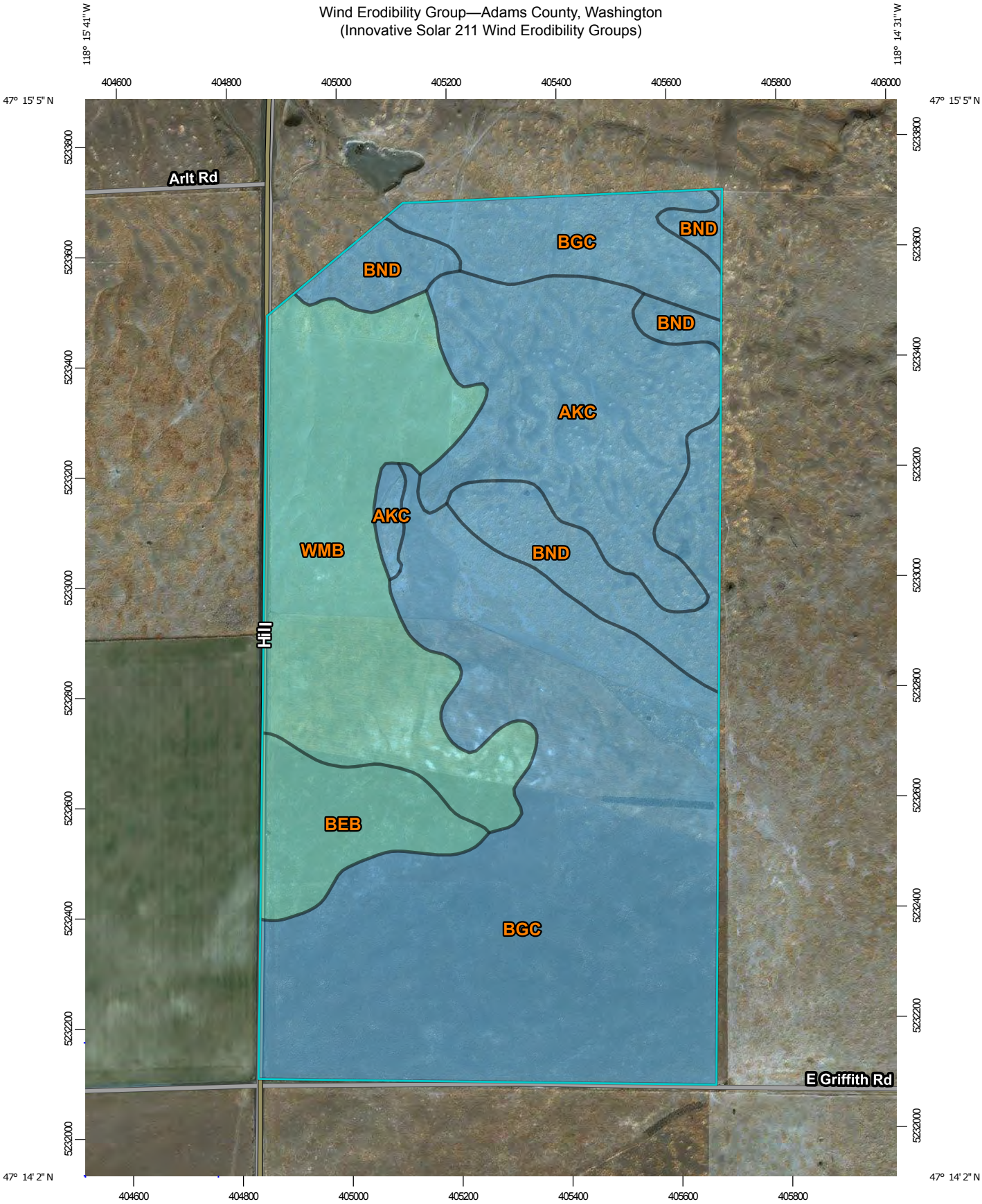
Aggregation Method: Dominant Condition

Component Percent Cutoff: None Specified

Tie-break Rule: Higher

Layer Options (Horizon Aggregation Method): Surface Layer (Not applicable)

Wind Erodibility Group—Adams County, Washington
(Innovative Solar 211 Wind Erodibility Groups)



Map Scale: 1:9,520 if printed on A portrait (8.5" x 11") sheet.

N

Meters: 0 100 200 400 600

Feet: 0 450 900 1800 2700

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 11N WGS84

MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils

Soil Rating Polygons

1
2
3
4
4L
5
6
7
8
Not rated or not available

Soil Rating Lines

1
2
3
4
4L
5
6
7
8
Not rated or not available

Soil Rating Points

1
2
3
4
4L
5
6
7
8
Not rated or not available

Water Features

Streams and Canals

Transportation

Rails
Interstate Highways
US Routes
Major Roads
Local Roads

Background

Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Adams County, Washington
Survey Area Data: Version 18, Sep 5, 2017

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Aug 6, 2015—Aug 12, 2016

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Wind Erodibility Group

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	6	50.9	15.7%
BEB	Benge silt loam, 0 to 5 percent slopes	5	18.6	5.7%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	6	156.7	48.4%
BND	Benge very stony silt loam, 0 to 30 percent slopes	6	31.4	9.7%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	5	66.5	20.5%
Totals for Area of Interest			**324.0**	**100.0%**

Description

A wind erodibility group (WEG) consists of soils that have similar properties affecting their susceptibility to wind erosion in cultivated areas. The soils assigned to group 1 are the most susceptible to wind erosion, and those assigned to group 8 are the least susceptible.

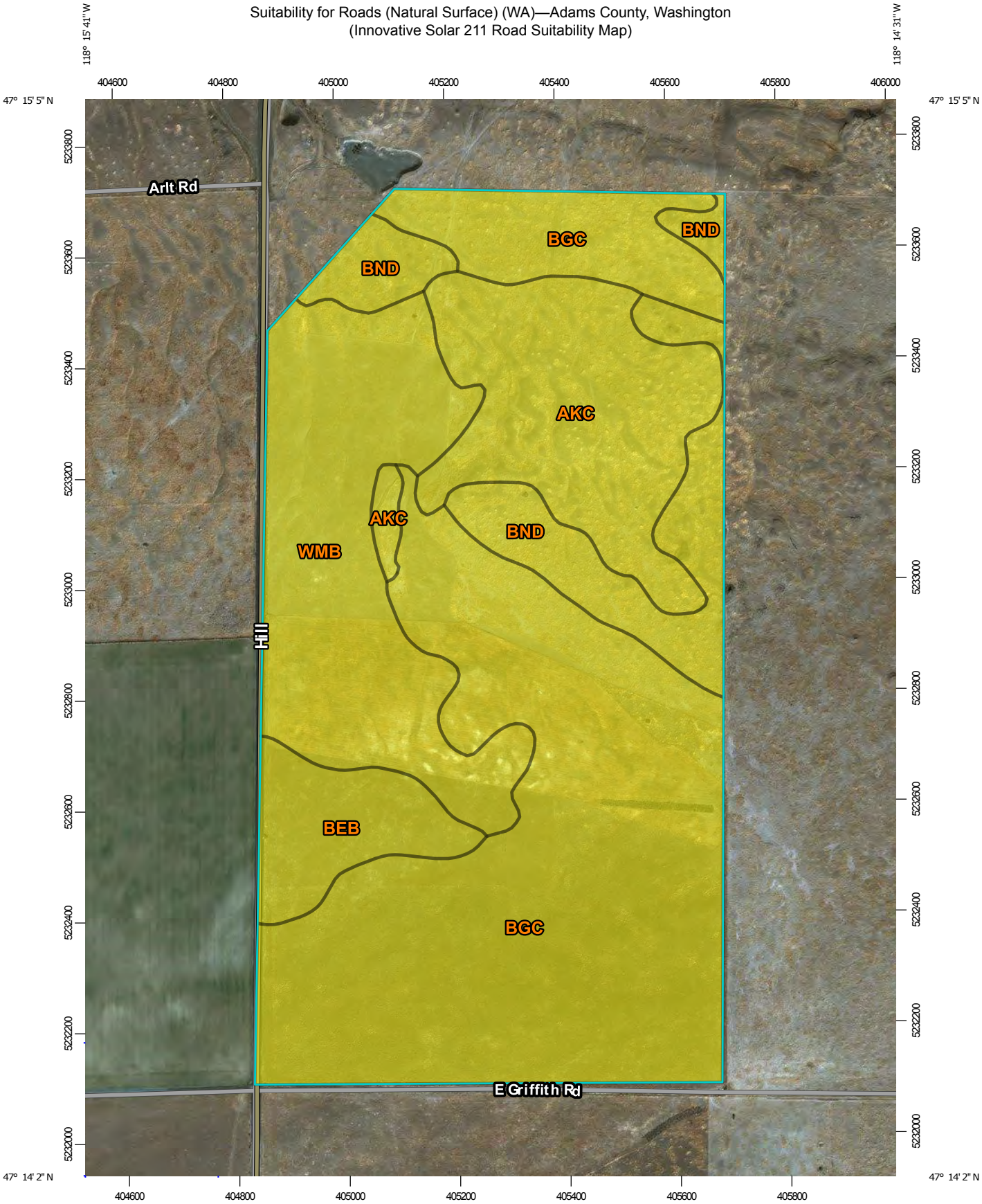
Rating Options

Aggregation Method: Dominant Condition

Component Percent Cutoff: None Specified

Tie-break Rule: Lower

Suitability for Roads (Natural Surface) (WA)—Adams County, Washington
(Innovative Solar 211 Road Suitability Map)



Map Scale: 1:9,460 if printed on A portrait (8.5" x 11") sheet.

N

Meters: 0 100 200 400 600

Feet: 0 450 900 1800 2700

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 11N WGS84

MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils

Soil Rating Polygons

Poorly suited

Moderately suited

Well suited

Not rated or not available

Soil Rating Lines

Poorly suited

Moderately suited

Well suited

Not rated or not available

Soil Rating Points

Poorly suited

Moderately suited

Well suited

Not rated or not available

Water Features

Streams and Canals

Transportation

Rails

Interstate Highways

US Routes

Major Roads

Local Roads

Background

Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Adams County, Washington
Survey Area Data: Version 18, Sep 5, 2017

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Aug 6, 2015—Aug 12, 2016

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Suitability for Roads (Natural Surface) (WA)

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	Moderately suited	Anders (45%)	Low strength (0.50)	51.0	15.6%
				Slope (0.50)		
			Kuhl (40%)	Low strength (0.50)		
				Slope (0.50)		
BEB	Benge silt loam, 0 to 5 percent slopes	Moderately suited	Benge (100%)	Low strength (0.50)	18.4	5.6%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	Moderately suited	Benge (100%)	Slope (0.50)	159.1	48.7%
BND	Benge very stony silt loam, 0 to 30 percent slopes	Moderately suited	Benge (100%)	Slope (0.50)	33.3	10.2%
				Low strength (0.50)		
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	Moderately suited	Walla Walla (100%)	Low strength (0.50)	65.2	19.9%
Totals for Area of Interest					**327.0**	**100.0%**

Rating	Acres in AOI	Percent of AOI
Moderately suited	327.0	100.0%
Totals for Area of Interest	**327.0**	**100.0%**

Description

The ratings in this interpretation indicate the suitability for using the natural surface of the soil for roads. The ratings are based on slope, rock fragments on the surface, plasticity index, content of sand, the Unified classification of the soil, depth to a water table, ponding, flooding, and the hazard of soil slippage.

The ratings are both verbal and numerical. The soils are described as "well suited," "moderately suited," or "poorly suited" to this use. "Well suited" indicates that the soil has features that are favorable for the specified kind of roads and has no limitations. Good performance can be expected, and little or no maintenance is needed. "Moderately suited" indicates that the soil has features that are moderately favorable for the specified kind of roads. One or more soil properties are less than desirable, and fair performance can be expected. Some maintenance is needed. "Poorly suited" indicates that the soil has one or more properties that are unfavorable for the specified kind of roads. Overcoming the unfavorable properties requires special design, extra maintenance, and costly alteration.

Numerical ratings indicate the severity of individual limitations. The ratings are shown as decimal fractions ranging from 0.01 to 1.00. They indicate gradations between the point at which a soil feature has the greatest negative impact on the specified aspect of forestland management (1.00) and the point at which the soil feature is not a limitation (0.00).

The map unit components listed for each map unit in the accompanying Summary by Map Unit table in Web Soil Survey or the Aggregation Report in Soil Data Viewer are determined by the aggregation method chosen, which is displayed on the report. An aggregated rating class is shown for each map unit. The components listed for each map unit are only those that have the same rating class as listed for the map unit. The percent composition of each component in a particular map unit is presented to help the user better understand the percentage of each map unit that has the rating presented.

Other components with different ratings may be present in each map unit. The ratings for all components, regardless of the map unit aggregated rating, can be viewed by generating the Selected Soil Interpretations report with this interpretation included from the Soil Reports tab in Web Soil Survey or from the Soil Data Mart site. Onsite investigation may be needed to validate these interpretations and to confirm the identity of the soil on a given site.

Rating Options

Aggregation Method: Dominant Condition

Component Percent Cutoff: None Specified

Tie-break Rule: Higher

Shaking Intensity (MMI Value)

- 4 - Light

Deep Susceptibility

- Moderate
- High

Shallow Susceptibility

- Moderate
- High

Innovative Solar 211, LLC

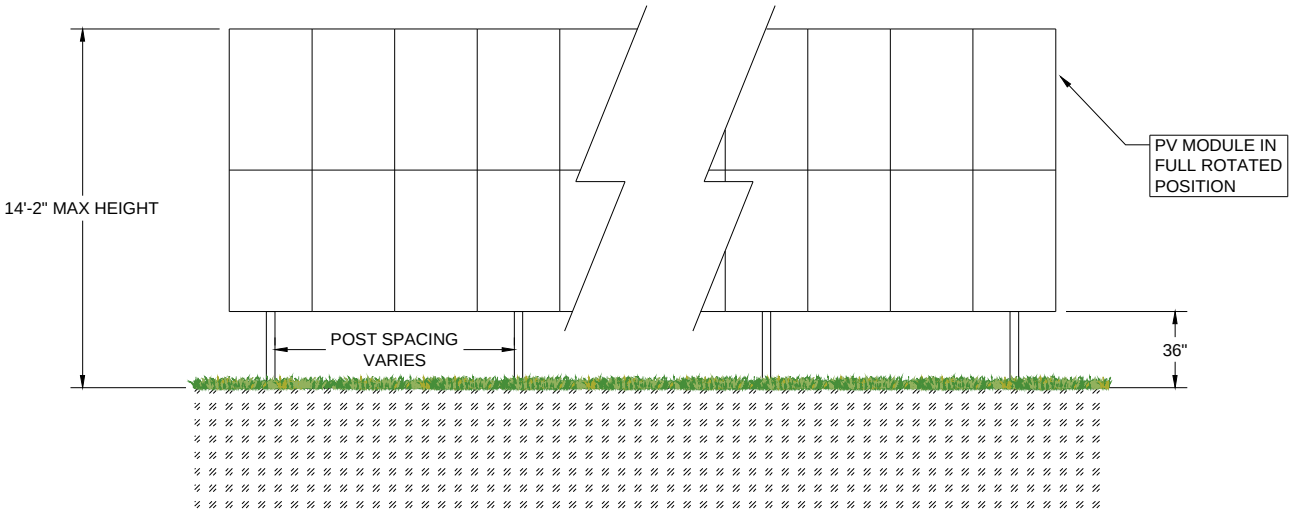
0 0.175 0.35 0.7 Miles

N

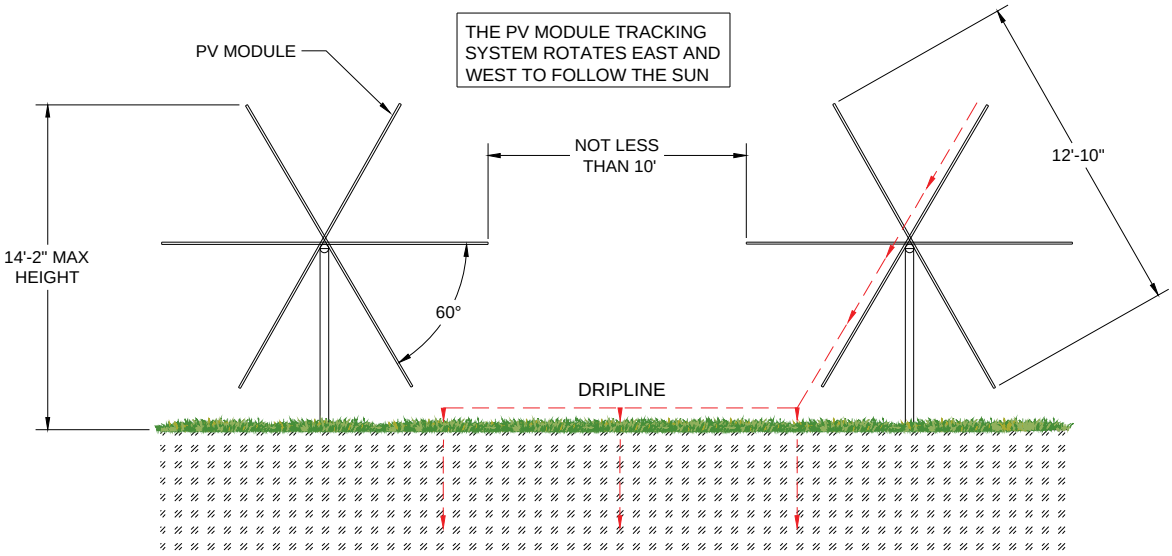
WASHINGTON STATE DEPARTMENT OF
NATURAL RESOURCES
WASHINGTON GEOLOGICAL SURVEY

Washington Geologic Portal

Exhibit C- Panel Profile



ELEVATION VIEW



SIDE VIEW OF TRACKER AND PANELS

TRACKER RACK DETAIL
(NOT TO SCALE)

Exhibit D- DoD Correspondence

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400

ENERGY,
INSTALLATIONS
AND ENVIRONMENT

March 19, 2018

Nicki Bishop
Innovative Solar Systems LLC
1095 Hendersonville Road
Asheville, NC 28803
Nicki.Bishop@innovativesolarsystemsllc.com

Dear Ms. Bishop,

As requested, the Department of Defense (DoD) Siting Clearinghouse coordinated within DoD an informal review of your company's proposed project. The results of our informal review indicated that the 40MW Innovative Solar 211 Project located in Adams County, Washington, as proposed, will minimally impact military operations conducted in this area.

Please note that this informal review by the DoD Siting Clearinghouse does not constitute an action under 49 United States Code Section 44718 and that DoD is not bound by the conclusion arrived at under this informal review. Please contact me at steven.j.sample4.civ@mail.mil or at 703-571-0076 if you have any questions.

Sincerely,

Steven J. Sample
Deputy Director
DoD Siting Clearinghouse

Exhibit E- Excerpts of Supplemental Reports

Full versions of all reports available for download on Adams County website

- Phase 1 Environmental Site Assessment (ESA) Executive Summary
- Wetland Delineation Report
- Federally Threatened and Endangered Species Survey
- Cultural Resources Report
- Tribal Outreach/Correspondence

ALPHA

ALPHA ENVIRONMENTAL
ALPHA ENGINEERING SERVICES, P.A.

SOLAR SITE DEVELOPMENT
ENVIRONMENTAL SERVICES DIVISION

PHASE I
ENVIRONMENTAL SITE ASSESSMENT

INNOVATIVE SOLAR #211
N. HILLS ROAD
RITZVILLE, ADAMS COUNTY, WASHINGTON 99032

Prepared for:

INNOVATIVE SOLAR 211, LLC
1095 HENDERSONVILLE ROAD
ASHEVILLE, NORTH CAROLINA 28803

Prepared by:

ALPHA ENVIRONMENTAL.
PO BOX 2155
ASHEVILLE, NORTH CAROLINA 28802

June 14, 2017
AES Project Number 17103.01

1.0 EXECUTIVE SUMMARY

Alpha Environmental performed a Phase I Environmental Site Assessment (Phase I ESA) in conformance with the scope and limitations described in the American Society for Testing and Materials ASTM E 1527-13 of the property located on N. Hills Road, Ritzville, Adams County, Washington 99032 (Figure 1). At the time of this assessment no E911 address was assigned to the property being assessed, therefore the physical address is approximate. The purpose of the Phase I ESA was to identify obvious environmental concerns related to Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), Controlled Recognized Environmental Conditions (CRECs), or vapor intrusion risks resulting from practices and activities that have occurred on the Subject Site/Area, adjacent sites, or on surrounding areas. The practices used to produce this report constitute "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in AAI, 40 CFR Part 312. As such, this report is intended to permit the Report User to satisfy one of the requirements to qualify for the innocent landowner defense to Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Any exceptions to, or deletions from, the ASTM E 1527-13 practice are described in Section 13.0 of this report.

The Phase I ESA was ordered by Mr. Lance Roddy, Land Development Manager, for Innovative Solar Systems LLC, 1095 Hendersonville Road, Asheville, NC 28803, for and on behalf of the "Report User" Innovative Solar 211, LLC and its' Assignees. The assessed property, here within referred to as the "Site, Subject Site, Subject Site/Area, Subject Property, Property or Target Property", includes approximately 318 acres of the 338-acre parcel identified in the Adams county tax record as parcel number 2036110200001. The 318 approximate acres that comprise the Subject Site/Area (Figure 2) will be verified by a survey (Figure 4), however, a survey is not a requirement of the ASTM Standard.

1.1 Subject Site/Area History:

The assessed Target Property historical use, based on available federal, state, county and local records, together with information obtained from persons associated with the Site or knowledgeable of the Site and its immediate area development revealed that the Site has a history of undeveloped use and/or agricultural use for over 60 years.

1.2 Risk Assessment of Findings:

Alpha Environmental contracts Environmental Data Resources, Inc. (EDR) to perform a records search of available Federal and State databases to find listings that have information on the Subject Site/Area and Off-Sites (adjoining and surrounding sites). The Off-Site search is limited within a search radius established by the ASTM Standard. In the event the records search revealed evidence of a historical or existing recognized environmental condition then each site and its findings are reviewed by Alpha Environmental to determine the risk to the Subject Site/Area. The risk determination (N, L, or H) is noted in the respective Subject Site/Area Findings table or Off-Site Findings table. The risk is assigned based on the following.

No Risk = (N)

- The hydrologic characteristics of the site suggest that any past or present contamination would not migrate from the source to the Target Property.
- The source is down-gradient and beyond the critical distance.
- The source is up-gradient but is beyond the critical distance and there are hydrologic, soil, or other characteristics that suggests any past or present contamination would not migrate to the target property.
- Sampling data or remediation actions supports the site does not create or represent a potential risk condition.

Low Risk = (L)

- The hydrologic characteristics of the site suggest that any past or present contamination would not migrate from the source to the Target Property.
- The soil characteristics of the site would make any past or present contamination migration from the source or plume unlikely.
- The site is considered a low risk or has been closed by the responsible regulatory agency.

High Risk = (H)

- Ground water or soil contamination is known from another source to be on or nearby the Subject Site/Area.
- Sampling data or remediation actions suggests the site may create or represent a potential risk condition.
- The soil and/or hydrologic characteristics of the site suggest that any past or present contamination is likely to migrate from the source to the Target Property.

1.3 Subject Site/Area Findings:

This Phase I ESA search of available Federal and State databases in connection with the Subject Site/Area, revealed no evidence of a historical or existing recognized environmental conditions in connection with the Subject Site. The findings, if any, are listed in the chart below and detailed in the Environmental Data Resources Radius Report provided in Appendix III.

MAP ID	SITE NAME	SITE ADDRESS	DATA BASE LISTING	ELEVATION	FT-MILES-DIR	RISK
No on-site listings found						

1.4 Off-Site Findings:

This Phase I ESA search of available Federal and State databases in connection with an Adjoining Site or Surrounding Area (an Off-Site), limited within a search radius established by the ASTM Standard, revealed no evidence that sites exist having a recognized environmental condition of potential impact to the Subject Site/Area. The findings, if any, are listed in the chart below and detailed in the Environmental Data Resources Radius Report provided in Appendix III. The location of any finding respective to its distance from the Subject Site is plotted on Figure 4 Adjacent and Surrounding Site Map.

MAP ID	SITE NAME	SITE ADDRESS	DATA BASE LISTING	ELEVATION	FT-MILES-DIR	RISK
No off-site listings found						

1.5 Observation or Findings of Other Conditions:

This Phase I ESA included an investigation for obvious or suspect additional conditions not found on any regulatory database. Additional conditions that are not included under the definitions of a REC, but are defined by ASTM Practice 1527-13 include:

1.5.1 De Minimis: A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

- It is our professional opinion that there are no findings or suspect conditions.

1.5.2 Business Environmental Risk: A risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.

- It is our professional opinion that there are no findings or suspect conditions.

1.5.3 Non-Scope Conditions: A business risk issue related to safety, health, hazardous building materials and other conditions that may be of interest, in the opinion of the Report Writer, to the Report User.

- It is our professional opinion that there are no findings or suspect conditions.

1.6 Opinions and Recommendations:

The following opinions and recommendations are made based on our findings as presented in this Executive Summary, available records, interviews, and other ascertained information in connection to the Subject Site/Area:

1.6.1 Recognized Environmental Conditions:

- Based on this Phase I ESA, no RECs were identified in connection with the Subject Site/Area.

1.6.2 Historical Recognized Environmental Conditions (HRECs):

The ASTM E1527-13 Standard defines the term HREC as meaning a past release of any hazardous substance or petroleum products that has occurred in connection with the Subject Site/Area that has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the Property to any use restrictions, Activity and Use Limitations (AULs), institutional controls, or engineering controls.

- Based on this Phase I ESA, no HRECs were identified in connection with the Subject Site/Area.

1.6.3 Controlled Recognized Environmental Conditions (CRECs):

The ASTM E1527-13 Standard defines the term CREC as meaning a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, as evidenced by the issuance of NFA letter or equivalent, or meeting risk-based criteria established by regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls, property use restrictions, AULs, institutional controls, or engineering controls.

- Based on this Phase I ESA, no CRECs were identified in connection with the Subject Site/Area.

1.6.4 Vapor Encroachment Evaluation (VEC):

ASTM E2600-10 Standard was used to assess vapor encroachment onto the Subject Site/Area from documented releases or potential sources from facilities located offsite within the Standards' defined Area of Concern of 1/10th mile for petroleum products or 1/3 mile for other chemicals of concern.

- Based on this assessment no vapor intrusion risks were identified for the Subject Site/Area, and therefore, a Phase II VEC is not needed or recommended.

1.6.5 General or Other Recommendations:

- In the unlikely event that evidence of release or contamination is discovered during the Subject Site/Area's normal use activities or redevelopment it is recommended that an Environmental Professional be contacted immediately to ensure proper management of any regulated materials or other hazardous materials.

1.7 Conclusion:

Based on our findings as presented in this Executive Summary, available records, interviews, and an on-site reconnaissance of the Subject Site/Area, this Phase I ESA revealed no RECs, HRECs, or CRECs associated with the Subject Site/Area. Based on the results of this assessment it is reasonable and prudent to believe that the risk of contamination from any known source is non-existent, therefore, no further investigative action is warranted.

1.8 Conditions of the Executive Summary:

The findings, opinions, and recommendations of the Executive Summary are derived from the Phase I Environmental Site Assessment and, therefore by itself, does not constitute "all appropriate inquiry" as defined in AAI, 40 CFR Part 312 and as described in the American Society for Testing and Materials ASTM E 1527-13 until presented together with the full Phase I ESA.

End of Executive Summary.

ALPHA

ALPHA ENVIRONMENTAL
ALPHA ENGINEERING SERVICES, P.A.

SOLAR SITE DEVELOPMENT
ENVIRONMENTAL SERVICES DIVISION

FEDERALLY THREATENED AND ENDANGERED SPECIES SURVEY

INNOVATIVE SOLAR 211
N. HILLS ROAD
ADAMS COUNTY
RITZVILLE, WASHINGTON 99032

Prepared for:

INNOVATIVE SOLAR , LLC
1095 HENDERSONVILLE ROAD
ASHEVILLE, NORTH CAROLINA 28803

Prepared by:

ALPHA ENVIRONMENTAL.
PO BOX 2155
ASHEVILLE, NORTH CAROLINA 28802

June 14, 2017
AES Project Number 17103.03

INTRODUCTION

The purpose of this report is to provide information on the potential presence of federally protected plant and animal species on the IS 211. The site is located northeast of the intersection of N Hills Road and Griffith Rd and in Adams County, Washington. The subject site is under review for a proposed solar farm referred to as Innovative Solar 211.

The Federally Threatened and Endangered Species Survey was ordered by Mr. Lance Roddy, Land Development Manager, for Innovative Solar, LLC, 1095 Hendersonville Road, Asheville, North Carolina 28803, for and on behalf of the "Report User" INNOVATIVE SOLAR 211, LLC, and its' Assignees. The assessed property, here within referred to as the "Site, Subject Site, Subject Site/Area, Subject Property, Property, or Target Property", includes portions of the parcels identified in the Adams County Tax Record as parcel PIN 2036110200001.

ALPHA ENVIRONMENTAL has concluded that the construction of a solar farm on the IS 211 would have "no effect" on any federally threatened or endangered species. The Survey has been submitted for concurrence by the United States Fish and Wildlife Service.

EXECUTIVE SUMMARY

Six Federally listed Endangered or Threatened species are currently documented by the United States Fish and Wildlife Service as occurring in Adams County, WA. These are:

Six Federally listed Endangered or Threatened species are currently documented by the WA Natural Heritage Program (NHP) as occurring in Adams County, WA. These are: Yellow-billed Cuckoo (Coccyzus americanus), Bull Trout (Salvelinus confluentus), Spalding's Catchfly (Silene spaldingii), Water Howellia (Howellia aquatilis), Gray Wolf (Canis lupus), and Columbia Basin Pygmy Rabbit (Brachylagus idahoensis).

No potentially suitable habitat was found on the IS 211 Solar Site for the any of the above listed threatened or endangered species.

FIELD SURVEY

Natural communities are recurring assemblages of plants and animals found in particular physical environments. Natural communities are influenced by topography, parent material, and human activity. Each type of natural community has a unique set of environmental conditions supporting certain species that have adapted to those conditions. By examining natural community types and comparing them to the habitat preferences of specific taxa, a majority of species can be accurately located. In turn, by eliminating unsuitable habitat, many taxa can be ruled out as likely to occur.

Before initiating field surveys, maps were prepared in QGIS of the natural heritage elements on and near the property. Topographical maps and aerial maps were then used to aid in locating habitat types. Optimal survey windows for rare species were determined using publications and websites.

The field survey to collect data for this report was collected on June 5, 2017. Transects were traversed on foot throughout the property. Ground truthing of specific habitat types and ecotones was done in the field. A GPS unit was used for navigation and further documentation of potential habitats. 2015 aerial images, and USGS topographic quadrangle maps were all used during preliminary site assessment and ground truthing.

RESULTS

Federally Listed Endangered and Threatened Species

Washington Natural Heritage Program has documented occurrences of state or federally listed assemblages, communities, and species in Washington. As noted above, there are six federally listed Endangered or Threatened species documented to occur within Adams County. These species are discussed below.

Yellow-Billed Cuckoo

DESCRIPTION: Yellow-billed Cuckoos are fairly large, long, and slim birds. The mostly yellow bill is almost as long as the head, thick and slightly downcurved. They have a flat head, thin body, and very long tail. Wings appear pointed and swept back in flight. Yellow-billed Cuckoos are warm brown above and clean whitish below. Their blackish face mask is accompanied by a yellow eye ring. In flight, the outer part of the wings flash rufous. From below, the tail has wide white bands and narrower black ones

RANGE AND POPULATION LEVEL: Yellow-billed Cuckoos breed throughout much of the eastern and central U.S., winter almost entirely in South America east of the Andes, and migrate through Central America. The western subspecies (C.a. occidentalis) has disappeared over much of the western U.S. and now occurs as a rare breeder in California, Arizona, New Mexico, and west Texas.

HABITAT: Yellow-billed Cuckoos use wooded habitat with dense cover and water nearby, including woodlands with low, scrubby, vegetation, overgrown orchards, abandoned farmland, and dense thickets along streams and marshes. In the Midwest, look for cuckoos in shrublands of mixed willow and dogwood, and in dense stands of small trees such as American elm. In the central and eastern U.S., Yellow-billed Cuckoo's nest in oaks, beech, hawthorn, and ash. In the West, nests are often placed in willows along streams and rivers, with nearby cottonwoods serving as foraging sites.

It is the opinion of Alpha Environmental that suitable habitat for the Yellow-Billed Cuckoo does not exist within the IS 211 Site. No further surveys are recommended for Yellow-Billed Cuckoo on the IS 211 Site.

Bull Trout

DESCRIPTION: Bull trout may be distinguished from brook trout (Salvelinus fontinalis) by several characteristics: spots never appear on the dorsal (back) fin, and the spots that rest on the fish's olive green to bronze back are pale yellow, orange or salmon-colored. The bull trout's tail is not deeply forked as is the case with lake trout (Salvelinus namaycush). Bull trout exhibit two forms: resident and migratory. Resident bull trout spend their entire lives in the same stream/creek. Migratory bull trout move to larger bodies of water to overwinter and then migrate back to smaller waters to reproduce. An anadromous form of bull trout also exists in the Coastal-Puget Sound population, which spawns in rivers and streams but rears young in the ocean. Resident and juvenile bull trout prey on invertebrates and small fish. Adult migratory bull trout primarily eat fish. Resident bull trout range up to 10 inches long and migratory forms may range up to 35 inches and up to 32 pounds. Bull trout are currently listed conterminously as a threatened species.

HABITAT: Bull trout (Salvelinus confluentus) are members of the family Salmonidae and are char native Washington, Oregon, Idaho, Nevada, Montana and western Canada. Compared to other salmonids, bull trout have more specific habitat requirements that appear to influence their distribution and abundance. They need cold water to survive, so they are seldom found in waters where temperatures exceed 59 to 64 degrees (F). They also require stable stream channels, clean spawning and rearing gravel, complex and diverse cover, and unblocked migratory corridors.

It is the opinion of Alpha Environmental that suitable habitat for the Bull Trout does not exist within the IS 211 Site. No further surveys are recommended for Bull Trout on the IS 211 Site.

Spalding's Catchfly

DESCRIPTION: Spalding's catchfly produces one to several vegetative or flowering stems that arise from a simple or branched persistent underground stem (caudex), which surmounts a long, narrow taproot. Plants range from 20 to 40 cm in height. Each stem typically bears 4 to 7 pairs of simple, opposite leaves that are 5 to 8 cm in length and 2 to 4 cm in width. Similar to the majority of plants in this family, Spalding's catchfly has distinctly swollen nodes located where the leaves are attached to the stem. Reproductive individuals produce 3 to 20 cream to pink or light green flowers that are borne in a branched, terminal inflorescence. All green portions of the plant (foliage, stem, and flower bracts) are covered in dense sticky hairs that frequently trap dust and insects, giving this species the common name 'catchfly'. Plants (both vegetative and reproductive) emerge in mid-to late May. Flowering typically occurs from mid-July through August, but may occasionally continue into October. Rosettes are formed the first and possibly the second year, followed by the formation of vegetative stems. Above-ground vegetation dies back at the end of the growing season and plants either emerge in the spring or remain dormant below ground for one to several consecutive years. Spalding's catchfly reproduces solely by seed. It lacks rhizomes or other means of reproducing vegetatively.

HABITAT: Spalding's catchfly (Silene spaldingii) is an herbaceous perennial in the pink family (Caryophyllacea). The species is endemic to the Palouse region of south-east Washington and adjacent Oregon and Idaho, and is disjunct in northwestern Montana and British Columbia, Canada. This species is found predominantly in the Pacific Northwest bunchgrass grasslands and sagebrush-steppe, and occasionally in open-canopy pine stands. Occupied habitat includes five physiographic (physical geographic) regions: 1) the Palouse Grasslands in west-central Idaho and southeastern Washington; 2) the Channeled Scablands in east-central Washington; 3) the Blue Mountain Basins in northeastern Oregon; 4) the Canyon Grasslands along major river systems in Idaho, Oregon, and Washington; and 5) the Intermontane Valleys of northwestern Montana and British Columbia, Canada.

It is the opinion of Alpha Environmental that suitable habitat for Spalding's Catchfly does not exist within the IS 211 Site. No further surveys are recommended for Spalding's Catchfly on the IS 211 Site.

Water Howellia

DESCRIPTION: Water howellia (Howellia aquatilis) is a winter annual aquatic plant that grows 4-24 inches high. It has extensively branched, submerged or floating stems and narrow, linear, alternate (sometimes opposite) leaves up to 2 inches in length. Water howellia usually flowers in May and June, with small trumpet-shaped blooms ranging from white to light purple in color, at or above the water surface. There may also be small axillary flowers beneath the water surface. Water howellia reproduces only by seed which germinates when ponds dry during fall. This results in annual variability in population size depending on the extent of the previous seasons drying. Flowering occurs from June to August.

HABITAT: The plant grows in areas that were once associated with glacial potholes and former river oxbows that flood in the spring, but usually dry at least partially by late summer. It is often found in shallow water (1-2 meters) and on the edges of deep ponds that are partially surrounded by deciduous trees such as black cottonwood and aspen. States in which Howellia aquatilis is known to occur: Currently known from California, Idaho, Montana, and Washington. Historically found in Oregon. The plant has also been found on Turnbull National Wildlife Refuge in Washington

It is the opinion of Alpha Environmental that suitable habitat for Water Howellia does not exist within the IS 211 Site. No further surveys are recommended for Water Howellia on the IS 211 Site.

Gray Wolf

DESCRIPTION: Gray wolves are canines with long bushy tails that are often black-tipped. Coat color is typically a mix of gray and brown with buffy facial markings and undersides, but the color can vary from solid white to brown or black. Gray wolves look somewhat like a large German Shepherd. Wolves vary in size depending on where they live. Wolves in the north are usually larger than those in the south. The average size of a wolf's body is 3-5 feet long. Their tails are usually 1-2 feet long. Females typically weigh 60-100 pounds, and males weigh 70-145 pounds. Wolves are carnivores--they prefer to eat large hoofed mammals such as deer, elk, bison and moose.

They also hunt smaller mammals such as beavers, rodents and hares. Adults can eat 20 pounds of meat in a single meal.

HABITAT: Gray Wolves can thrive in a diversity of habitats from the tundra to woodlands, forests, grasslands and deserts. Today, gray wolves have populations in Alaska, northern Michigan, northern Wisconsin, western Montana, northern Idaho, northeast Oregon and the Yellowstone area of Wyoming. Mexican wolves, a subspecies of the gray wolf, were reintroduced to protected parkland in eastern Arizona and southwest New Mexico. The historic range of the gray wolf covered over two-thirds of the United States.

It is the opinion of Alpha Environmental that suitable habitat for the Gray Wolf does not exist within the IS 211 Site. No further surveys are recommended for the Gray Wolf on the IS 211 Site.

Columbia Basin Pygmy Rabbit
DESCRIPTION: The Pygmy Rabbit is small and slate gray with a pinkish tinge in the winter but turns a brownish color in the summer. The tail is nearly hidden. Its ears are small for a rabbit. There are whitish spots on the sides of its nostrils. Females are slightly larger than males.

RANGE AND HABITAT:
The Columbia Basin Pygmy Rabbit historical range includes portions of the following states: California, Oregon, Nevada, Idaho, Montana, Wyoming, Utah and Washington. On March 5, 2003, the Columbia Basin Distinct Population Segment of the pygmy rabbit was listed as endangered in the state of Washington.
Pygmy rabbits are typically found in areas of tall, dense sagebrush (Artemisia spp.) cover, and are highly dependent on sagebrush to provide both food and shelter throughout the year. Their diet in the winter consists of up to 99 percent sagebrush. The pygmy rabbit is believed to be one of only two Leporids in Northern America that digs its own burrows. Pygmy rabbit burrows are typically found in relatively deep, loose soils of wind-borne or water-born origin. They occasionally make use of burrows abandoned by other species and as a result, may occur in areas of shallower or more compact soils that support sufficient shrub cover.

It is the opinion of Alpha Environmental that suitable habitat for the Columbia Basin Pygmy Rabbit does not exist within the IS 211 Site. No further surveys are recommended for the Columbia Basin Pygmy Rabbit on the IS 211 Site.

REGULATIONS
Federally Listed Species- Endangered and Threatened Under the Endangered Species Act (ESA) (1973), species may be listed as either "endangered" or "threatened." For the purposes of the ESA, Congress defined species to include subspecies, varieties, and, for vertebrates, distinct population segments. Section 4 of the ESA specifies that a species must be listed as endangered or threatened solely on the basis of its biological status and threats to its existence.

"Endangered Species" (E) means any native species documented by biological research and inventory to be in danger of extirpation throughout all or a significant port ion of its range within the state and to have no more than five occurrences in the state, and any species determined to be an "endangered species" pursuant to the federal Endangered Species Act.

"Threatened Species" (T) means any native species documented by biological research and inventory to be likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range within the state and to have no more than nine occurrences in the state, and any species determined to be a "threatened species" pursuant to the Federal Endangered Species Act except for such species determined to be endangered by the Commissioner in accordance with section 4 of this act.

When evaluating a species for listing. five factors are considered: 1) damage to, or destruction of. a species' habitat; 2) overuse of the species for commercial. recreational, scientific or educational purposes; 3) disease or predation; 4) the inadequacy of existing protection; and 5) other natural or human related threats to the species' survival. When one or more of these factors imperils the survival of a species. the United States Fish and Wildlife Service (USFWS) takes action to protect it. To ensure the accuracy of the data. the USFWS decides all listings using sound science and peer review.

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the law. This section also requires federal agencies to consult with the USFW to ensure that actions they authorize. fund or carry out will not jeopardize listed species. The consulting agency then receives a "biological opinion" on the proposed action. In the relatively few cases where the USFW or National Marine Fisheries Service (NMFS) determines that the proposed action will jeopardize the species, they must offer "reasonable and prudent alternatives" about how the proposed action could be modified to avoid potential impacts to the protected species. It is uncommon for the USACE to withdraw or terminate projects because of jeopardy to a listed species; however, it is common for there to be conditions applied to approvals, and/or modifications of projects.

Section 10 of the ESA provides relief to private landowners who want to develop land inhabited by listed species. Landowners can receive a permit for the taking of a listed species that may occur incidental to otherwise legal activities. provided they have developed an approved Habitat Conservation Plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed action, the steps that will be taken to minimize and mitigate those impacts, and the funding available to carry out those steps. When the USFW approves the HCP the landowner can apply for an "incidental take" permit, which allows them to proceed with the proposed action.

CONCLUSION

Species-specific surveys for Yellow-Billed Cuckoo, Spalding's Catchfly and Water Howellia were conducted on the IS 211 Site as designated by migration and flowering dates. Species-specific surveys for Gray wolf, Pygmy Rabbit and Bull Trout were also conducted on the IS211 Site. No specimens of any of these species were observed

on-site. ALPHA ENVIRONMENTAL has concluded that the construction of a solar farm on the IS 211 would have "no effect" on any federally threatened or endangered species.

This report was submitted to Eastern Washington Field Office, 11103 E. Montgomery Drive, Spokane, WA 99206 for concurrence by the assigned USFW representative. Copy of the concurrence letter will be added to this report when received.

ENVIRONMENTAL PROFESSIONAL STATEMENT

We declare that, to the best of our professional knowledge and belief, we possess the qualifications, education, training, and experience to assess a property of the nature, history and setting of the Subject Property.

Report Research by:

Environmental Scientist
Printed Name: Timothy M. Watkins

Report Prepared and Approved by:

Environmental Professional
Printed Name: Edward P. Dzierzynski

REGISTERED ENVIRONMENTAL PROPERTY ASSESSOR
EDWARD P. DZIERZYNSKI
REPA
6161

Alpha Environmental, PO Box 2155, Asheville, NC 28802
Phone: 828-398-2040 Email: info@alphaenviron.com

REFERENCES

- Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. 2008. Official Soil Series Descriptions Available URL: "hltp:/lsoils.usda.gov/technical/classification/osd/index.html" Accessed June 2017.
- U.S.Fish and Wildlife Service. Yellow-Billed Cuckoo (Coccyzus americanus). "https://ecos.fws.gov/ecp0/profile/speciesProfile/spcode=B06R." Accessed June 2017
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- U.S.Fish and Wildlife Service. Spalding's Catchfly (Silene spaldingii). "https://ecos.fws.gov/ecp0/profile/speciesProfile/spcode=Q1P9." Accessed June 2017
- U.S.Fish and Wildlife Service. Water howellia (Howellia aquatilis). "https://ecos.fws.gov/ecp0/profile/speciesProfile/spcode=Q2RM." Accessed June 2017
- U.S.Fish and Wildlife Service. Columbia Basin Pygmy Rabbit (Brachylagus idahoensis). "https://ecos.fws.gov/ecp0/profile/speciesProfile/spcode=A0GG." Accessed June 2017
- U.S.Fish and Wildlife Service. Gray wolf (Canis lupus). "https://ecos.fws.gov/ecp0/profile/speciesProfile/spcode=A00D." Accessed June 2017

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APPENDIX I

Concurrence Request Letter

USFW Concurrence Email

ALPHA

ALPHA ENVIRONMENTAL
ALPHA ENGINEERING SERVICES, P.A.

June 14, 2017

Fish & Wildlife Service, Eastern Washington Field Office
11103 E. Montgomery Drive
Spokane, WA 99206
Attn: Russ Macrae, Field Supervisor

Dear Mr. MacRae,

The included report is a threatened and endangered species survey for the Innovative Solar Site 211 slated for development in Adams County, Washington. Alpha Environmental did not identify any evidence of current or potential habitat for any listed threatened or endangered species in Adams County, Washington. The report concludes that the development of a solar project within the boundaries for IS 211 is unlikely to impact any threatened or endangered species. Alpha Environmental requests a letter of concurrence with this conclusion from the U.S. Fish & Wildlife Service.

Please do not hesitate to email or call Alpha Environmental if any additional information or discussion is needed.

Sincerely,

Environmental Professional
Printed Name: Edward P. Dzierzynski

REGISTERED ENVIRONMENTAL PROPERTY ASSESSOR
EDWARD P. DZIERZYNSKI
REPA
6161

Enclosure: IS211 T&E Survey, Adams County, WA

PO BOX 2155 ASHEVILLE, NORTH CAROLINA 28802
Phone: 828-398-2040 Fax: 828-398-2041 Email: info@alphaenviron.com

Tim Watkins

From: Russ MacRae <russ_macrae@fws.gov>
Sent: Tuesday, July 18, 2017 4:04 PM
To: Tim Watkins
Subject: RE: Request for Concurrence on Threatened and Endangered Species Study

Hi Tim-

I don't see any connection to a federal agency or money, and if that is true there is no need to consult with us.

Nonetheless, after reviewing the attached report, I suspect the more appropriate terminology is "no effect" rather than "not likely to adversely affect." If that is the case, then this email should suffice for your records. The implementing regulations of the Endangered Species Act do not provide a formal mechanism for the Service to concur with a "no effect" determination.

Please let me know if you have any questions.

Russ MacRae

Russell MacRae, Field Supervisor
Eastern Washington Field Office, U.S. Fish & Wildlife Service
11103 E. Montgomery Dr., Spokane Valley, WA 99206
Office: 509-893-8001
Mobile: 208-699-9726
Email: russ_macrae@fws.gov

ALPHA

Solar Site Development Environmental Service Division

JURISDICTIONAL DETERMINATION
WETLAND DELINEATION REPORT
INNOVATIVE SOLAR #211

N. HILLS ROAD
RITZVILLE, ADAMS COUNTY, WASHINGTON 99032

Prepared for:

INNOVATIVE SOLAR 211, LLC
1095 HENDERSONVILLE ROAD
ASHEVILLE, NORTH CAROLINA 28803

Prepared by:

ALPHA ENVIRONMENTAL
PO BOX 2155
ASHEVILLE, NORTH CAROLINAS 28802

October 23, 2017
Alpha Project 17103.02

JURISDICTIONAL DETERMINATION

On October 23, 2017 the United States Army Corp of Engineers Seattle (WA) District determined that there are no waters of the U.S. within the project area.

See the following letter of jurisdictional determination including supporting and other documents for the ruling.

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

REPLY TO
ATTENTION OF

Regulatory Branch October 23, 2017

Mr. Lance Roddy
Innovative Solar Systems
1095 Hendersonville Road
Asheville, North Carolina 28803

Reference: NWS-2017-831
Innovative Solar Systems
LLC (Approved JD Only)

Dear Mr. Roddy:

We have received your application for a Department of the Army (DA) permit to construct a solar power collection and distribution project near Ritzville, Adams County, Washington. We have reviewed the information you provided to us pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. On October 18, 2017, we inspected this property in response to your request for verification of the jurisdictional limits of waters of the U.S. in the review area as shown on the enclosed drawings dated September 6, 2017. The U.S. Army Corps of Engineers has determined that there are no waters of the U.S. within the project review area. This determination applies only to the review area. Other waters and wetlands that may occur on this property outside the review area are not the subject of this determination. Because there are no waters of the U.S., we have determined that a DA permit is not required for your proposed work as described in your application and drawings.

Under Section 404 of the Clean Water Act, a DA permit is normally required for the discharge of dredged or fill material (e.g., fill, excavation, or mechanized land clearing) into waters of the U.S., including wetlands and navigable waters of the U.S. For more information, see the enclosed *Clean Water Act Extracts and Definitions*. Since there are no waters of the U.S. within the project review area, work that would occur within these areas does not require Department of the Army authorization under Section 404 of the Clean Water Act. Other state and local regulations may still apply to these wetlands. We are sending a copy of this letter to Ecology and to the Environmental Protection Agency's Aquatic Resources Unit.

This approved jurisdictional determination is valid for a period of five years from the date of this letter unless new information warrants revisions of the determination. A copy of this jurisdictional determination, dated October 23, 2017 can be found on our website at www.nws.usace.army.mil select "Regulatory Branch, Permit Information" and then "Jurisdictional Determinations". If you object to this determination, you may request an

administrative appeal under our regulations (33 Code of Federal Regulations, Part 331) as described in the enclosed *Appeal Process Fact Sheet* and the *Notification of Administrative Appeal Options and Process and Request for Appeal* form.

While a DA permit is not required, other federal, state, and local requirements may still apply. For assistance in determining other permit requirements for the proposed project, we recommend you contact the Washington State Office of Regulatory Assistance via the internet at www.ora.wa.gov.

If you propose to do any work outside of the review area in other waters and wetlands that were not the subject of this determination, you should contact our office prior to commencing work to determine permit requirements. If you have any questions, please contact Mr. David Moore at david.j.moore@usace.army.mil or at (206) 316-3166.

Sincerely,

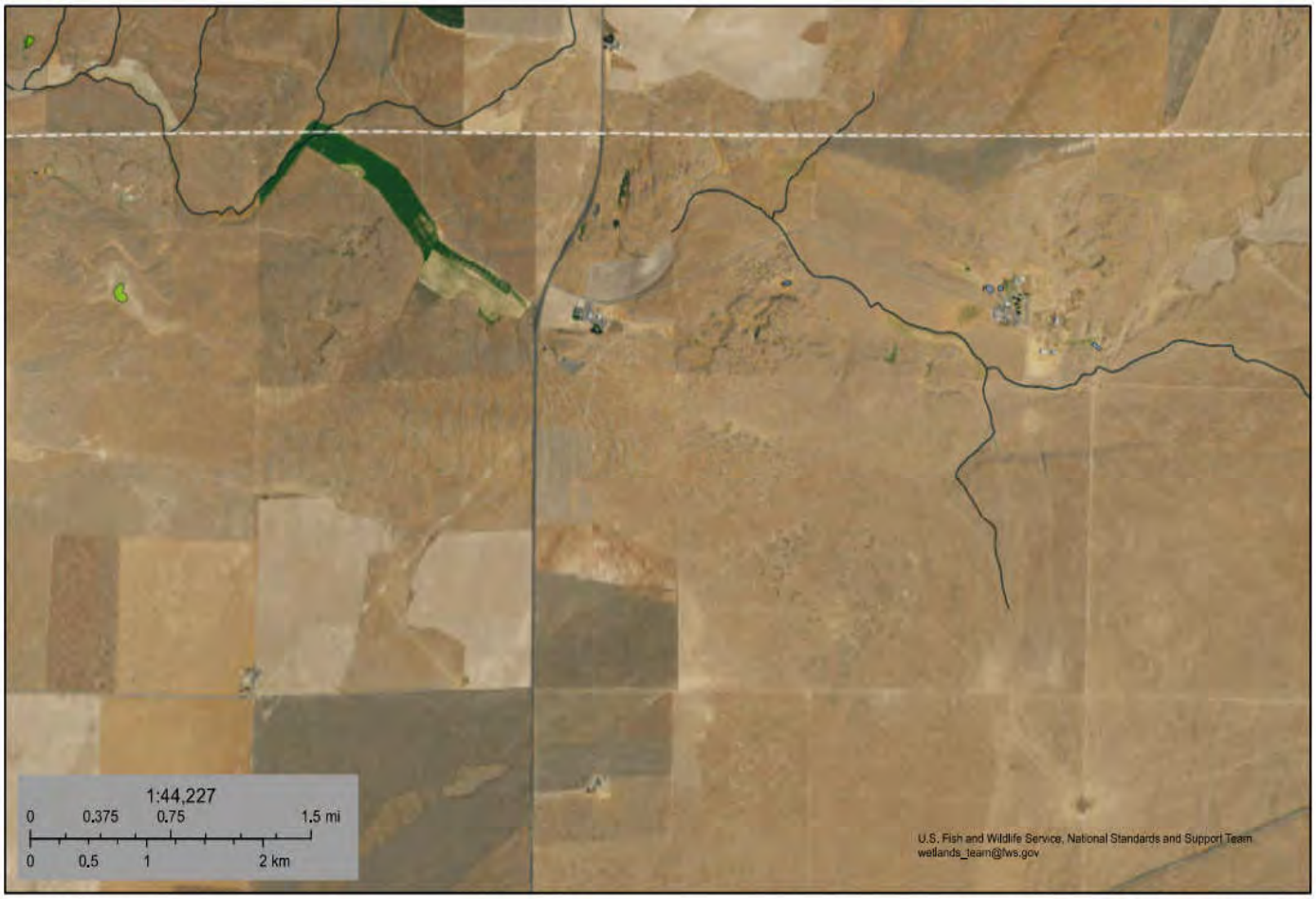
Jacalen Printz, Section Chief
Regulatory Branch

Enclosure

cc with drawings and JD form:
Washington Department of Ecology, ATTN: Federal Permit Coordinator
Environmental Protection Agency's Aquatic Resources Unit, Region 10

U.S. Fish and Wildlife Service
National Wetlands Inventory

NWI Map



June 18, 2017

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

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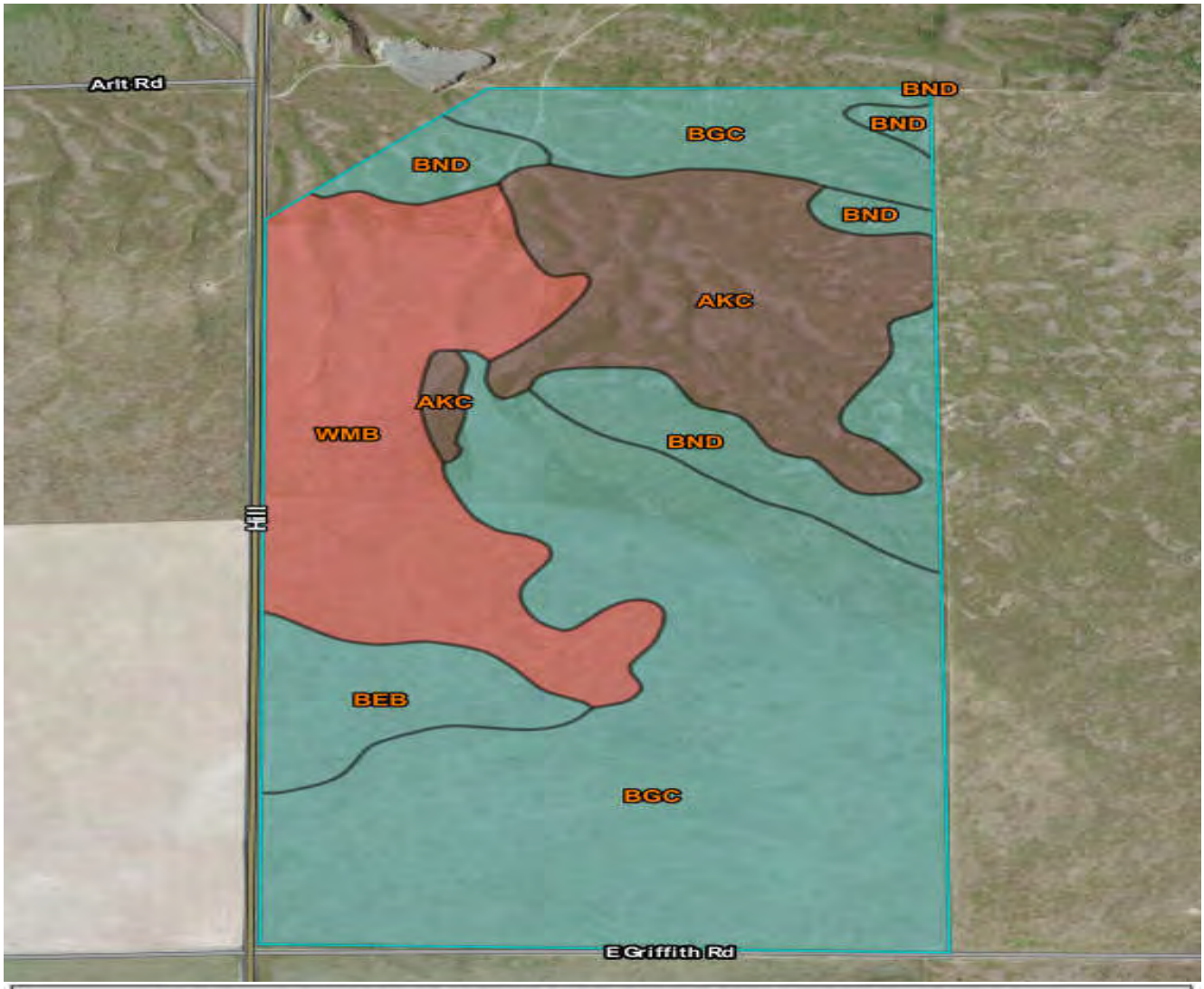
Figure 4
NWI Map
NWS-2017-831

IS #211 Solar Site
Ritzville, WA
Project No. 17103.02



Soil Taxonomy Classification— Summary by Map Unit — Adams County, Washington (WA001)				
Map unit symbol	**Map unit name**	**Rating**	**Acres in AOI**	**Percent of AOI**
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	Coarse-loamy, mixed, superactive, mesic Typic Haploxerolls	50.7	15.8%
BEB	Benge silt loam, 0 to 5 percent slopes	Coarse-loamy over sandy or sandy-skeletal, mixed, superactive, mesic Typic Haploxerolls	17.5	5.5%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	Coarse-loamy over sandy or sandy-skeletal, mixed, superactive, mesic Typic Haploxerolls	158.1	49.3%
BND	Benge very stony silt loam, 0 to 30 percent slopes	Coarse-loamy over sandy or sandy-skeletal, mixed, superactive, mesic Typic Haploxerolls	30.2	9.4%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	Coarse-silty, mixed, superactive, mesic Typic Haploxerolls	64.4	20.1%
Totals for Area of Interest			**320.9**	**100.0%**

N

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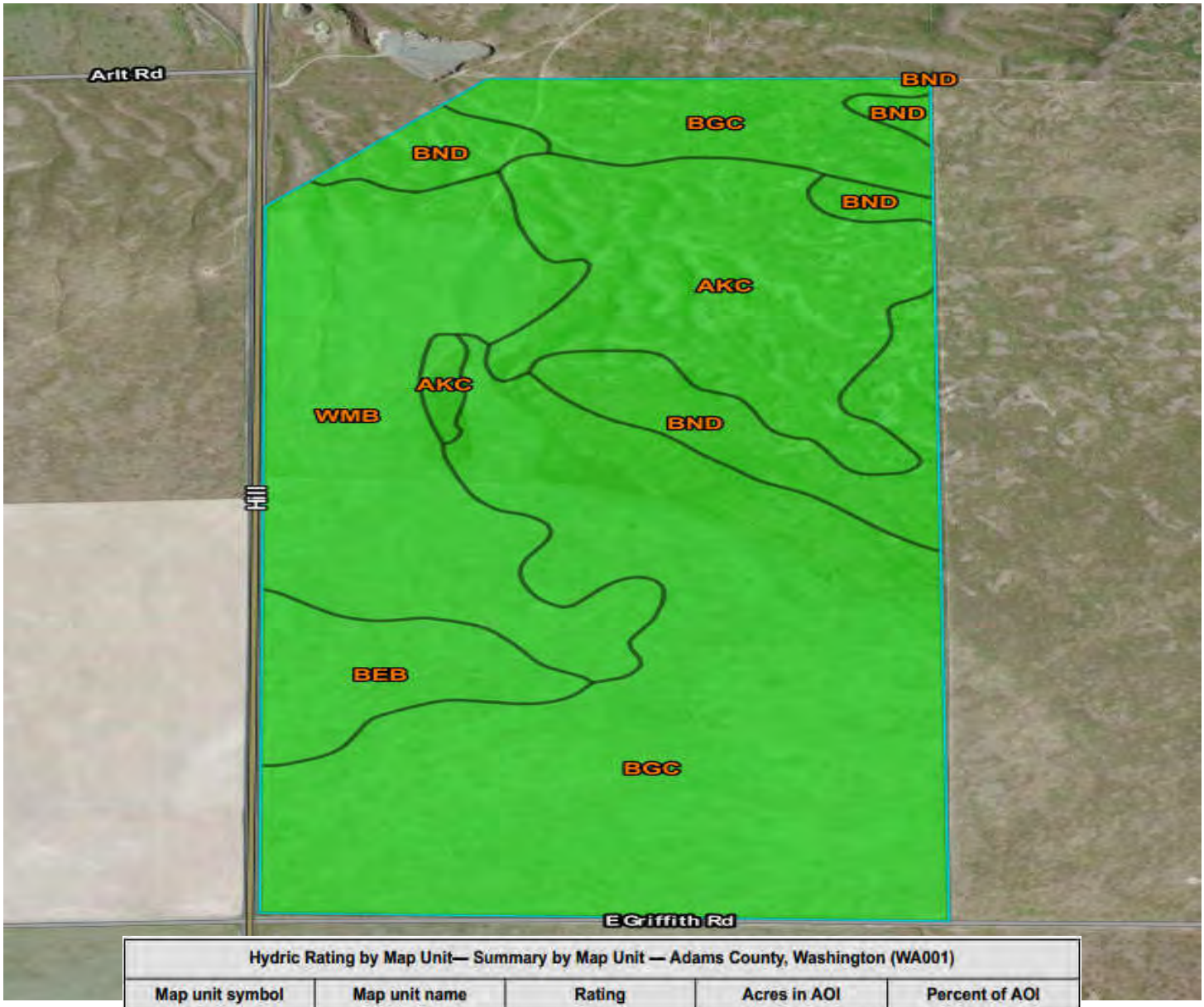
Figure 5
Soil Taxonomy Map
NWS-2017-831

IS #211 Solar Site
Ritzville, WA
Project No. 17103.02



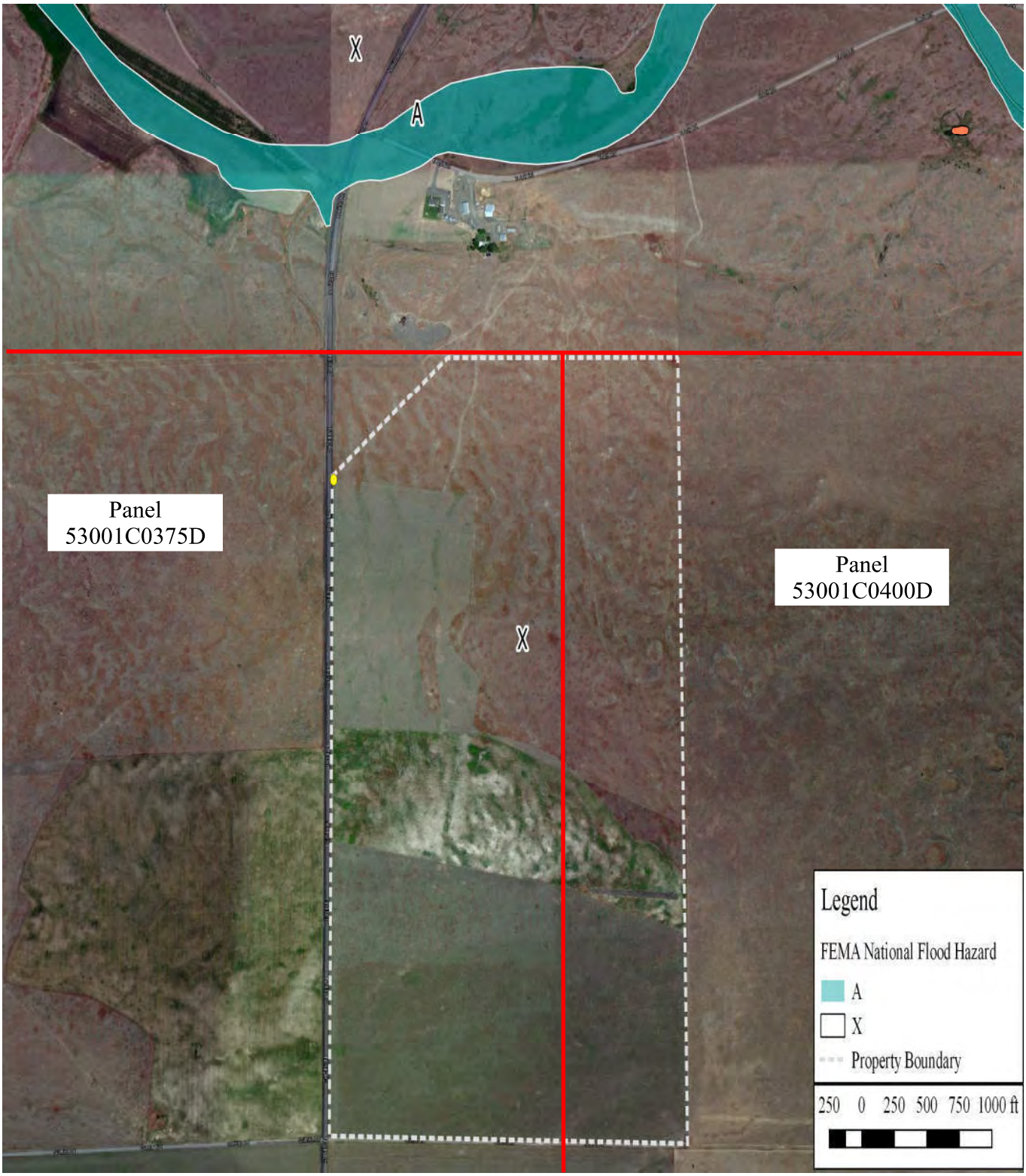
Hydric Rating by Map Unit— Summary by Map Unit — Adams County, Washington (WA001)				
Map unit symbol	**Map unit name**	**Rating**	**Acres in AOI**	**Percent of AOI**
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	0	50.7	15.8%
BEB	Benge silt loam, 0 to 5 percent slopes	0	17.5	5.5%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	0	158.1	49.3%
BND	Benge very stony silt loam, 0 to 30 percent slopes	0	30.2	9.4%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	0	64.4	20.1%
Totals for Area of Interest			**320.9**	**100.0%**

N

ALPHA

Figure 6
Hydric Soil Map
NWS-2017-831

IS #211 Solar Site
Ritzville, WA
Project No. 17103.02



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ALPHA

Figure 7
FEMA Flood Zone Data
NWS-2017-831

IS #211 Solar Site
Ritzville, WA
Project No. 17103.02

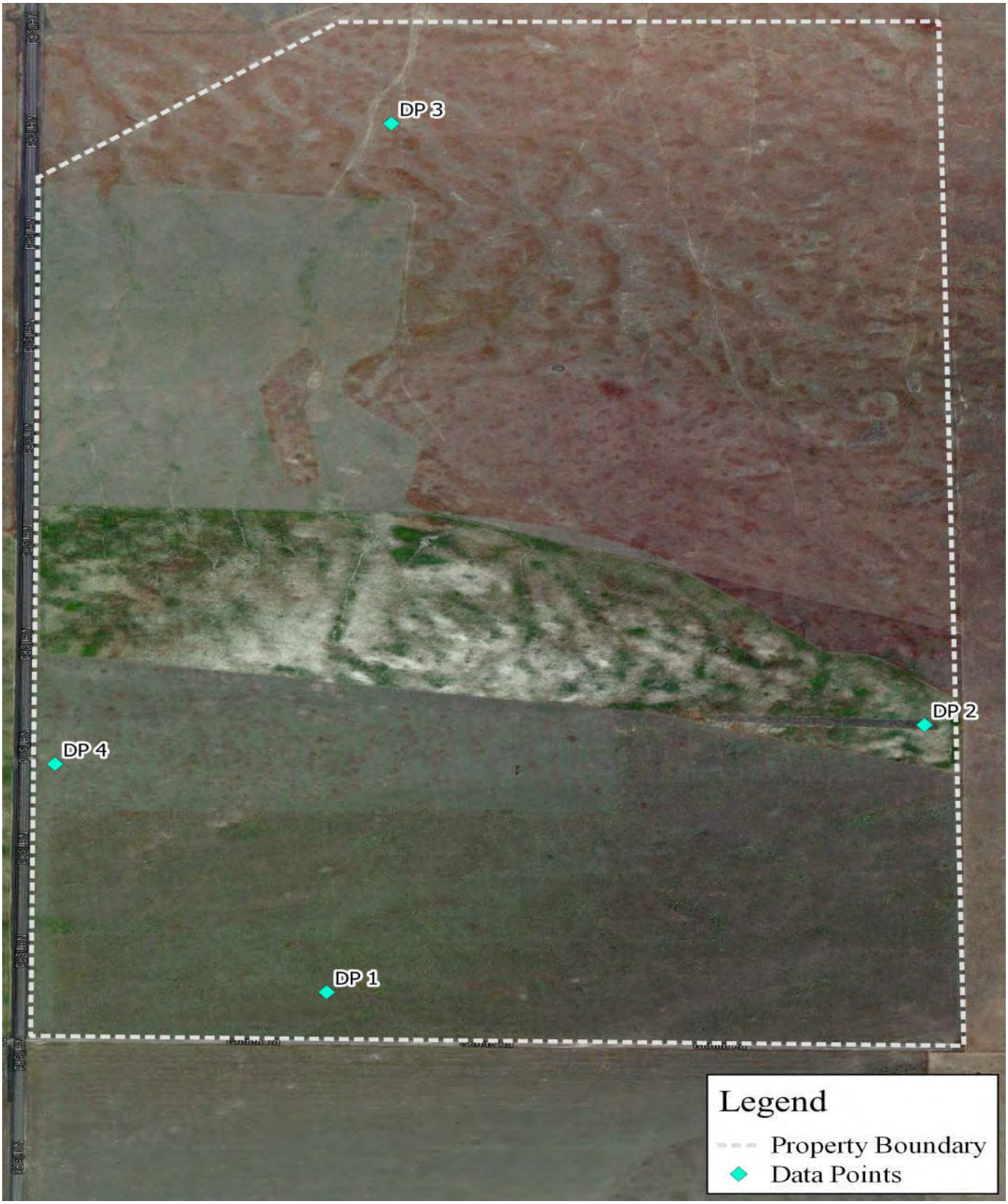

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Figure 8
Data Point Map
NWS-2017-831

IS #211 Solar Site
Ritzville, WA
Project No. 17103.02

SUMMARY REPORT

ALPHA

Solar Site Development Environmental Service Division

INNOVATIVE SOLAR #211
WETLAND DELINEATION SUMMARY REPORT

Introduction and Site Description:

The subject property is being considered for installation of a utility-scale solar project. The subject property was investigated by Alpha Environmental to determine the presence, quality, and extent of any wetlands, waterways, and other areas under the jurisdiction of the United States Environmental Protection Agency, as determined by the United States Army Corps of Engineers. This report also includes documentation of Alpha's submittal of Washington State required Joint Aquatic Resources Permit Application (JARPA) Form, and The State Environmental Policy Act (SEPA) Form 11. These documents are found in Appendix D and E respectively.

The site is composed of an approximate 318.0-acre portion of the Adams County parcel of land identified by PIN# 2036110200001 and located on N. Hills Road, Ritzville, Washington 99032 (Figure 1). The property is owned by Neil R. Telecky and Sandra L. Telecky, 2229 E. Arlt Road, Sprague, Washington. 99032. The subject property is currently being used for cattle grazing. There are is a high-tension power line crossing the northwest portion of the property.

It is the purpose of this report to establish a delineation of wetlands on the above described site. As defined jointly by the United States Army Corps of Engineers (USACE) (Federal Register, 1982) and the United States Environmental Protection Agency (EPA) (Federal Register, 1980), wetlands are "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." The diagnostic approach to determination of wetlands, as per the USACE Wetland Delineation Manual (1987), requires the presence of hydrophytic vegetative species, hydric soils, and hydrologic conditions of permanent or periodic inundation, or soil saturation during the growing season of the prevalent species of vegetation.

No prior Jurisdictional Determinations are known to have been conducted on the Subject Site Area of Interest (Figure 2).

Literature Review

A review of available literature was conducted to aid in the establishment of site characteristics, the results of which follow.

The USGS Hydrologic Atlas indicates that the north two thirds of the site lie within the Central Columbia River Basin. The southern third of the site lies within the Snake River Basin. Crab Creek of the Central Columbia River Basin is located approximately 3.5 miles north of the site. As such, additional riparian buffer permitting is not required.

USGS Quadrangle Topographic Map (Figure 3) indicate the Subject Site/Area is approximately 1885-1960 feet above mean sea level in the Columbia Basin geologic province of Washington. The site is moderately sloping towards the north, east and south. Surface water will flow from the western edge and the interior of the site to the north, east and south.

The National Wetland Inventory (Figure 4) does not classify any area within the site, or any area within a quarter mile of the site perimeter as a wetland.

The United States Department of Agriculture (USDA) National Resources Conservation Services (NRCS) Web Soil Survey lists the site as being comprised of five (5) soil taxonomic classifications (Figure 5).

Soil Taxonomy Classification— Summary by Map Unit — Adams County, Washington (WA001)				
Map unit symbol	**Map unit name**	**Rating**	**Acres in AOI**	**Percent of AOI**
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	Coarse-loamy, mixed, superactive, mesic Typic Haploxerolls	50.7	15.8%
BEB	Benge silt loam, 0 to 5 percent slopes	Coarse-loamy over sandy or sandy-skeletal, mixed, superactive, mesic Typic Haploxerolls	17.5	5.5%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	Coarse-loamy over sandy or sandy-skeletal, mixed, superactive, mesic Typic Haploxerolls	158.1	49.3%
BND	Benge very stony silt loam, 0 to 30 percent slopes	Coarse-loamy over sandy or sandy-skeletal, mixed, superactive, mesic Typic Haploxerolls	30.2	9.4%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	Coarse-silty, mixed, superactive, mesic Typic Haploxerolls	64.4	20.1%
Totals for Area of Interest			**320.9**	**100.0%**

Continued next page.

The Web Soil Survey indicated that the Subject Site soil classifications have five (5) associated hydric soil ratings (figure 6).

Hydric Rating by Map Unit— Summary by Map Unit — Adams County, Washington (WA001)				
Map unit symbol	**Map unit name**	**Rating**	**Acres in AOI**	**Percent of AOI**
AKC	Anders-Kuhl very stony silt loams, 0 to 15 percent slopes	0	50.7	15.8%
BEB	Benge silt loam, 0 to 5 percent slopes	0	17.5	5.5%
BGC	Benge gravelly silt loam, 0 to 15 percent slopes	0	158.1	49.3%
BND	Benge very stony silt loam, 0 to 30 percent slopes	0	30.2	9.4%
WMB	Walla Walla silt loam, moderately shallow, 0 to 5 percent slopes	0	64.4	20.1%
Totals for Area of Interest			**320.9**	**100.0%**

Federal Emergency Management Agency (FEMA) DFIRM Flood Data (Figure 7) indicates lists the Site lies outside of any flood hazard.

Site Reconnaissance

Alpha representative and authorized agent conducted a site reconnaissance on June 5, 2017 for evidence of wetlands and waterways. The weather conditions leading up to the visit were typical for the time of year for Ritzville, Washington. During the reconnaissance, no areas were determined to be wetlands. Data Points taken at four (4) locations of interest (Figure 8) were chosen to allow for characterization and sampling of any non-homogenous areas of the site. Wetland Determination Data Forms were completed for each Data Point (Appendix B).

Discussion

Section 404 of the Clean Water Act establishes a program to regulate the discharge of dredged and fill materials into waters of the United States, including wetlands. Responsibility for administering and enforcing Section 404 is shared by the U.S. Army Corps of Engineers (USACE) and the Environmental Protection Agency (EPA). The USACE administers the day-to-day program, including individual permit decisions and jurisdictional determinations; develops policy and guidance; and enforces Section 404 provisions. The EPA develops and interprets environmental criteria used in evaluating permit applications, identifies activities that are exempt from permitting, reviews/comments on individual permit applications, enforces Section 404 provisions, and has authority to veto USACE permit decisions.

Past alterations of the site for agricultural and forestry uses as indicated in historical aerial imagery and observations made during the site reconnaissance suggest that the hydrology, soils, and vegetation of the site have not been modified over the past 60 years. Storm water management plans should be developed before construction begins on this site. As determined by the U.S. Army Corp of Engineers in their October 23, 2017 letter, since there are no

waters of the U.S. within the project review area, work that would occur within these areas does not require Department of the Army authorization under Section 404 of the Clean Water Act. As it pertains to this determination 'no waters' means no waterways, associated wetlands, jurisdictional ditches, or isolated wetlands.

The subject property is being considered for a utility-scale solar project. When established and provided by the project developer a site plan is found in Appendix C, otherwise the appendix includes a defined project area.

Regulatory Verification

On October 23, 2017 The U.S. Army Corp of Engineers, Seattle (WA) District determined that no U.S. waters lie within the project area and that a Department of Army permit is not required to development the project area for solar power collection and distribution. The determination is assigned the reference number NWS-2017-831. All letters of this determination and supporting documents are found at the front of this report in the Jurisdictional Determination section.

Closing Statement

This report and the associated work have been provided in accordance with applicable regulatory standards and guidelines and the standard principles and practices generally employed by an environmental consulting professional. ALPHA does not assume liability for information that may have been misrepresented by others, for items not visible or present on the subject property, or for areas that may not have been accessible during the site reconnaissance. Opinions and recommendations presented herein apply to the site conditions existing at the time of our investigation and cannot necessarily apply to site changes of which ALPHA is not aware and has not had the opportunity to evaluate. Changes in the conditions of this property or adjacent properties may occur with time due to natural processes or unnatural changes by man. The findings of this report may be invalidated, wholly or in part, by changes in applicable standards or other changes beyond our control. Opinions and judgments expressed herein are based on ALPHA's understanding and interpretation of current regulatory standards, and should not be construed as legal opinions.

Thank you for the opportunity to provide this service. Please contact us if you have any questions.

Respectfully Submitted,
Alpha Environmental

Environmental Scientist
Printed Name: Timothy M. Watkins

Certified Wetland Delineator

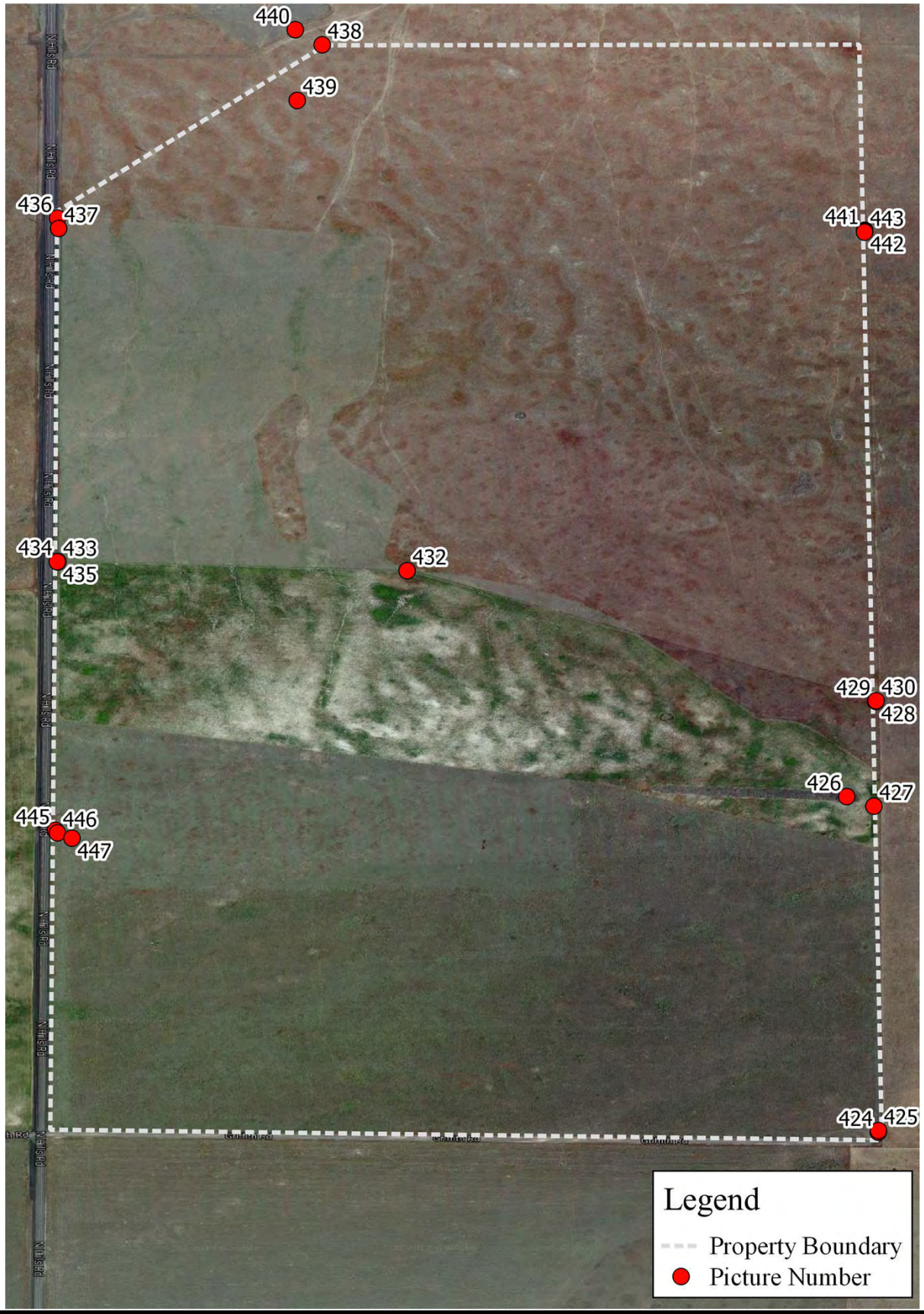
Environmental Professional
Printed Name: Edward P. Dzierzynski

REGISTERED ENVIRONMENTAL PROPERTY ASSESSOR
EDWARD P. DZIERZYNSKI
REPA
6161

National Registry of Environmental Professionals

APPENDIX A

Site Photographs



ALPHA

Appendix I
Photograph Location Map

IS #211 Solar Site
Sprague, WA
Project No. 17103.02

Photo 424

Photo 425

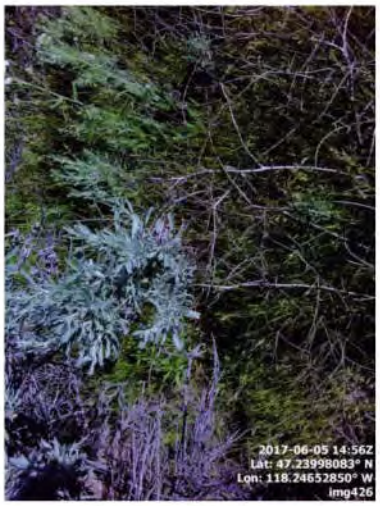


Photo 426

Photo 427

Photo 428

Photo 429

Photo 430

Photo 432

Photo 433

Photo 434

Photo 435

Photo 436

Photo 437

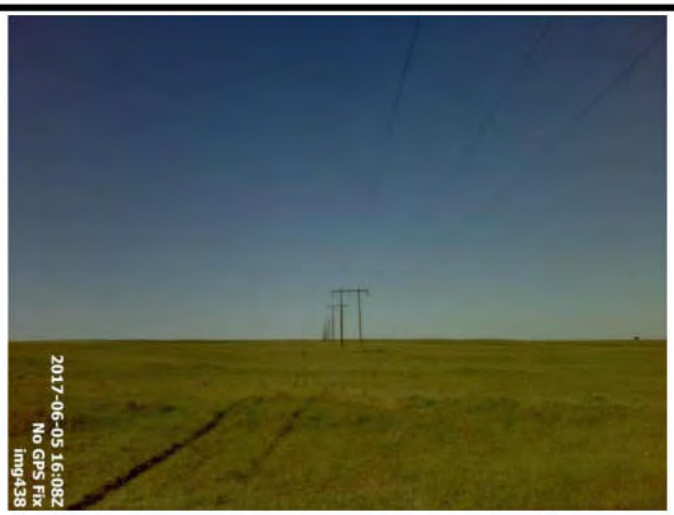


Photo 438

Photo 439

Photo 440

Photo 441

Photo 442

ALPHA	Appendix I Site Photographs	IS 211 Solar Site Project # 17103.02

Photo 443

Photo 445

Photo 446

Photo 447

Cultural Resources Survey for Innovative Solar 211, LLC, Proposed 317-Acre Solar Farm near Ritzville, Adams County, Washington

by Jennifer Thomas

Principal Investigator: Jennifer Wilson

Submitted to Innovative Solar 211, LLC
Asheville, North Carolina

Short Report 1298
Archaeological and Historical Services
Eastern Washington University

March 2018

Archaeological and Historical Services, Eastern Washington University
Cultural Resource Short Report Form

Author(s): Jennifer Thomas **Date:** March 2018
USGS Quadrangle(s): Karakul Hills, Wash. (1964), Ritzville NE, Wash. (1967)
Location (Sec., T, R): Section 11, T20N, R36E

PROJECT DATA

Agency/Sponsor: Innovative Solar 211, LLC

PROJECT DESCRIPTION

Undertaking/Area of Potential Effects: Innovative Solar 211, LLC (Innovative) proposes to construct a solar farm near Ritzville (Figure 1). The project area encompasses approximately 317 acres.

Cultural Resource Task(s): At the request of Innovative, Archaeological and Historical Services (AHS), Eastern Washington University (EWU), conducted the following tasks: 1) a search of records managed by the Washington State Department of Archaeology and Historic Preservation (DAHP) through the Washington Information System for Architectural and Archaeological Data (WISAARD) database, to document cultural resources previously recorded within or near the project area; 2) background research concerning ethnography, history, and previous cultural resources investigations of the project vicinity; 3) 100 percent survey of the project area (including shovel testing); and, 4) prepared this technical report of findings.

LOCATION

Project/locational information: The project area is located nine miles northeast of Ritzville and just under two miles northeast of the community of Tokio.

Regulatory Framework: State Environmental Policy Act (SEPA)

Landowner(s): Neil R. Telecky

ENVIRONMENTAL BACKGROUND

Setting/Landform(s)/Vegetation: The project area is located in the Columbia Plateau physiographic province. The project vicinity is characterized by gently rolling hills and some areas of Channeled Scabland (Folsom 1984). The project area is located on ca. 14.5 million year old Wanapum basalt of the Columbia River Basalt Group and Pleistocene-age periglacial loess (Department of Natural Resources [DNR] 2018; Tolan et al. 1989). Soils in the eastern half of the project area are mapped as Anders-Kuhl very stony silt loams and Benge gravelly silt loams. These soil series are typically found on plateaus, benches, or steep canyon slopes and consist of moderately deep to deep, well drained soils formed in loess and alluvium and colluvium formed from igneous rocks. The Benge series is generally found on terraces and consists of deep, well drained soils formed in glacial outwash with a mix of loess. Soils in the western half of the project area are mapped as Benge silt loam and Walla Walla silt loam. The Walla Walla series is typically found on hills and consists of deep and very deep, well drained soils formed in loess (Soil Survey Staff 2017). Soil profiles for each soil type are presented in Table 1.

Table 1. Typical Project Area Soil Profiles

Soil Complex	Soil Type	Typical Profile	Depth to Restrictive Feature
Anders-Kuhl complex, 0-15% slopes	Anders	A: 0-13 cm, silt loam	70 cm- unweathered basalt
		AB: 13-30 cm, silt loam	
		BA: 30-48 cm, silt loam	
		Bw: 48-69 cm, gravelly silt loam	
	Kuhl	A1: 0-5 cm, very stony silt loam	39 cm- basalt
		A2: 5-15 cm, very stony silt loam	
		A3: 15-28 cm, stony silt loam	
		Bw: 28-38 cm, stony silt loam	
Walla Walla silt loam, 0-5% slopes	Walla Walla	Ap: 0-15 cm, silt loam	100-150 cm- basalt
		A: 15-33 cm, silt loam	
		AB: 33-46 cm, silt loam	
		Bw: 46-114 cm, silt loam	
		Bk1: 114-140 cm, silt loam	
		Bk2: 140-165 cm, silt loam	
Benge silt loam, 0-5% slopes	Benge	A11: 0-15 cm, silt loam	66 cm- basalt, gravel, and sand
		A12: 15-25 cm, silt loam	
		B2: 25-41 cm, silt loam	
		C1: 41-66 cm, gravelly loam	
Benge gravelly silt loam, 0-15% slopes	Benge	A11: 0-15 cm, silt loam	66 cm- basalt, gravel, and sand
		A12: 15-25 cm, silt loam	
		B2: 25-41 cm, silt loam	
		C1: 41-66 cm, gravelly loam	
Benge very stony silt loam, 0-30% slopes	Benge	A11: 0-15 cm, silt loam	66 cm- basalt, gravel, and sand
		A12: 15-25 cm, silt loam	
		B2: 25-41 cm, silt loam	
		C1: 41-66 cm, gravelly loam	

The project area is within the *Artemisia tridentata/Agropyron spicatum* Association of the Shrub-steppe vegetational zone. Native species in this association consist primarily of various types of sagebrush, rabbitbrush, bluebunch wheatgrass, needleandthread, cheatgrass, crustose lichens, and mosses (Chatters 1998; Franklin and Dyrness 1988:216-217). Plant species in the area important to Native Americans include bitterroot, wild onions, cattail and tule (Chatters 1998). Currently, the general project area is used for agriculture and grazing cattle, activities which have removed native vegetation.

ETHNOGRAPHIC/HISTORIC BACKGROUND

The project area is within lands traditionally occupied by the Salish-speaking Spokane (or Spokan) Tribe. Ethnographers have assigned the area surrounding Sprague Lake, including the project area, located roughly nine miles to the east of the project area, to the Middle Spokan (Ray 1936; Ross 2011). The Palouse also have ties to the region. The Sprague Lake area was a popular resting spot for those traveling along established trails between the Snake River to the south and the Colville area to the north (Southeastern Lincoln County Historical Society 1982:11). Ethnographic records indicate that during the warmer months, the Spokan and Palouse left their semi-permanent winter villages along major rivers and streams and traveled to their seasonal gathering locations to collect roots and berries and other necessary resources (Anglin 1995:25; Ross 1998; Sprague 1998). Salmon was a staple to these groups, but other species such as trout and sturgeon were also fished (Ross 1998:274). The Spokan are known to have collected turtles, which were either prepared onsite through boiling or roasting or taken home live to cook later (Ross 2011:332).

The horse and European goods made their way to the Columbia Plateau through trade with neighboring tribes during the 1700s, but it was not until the early nineteenth century that fur traders made direct contact with local tribal groups. In July of 1811, David Thompson of the North West Company traveled down the Columbia River from the present-day Wenatchee area to Crab Creek and documented encounters with people of various tribes in the region (Tyrell 1916). Within a few decades missionaries arrived, followed soon after by gold seekers, settlers, and ranchers who quickly built a solid foothold, forcing tribes out of their traditional homelands (Wyencoop 1969). Resistance to encroachment led to military involvement and the eventual establishment of reservations. The Spokane Indian Reservation was established in 1881. Many Lower Spokane eventually submitted to the relocation, while the Middle and Upper Spokan moved to the Coeur d'Alene Reservation established in 1873 (Ross 2011).

In 1853, Washington Territory was formed from the expansive Oregon Territory, with initial non-Indian settlement occurring in the east in the Walla Walla Valley and in the Puget Sound area to the west. The 1890 federal census shows that soon after its 1883 establishment, Adams County had a population of 2,098. Russian-German farmers arrived in 1883 and found the area well suited for the wheat seeds they brought with them. The population more than doubled in ten years, and soon wheat farming began to eclipse cattle ranching. In 1901, Ritzville exported two

million bushels and became the world's largest exporter of wheat. By 1910, nearly 11,000 people were living in Adams County, but a severe drought from 1928 to 1931 led to a dustbowl, forcing many to abandon their farms (Forstall 1996; Meseck 2015).

Construction of the Northern Pacific Railway Company (NP) through Washington Territory began in October of 1871, but tracks did not reach Adams County until 1880 (Robertson 1995). The town of Ritzville was named for Philip Ritz, a wheat farmer who homesteaded there in 1878. Affiliates of the NP platted it in 1880 (Hitchman 1985). The community of Tokio was originally called Iona, which was established in 1888 by the NP. The company later changed the name to Tracy in 1905, but the town was renamed again a year later, and the name Tokio stuck. To confuse the situation further, the post office was called Wheatland (Hitchman 1985). The Tokio school district was organized in 1889 and witnessed enough growth to warrant construction of an addition to the school building and the hiring of a second teacher within a few short years. However, families quickly moved away, and in 1928 the community voted to consolidate with Ritzville (Washington Rural Heritage 1957). The community of Tokio was eventually abandoned, and most of the buildings were torn down, although the grain elevator still stands. Burlington Northern Railroad purchased the NP in 1970 and continues to use the tracks.

The population of Adams County has grown steadily since the substantial decline of the 1930s and currently sits at over 18,000 according to the 2010 federal census (Forstall 1996; U.S. Department of Commerce 2018). Agriculture, local government, and manufacturing are the primary employment industries. French fry production provides the most jobs in the manufacturing sector (Meseck 2015).

An examination of the General Land Office (GLO) Cadastral Survey Plats for T20N, R36E, identified an unnamed trail just half a mile north of the project area extending east towards Sprague Lake (BLM 1875). No other trails, roads, or homesteads were observed within one mile of the project area. A review of land patents revealed the entirety of Section 11 was patented to NP in May of 1895. In 1912, George A. Ogle and Co. published an Adams County parcel ownership map illustrating built environment resources. The map indicates the west half of Section 11, where the project area is situated, was owned by John Telecky. Telecky's residence appears to be plotted in the southwest quadrant of Section 2 to the north of the project area. There are two additional buildings plotted in in the west half of Section 14, south of the project area. No other buildings are plotted within one mile of the project area (Ogle 1912).

Maps and aerial photography from the 1950s, 1960s, and 1970s demonstrate the limited amount of development here. There has been no residential or commercial development outside of the properties depicted on the 1912 map. Modern aerial photographs indicate many areas are used for agriculture, including portions of the project area.

Traditional Cultural Properties: No traditional cultural properties have been recorded in or within one mile of the project area, according to DAHP records. A letter soliciting tribal concerns for the project area was sent by AHS to Randy Abrahamson on March 9, 2018. Mr.

Abrahamson responded on March 15, 2018, stating there was a low probability for cultural resources in this location. He requested that a cultural resources Inadvertent Discovery Plan be included in the construction contract scope of work.

Previously recorded cultural resources near project area: A review of DAHP records indicate there is one previously recorded site within one mile of the project area. Site 45AD137 is a historic road alignment (Harder and Hannum 2017). The only other cultural resource investigation within a mile occurred just north of the project area; no resources were identified (Meyer and Ellis 2017). Site 45AD137 does not cross the project area (see Figure 1) and will not be impacted by the solar project.

Previously recorded cultural resources within project area: None

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CULTURAL RESOURCE SURVEY RESEARCH DESIGN

Objectives: The objective of this study is to assist Innovative in compliance with SEPA to identify any buildings, structures, or sites over 45 years old located in or near the project area that are eligible for listing in national, state, or local preservation registers.

Expectations: According to a DAHP probability model, the southern third of the project area is mapped as having a moderate probability for cultural resources, the middle third has a low probability, and the remaining northern third has a moderately low probability. Modern aerial maps indicate several portions of the project area have been cultivated. Crab Creek, located approximately four miles to the north, has a much higher likelihood for cultural resources. There are no natural lithic material outcrops in the area that would likely have been used by indigenous populations for tool manufacture. Ethnographic records indicate Sprague Lake, about nine miles to the east, was a common gathering location for several tribes in the region. While the area surrounding the project area was no doubt utilized, there is little evidence to suggest this was a common gathering or camping location. A review of historic maps also reveal little use of the region by early settlers beyond cultivation.

Area surveyed: The entire 317-acre project area was surveyed.

Methods: Prior to fieldwork, AHS personnel searched DAHP records through the online WISAARD database to determine the presence/absence of previously recorded cultural resources within the project area. Background research included a review of online historical narratives and historic maps of the project area, as well as pertinent literature on file at AHS and available through the EWU John F. Kennedy Library, interlibrary loan, and land records.

Jennifer Thomas and Ryan Ives, AHS archaeologists, conducted cultural resource investigations from March 12-14, 2018. Investigations consisted of a 100 percent pedestrian survey in transects no wider than 30 meters. Shovel tests were excavated in areas where undisturbed sediments

were present. Shovel tests measured approximately 40 centimeters in diameter and are excavated to varying depths depending on field conditions. All excavated sediments were screened through ¼-inch-mesh hardware cloth. Shovel tests were backfilled immediately upon completion of the recording paperwork.

During the survey, descriptive survey and excavation notes were recorded and representative photographs taken depicting landscape appearance. Finally, this report presents findings, conclusions, and recommendations. All photographs, field notes, maps, correspondence, and other records generated during this study are on file at the AHS office in Cheney.

RESULTS __ positive _X_ negative

Cultural resources recorded/observed:

☐ building(s)	☐ site(s)	☐ structure(s)
☐ historic district(s)	☐ feature(s)	☐ isolated find(s)
☐ **see attached**	☐ artifact(s)	☐ object(s)

The survey of Innovative's proposed solar farm, including shovel testing, did not identify any cultural resources in the 317-acre project area. Shovel tests were excavated in the central portion of the project area in three locations. Excavation results are discussed below. Project area vegetation consists of various xerophytic grasses, yarrow, and some sagebrush (Figures 2 and 3). The northern half of the project area contains several rock outcroppings and is heavily grazed by cattle. The western end of this half was cultivated at one time, but the remainder is relatively undisturbed. The southern half of the project area also contains some cultivated segments. One narrow strip of sagebrush was observed in the eastern half. Ground surface visibility varied throughout the project area from excellent around the rock outcrops and animal burrows to poor in areas of dense grass. A few pieces of modern farm equipment and several large and small recent field clearance piles were observed.

Shovel Test Results

Twenty shovel tests were excavated at approximately 20-meter intervals in undisturbed areas (Figure 4). Shovel test details are presented in Table 2. Shovel test excavations revealed a profile similar to the soils mapped for the area (see Table 1). Sediments consisted of more sand than silts, but the general depths to gravels and bedrock were consistent with those mapped (Figure 5). No cultural materials were identified as a result of shovel testing.

Table 2. Shovel Test Data.

Shovel Test	Reason for Termination	Depth (cmbs)	Sediments
1	Pleistocene sediments	0-85	brown sandy loam, 0-15% subrounded gravels
2	Pleistocene sediments	0-50	brown sandy loam, 0-15% subrounded gravels
		50-78	brown loamy sand, 35-60% subrounded gravels rimed with calcium carbonate
3	Pleistocene sediments	0-53	brown sandy loam, 0-15% subrounded gravels
		53-70	brown loamy sand, 35-60% subrounded gravels rimed with calcium carbonate
4	Pleistocene sediments	0-53	brown sandy loam, 0-15% subrounded gravels
		53-65	brown loamy sand, 35-60% subrounded gravels
5	Pleistocene sediments	0-50	brown sandy loam, 0-15% subrounded gravels
		50-69	brown loamy sand, 35-60% subrounded gravels rimed with calcium carbonate
6	Pleistocene sediments	0-45	brown sandy loam, 0-15% subrounded gravels
		45-58	brown loamy sand, 35-60% subrounded gravels
7	Pleistocene sediments	0-30	brown sandy loam, 0-15% subrounded gravels
		30-54	brown loamy sand, 35-60% subrounded gravels
8	Pleistocene sediments	0-60	brown sandy loam, 0-15% subrounded gravels
		60-80	yellowish brown loamy sand, 35-60% subrounded gravels
9	Pleistocene sediments	0-33	brown sandy loam, 0-15% subrounded gravels
		33-57	yellowish brown loamy sand, 35-60% subrounded gravels
10	Pleistocene sediments	0-54	brown sandy loam, 0-15% subrounded gravels
		54-82	yellowish brown loamy sand, 35-60% subrounded gravels
11	cobble impasse	0-52	brown loam, 0-15% subrounded gravels
12	carbonate hardpan	0-48	brown sandy loam, 0-15% subrounded gravels
13	carbonate hardpan	0-56	brown loam, 0-15% subrounded gravels
14	carbonate hardpan	0-92	brown loam, 0-15% subrounded gravels
15	bedrock	0-44	brown loam, 0-15% subrounded gravels
16	bedrock	0-35	1980 Mt. St. Helen's ash (≤1 cm) under sod layer, brown loam, 0-15% subrounded gravels
17	bedrock	0-38	1980 Mt. St. Helen's ash (≤1 cm) under sod layer, brown loam, 0-15% subrounded gravels
18	bedrock	0-54	1980 Mt. St. Helen's ash (≤1 cm) under sod layer, brown loam, 0-15% subrounded gravels
19	Pleistocene sediments	0-42	1980 Mt. St. Helen's ash (≤1 cm) under sod layer, brown loam, 0-15% subrounded gravels
		42-70	yellowish brown loamy sand, 35-60% subrounded gravels
20	bedrock	0-35	1980 Mt. St. Helen's ash (≤1 cm) under sod layer, brown loam, 0-15% subrounded gravels

Discussion

The cultural resources survey for the proposed 317-acre solar farm project did not result in identification of cultural resources. Although the project area is located in a region used by Native American groups, no evidence of precontact activity was identified during the survey. Homesteader activity was also limited beyond cultivation of some areas. No historic structures or features were identified. One possible explanation for the lack of cultural resources within the project area may be the lack of water which would likely have discouraged habitation and limited hunting opportunities, resulting in an ephemeral archaeological record. It is also possible that agricultural activities may have obscured archaeological evidence.

Significant cultural resources in project area: None

Possible effects of the proposed project on significant cultural resources: None

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MANAGEMENT SUMMARY

No cultural resources were identified during the inventory of the Innovative proposed solar farm project area. No further cultural resources work is warranted prior to ground disturbing activities in the project area. Inclusion of a cultural resources Inadvertent Discovery Plan in the construction contract scope of work is recommended. In the unlikely event that cultural resources are identified during construction activities, work should be halted in the immediate vicinity of the find and a professional archaeologist notified to assess the resource.

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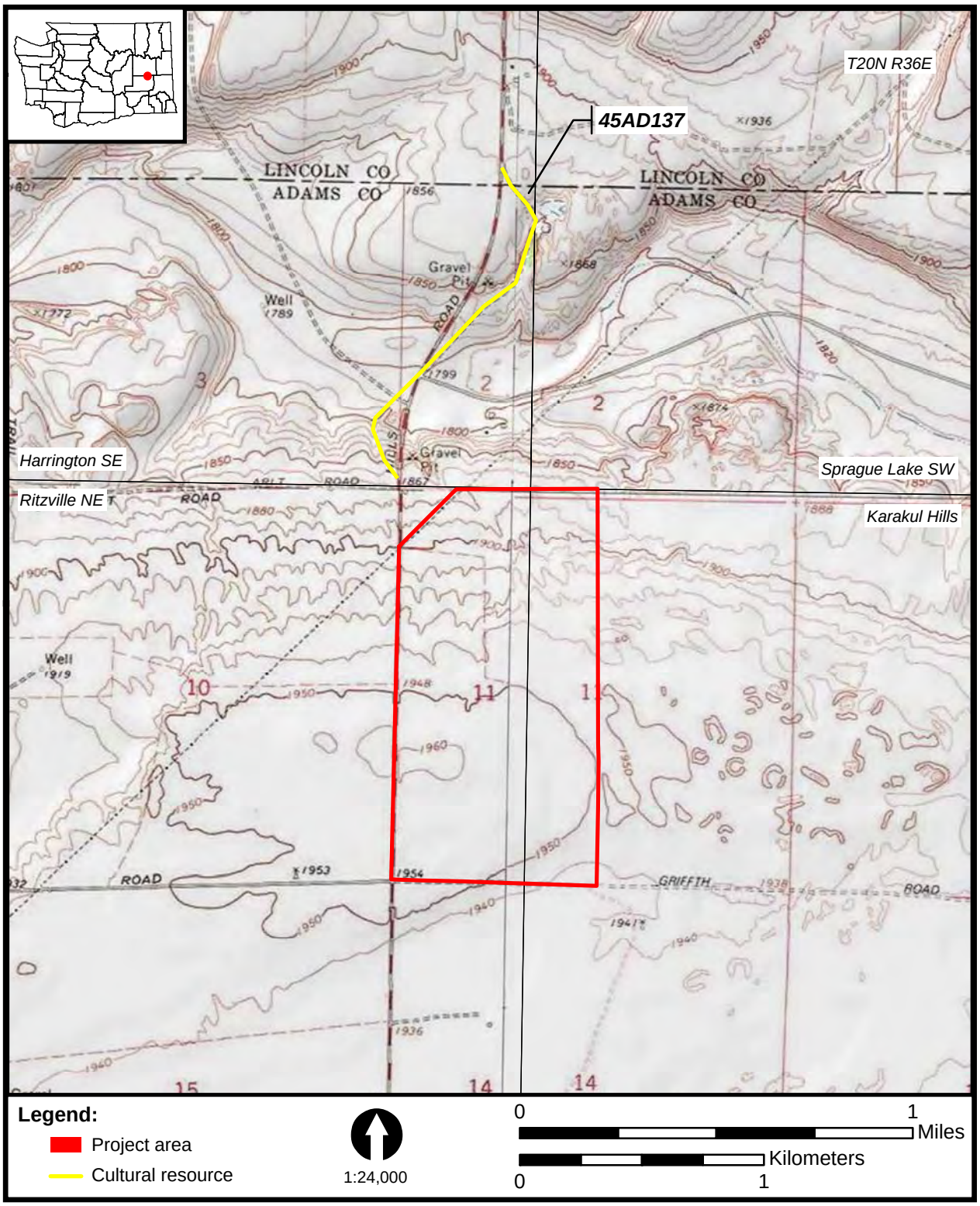

Figure 1. *Topographic map showing the locations of the Innovative Solar 211 Proposed Solar Farm project area and the single cultural resource recorded within one mile (adapted from USGS 7.5' topographic quadrangles Harrington SE, Wash. 1969, Ritzville NE, Wash. 1967, Sprague Lake SW, Wash. 1969, and Karakul Hills, Wash. 1964).*

Figure 2. *Overview of the northern half of the project area, facing northeast.*

Figure 3. *Overview of the southern half of the project area, facing southeast.*

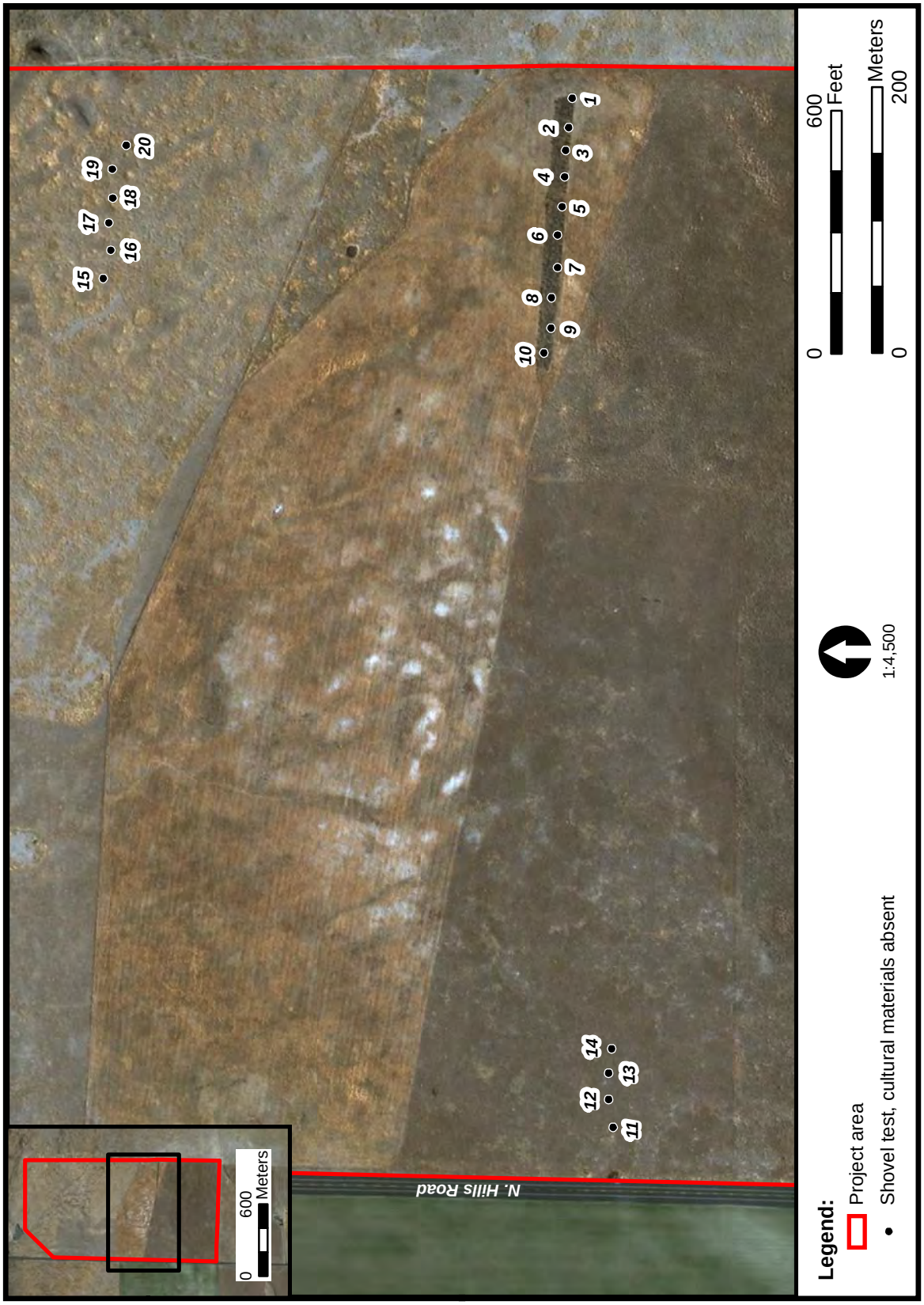

Figure 4. *Aerial photograph showing the project area and the locations of excavated shovel tests. Shovel tests 1-10 are located in a narrow strip of sagebrush.*

Figure 5. *Shovel test 2 showing the typical soil profile in the area. The bar scale is marked in 10-centimeter intervals.*

Spokane Tribe of Indians

March 15, 2018

Jennifer Thomas
Planner

RE: Solar Farm Project

Ms. Thomas:

Thank you for allowing the Spokane Tribe of Indians the opportunity to review and comment on your project.

Pursuant to SEPA checklist we are hereby in consultation for this project mention above.

I have received your application of the projected area mention above, after archive research your project has a low probability for cultural resources, if cultural resources be encountered during construction the Spokane Tribe should be notified immediately.

RE: With the respect of cultural resources, this project will require an Inadvertent Discovery Plan implemented into the scope of work.

With this letter is your notification that this project may move forward.

As always, if any artifacts or human remains are found upon excavation, this office should be immediately notified and the work in the immediate area cease.

Should additional information become available our assessment may be revised.

Again thank you for this opportunity to comment and consider this a positive action that will assist in protecting our shared heritage.

If questions arise, please contact me at (509) 258 – 4315.

Sincerely,

Randy Abrahamson
Tribal Historic Preservation Officer (T.H.P.O.)

Nicki Bishop

From: Nicki Bishop
Sent: Thursday, June 14, 2018 2:34 PM
To: 'keithb@nezperce.org'
Cc: Lance Roddy (lance@innovativesolarsystemsllc.com); Mike Hill
Subject: Innovative Solar 211 Solar Project Review
Attachments: IS211CulturalResourcesSurvey_3-28-18.pdf

Mr. Baird,

This e-mail is in regard to a utility-scale photovoltaic solar farm project that our company has proposed in Adams County, Washington. We are in the process of applying for the necessary permits for the project. We are nearing completion of our SEPA checklist for submittal and we wanted to reach out to you. In your capacity as the THPO for the Nez Perce tribe, we recognize that you normally would engage in official government-to-government consultations or with the DHAP, but we are hoping you will review our Cultural Resources report and advise us of any concerns so we can address them in our initial submissions to the County. Our goal is to send our submission package to Loren Wiltse, Planning Director of Adams County, by June 30th. In our preliminary conversations with him, Mr. Wiltse indicated that our reaching out to you should help make sure that any tribal input is received and addressed.

We have attached a copy of the survey performed by Archaeological and Historical Services (AHS) at Eastern Washington University. It does include the location of our project and all other pertinent information. Please feel free to call us if you have any questions about the report or our proposed project.

We appreciate your time and courtesy. Have a wonderful day!

Innovative Solar Systems

Nicki Bishop

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