

SEPA ENVIRONMENTAL CHECKLIST

A. Background

1. **Name of proposed project, if applicable:** Desert Claim Wind Power Project

2. **Name of applicant:** Desert Claim Wind Power LLC

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

Brian Sarantos
Development Manager
EDF Renewable Energy
T: 510.457.2146
C: 925.768.3474
brian.sarantos@edf-re.com

4. **Date checklist prepared:** February 23, 2018

5. **Agency requesting checklist:**

Washington Energy Facility Site Evaluation Council (EFSEC)

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

Construction is expected to begin early 2020.

Commercial operation is expected to begin late 2020

7. **Do you have any plans for future additions, expansion, 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.**

- Final Environmental Impact Statement (Kittitas County Aug. 2004), hereinafter "FEIS" <http://www.efsec.wa.gov/Desert%20Claim/FEIS/FEIS.shtml> ;
- Final Supplemental Environmental Impact Statement (EFSEC Nov. 2009), hereinafter "SEIS" <http://www.efsec.wa.gov/Desert%20Claim/FSEIS/FSEIS.shtml> ;
- Application for Site Certification and accompanying environmental studies available at EFSEC website: <http://www.efsec.wa.gov/Desert%20Claim.shtml> ;
- Request for Amendment of Site Certification Agreement and accompanying environmental studies submitted herewith.

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. No

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

- EFSEC, Amendment of Site Certification Agreement
- EFSEC, NPDES Construction Stormwater General Permit Coverage
- FAA, No Hazard Determinations
- USACE, Clean Water Act Section 404, Nationwide Permit Coverage

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

Desert Claim Wind Power LLC (the "Certificate Holder") holds a Site Certification Agreement from Washington that authorizes construction and operation of a 95-turbine, 190 megawatt (MW) capacity wind power project on approximately 5200 acres of land in unincorporated Kittitas County, northeast of Ellensburg, Washington.

The Certificate Holder is requesting an amendment of the Site Certification Agreement to authorize construction and operation of a smaller project in the same area. The revised project would have 25-31 turbines, and a capacity of 80-100 MW.

A complete Project Description has been provided with the request for amendment.

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

The project will be located in unincorporated Kittitas County, approximately 8 miles northwest of Ellensburg, Washington. The Project Area consists of approximately 5900 acres, which includes all or portions of the following sections in Township 19N, Range 18E, Sections 13, 16, 17, 18, 19, 20, 21, 22, 27, 29 and 30 along with the NW corner of Township 19N, Range 17E, Section 25.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site: See FEIS Section 3.1 Earth Resources

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

Topography is gentle over most of the site.

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

20%

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

See FEIS 3.1.1.4

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

See FEIS 3.1.1.5

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

The construction of roads, collection lines, substation and turbine pads will require grading and excavation. Because there will be fewer turbines (25-31 versus 95) and less road construction (20 versus 27 miles) than was associated with the permitted project, the requested amendment will reduce the amount of excavation, fill and grading. There will be no imported fill on the project; the total project site will have cut and fill balance.

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

Yes. However, the revised project will result in less ground disturbance than the previously permitted project, thereby reducing the potential for erosion. Temporary construction impacts have been reduced by approximately 30% relative to the permitted project, and the permanent footprint has been reduced by more than 40%. Best management practices will be employed to reduce the possibility of erosion. The Site Certificate Agreement requires preparation of a Temporary Erosion and Sediment Control Plan and a Construction Stormwater Pollution Prevention Plan.

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

Impervious surfaces occupying a total of approximately 50 acres would be associated with turbine footings, transformers, the substation footprint, the O&M building footprint, and the project access roads. The revised project is expected to have a permanent footprint that is more than 40% smaller than the version of the project authorized by the 2010 Site Certification Agreement.

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

The Site Certification Agreement requires development and implementation of a Temporary Erosion and Sediment Control Plan, and a Construction Stormwater Pollution Prevention Plan.

2. Air See FEIS 3.2

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

The only air emissions would be associated with construction activities. Because the revised project is smaller than the permitted project, the requested amendment is expected to result in a decrease in construction-related air emissions relative to the permitted project.

b. Are there 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 impacts to air, if any:

Standard practices will be used to control dust during construction and minimize emissions from construction equipment. (See FEIS 3.2.2.1).

3. Water See SEIS 3.1 and 3.2

a. Surface Water:

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

Perennial, intermittent and ephemeral streams and wetlands in the Project Area were described in the FEIS and SEIS, and are described in the report prepared by Grette Associates submitted with the Amendment Request.

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.

SEIS section 3.1.3.1 describes potential impacts including disturbance of the streambed and banks, disturbance or removal of riparian vegetation, potential filling or relocation of parts of streams, and erosion and sedimentation, which could degrade water quality.

The report prepared by Grette Associates submitted with the Amendment Request describes stream and wetland crossings associated with access roads and electric collection system associated with the revised project configuration.

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.

Cumulative permanent impacts to wetlands and streams are expected to total less than one-half (1/2) of an acre, with approximately 1, 250 cubic yards of fill placed in wetlands or streams. Temporary impacts are expected total less than two acres.

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 Water:

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

The Site Certification Agreement authorizes development of an exempt well, from which less than 5,000 gpd would be extracted for domestic use at the O&M building. The requested amendment makes no change in the proposed water supply.

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.

Restroom and kitchen facilities in the O&M building would drain into an on-site septic system. See FEIS 3.3.2.2

c. Water runoff (including stormwater):

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

Stormwater runoff is discussed in FEIS section 3.3.5.1.

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

Erosion could carry sediment from construction into surface waters. These issues are addressed in the FEIS, and the Site Certification Agreement requires a Temporary Erosion and Sediment Control Plan and a Construction Stormwater Pollution Control Plan. The revised project is smaller and will result in less ground disturbance, reducing the potential from erosion impacts.

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

No

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

The Site Certification Agreement contains numerous requirements designed to minimize and mitigate potential impacts. These include, among others, the requirement to develop and implement a Temporary Erosion and Sediment Control Plan, and a Construction Stormwater Pollution Prevention Plan. The requested amendment does not propose any changes to these requirements.

4. Plants

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

See FEIS section 3.4, SEIS section 3.2.1, and West Report submitted with Amendment Request

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

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

Vegetation impacts from the permitted project are detailed in Table 3.2-1 of the SEIS, and the impacts of the revised project are addressed in the report prepared by WEST submitted with the Amendment Request. The revised project will have fewer impacts due to the reduced number of turbines. The permanent project footprint has been reduced by more than 40% (to approximately 50 acres) and temporary construction impacts have been reduced by approximately 30% (to approximately 225 acres).

The existing Site Certification Agreement requires development and implementation of a Habitat Mitigation Plan. It also requires the Certificate Holder to conduct a rare plant survey, and if necessary, to develop a Plant Conservation Plan.

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

See FEIS section 3.4, SEIS section 3.2, and WEST report submitted with Amendment Request. As described in more detail in the WEST report, threatened, endangered and sensitive species surveys were performed on the site. No state or federally threatened or endangered species were observed during the surveys, nor were any rare plants.

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

The Site Certification Agreement requires development and implementation of a Habitat Mitigation Plan. It also requires development and implementation of a Construction Soil Management Plan and Vegetation Plan.

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

See FEIS section 3.4. The Site Certification Agreement requires development and implementation of a Noxious Weed Control Plan.

5. Animals

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

See FEIS section 3.4 and SEIS section 3.2. Additional information is provided in the WEST report submitted with the Amendment Request.

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

See FEIS section 3.4, SEIS section 3.2, and WEST report submitted with Amendment Request. As described in more detail in the WEST report, threatened, endangered and sensitive species surveys were performed on the site. No state or federally threatened or endangered species were observed during the surveys, nor were any rare plants.

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

See FEIS section 3.4, SEIS section 3.2, and WEST report submitted with Amendment Request.

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

The requested amendment will reduce potential impacts to wildlife by reducing the number of turbines, the rotor-swept area, and the area of habitat disturbance relative to the version of the Project authorized by the 2010 Site Certification Agreement. The Site Certification Agreement requires development and implementation of a Habitat Mitigation Plan, an Avian Monitoring Plan, a Bat Monitoring Plan and a Technical Advisory Committee process. The Site Certification Agreement also includes a variety of requirements to minimize impacts to wildlife during project construction and operation.

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

None

6. Energy and Natural Resources See FEIS section 3.5

- 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.**

The completed project will generate electricity. Project operations will require a small amount of diesel fuel and gasoline. The project will use electricity for lighting and heat in the operations center.

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

No

- 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:**

The project will use energy efficient lighting.

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.**

No. The requested amended will not result in any impacts to environmental health; in fact, it would reduce potential impacts by reducing the size of the project.

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

n/a

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

n/a

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

The requested amendment will not change the chemicals used in connection with project construction and operation.

- 4) Describe special emergency services that might be required.**

The project will not require special emergency services. The Site Certification Agreement already requires confirmation of fire protection services and the development of a construction phase Fire Control Plan and an operations phase Fire Control Plan.

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

In addition to the Fire Control Plans, the Site Certification Agreement requires development of both a Construction Emergency Plan and an Operations Emergency Plan.

b. Noise

See FEIS section 3.9, 2009 Application Tab 6, and Rambol report submitted with Amendment Request.

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

The project is not expected to be affected by existing noises in the area.

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.

Wind turbines produce some noise when operating. The permitted project was designed so that it would comply with state noise regulations and not produce sound levels of greater than 50 dBA at non-participating residential properties adjacent to the project site. Noise modeling has been completed regarding the revised project configurations. It confirms that the revised project will comply with state regulations and the Site Certification Agreement's requirements.

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

The Site Certification Agreement requires compliance with applicable Washington State Environmental Noise Levels found in WAC 173-60. The revised project will comply with those levels.

8. Land and Shoreline Use See FEIS section 3.7

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

The site is currently permitted for construction and operation of a wind power facility. Much of the land within and surrounding the Project Area is cultivated for feed crop production and pasture.

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

Much of the project site is used as farm or rangeland, and will continue to be used in that manner after the project is constructed.

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

No

c. Describe any structures on the site.

There are currently some residences and farm buildings on the project site.

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

No

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

The land in the Project Area is zoned either Ag-20 or Forest & Range.

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

Rural

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 a critical area by the city or county? If so, specify.

Yes. The project area includes Reecer Creek and its associated riparian/wetland habitat. The revised configuration in the Amendment Request avoids crossing Reecer Creek or development of areas east of Reecer Creek.

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

The project will employ 8-10 full time staff for long-term operations and maintenance. None will reside at the project.

j. Approximately how many people would the completed project displace? None

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, if any:

Existing uses will continue.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

The proposed use is compatible with nearby uses.

9. Housing See FEIS section 3.15

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.** None
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.** None
- c. Proposed measures to reduce or control housing impacts, if any:** n/a

10. Aesthetics See SEIS sec. 3.4

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

Depending upon the turbine model selected, the hub height will range from 80 to 85.1 meters (262 to 280 feet) and the tip height will range from 134 to 150 meters (440 to 492 feet).

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

A detailed analysis of visual impacts was provided in the SEIS. Revised visual simulations were provided with Amendment Request. The requested amendment would reduce visual impacts relative to the permitted project because there will be fewer turbines, and they will be located further from the closest residences.

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

The revised project has been designed to reduce the number of turbines and to increase the distance between turbines and the closest residences. All turbines will be located at least 2500 feet from residences.

11. Light and Glare

See FEIS sec. 3.10.2.3

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

Some of the turbines will have flashing red lights as required by FAA regulations, and project buildings will have outdoor lights for safety and security. These lights are not expected to interfere with star watching.

Wind turbines have the potential to produce shadow flicker under certain conditions. A report concerning shadow flicker was submitted with the Amendment Request. If nearby residences experience shadow flicker, the Certificate Holder will work with EFSEC and the affected residents to avoid, minimize and mitigate those impacts. Shadow flicker can usually be addressed by planting trees, shading windows, or other mitigation measures. As

a last resort, the control system of the wind turbine could be programmed to stop the blades during the brief periods when conditions result in perceptible shadow flicker.

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

No. See FEIS sec. 3.10.2.3.

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 impacts, if any:

As explained above, the project design includes measures to minimize light and glare impacts.

12. Recreation

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

See FEIS section 3.11

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:

The Site Certification Agreement requires the Certificate Holder to cooperate with WDFW in its efforts to manage deer and elk in the Project vicinity. It also provides that the Certificate Holder shall not prohibit hunting in the Project Area, except when it would place personnel, property or equipment in jeopardy.

13. Historic and cultural preservation

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

See SEIS section 3.3, FEIS section 3.6 and the report prepared by Archeological Investigations Northwest, Inc., submitted with the Amendment Request.

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

See SEIS section 3.3, FEIS section 3.6 and the report prepared by Archeological Investigations Northwest, Inc., submitted with the Amendment Request.

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

See SEIS section 3.3, FEIS section 3.6 and the report prepared by Archeological Investigations Northwest, Inc., submitted with the Amendment Request.

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

Relative to the version of the project authorized by the 2010 Site Certification Agreement, the Amendment Request will reduce the potential for impacts to archeological and cultural resources by reducing the number of turbines, the length of roads and associated ground disturbance. The report prepared by Archeological Investigations Northwest submitted with the Amendment Request describes how impacts to archeological and cultural resources will be avoided, minimized and mitigated. The Site Certification Agreement requires development of a Cultural and Archeological Resources Plan, which will address the avoidance, minimization and mitigation of impacts in further detail.

14. Transportation

See FEIS sections 3.12 and 3.13

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

See FEIS section 3.12

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

No

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

The project would have 10-15 parking spots at the O&M building.

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

No

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

No

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

20-30 trips for staff to/from the project site.

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

No

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

The Site Certification Agreement requires development of a Construction Traffic Management Plan, the video monitoring of County roads before and after construction, and a variety of other road-related mitigation measures.

15. Public Services

See FEIS sec. 3.14

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

No

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

n/a

16. Utilities

See FEIS sec. 3.14

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

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.

Septic System

C. Signature

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

Signature:



Name of signee: Brian Sarantos

Position and Agency/Organization: Development Manager, EDF Renewables

Date Submitted: February 23, 2018