

# **SEPA Environmental Checklist**

## **Purpose of Checklist**

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

## **Instructions for Applicants**

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

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

## **Instructions for Lead Agencies**

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

## **Use of Checklist for Nonproject Proposals**

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

## **A. Background** [Find help answering background questions](#)

### **1. Name of proposed project, if applicable:**

Appaloosa Solar Project

### **2. Name of applicant:**

Appaloosa Solar Project LLC (ASP)

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

HQC Solar Holdings 1 LLC (parent of ASP)

Attn: Brian Tran

300 Spectrum Center Drive, Suite 1250

Irvine, CA 92618

brian.tran@qcells.com

(626) 646-3560

### **4. Date checklist prepared:**

August 31, 2021 (revised September 2023)

### **5. Agency requesting checklist:**

Garfield County

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

The proposed project is designed for a capacity of 300 megawatts (MW). Below is the anticipated schedule for construction.

- August 2021–December 2023: Environmental review and permitting
- January 2022–April 2024: Preconstruction engineering and surveying
- April 2024–July 2024: Construction permits and approvals
- August 2024–October 2025: Construction activities
- December 2025: Final testing and Commercial Operations Date

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

There are no plans for additions to or expansions of the proposed project. ASP (the Applicant) is considering future development of a 150-MW solar facility within Garfield County, on approximately 800 acres of land within the general vicinity of the proposed Appaloosa Solar Project. This development would have independent utility from this proposal and would be subject to a separate Conditional Use Permit approval from Garfield County if pursued by the Applicant in the future.

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

#### Existing Environmental Information

- A list of Applicant-proposed avoidance, minimization, and mitigation measures which are included as part of the proposed project are provided in Appendix A.

- **Natural Resource Report:** *An Assessment of Selected Natural Resource Features of the Appaloosa Solar Project (ASP)*, was completed for the proposed project in November 2021 (Appendix B). This report documents the results of desktop analysis and field surveys performed for surface water features, vegetation cover classifications, game trails and mule deer use patterns, and raptor nesting sites within the Appaloosa Solar Project area.
- **Critical Issues Review:** An environmental critical issues review was completed for the proposed project in June 2021. This involved reviewing data and information prepared for the Lower Snake River Wind (LSRW) Project and other published documents related to the flora and fauna of the region. No formal report was prepared as part of this review; however, results were used to inform the scope of subsequent surveys and studies completed for the project.
- **Archaeological Resources Inventory Report:** Archaeological resources pedestrian surveys were completed within the proposed buildable project site between December 2022 and August 2023. Result of these field investigations are documented in the attached *Archaeological Inventory for the Appaloosa Solar Project Environmental Permitting Support, Garfield County, Washington* (Appendix C).
- **Special Status Species Report:** Field surveys for special status species and their associated habitats were completed in spring and summer 2023. Surveys were focused on characterizing wildlife habitat and determining habitat suitability for special status species, delineating priority habitats, locating raptor nests, and noting any other incidental observations of wildlife. Results of field surveys are documented in the attached *Appaloosa Solar Project Special Status Species Report* (Appendix D).
- **Phase I Environmental Site Assessment:** A Phase I environmental site assessment was completed for the project area in spring 2023, and results are documented in the attached *Phase I Environmental Site Assessment for Appaloosa Solar Project, LLC, Garfield County, Washington* (Appendix E).
- **Wetland and Waters Delineation Report:** Formal wetland and waters delineation surveys were completed for the project area in spring 2023. Results are documented in the attached *Appaloosa Solar Project Wetland and Waters Delineation Report, Garfield County, Washington* (Appendix F).
- **Other Documents Incorporated by Reference:** The majority of the Appaloosa Solar Project area was previously analyzed in the LSRW Project draft and final environmental impact statements (EISs) (August 2009 and October 2009, respectively)<sup>1</sup> for potential environmental effects related to wind development. The portion of the Appaloosa Solar Project area that was not included in the LSRW Project analysis area is the northernmost solar array area (shown as Polygon A on Figure 2) which was only partially covered in LSRW analysis. The proposed Appaloosa Solar Project would be constructed in the northwestern portion of the LSRW Project area, which is referred to as the Kuhl Ridge Wind Resource Area in the LSRW Project EIS. Relevant information and data from the LSRW Project EIS are included in this checklist wherever applicable, and the LSRW Project EIS (including all appendices) is hereby incorporated by reference as allowed under Washington Administrative Code (WAC) 197-11-635. Relevant sections from the LSRW Project EIS that have been referenced in this SEPA checklist are included in Appendix G and are primarily related to surface waters and hydrology, vegetation and habitat, plant and animal species, historic and cultural resources, and existing developments and facilities (e.g., access roads, laydown areas and substations) that could be utilized for the proposed Appaloosa Solar Project.

The following cultural resource studies which were completed for the LSRW Project are incorporated by reference and relevant information and data have been included in this checklist where applicable. These studies are included in Appendix H of this checklist:

- *Cultural Resources Inventory for Phase I of the Lower Snake River Wind Energy Project, Garfield County, Washington, 2011*
- *Cultural Resources Inventory for Phase IV of the Lower Snake River Wind Energy Project, Garfield County, Washington, 2014*

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<sup>1</sup> Available at: <https://www.co.garfield.wa.us/publicworks/page/wind-energy-project>

**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 our knowledge there are no other government approvals or proposals pending for the project area. Appaloosa is, however, aware, that other clean energy facilities, including potentially additional wind facilities at the LSRW development and elsewhere, could be submitted during the county's review of ASP's application.

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

**Garfield County Permits**

- Conditional Use Permit (Garfield County Zoning Ordinance: Garfield County Code [GCC] Chapter 1.05.020). Includes reviews under Garfield County Critical Areas Ordinance (CAO) and GCC Chapter 1.05.080 (Wind Energy Generators, Solar and Fuel Cell Energy Facility Permit)
- Building Permit
- Right-of-Way Use Permit
- Right-of-Way Approach Permit
- Haul Road and Franchise Agreement

**Garfield County Approvals and Coordination**

- Pre-approval for any improvements to existing county roads and/or new road construction
- Coordinate with county, hospital district and school district officials about project schedules that will affect tax rolls so the taxing districts can plan for levies and rate impacts
- Prior to construction, determine fire protection services during construction and operations with the local fire districts

**State Permits**

- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Washington State Department of Ecology [Ecology])
- Sand and Gravel General Permit (Washington State Department of Natural Resources)
- Compliance with the General Order of Approval for Concrete Batch Plants and General Order of Approval for Portable Rock Crushers (Ecology)
- State Highway Access Permit/Approval (Washington State Department of Transportation [WSDOT])
- State Highway Utility Crossing permit (WSDOT)
- Electrical Permit and Inspection, issued and conducted by the Washington State Department of Labor and Industries
- A Reclamation Permit for Site Quarry(s) from the Washington Department of Natural Resources (WADNR) if quarries are greater than 3 acres or have a working face greater than 30 feet tall and slope steeper than 45 degrees.

**Federal Permits**

- It is anticipated that no federal permits will be required. This section will be updated pending the completion of the critical areas review.

**Plans to be Prepared** (in accordance with requirements of associated permits and approvals listed above)

- Cultural resources monitoring, mitigation, and inadvertent discovery plan
- Noxious weed management plan
- Transportation route and site access plan
- Road use plan (for use of county roads)
- Drainage report
- Stormwater pollution prevention plan (SWPPP) and erosion and sediment control plan (ESCP)
- Spill prevention, control, and countermeasure (SPCC) plan
- Fugitive dust control plan (FDCP)
- Health and safety plan and emergency response plan
- Site security plan
- Site restoration plan
- Decommissioning plan
- Habitat mitigation plan (to be prepared in coordination with the Washington Department of Fish and Wildlife [WDFW])

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

The Appaloosa Solar Project consists of constructing and operating 300 MW of alternating current (AC) solar photovoltaic arrays with a battery storage facility capable of storing up to 150 MW of energy.

The project site is located on agricultural land in unincorporated Garfield County (Figure 1). The overall project lease area consists of 14 tax lot parcels totaling approximately 7,000 acres (Figure 2). However, the project area where development would occur (i.e., fenced solar arrays, substation, and battery energy storage system [BESS] areas) covers approximately 1,790 acres (Figure 3). Within the 1,790-acre project area, the actual footprint of project infrastructure would occupy a smaller area to accommodate required setbacks and other developmental constraints. The applicant requests flexibility to microsite project infrastructure anywhere within the project area (excluding required setbacks and resource constraints identified throughout this SEPA checklist) so long as resource impacts are no greater than those described in this analysis. This analysis conservatively assumes that the entire project area could be developed (excluding required setbacks and resource constraints identified throughout this SEPA checklist), to allow for flexibility in the final design, despite a smaller footprint for final ground-disturbance.

The project will utilize bifacial solar panels that capture sunlight directly from the sun and reflective off the ground, mounted on single axis trackers where the panels will rotate throughout the day to track the sun and maximize efficiency and sunlight capture. The height of solar panels would vary as they move throughout the day; however, the maximum height of the panels in the vertical position would be approximately 15 feet tall including a 2-foot clearance above ground. Electricity produced by the solar panels is direct current (DC) and is converted by inverters into AC. Each inverter is coupled with a medium voltage step-up transformer to increase the voltage of the power to a medium voltage of 34.5 kilovolts (kV) which minimizes losses for the collection of the power into the substation. The solar panel array system will be interconnected with underground AC electrical lines to a new project substation (approximately 5 acres) connecting to an above-ground 230-kV transmission line with protection circuits that will interconnect with Puget Sound Energy's (PSE's) Phalen Gulch 230 kV substation

(see Figure 3). A new aboveground transmission line will have a single pole configuration approximately 2.5 miles long with a direct interconnection with the PSE substation. Within the PSE substation, the power will be connected with an existing ring bus in an available bay and with breakers/communications equipment and remedial action scheme protection to an existing 230-kV transmission line to intertie with the existing 500-kV Bonneville Power Administration (BPA) Central Ferry Substation, which is within the project boundaries (Figure 4). There would be no changes to the existing footprint of the Phalen Gulch or Central Ferry Substations.

The BESS and new project substation will be located on approximately 15 acres adjacent to State Highway 127 (see Figures 3 and 4). The BESS (approximately 10 acres) will use lithium-ion technology for the batteries. Energy storage consists of modular, self-contained metal containers. Lithium-ion battery technology is composed of individual cells that are hermetically sealed and cannot be opened on-site and do not have any wastewater discharges. Lithium-ion battery containers are equipped with an internal fire suppression system, including monitoring equipment and alarm systems with remote shut-off capabilities. The BESS facility would meet the standards of the Fire Code and National Fire Protection Association.

The project would use existing roads for construction, operation, and maintenance access to the maximum extent possible. However, the project will require up to approximately 27 miles of new roads for construction and maintenance access within the solar array areas (see Figure 4). The project will use existing parking and construction laydown areas previously used for construction of the LSRW Project to the extent possible. All laydown areas would be located within the project area and would cover approximately 9 acres. Two new access roads would be constructed off State Highway 127; one to access the project substation and BESS and another to access the solar array on the opposite side of the Highway from the project substation. The project would not include an on-site operations and maintenance building.

In order to minimize impacts to wildlife, the entire solar project site would not be enclosed by a single, continuous perimeter chain-link fence; instead, smaller groups of solar panel arrays (depicted as Polygons A through H on Figure 3) would be fenced individually; this includes the BESS and project substation in Polygon D. The chain-link fencing would be up to 6 feet in height with 1-foot of barbed wire, and raised a minimum of 4 inches above grade. In total, approximately 22 miles of fencing would be installed for the proposed project (of which approximately 1 mile would surround the BESS/project substation and the remainder would enclose solar arrays).

Construction is anticipated to last approximately 18 months and would begin in August 2024, or as soon as necessary permits and approvals have been obtained. During construction, peak employment for the project would be approximately 350 workers. This includes survey crews, land-clearing crews, construction and electrical workers, inspectors, and delivery truck drivers. The operational life of the project would be approximately 40 years.

A list of Applicant-proposed avoidance, minimization, and mitigation measures which are included as part of the proposed project are provided in Appendix A.

**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 area is located entirely within Garfield County, approximately 13 miles northwest of Pomeroy, Washington (see Figure 1). The project area is bordered to the north by the Snake River (approximately 0.6 mile north of project area), to the east by meadow Creek, and to the southwest by Highway 12. State Highway 127 transects the project area (see Figure 3). The project would be constructed on leased land owned by the Morgan Family Trust; the H.C. Barr Family Trust (and PSL Farms LLC, a Barr company); and Klaveano Ranch, Inc., on the following parcels (see Figure 2):

Morgan Family Trust

- 2-012-40-001-2000-0000
- 2-012-40-002-1000-0000
- 2-013-40-027-1000-0000
- 2-013-40-035-2000-0000

H.C. Barr Family Trust and PSL Farms LLC

- 2-012-40-003-1000-0000
- 2-013-40-032-1000-1000 (crossed by transmission line only)
- 2-013-40-033-1000-1000 (crossed by transmission line only)
- 2-013-40-034-1000-0000
- 2-013-40-028-4000-0000

Klaveano Ranch, Inc.

- 2-013-40-017-1000-0000
- 2-013-40-020-1010-0000
- 2-013-40-021-1010-0000
- 2-013-40-028-1000-0000

## B. Environmental Elements

### 1. Earth [Find help answering earth questions](#)

#### a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

The Project lies between the Snake River to the North and the Blue Mountains to the south. The region is characterized by rolling hills and prairie, and is part of the Columbia Plateau, a semi-arid region lying in the rain shadow of the Cascade Mountains. The majority of the Project area is dominated by agricultural land used for grazing or farming with smaller areas of grassland and sagebrush steppe habitats. Drainage features are generally best characterized as ephemeral, due to the low precipitation levels.

Project site elevations range from 1,000 to 1,200 feet above mean sea level along plateaus south of the Snake River. Topography in the project area is primarily plateaus with some incised drainages and few basaltic outcrops.

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

The project would be constructed on lands that range from being flat to having an approximately 14% slope. Steep slopes will be avoided.

- 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.**

Based on review of Natural Resources Conservation Service (NRCS) soils data, soils in the project area are silt loams overlying basalt bedrock with isolated rock outcrops. The soils are generally deep and well drained and were formed in loess deposits. The dominant soil types in the project area are Walla Walla silt loam and Oliphant silt loam. These soils are predominantly fine-grained silt loams and classified by the NRCS as well drained with a low potential for erosion. Although some grading of soils may be necessary for project roads and the BESS, no soils will be removed from the project area.

The Garfield County Comprehensive Plan soils map indicates the entire project lies with the Chard-Licksillet–Walla Walla Association. These soils are deep to very deep, and slightly sloping to steep, silt loams. Precipitation is 12 to 16 inches annually.

Based on review of NRCS soils data, approximately 1,333 acres of the 1,790-acre project area are mapped as “farmland of statewide importance,” 83 acres are mapped as “prime farmland,” and the remaining 374 acres are not prime farmland. A portion of the project area’s farmland soils (approximately 613 acres) are actively cultivated croplands and remaining portions are open herbaceous grasslands (see Section B.4). Construction of the project would temporarily convert the use of up to approximately 1,416 acres of NRCS-mapped important and prime farmland soils (including 1,333 acres of farmland of statewide importance and 83 acres of prime farmland) to a solar electricity generation facility for the life of the project (approximately 40 years). Following decommissioning and reclamation of the project area, agricultural uses would be able to resume. According to the U.S. Department of Agriculture, in 2017 there were 289,848 acres in production in Garfield County. Using this amount, the project would temporarily convert approximately 0.5% of the overall amount of agricultural land in the county. This amount of temporary conversion is not expected to adversely impact agricultural land or overall character in the county during construction or operation of the project.

Based on review of the Conservation Biology Institute’s Farmland Value Map for the Columbia Plateau region of eastern Washington,<sup>2</sup> farmland ratings within the project area range from approximately -0.5 to 0.5, on a scale of -1 to 1, with 1 being highest value farmland.

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

There are no indications or history of unstable soils in the immediate vicinity of the project area. Based on review of WADNR geologic hazard data,<sup>3</sup> the project area does not contain any landslide hazards, liquefaction susceptibility is rated as low, and the National Earthquake Hazard Reduction Program (NEHRP) seismic site class ratings are a mixture of B and D which are considered low to moderate risk categories. Geotechnical investigations are being performed within the project area to ensure that the proposed facilities are safely designed based on site-specific geologic conditions.

- 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.**

Construction of the solar arrays, access roads, transmission line, substation and BESS features would include ground-disturbing activities (e.g., excavation, grading, and fill). Overall, the existing topography and drainage patterns throughout the project would remain relatively undisturbed and the proposed solar arrays would be designed to follow the existing grade of the site to the extent practicable. It has been conservatively assumed that all areas within the approximately 1,790-acre project area could be subject to ground disturbance during

<sup>2</sup> Available at: <https://wsuenergy.databasin.org/maps/6b45a1560c3640e388f18626b7e8810d/active/>

<sup>3</sup> Available at: <https://www.dnr.wa.gov/geologyportal>



construction. However, the actual disturbance footprint would be smaller than this and would be determined closer to construction.

Construction of access roads will require some grading, resulting in minor cuts and fills. The BESS and project substation (approximately 15 acres combined) may require minor grading and fill, including gravel.

**f. Could erosion occur because of clearing, construction, or use? If so, generally describe.**

Ground-disturbing activities during construction would temporarily expose soils, leading to the potential for wind or rain erosion. Steep slopes, which are typically most susceptible to erosion, would be avoided for development.

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

The solar panels will be mounted on posts that are driven or screwed into the soil and the panel suspended on a rack that on level ground and in the vertical position would be approximately 15 feet tall, including a 2-foot clearance above ground. However, the panel height will vary greatly depending on topography and tilt of the panel. Solar panels would not constitute impervious surfaces because they do not rest directly on the ground and do not prevent the infiltration of water into the soils beneath them. As the panels tilt throughout the day, stormwater would either run off the panels before infiltrating into the ground or would infiltrate into the ground directly without hitting the panels at all.

New impervious surfaces would consist of graveled access roads (approximately 65 acres), solar posts and inverter/step-up facilities (approximately 6 acres), and the BESS and project substation (approximately 15 acres) for a total of approximately 86 acres (approximately 8% of the total project area) of impervious surfaces, which would be evenly distributed throughout the project area. Although gravel access roads are considered impervious surfaces by Ecology, stormwater would still be able to infiltrate through the gravel at a reduced rate.

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

Very minor changes to stormwater drainage would result due to grading and new impervious surfaces created as part of the project. As indicated above, it is anticipated there would be approximately 86 acres of new impervious surfaces that would be dispersed across the project area and existing topography and drainage patterns throughout the project area would remain relatively undisturbed.

The risk of erosion from ground-disturbing activities would be minimized through the implementation of appropriate erosion and sediment control best management practices (BMPs). Erosion and sediment control BMPs may include, but would not be limited to, the following types of measures:

- Preserving natural vegetation.
- Quickly revegetating or reseeding habitats temporarily disturbed during construction with an appropriate mix of native plant species.
- Establishing buffer zones to protect ephemeral drainages.
- Providing stabilized construction entrances to prevent soil and sediment from being tracked off the site.
- Installing a silt fence at all areas downslope of disturbed areas, and upslope of existing drainages.
- Stabilizing soils when necessary, including the use of plastic covering to protect soil stockpiles.
- If necessary, using a wheel wash at the site exit if sediment may be tracked off-site.

Per requirements of the Garfield County Zoning Ordinance the project will comply with Ecology stormwater regulations including adhering to the Stormwater Management Manual for Eastern Washington. Prior to

construction, the project will file for a Construction Stormwater NPDES Permit and prepare a SWPPP and an ESCP.

**2. Air [Find help answering air questions](#)**

- 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.**

Air emissions will be temporary (i.e., limited to the 18-month construction period) and limited to exhaust emissions from construction equipment and vehicles, and fugitive dust from road grading and construction traffic, trenching for underground energy collection lines, and land clearing activities. As stated in the LSRW EIS (Section 2.11, Climate and Air Quality) “the amount of fugitive dust emissions will vary depending on the level and type of construction activity (i.e., earthmoving activities would generate more fugitive dust). Weather conditions, especially precipitation, will also affect the amount of fugitive dust generated.” In general, activities involving blasting and excavation will generate the most fugitive dust (see LSRW EIS Section 2-11, Page 2-174). To comply with fugitive dust regulations under WAC 173-400-040, a FDCP will be prepared describing the BMPs to minimize fugitive dust during construction. The FDCP will be submitted to the county for review and approval prior to commencement of construction.

Air emissions during operations would be minimal, of short duration, primarily associated with vehicles used for operations and maintenance activities. No air permits are required for the operation of these facilities.

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

There are no off-site emissions or odors that would affect the project.

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

Construction access roads will be graveled, watered down, or managed with other acceptable BMPs, as needed for dust suppression. Specific details will be included in the FDCP and submitted to the county for review and approval prior to commencement of construction.

**3. Water [Find help answering water questions](#)**

- a. Surface Water: [Find help answering surface water questions](#)**

- 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.**

Several named streams originate within the vicinity of the project (at Kuhl Ridge; Table 1). These streams primarily drain west-northwest to the Snake River or south to Pataha Creek. None of these streams occur within the project area itself.

**Table 1. Waterbodies found in Project Vicinity at Kuhl Ridge**

<b>Waterbody Name</b>	<b>Length (GIS data)</b>
Coyote Creek	1.2
Dry Gulch	10.5
Heaton Gulch	1.2
Meadow Creek	6.6
New York Gulch	12.0
Pataha Creek	3.5

<b>Waterbody Name</b>	<b>Length (GIS data)</b>
Phalen Gulch	1.0
Weimer Creek	3.3

Source: LSRW Project EIS, Section 2.4.1.2 Surface Water General Hydrology

There are several National Hydrography Dataset (NHD)-mapped streams and National Wetlands Inventory (NWI)-mapped riverine wetlands that are present within or near to the project area. Based on field surveys completed in November 2021, all NHD- and NWI-mapped features within the project area were classified as ephemeral drainages (see Figure 2 in Appendix B for a map of NHD features in project area). Formal wetland water delineations were completed in spring 2023 to formally delineate all ephemeral drainages in accordance with U.S. Army Corps of Engineers (USACE) methods. No wetlands were delineated in the project area or within 300 feet of the project area during spring 2023 surveys and three ephemeral drainages (totaling 2,704 linear feet) were found to occur, consistent with previous study results (Figure 5). Delineation results are documented in a wetland and waters delineation report that meets USACE and Ecology reporting requirements (see Appendix F). There will be no project work over, in, or adjacent to (within 200 feet) any surface water features, including ephemeral drainages. Therefore, the project would not directly or indirectly affect any surface waters. Garfield County’s CAO does not specify any minimum buffer requirements for ephemeral streams (see Section 14.7 of the Garfield County CAO).

**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.**

There will be no project work over, in, or adjacent to (within 200 feet) any surface water features, including ephemeral drainages.

**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.**

No fill material will be placed in or removed from surface waters or wetlands.

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

No new surface water withdrawals or diversions will be required. All water required for project construction or operation would be sourced from existing approved local water sources, either from landowners or transported to the project from a permitted off-site source. See response to question B.3.b.1 for approximate water use quantities during construction and operation.

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

Based on review of the Federal Emergency Management Agency’s (FEMA’s) floodplain maps (Map No. 5300470003A, effective date November 15, 1977), the project does not lie within a 100-year floodplain.

**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.**

The project does not involve any direct discharges of waste materials to surface waters. During construction there is a potential for sediment to be discharged to ephemeral drainages. However, the ESCP will include mitigation measures to protect these drainages. Solar panel washing would not include the use of surfactants, and runoff from these washing activities is not expected due to the limited amount of water used.

**b. Ground Water:** [Find help answering ground water questions](#)

- 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 a general description, purpose, and approximate quantities if known.**

During the 18-month construction period, up to approximately 20 million gallons of water (61.4 acre-feet [AF]) may be used for dust suppression. Average water use during construction is estimated to be approximately 60,000 gallons of water per day. However, actual water needs would fluctuate daily depending on soil conditions, weather, and type of construction activity.

During project operation, water would be used for panel washing. Annual operational water use for the project is not expected to exceed approximately 300,000 gallons (less than 1 AF).

All water required for project construction or operation would be sourced existing approved local water sources, either from landowners or transported to the project from a permitted off-site source. ASP, or their contractor, will verify the sources and availability of on-site water sources prior to construction. If water is sourced from an on-site well, withdrawals would not exceed the groundwater permit exempt well threshold of 5,000 gallons per day (Revised Code of Washington [RCW] 90.44.050).

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (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 waste materials will be discharged into the ground. Solar panel washing would not include the use of surfactants, and runoff from these washing activities is not expected because of the small amount of water needed.

**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.**

As previously described under Section B.1.h, the project would cause very minor changes to stormwater drainage due to the limited amount of new impervious surfaces (86 acres) and because existing topography and drainage patterns throughout the project would remain relatively undisturbed. In addition, existing ephemeral drainages would be avoided for development. The project substation and BESS facility will be graveled to reduce runoff. The project would comply with all Ecology stormwater regulations and NPDES permit conditions.

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

No waste materials will enter ground or surface waters. Solar panel washing would not include the use of surfactants, and runoff from these washing activities is not expected because of the small amount of water needed.

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

As indicated in Section B.3.c.1, above, stormwater drainage patterns will not be altered by the construction or operation of the solar facility.

- 4. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.**

Prior to issuance of any grading or building permit or on-site preparation, a drainage report and on-site SWPPP will be submitted to Garfield County and Ecology for review and approval. The report will describe and analyze drainage patterns, hydraulic calculations, change in off-site flows (if any), and the design of BMPs used to

maintain natural drainage patterns, manage stormwater, and minimize erosion and sediment transport and will be stamped by a licensed engineer. Proposed stormwater management and BMPs must conform to the most current version of the Stormwater Management Manual for Eastern Washington (Garfield County Zoning Ordinance). Any hazardous materials stored on-site would be in a secure area that meets State of Washington requirements. Contractors will be required to use BMPs for handling materials to help prevent spills.

#### 4. Plants [Find help answering plants questions](#)

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

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

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

Vegetation was previously mapped in the project area for the LSRW Project EIS (see Section 2.8, Vegetation, of the LSRW Project EIS). The LSRW Project mapping was completed in 2008, and subsequent vegetation surveys performed for the Appaloosa Solar Project in November 2021 (see Appendix B) found little change in vegetation type or extent from what was previously mapped in the LSRW Project EIS. Based on review of WDFW priority habitat and species (PHS) data,<sup>4</sup> priority habitat types which are mapped in the project area include shrub steppe and eastside steppe. Eastside steppe is mapped throughout the majority of Polygons A and B and portions of C, and shrubsteppe is mapped more sparsely in Polygons A and B (Figure 5). Habitat characterization surveys were completed in spring and summer 2023 to verify the extent of mapped habitat types described above and further refine mapped habitat boundaries (including WDFW-designated priority habitats). Prior to completing these surveys, WDFW was consulted on the scope of surveys and their recommendations were incorporated into the survey methods (see Appendix D). Below is a summary of habitat types in the project area, based on field survey results.

**Cultivated Crops:** Cultivated crops cover approximately 613 acres (34%) of the project area and are dominant in the southern half of the project area. Non-irrigated winter wheat (*Triticum aestivum*) is the active crop. Most of these croplands are cultivated and treated with herbicides and fertilizer on an annual basis. Due to the intensive human land use, these areas have been completely modified in terms of ecological function. They may be a source of seeds for a short time following harvests. These extensive areas also provide minimal habitat for native plant species. See response to Question B.1.c regarding farmland ratings.

**Disturbed Grassland:** Disturbed grasslands cover approximately 1,173 acres (66%) of the project area and are dominant in the northern half of the project area. Disturbed grasslands are dominated by introduced grasses such as tall fescue (*Schedonorus arundinaceus*) and downy cheat grass (*Bromus tectorum*). Other forb species observed included prickly lettuce (*Lactuca serriola*), tall hedge-mustard (*Sisymbrium altissimum*), tessellate fiddleneck (*Amsinckia tessellata*), lupine (*Lupinus* spp.), and common yarrow (*Achillea millefolium*). Native species such as bluebunch fescue (*Festuca idahoensis*), big sagebrush (*Artemisia tridentata*), and rabbitbrush (*Chrysothamnus* spp.) were occasionally observed in small and scattered patches but were never dominant. Other large grasses

<sup>4</sup> Available at: <https://geodataservices.wdfw.wa.gov/hp/phs/>

were also present that had yet to produce seed heads for identification. Soils were dry, loamy, and gravelly with no indication of soil crusts. The species observed in this community are characteristic of modified grasslands east of the Cascades, which are described in Johnson and O'Neil (2001)<sup>5</sup> as areas that were historically native eastside grasslands or shrublands but have since been disturbed by grazing or agricultural practices and are now dominated by annual, non-native plants.

**Shrubsteppe:** Shrubsteppe habitat covers approximately 3.3 acres (<1%) of the project area and is dominated by big sagebrush and rubber rabbitbrush (*Ericameria nauseosa*), with a grass-dominated herbaceous component similar to the disturbed grassland described above. Shrubsteppe habitat is limited to scattered patches along the side-slope of a drainage in Polygon B. Shrubsteppe habitat is a WDFW-designated priority habitat, as well as a type of critical area under Garfield County's CAO. Therefore, the project would be designed to avoid and minimize development within shrubsteppe habitat to the maximum extent practicable.

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

There are five listed plant species on the U.S. Fish and Wildlife Service (USFWS) Eastern Washington Endangered Species Act plant species list, but only Spalding's catchfly (*Silene spaldingii*) is listed for Garfield County. Ute Ladies'-tresses (*Spiranthes diluvialis*) was listed in the LSRW Project EIS as occurring in eastern Washington; however, this species is not known to occur in Garfield County and is therefore not expected to occur in the project area (see Section 2.8.1.1 and Appendix D of the LSRW EIS). Based on review of the Washington Natural Heritage Program (WNHP) data explorer, there are no documented occurrences of rare plant species within or near the project area.<sup>6</sup> Based on review of USFWS's Information for Planning and Consultation (IPaC) data, Spalding's catchfly (federally threatened) has the potential to occur in the project area and vicinity. This species is found predominantly in the Pacific Northwest bunchgrass grasslands and sagebrush-steppe. Although the project area occurs within the species' historic range of the Palouse grasslands, there are no documented occurrences of the species in the project area and based on review of WNHP data for this species,<sup>6</sup> the nearest documented occurrence is approximately 17 miles away. Therefore, this species is unlikely to occur within the project area.

The attached special status species report (see Appendix D) identifies special status species or associated habitats that are known or likely to be present within the project area based on results of desktop analysis and habitat surveys performed in spring and summer 2023. No special status plant species were identified as potentially occurring in the project area during desktop analysis and none were observed in the project area during field surveys.

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

As soon as possible after construction is completed, disturbed vegetated areas will be seeded to prevent the spread of noxious weeds, dust, and soil erosion. All temporarily disturbed areas would be reseeded with an appropriate seed mix selected in accordance with the recommendations provided by WDFW and the Garfield County Weed Board. No landscaping is proposed; however, where the solar panels are adjacent to Highway 127 and the project substation and BESS are located drought tolerant trees and/or shrubs will be planted along the fence line to partially screen the panels and substation and BESS from passersby.

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

Prior to construction, a noxious weed survey will be conducted of the project area and a weed/vegetation management plan will be prepared in consultation with the Garfield County Weed Board and WDFW. The weed management plan will outline proposed methods for reseeded/restoration with appropriate seed mixes, construction weed management, and revegetation activities to prevent weed spread and the introduction of new

<sup>5</sup> Johnson, D. H., and T. A. O'Neil. 2001. *Wildlife-Habitat Relationships in Oregon and Washington*. Corvallis: Oregon State University Press.

<sup>6</sup> Available at: <https://www.dnr.wa.gov/NHPdataexplorer>

weed populations and to identify appropriate seed mixes for reseeded efforts in CRP and grassland habitat areas temporarily disturbed by construction activities. This plan will be submitted to the county for review and approval prior to commencement of construction.

## 5. Animals [Find help answering animal questions](#)

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

Examples include:

- **Birds:** hawk, heron, eagle, songbirds, other:
- **Mammals:** deer, bear, elk, beaver, other:
- **Fish:** bass, salmon, trout, herring, shellfish, other:

The project area was extensively studied for potential impacts on birds for the LSRW Project (see LSRW Project EIS, Section 2.7, Bird and Bat Resources, and Appendix C of that document). During 2 years of avian surveys (2007-2009), 89 individual species were observed over the course of all fixed-point bird use surveys. However, three species accounted for over half of the observations: horned lark (*Eremophila alpestris*), European starling (*Sturnus vulgaris*), and common raven (*Corvus corax*). The avian studies also found that passerines were the most abundant avian group, accounting for 65% of all observations. Raptors were the second most consistently observed, ranging from 8% to 16% seasonally. Upland game birds contributed up to 5% of avian observations and waterfowl contributed 2% in the winter (LSRW Project EIS, Section 2.7.1.1, Birds). For a complete list of avian species identified during the surveys see Table 4.2, Appendix C, of the LSRW Project EIS.

As stated in the LSRW EIS (Section 2.6.1.2, Wildlife), “Other general wildlife species that may occur throughout the Project area include badger (*Taxidea taxus*), coyote (*Canis latrans*), porcupines (*Erethizon dorsatum*), red fox (*Vulpes vulpes*), rabbits, voles, and mice. Several species of reptiles are also present including the northern pacific rattlesnake (*Crotalus viridis oreganus*), western yellow-bellied racer (*Coluber constrictor*), and gopher snake (*Pituophis catenifer*).”

The attached special status species report (see Appendix D) identifies special status species or associated habitats that are known or likely to be present within the project area based on results of desktop analysis and wildlife surveys performed in spring and summer 2023. Special status species consist of species federally listed as threatened or endangered under the federal Endangered Species Act (ESA); state-listed threatened or endangered species; avian species protected under the Migratory Bird Treaty Act or Bald and Golden Eagle Protection Act; as well as WDFW-designated PHS. Special status species and their associated habitats are also considered a type of critical area (fish and wildlife habitat conservation areas) under the Garfield County CAO. Wildlife surveys were performed for the project in spring 2023 to note incidental observations or signs of wildlife use throughout the project area and determine the suitability of project area habitat for special status species. Surveys involved general wildlife and special status species surveys, ground-based raptor nest surveys, and avian point count surveys. Results of desktop analysis and field surveys for special status species are summarized below; please see Appendix D for additional details.

In total, 15 special status species were found to have the potential to occur in the project area based on database queries and review of previously completed surveys and studies. Of the 15 total species identified, seven are not likely to occur within the project area due to a lack of suitable habitat. The remaining eight species are known or likely to occur in the project area based on the presence of suitable habitat and/or documented occurrences during field surveys. These consist of chukar (*Alectoris chukar*), ferruginous hawk (*Buteo regalis*), golden eagle (*Aquila chrysaetos*), prairie falcon (*Falco mexicanus*), ring-necked pheasant (*Phasianus colchicus*), mule deer (*Odocoileus hemionus*), white-tailed deer (*Odocoileus virginianus ochrourus*), and elk (*Cervus canadensis*). All eight species that are known or likely to occur in the project area are classified as priority species by WDFW, but none are federally listed as threatened or endangered under the ESA. Consultation with WDFW regarding priority

habitats and species was initiated for the project in October 2022 and is considered ongoing. WDFW recommendations were incorporated into the survey plan for 2023 surveys.

Non-avian wildlife species that were observed during field surveys consisted of mule deer, ring-necked pheasant, coyote (*Canis latrans*), and Columbian black-tailed deer (*Odocoileus hemionus columbianus*). The most common avian species observed during 2023 surveys were western meadowlark (*Sturnella neglecta*) and horned lark (*Eremophila alpestris*). Raptor species observed during 2023 surveys consisted of red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), and great horned owl (*Bubo virginianus*). No raptor nests were observed within the project area during 2023 surveys; however, 12 raptor nests were observed outside of the project area, consisting of nine red-tailed hawk nests, two common raven (*Corvus corax*) nests, and one great horned owl nest. Of these, eight nests were observed within 0.5 mile of the project area, and an additional five nests were observed beyond 0.5 mile of the project area.

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

The attached special status species report (see Appendix D) identifies special status species or associated habitats that are known or likely to be present within the project area based on the results of desktop analysis and wildlife surveys performed in spring and summer 2023. Results relevant to threatened and endangered species are summarized below; please see Appendix D for additional details.

Based on review of the USFWS IPaC database for federal threatened, endangered, and candidate species, there are two federally threatened wildlife species (yellow-billed cuckoo [*Coccyzus americanus*] and bull trout [*Salvelinus confluentus*]) and one candidate wildlife species (monarch butterfly [*Danaus plexippus*]) that have the potential to occur in the project area. None of these species have been documented in the project area during previous site evaluations (see Appendices B and D), and none of these species are likely to occur in the project area due to a lack of suitable habitat. Yellow-billed cuckoos inhabit dense riparian woodlands and bull trout inhabits perennial rivers, streams and lakes. Monarch butterflies can be found in a variety of habitat types (such as grassy fields, roadside areas, wetlands, or urban gardens) but depend on the presence of milkweed species for breeding, and abundant flowering plants for nectar sources. The project area does not provide suitable riparian habitat for yellow-billed cuckoo or perennial surface waters for bull trout, and suitable breeding habitat for monarch butterfly does not occur within the project area (see Appendix D).

Based on review of WDFW PHS data and previously completed surveys and studies, in total, seven state-listed species were found to have the potential to occur in the project area; this consist of five species listed as state candidates, and two species listed as state endangered (ferruginous hawk and yellow-billed cuckoo). As previously noted, the project area does not provide suitable riparian habitat for yellow-billed cuckoo. Ferruginous hawk has been observed (flyover only) in the project vicinity during previous surveys for the LSRW Project, but no nests have been observed within the project area or immediate vicinity. Historical ferruginous hawk use has been documented along Deadman Creek, which is approximately 1.5 miles or more from the project area boundary. Although ferruginous hawk is known to occur within the project area for foraging, nesting is unlikely in project area due to lack of suitable nesting habitat. Consultation with WDFW was initiated for the project in October 2022 and is considered ongoing. WDFW recommendations for raptor nest surveys were incorporated into the survey plan for 2023 surveys.

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

The project area partially overlaps WDFW-designated mule deer winter range, which is mapped in the western portion of the project area (a northwest-southwest-trending linear area). Mule deer have been documented within project area and vicinity during site surveys, and a wildlife survey in November 2021 documented diurnal and seasonal game trails used by deer (see Appendices B and D).

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

Land clearing will be kept to the minimum possible and disturbed lands, such as trenched areas for the underground transmission lines, will be restored and reseeded with an appropriate mix of native plant species.



Reseeding with pollinator-friendly plants can provide a host of ecosystem services, including habitat for wild insect pollinators, improved groundwater recharge, reduced erosion, and soil carbon sequestration. A site restoration plan would be prepared for review by Garfield County and WDFW. See also Measures I-8, VI-7, VI-12, VIII-1, and VIII-3 in Appendix A.

The solar arrays have been designed to avoid documented game trail corridors along drainages and allow a buffer area for movement of big game, primarily deer, across the project area. In order to minimize impacts to wildlife, smaller groups of solar panel arrays (depicted as areas “A” through “H” on Figure 3) would be fenced individually, and fencing would be raised a minimum of 4 inches above grade to allow passage by small animals. See also Measures III-12, III-14, and IV-14 in Appendix A.

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

There are no known invasive animal species on or near the site. Although chukars are an introduced species, they are now considered a game species and are not considered invasive.

**6. Energy and Natural Resources [Find help answering energy and natural resource questions](#)**

**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.**

During construction oil and gas will be consumed for operation of equipment. Operation of the project will produce and store energy, but small amounts of electric energy may be consumed for lighting and for infrastructure service power (meteorological equipment, substation, controller motors, inverters, etc.).

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

The project would not affect the potential use of solar energy on adjacent properties.

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

The project is a renewable energy project and is proposed to be constructed within the footprint of the LSRW Project, which will save energy and minimize environmental impacts by utilizing, to the extent feasible, the existing infrastructure such as roads, construction laydown and parking areas, the existing Phalen Gulch substation and an inter-tie line to the BPA Central Ferry Substation, and other ancillary facilities.

**7. Environmental Health [Find help with answering environmental health questions](#)**

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

Potential environmental hazards during construction and operations include fire hazards (e.g., from use of equipment and combustible materials such as gasoline or diesel, and electrical fire risks), as well as the potential for hazardous material spills.

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

There is no known contamination at the site from present or past uses. A Phase I environmental site assessment report was completed for the project area in summer 2023 and is included in Appendix E. Results of the Phase I environmental site assessment indicate there are no recognized environmental conditions in the project area that would indicate the presence of hazardous substances at the project site.

**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.**

There are no underground hazardous liquid or gas transmission lines located within the vicinity of the project area. However, the project site includes existing wind turbines that also have underground transmission lines. Prior to any belowground disturbance, all underground transmission lines will be identified and marked.

**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.**

During construction of the solar facility, the construction contractor may have small quantities of gasoline, diesel, and lubricants on-site. Few hazardous materials will be used during project operation—primarily small amounts of lubricants and cleaning solutions. Any hazardous materials stored on-site will be in a secure area that meets State of Washington requirements. Any hazardous/dangerous waste material generated by project construction or operation will be disposed of in a manner specified by local and state regulations or by the manufacturer. In addition, certain project components (e.g., substation transformers and BESS) will contain hazardous substances which are fully contained. Lithium-ion battery technology is composed of individual cells that are hermetically sealed and cannot be opened on-site and do not have any wastewater discharges.

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

First aid supplies will be kept at the construction site, but there is a potential requirement for emergency health response. Emergency response plans will be prepared for construction and operation that include evacuation procedures, emergency muster points, emergency contacts and their phone numbers.

Although there is no live electrical work (e.g., welding) planned during the construction of the solar facility, there is still the possibility of a fire occurring on-site or an off-site fire threatening the project area. Construction crews will have fire tools available but will call on local and state fire crews in the case of a significant wildfire. A fire engine and local water storage, owned by a local landowner, may be called upon if advance arrangements are made with the local landowner.

**5. Proposed measures to reduce or control environmental health hazards, if any.**

For due diligence purposes, a Phase I environmental site assessment was completed for the project area to confirm a lack of existing environmental health hazards in the project area (see Appendix E).

An emergency response plan will be prepared, including an emergency action plan and a fire prevention plan, both of which will be prepared in coordination with emergency and fire service providers of Garfield County, and an operational safety program will also be prepared. Such plans will comply with the county's development standards, and the conditions contained herein. The emergency action and fire prevention portions of these plans will be submitted to the county for review and approval prior to commencement of construction. The operational safety portion of these plans will be submitted to the county prior to commencement of operations. Prior to construction, any fire protection services potentially needed during construction and operation of the project will be coordinated with local fire districts.

Any hazardous materials stored on-site would be in a secure area that meets State of Washington requirements. An SPCC plan would be prepared to prevent spills during construction and operation and outline measures for responding to spills, should they occur. Contractors will be required to use BMPs for handling materials to help prevent spills.

Prior to construction, any fire protection services potentially needed during construction and operation of the project will be coordinated with local fire districts. Preventative safety measures will be employed to reduce the risk of fires or to safely contain a fire if one should occur. During construction and all project welding operations, readily accessible water truck and chemical fire suppression materials will be available on-site to allow immediate

fire response. Inverter stations will be constructed with a graveled or concrete footprint for fire protection and maintenance.

During construction, every morning prior to commencement of work, there will be a tailgate safety awareness briefing to go over the work proposed for the day and potential health hazards. In addition, the phone numbers for emergency services will be provided to all crew supervisors. Safety Data Sheets will be stored on site, and proper Personal Protective Equipment will be required for site work. Dust control measures would be implemented during construction to reduce fugitive dust and associated environmental health hazards. Portable sanitation facilities will be placed at key locations in the construction area.

## 8. Noise

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

Existing sources of noise in the project area include existing wind turbines, substations, occasional farm equipment, and vehicles on roads. There are no sensitive noise receptors within the project area; the closest residence is approximately 0.4 mile from the solar panels.

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

Noise generated during construction would be from trucks and other vehicles driving to and from the site and construction noise from drilling of post holes, grading of roads, trenching for underground transmission, and construction equipment installing solar racks and panels.

No appreciable noise would be created from operation of the facility. Potential sources of noise include solar panels as they slowly swivel to track the sun, DC-to-AC inverters and the overhead transmission line (corona); of these, the primary source of noise would be the inverters. Based on review of similar projects (Lund Hill Solar Project<sup>7</sup> and Goose Prairie Solar Project<sup>8</sup>) the typical sound level for inverters is approximately 93-99 A-weighted decibels (dBA) and based on noise modelling done for these projects, noise levels were shown to attenuate to levels below applicable WAC thresholds (50 dBA nighttime and 60 dBA daytime) for all residences in the surrounding area- including those immediately adjacent or within 1 mile or less of the project area boundaries. Given the limited number of residents in the immediate area, noise generated by project facilities would not be noticeable for nearby residences and would not be expected to cause long-term noise disturbances for any residents.

### c. Proposed measures to reduce or control noise impacts, if any.

The DC-to-AC string inverters will be placed within the boundaries of the project area such that noise levels at the property boundary are within the acceptable standards of WAC 173-60-040 (i.e., 70 dBA for Class C agricultural lands or 60 dBA for Class A residential properties). In addition, temporary noise exceedances resulting from construction activities are exempt from Washington State Noise Limitations (WAC 173-60-050). Therefore, because noise levels would meet Washington State thresholds, no mitigation measures are proposed.

## 9. Land and Shoreline Use [Find help answering land and shoreline use questions](#)

### 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 current use of the project site and adjacent properties is dryland agriculture, grazing, and CRP reserved lands.

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<sup>7</sup> Available at: <https://klickitatcounty.org/1096/Solar-Projects>

<sup>8</sup> Available at: <https://www.efsec.wa.gov/energy-facilities/goose-prairie-solar>

- 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 because 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?**

Most of the project site has been farmed over the last 50-plus years. However, in 2010 areas in and around the project area were brought into use to generate renewable energy from wind turbines, which allows for continued use by farmers. The majority of the solar panels will be incorporated around the existing wind turbines with a 500-foot buffer around each turbine.

The project would convert up to approximately 1,790 acres from agricultural production, either dryland farming or grazing, to solar energy production. Of this, approximately 613 acres is currently used as cultivated cropland (see Section B.1.c). Based on review of the Conservation Biology Institute's Farmland Value Map for the Columbia Plateau region of eastern Washington,<sup>9</sup> farmland ratings within the project area range from approximately -0.5 to 0.5, on a scale of -1 to 1, with 1 being highest value farmland.

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

The project will not affect or be affected by surrounding working farmland.

- c. Describe any structures on the site.**

Existing structures in the project area include wind turbines, the BPA Central Ferry Substation, the PSE Phalen Gulch Substation, underground communication fiber lines and 34.5 kV energy collection systems, and overhead inter-tie and transmission lines.

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

No structures will be demolished.

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

The project area is zoned Agricultural/Transition (Garfield County Zoning Map). Agricultural/Transition is defined in GCC 1.03.010 (2) as to "accommodate the existing land uses which are predominately agricultural and low-density residential. As change and growth occurs, new land uses within this zone are intended to be compatible with the surrounding types." Additionally, as stipulated in the Garfield County Zoning Ordinance, solar renewable energy projects are a "conditional use" allowable in areas zoned Agricultural/Transition.

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

The Garfield County and City of Pomeroy Comprehensive Plan (adopted June 2019) designates the project area as agricultural, primarily in the production of winter wheat and barley.

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

Not applicable.

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

Garfield County's Critical Areas Ordinance (CAO) identifies five types of critical areas: wetlands, critical aquifer recharge areas, fish and wildlife conservation areas, frequently flooded areas, and geologically hazardous areas.

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<sup>9</sup> Available at: <https://wsuenergy.databasin.org/maps/6b45a1560c3640e388f18626b7e8810d/active/>

Of these, the only type of critical area that occurs within the project area are fish and wildlife conservation areas. None of the other types of critical areas are known to occur within the project area, as detailed below.

**Wetlands:** As described in question B.3.a of this checklist, there are no wetlands that occur within the project area; however, there are three ephemeral drainages that occur within the project area. Formal wetland water delineations were completed in spring 2023 to formally delineate all ephemeral drainages in accordance with USACE methods. In addition, delineations completed in spring 2023 confirmed the absence of wetlands throughout the project area. Delineation results are documented in a wetland and waters delineation report that meets USACE and Ecology reporting requirements (see Appendix F). There will be no project work over, in, or adjacent to (within 200 feet) any surface water features, including ephemeral drainages. Garfield County's CAO does not specify any minimum buffer requirements for ephemeral streams (see Section 14.7 of the Garfield County CAO).

**Critical Aquifer Recharge Areas:** Critical aquifer recharge areas are not mapped within Garfield County but generally include rivers, creeks, FEMA floodplains, and wetlands; areas within 100 feet of all irrigation district main canals; and areas of high groundwater identified by the Garfield County Health District (see Section 11.3 of the CAO). Surface waters that occur within the project area are limited to ephemeral drainages and there are no rivers, creeks, floodplains, or wetlands. There are no main irrigation canals or known areas of high groundwater in the project area either; therefore, the project area does not meet the criteria for a critical aquifer recharge area.

**Frequently Flooded Areas:** Based on review of FEMA's floodplain maps (Map No. 5300470003A, effective date November 15, 1977), the project does not lie within a 100-year floodplain.

**Geologically Hazardous Areas:** As described in question B.1 of this checklist, based on review of WADNR geologic hazard data,<sup>10</sup> the project area does not contain any landslide hazards, liquefaction susceptibility is rated as low, and the NEHRP seismic site class ratings are a mixture of B and D which are considered low to moderate risk categories. The project would be constructed on lands that range from being flat to having an approximately 14% slope, and steep slopes will be avoided. Geotechnical investigations are being performed within the project area to ensure that the proposed facilities are safely designed based on site-specific geologic conditions.

**Fish and Wildlife Conservation Areas:** WDFW-designated PHS features are mapped within the project area, which constitute a type of fish and wildlife habitat conservation area under Garfield County's CAO. As previously described in Section B.4 of this checklist, priority shrubsteppe habitat covers approximately 3.3 acres of the project area. As previously described in Section B.5 of this checklist, eight priority species are known or likely to occur in the project area based on the presence of suitable habitat and/or documented occurrences during field surveys: chukar, ferruginous hawk, golden eagle, prairie falcon, ring-necked pheasant, mule deer, white-tailed deer, and elk. The project area partially overlaps WDFW-designated mule deer winter range, which is mapped in the western portion of the project area (a northwest-southwest-trending linear area). Mule deer have been documented within project area and vicinity during site surveys, and a wildlife survey in November 2021 documented diurnal and seasonal game trails used by deer (see Appendices B and D). Consultation with WDFW regarding PHS was initiated for the project in October 2022 and is considered ongoing. WDFW recommendations were incorporated into the survey plan for 2023 surveys. The project would be designed to avoid and minimize development within priority habitats to the maximum extent practicable.

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

Operation of the solar facility will employ up to two full-time personnel for panel and transmission operation and maintenance. Operations and maintenance personnel would work remotely and would not reside in the project area but may travel to the site periodically to perform operation and maintenance activities, as needed. In addition, one to two personnel would travel to the site as needed to perform panel washing.

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<sup>10</sup> Available at: <https://www.dnr.wa.gov/geologyportal>

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

The project would not displace any people.

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

Not applicable.

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

As stipulated in the Garfield County Zoning Ordinance, solar renewable energy projects are a “conditional use” allowable in areas zoned Agricultural/Transition.

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

Land clearing will be kept to the minimum possible to minimize impacts to agricultural lands. Disturbed lands will be restored and reseeded with an appropriate mix of native plant species and a site restoration plan would be prepared for review by Garfield County and WDFW. See also Measures I-8, VI-7, VI-12, VIII-1 and VIII-3 in Appendix A. The risk of erosion from ground-disturbing activities would be minimized through the implementation of appropriate erosion and sediment control BMPs.

**10. Housing [Find help answering housing questions](#)**

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

No housing units will be provided.

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

No housing units will be eliminated.

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

No measures are necessary to reduce or control housing impacts.

**11. Aesthetics [Find help answering aesthetics questions](#)**

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

The tallest structures related to the project will be the aboveground transmission line connecting the solar facility to the Phalen Gulch Substation. The individual transmission towers would be in the range of 50 to 70 feet. The BESS will be made up of modular containers that would be trucked to the project area. BESS containers are generally 20 or 40 feet in length and approximately 10 feet high. Actual size will depend on final design requirements and the needs of the energy off-taker. The individual solar panels will be approximately 8 to 15 feet off the ground depending on topography and tilt of the panel. The principal building materials for the overall project would be steel (e.g., for fencing and electrical equipment), and glass and aluminum (e.g., for solar panels).

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

Due to the rolling topography of the project area and surrounding vicinity, the solar arrays would only be intermittently visible from immediately surrounding areas; based on review of similar projects (Lund Hill Solar

Project<sup>11</sup> and Goose Prairie Solar Project<sup>12</sup>) the solar arrays are estimated to be most visible within approximately 1 mile or less, or from higher elevation areas further removed. Beyond approximately 1 mile from the solar arrays, any views of the solar arrays would likely be subordinate to the large landscape context and would not attract viewers' attention. Viewer groups potentially affected in the immediate vicinity include travelers on Highway 127, Highway 12, and other local roads, as well as local residents and farmers travelling through, or working, in the area.

Because the panels are relatively low to the ground, they are not likely to obstruct background views for passersby. However, where panels are visible from public viewpoints they will alter the foreground landscape view; views would shift from primarily rural/agricultural in nature to primarily developed/industrial in nature. Panels are proposed on both sides of Highway 127, approximately 5 miles from its intersection with Highway 12, and they would change the view of rolling cultivated dryland fields to rows of solar panels suspended off the ground. From this viewpoint the landscape also includes wind turbines in the background view.

The project substation and BESS will be visible from Highway 127 and alter the near-field views of agricultural fields from passersby on the highway. Motorists would temporarily experience minor to moderate contrasts with the surrounding agricultural landscape as they pass by the project area. Although primarily agricultural in setting, there are existing transmission lines and wind turbines visible from Highway 127 that represent existing minor to moderate visual contrasts.

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

To the maximum extent practicable, the project's collector systems will be buried underground to minimize visual impacts. However, where this is not feasible, portions of the collector systems may be carried overhead (see Measure IV-24 in Appendix A).

Where portions of the solar panels, project substation, and BESS parallel Highway 127, the solar panels will be set back a minimum of 50 feet from the highway right-of-way and drought tolerant trees and/or shrubs will be planted along the fence line to partially screen the panels and substation and BESS from passersby. In consultation with the county and WSDOT, a vegetation screening plan will be prepared and submitted to the county (see Measure IV-25 in Appendix A).

The project will be designed to include setbacks from highways, roads, residences, and the project area boundary (see Measure IV-4 in Appendix A). Ground disturbance will be minimized to the maximum extent practicable, and facilities will be co-located with existing infrastructure to limit new visual impacts across the landscape (see Measures IV-5 through IV-8 in Appendix A). As soon as possible after construction is completed, disturbed vegetated areas will be reseeded with an appropriate seed mix selected in accordance with the recommendations provided by WDFW and the Garfield County Weed Board.

**12. Light and Glare [Find help answering light and glare questions](#)**

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

The solar panels will be coated with an anti-reflective coating to maximize light absorption and minimize glare. The single-axis trackers move glare angles throughout the day and the glare is focused on normal angles to the panel as it tracks the sun across the horizon. Since solar panels are typically designed to absorb incident solar irradiation, not to reflect it, panels have less reflectance than glass windows or flat-water surfaces. See Figure 6 for a picture of a typical solar array.

Lighting may be required for security purposes at the proposed substation and BESS facility. However, lights would be directed downward and into the facilities.

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<sup>11</sup> Available at: <https://klikitatcounty.org/1096/Solar-Projects>

<sup>12</sup> Available at: <https://www.efsec.wa.gov/energy-facilities/goose-prairie-solar>

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

Light or glare from the operation of the solar facility would not create a safety hazard or interfere with views. The project's location (center point) and maximum structure height (up to 70 feet) were entered into the Federal Aviation Administration's (FAA's) Notice Criteria Tool<sup>13</sup> which confirmed that the project does not meet the FAA's criteria for needing to file a notice of construction for aviation-related concerns.

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

No off-site sources of light or glare will affect the project.

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

The solar panels will be coated with an anti-glare material to maximize light absorption and minimize glare. If lighting is required for security purposes at the proposed substation and BESS facility, it would be directed downward and into the facilities.

**13. Recreation [Find help answering recreation questions](#)**

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

There are no public recreational sites within the project area itself. However, deer and bird hunting is currently allowed in the project area with landowner permission. Recreational opportunities in the vicinity of the project area include camping, boating, hiking, hunting, snowmobiling, and fishing. The Port of Garfield operates the Pataha Creek RV park. In the community of Pomeroy there is the Pomeroy Museum, Pataha Flour Mill, and the Eastern Washington Agricultural Museum.

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

During project operation, no hunting will be allowed within the racked panel areas and other hunting rules and restrictions (e.g., prohibiting access within 300 feet of solar panels and inverter stations) would be developed in consultation with landowners and WDFW and documented in a hunting program (see Measure III-13 in Appendix A).

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

Prior to project operations, a hunting program to address rules for hunting in the vicinity of the project racking and fenced areas will be prepared in consultation with landowners and WDFW. Rules may include prohibiting access within 300 feet of solar panels and inverter stations, restriction of vehicle traffic to normally traveled county roads, and adherence to WDFW Game Rules and Regulations. No hunting will be allowed within the racked panel areas. Prior to commencement of operations, a copy of the hunting program will be provided to the county (see Measure III-13 in Appendix A).

**14. Historic and Cultural Preservation [Find help answering historic and cultural preservation questions](#)**

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

Based on discussions with staff at the Washington State Department of Archaeology and Historic Preservation (DAHP), previous studies completed for the LSRW Project (Phases I and IV) identified sites of old abandoned farm equipment, cars, remnants of homesteads, and historic-era objects. Some of these sites may be eligible for the National Register of Historic Places (NRHP). Pedestrian surveys were completed within the proposed

<sup>13</sup> Available at: <https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp>



buildable project site area between December 2022 and August 2023 to determine if previously identified or newly identified cultural resources are present within the project area. In total, nine historic-era archaeological resources were identified during field investigations, consisting of seven previously recorded and two newly recorded resources, which are located within or overlap with the project area. All archaeological resources identified were surficial, relatively sparse scatters of historic-era vehicles, farm equipment, and refuse, with some features. Detailed results of field investigations are provided in the attached archaeological inventory report (see Appendix C).

A copy of the archaeological inventory report was submitted to the Nez Perce Tribe, Yakama Nation, and Confederated Tribes of the Colville Reservation on September 15<sup>th</sup>, 2023, for their review and comment. The Nez Perce Tribe provided comments on September 18<sup>th</sup>, 2023, requesting additional site-specific surveys and studies, as well as report edits. ASP will continue to coordinate with the Nez Perce Tribe to address their comments and requests for additional information or data collection within the project site. No other Tribal comments have been received as of September 18<sup>th</sup>, 2023.

In accordance with the proposed Applicant-committed measures III-22, III-24, IV-20, and IV-23 in Appendix A, ASP will coordinate with Garfield County, DAHP, and interested Tribal entities to address their comments, resource concerns, and any requests for additional information, surveys, or studies.

- 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.**

Based on discussions with staff at DAHP, archaeological surveys conducted for the LSRW Project (see Appendix D) identified one precontact isolate, however, it is not eligible for the NRHP, and the previously identified precontact isolate is not within the proposed buildable project site for the current project. Precontact lithic scatter sites generally consist primarily of lithic flakes and other stone tool use remnants. Scatters often occur in surface areas that have been disturbed by agricultural and natural events. No precontact resources were identified within the project area during pedestrian surveys completed between December 2022 and August 2023 (see Appendix C). ASP initiated Tribal outreach efforts for the project in November 2022, and will continue to coordinate with Tribes to address any resource concerns that have not yet been identified.

- 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.**

Potential impacts to cultural and historical resources on or near the project area were assessed by reviewing cultural resource reports prepared for the LSRW Project (see Appendix D). The LSRW Project conducted an archaeology pedestrian survey of the project area and submitted a report to Garfield County, affected Tribes, and DAHP. However, not all of land proposed for the current project was included in the surveys for the LSRW Project. The portion of the Appaloosa Solar Project area that was not included in the LSRW project area is the northernmost solar array area (shown as polygon A on Figure 2) which was only partially covered in LSRW analysis. ASP conducted pedestrian surveys of the project area, including areas not previously surveyed for the LSRW Project, per the Garfield County Zoning Ordinance, GCC 1.05.080 Wind Power, Solar and Fuel Cell Energy, v. Cultural Resources. Archaeological pedestrian surveys of the project area were initiated in December 2022 and were completed in August 2023. An archaeological inventory report was prepared to document results of field investigations (see Appendix C).

Prior to conducting pedestrian surveys, ASP's cultural resource contractor, SWCA, sent notification letters to the Nez Perce Tribe, Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Colville Reservation on November 1, 2022 notifying them about the project and inviting them to provide input on cultural resource concerns for the project. On November 22, 2022, the Confederated Tribes of the Umatilla Indian Reservation responded saying that they defer to the Nez Perce Tribe and other interested Tribes for the project.

On September 15<sup>th</sup>, 2023, a copy of the archaeological inventory report was submitted to the Nez Perce Tribe, Yakama Nation, and Confederated Tribes of the Colville Reservation for their review and comment. The Nez Perce Tribe provided comments on September 18<sup>th</sup>, 2023, requesting additional site-specific surveys and studies, and some suggested report edits. ASP will continue to coordinate with the Tribes to address their comments and any requests for additional information or data collection within the project site. No other Tribal comments have been received as of September 18<sup>th</sup>, 2023. A copy of the report will also be submitted to DAHP prior to construction.

In accordance with the proposed Applicant-committed measures III-22 through III-24, IV-20 through IV-23, and VI-34 through VI-37 (see Appendix A), ASP will coordinate with Garfield County, DAHP, and interested Tribal entities to address their comments, resource concerns, and any requests for additional information, or more intensive surveys or studies.

**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.**

Several mitigation measures related to cultural resource surveys, reporting, avoidance and mitigation, and Tribal engagement are provided in Appendix A (see Measures I-11, III-22 through III-24, IV-20 through IV-23, and VI-34 through VI-37).

**15. Transportation [Find help with answering transportation questions](#)**

**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.**

Access points will be provided off Highway 127; to the extent possible, existing access roads including ranch roads will be utilized. There are two existing access roads off Highway 127 that can be used for the project without additional improvements. Two additional farm access points along Highway 127 will likely be improved to provide better access to the proposed project substation and BESS the east side of solar array area “E” and another on the opposite side of Highway 127 to access solar array area “F” (see Figure 5).

**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?**

The project area is not served by public transportation.

**c. 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).**

The project will not require any improvements to existing public roads, streets, pedestrian, bicycle or state transportation facilities. However, two new or improved access points off Highway 127 may be required to construct and maintain the solar facility south of Highway 127. The project proposes a total of 27 miles of new access roads, all of which would be private.

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

The project will not use water, rail, or air transportation in Garfield County. Some components of the solar facility may be shipped by air or water to a port in Washington State then transported to the project area by truck.

- e. 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?**

Project construction would start in August 2024 and would last approximately 18 months. Construction workers would commute to the project area from the local area (Dayton and Pomeroy) and as far away as Kennewick, Walla Walla, and Clarkston, Washington, and Lewiston, Idaho.

Based on a peak construction workforce of 350 personnel, it is anticipated that there would be 190 daily round trips, including those made by survey crews, construction and electrical workers, and delivery trucks. The majority of these trips would be at the beginning and end of the workday. Approximately 96 (50%) of these trips would be delivery trucks. These estimates are based on data derived from the Lund Hill Solar Project Draft EIS, Klickitat County, which was similar in size to the proposed Appaloosa Solar Project.

- f. 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.**

Construction traffic may cause delays for local farmers and agricultural delivery vehicles; these effects would be most noticeable when construction activities overlap with agricultural harvest times, which vary according to the type of crops being grown..

- g. Proposed measures to reduce or control transportation impacts, if any.**

If construction traffic interferes with the movement of agricultural related activities, to the degree possible, truck deliveries to the project area would be scheduled to avoid peak traffic times. Measures I-3, III-7 through III-11, and VI-3 through VI-8 in Appendix A describe how the project would minimize traffic impacts through a Road Use Plan, road use agreements, traffic management strategies, compliance with roadway load/size limits, and other BMPs.

## **16. Public Services [Find help answering public service questions](#)**

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

The project would not result in an increased need for public services. During peak construction, up to 350 construction personnel could be working on the project, resulting in temporary increases to local populations and traffic volumes which, in turn, could temporarily increase the demand for housing. However, it is anticipated that construction of the project would take approximately 18 months with 1 to 2 months in the summer being peak construction. Because the amount of time that individual skilled workers would be working on the project is less than 1 year for most, few workers are likely to relocate their residences and families to Garfield County. Thus, no adverse impact on housing or schools would be observed.

No impacts to water, stormwater, sewer, or solid waste facilities are anticipated as a result of the proposed facility.

It is not anticipated that there will be impacts to fire protection or law enforcement. Although the potential for fires as a result of construction is low, fire suppression equipment would be stored on-site; this includes a water pump truck, dozers, and manual equipment. All construction vehicles on-site will be equipped with fire extinguishers and shovels.

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

Because there would be no or minimal potential impacts to public services, no minimization or mitigation measures are proposed.

**17. Utilities [Find help answering utilities questions](#)**

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

Electricity and telephone service are available from existing utilities in the area. In addition, cell phone service is available at the site.

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

No new utility connections are needed for the to provide services for the project. However, the project will produce electricity that will supply power to utilities. Construction of the project will require utility services. Small amounts of electricity may be consumed for lighting and for infrastructure service power (meteorological equipment, substation, controller motors, inverters, etc.).

### C. Signature [Find help about who should sign](#)

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.

X *Patrick Brown*

Vice President, Project Development, Q Cells USA Corp.

**Type name of signee:** Click or tap here to enter text.

**Position and agency/organization:** Click or tap here to enter text.

**Date submitted:** Click or tap to enter a date.

### D. Supplemental Sheet for Nonproject Actions [Find help for the nonproject actions worksheet](#)

**IT IS NOT REQUIRED** to use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. **How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**
  - Proposed measures to avoid or reduce such increases are:
2. **How would the proposal be likely to affect plants, animals, fish, or marine life?**
  - Proposed measures to protect or conserve plants, animals, fish, or marine life are:
3. **How would the proposal be likely to deplete energy or natural resources?**
  - Proposed measures to protect or conserve energy and natural resources are:
4. **How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**
  - Proposed measures to protect such resources or to avoid or reduce impacts are:

5. **How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**
  - Proposed measures to avoid or reduce shoreline and land use impacts are:
6. **How would the proposal be likely to increase demands on transportation or public services and utilities?**
  - Proposed measures to reduce or respond to such demand(s) are:
7. **Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**

## Appaloosa SEPA Checklist Figures

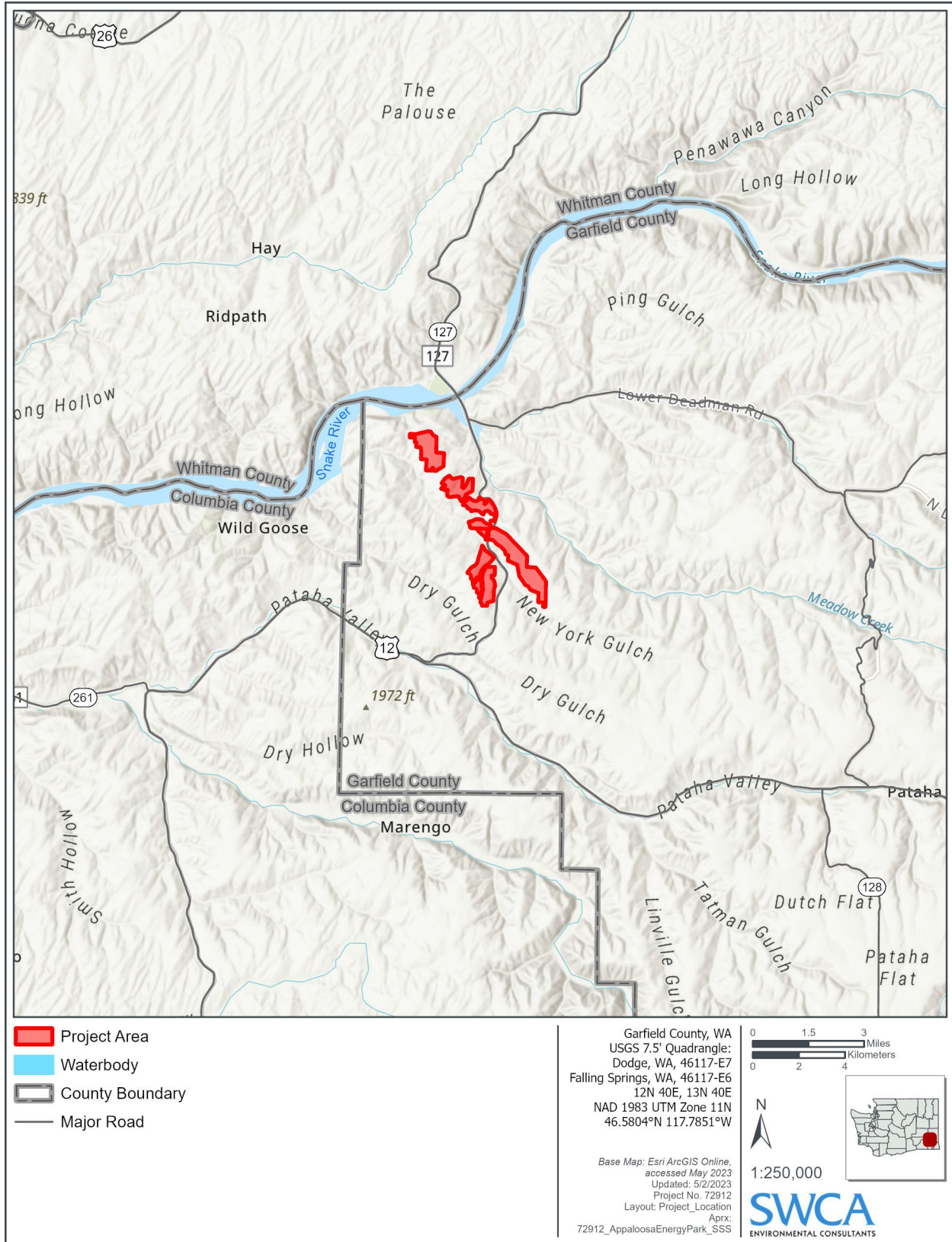


Figure 1. Project location.



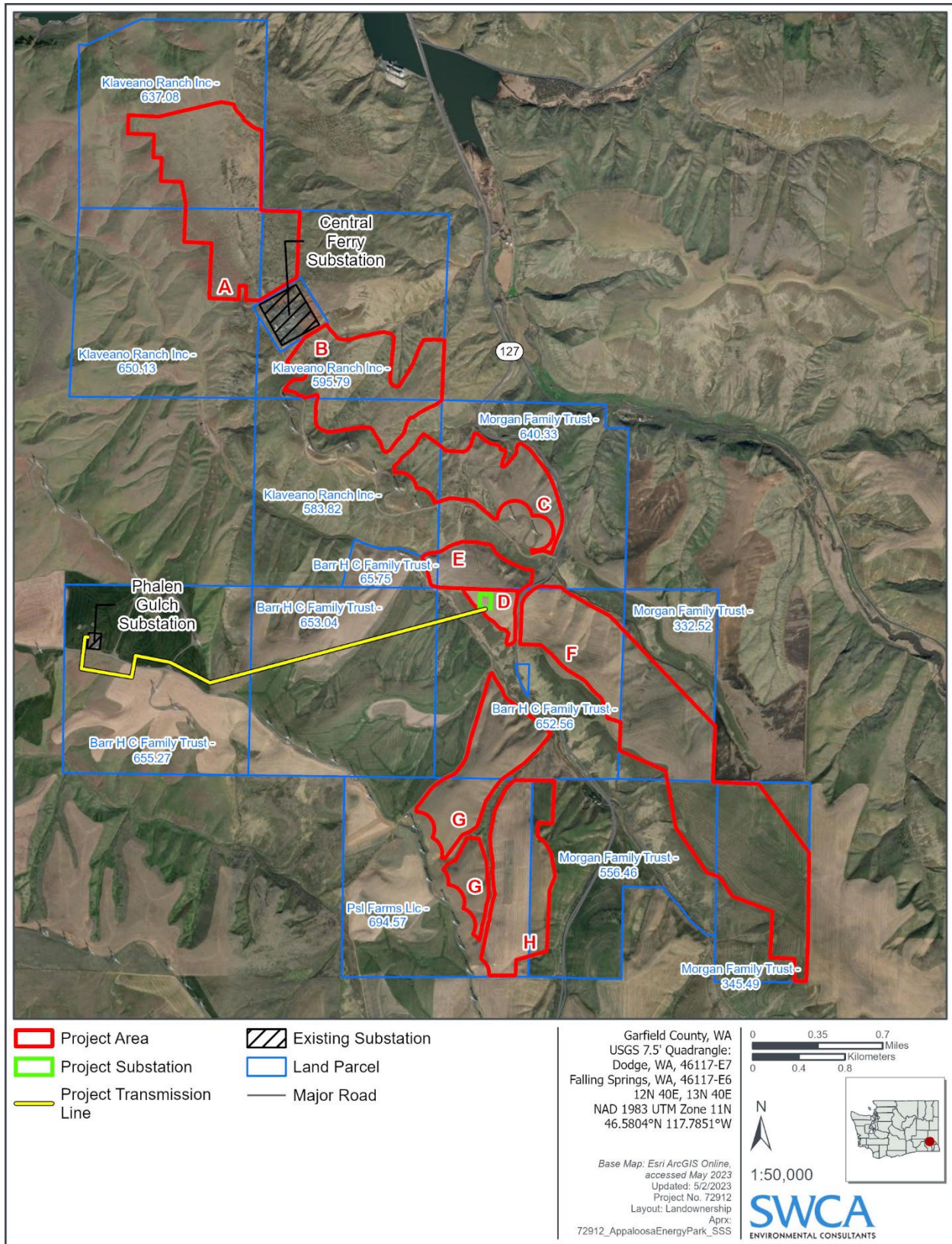


Figure 2. Project area parcels.

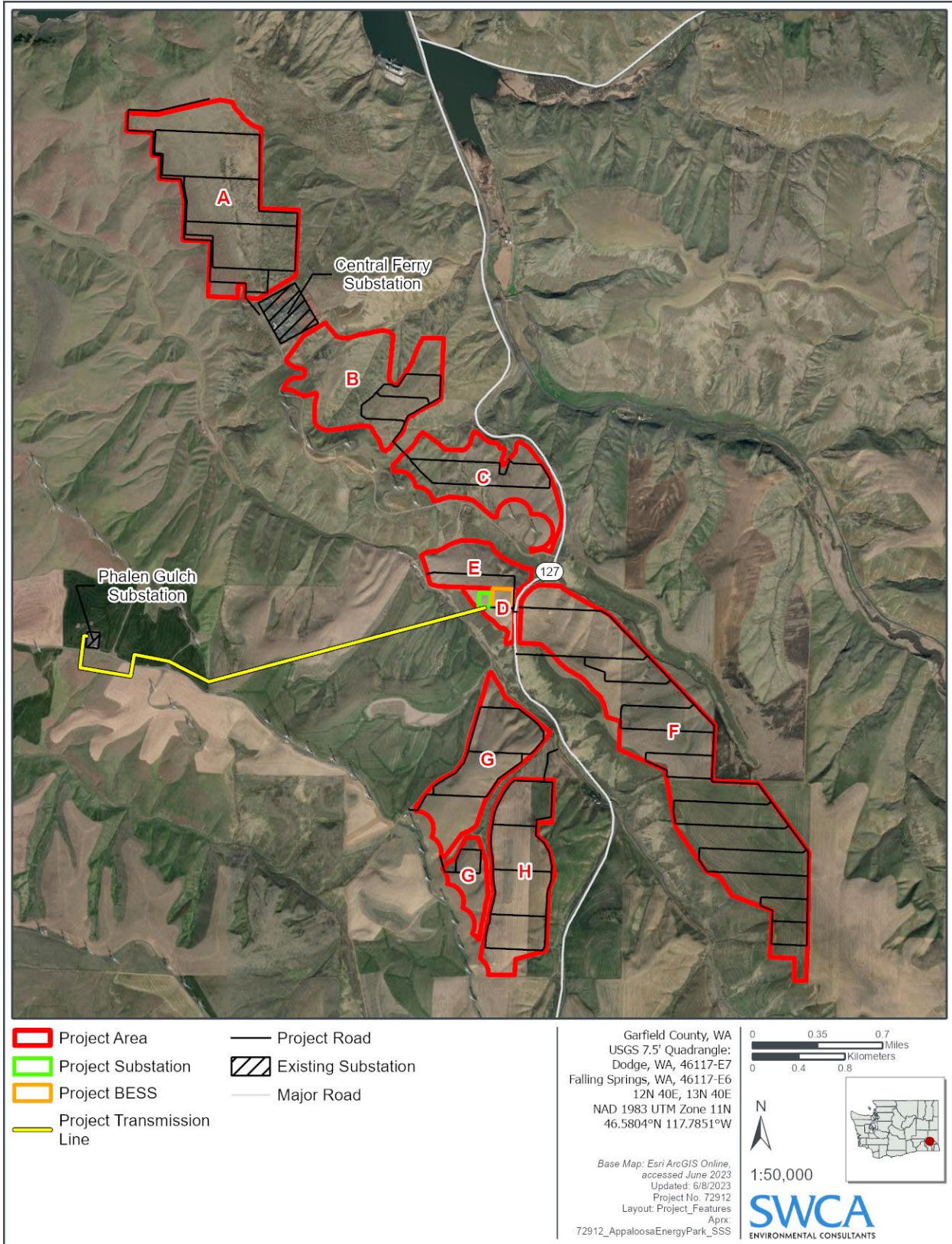
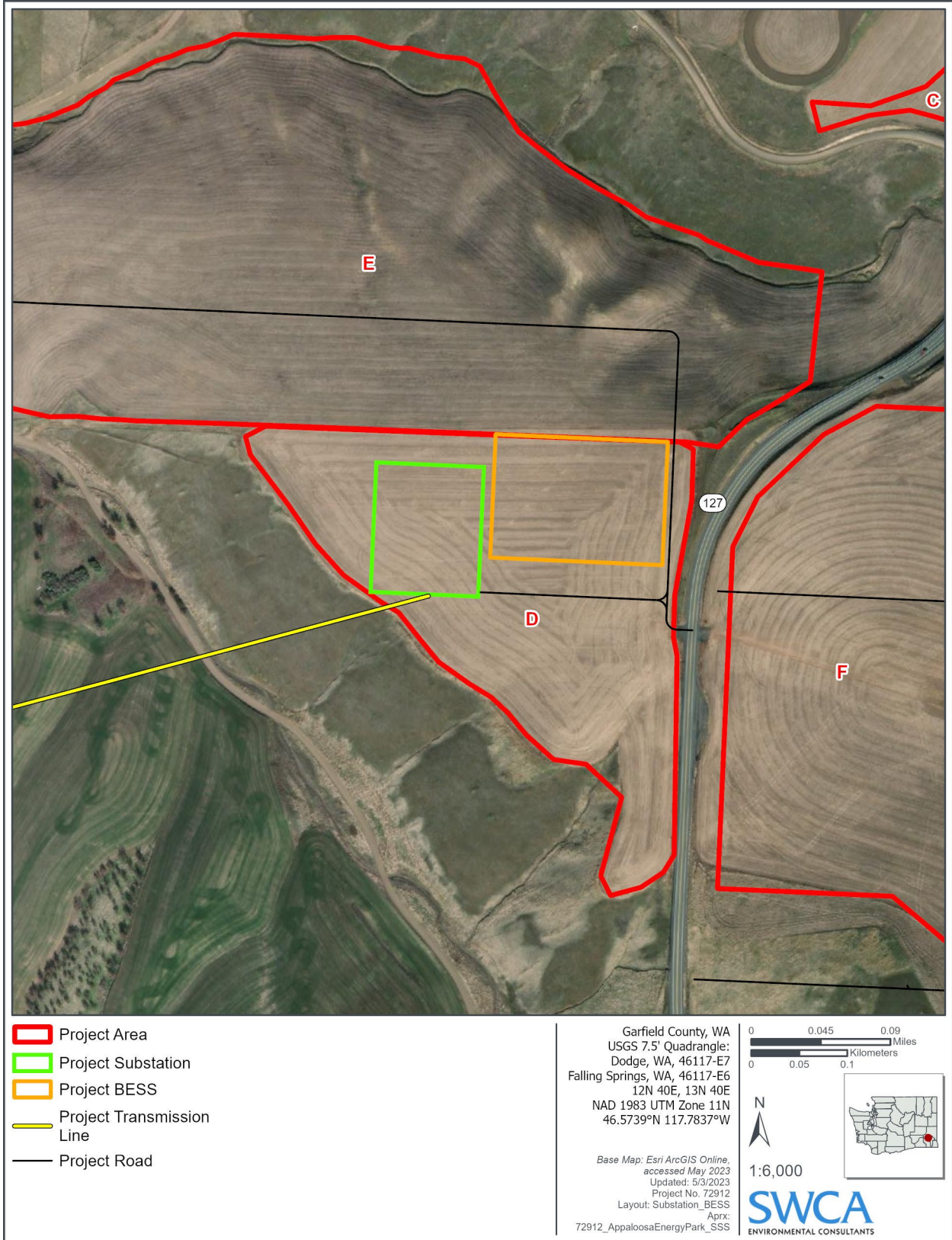


Figure 3. Project features.



**Figure 4. Project substation and BESS.**

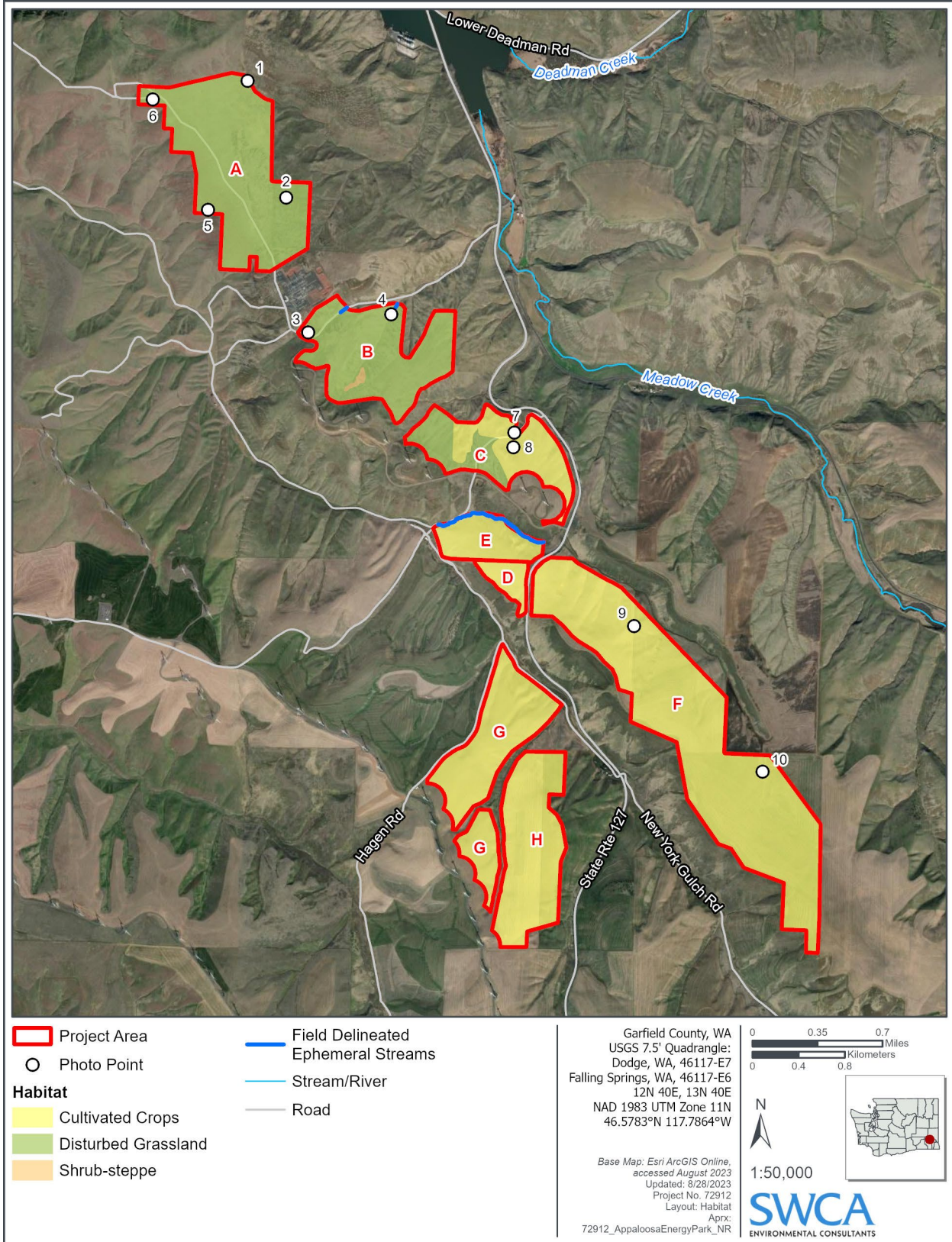


Figure 5. Project area vegetation types (see Appendix D for photo point photos).



**Figure 6. Example of solar arrays and panels.**

The picture above is of the Garnet Solar Project in California, the arrays and panels are similar to those proposed for the Appaloosa Solar Project. This picture shows the ground surface to be graded sand. However, for the Appaloosa Solar Project, the ground will be left undisturbed as much as possible. In addition, the solar panels for the Appaloosa Solar Project will be higher off the ground, with the lower edge of the panel 8 to 15 feet off the ground depending on the tilt of the panel.