

Jeff Watson

From: Clear, Gwen (ECY) <GCLE461@ECY.WA.GOV> on behalf of ECY RE CRO SEPA COORDINATOR <CROSEPACOORDINATOR@ECY.WA.GOV>
Sent: Thursday, February 19, 2015 3:39 PM
To: Jeff Watson
Subject: Comments for CU-14-00003
Attachments: 3870 One Energy Development LLC.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Please see the attached comment letter for the Solar Power Generation facility, proposed by One Energy Development, LLC. The original letter is in the mail.

Thank you,

Gwen Clear

Regional SEPA Coordinator
WA State Dept of Ecology
Central Regional Office - Yakima
(509) 575-2012



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

February 19, 2015

Jeff Watson
Kittitas County Community Development
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Re: CU-14-00003

Dear Mr. Watson:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the construction and operation a 13.6 acre photovoltaic solar power generation facility on approximately 112 acres, proposed by One Energy Development LLC. We have reviewed the documents and have the following comments.

SHORELANDS/ENVIRONMENTAL ASSISTANCE

The wetland report that was submitted by Sewell Wetland Consulting only evaluated the most northerly triangular portion of the property (approximately 7 acres) where the currently proposed solar panels will be placed. The National Wetland Inventory Maps for the State of Washington (Ecology GIS) show at least three very large wetlands located on most of the western lobe of the property. If development will take place now or is expected to be expanded into other areas of the property (outside of the area where the wetland reconnaissance took place) in future phases, then a wetland delineation for the entire property area needs to be done. **Any wetlands identified (even those in long-term grazing or agriculture) that will be impacted by the project, either through direct or indirect impacts, need to be identified on a map, described in the SEPA document and those impacts need to be mitigated.**

The wetland report identifies Wetland A as a category IV wetland. Based on information submitted in the Sewell wetland report that describes the dominant vegetation cover within Wetland A, a category IV rating appears to be in error. The rating document used by the consultant to characterize wetland A using the 1994 Rating system was not completed beyond the point where an incorrect item was circled in section Q4 4.1, and question Q4 4.2 (which was not filled out) would not apply either based on the described dominant species present in the wetland. Therefore, even using the old methodology, the wetland would rate at least as a category III wetland if the rating form was completed. (More detail about this issue: The



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wetland is not dominated by any of the following plants from page 18 of the 1991 guidance manual (*Juncus effuses*, *Spirea douglasii*, or *Typha latifolia*) or contains more than 90 percent cover of the plants listed in page 19 of the guidance.) The questions in section Q4 are a series which require all of the questions to be answered "Yes" to apply, so not having the appropriate plants to say yes to the question requires further analysis in the rest of the rating questionnaire to determine whether the wetland should then be a category III or II wetland. **A complete shoreline permit filing should include corrected wetland rating documentation and a wetland impact mitigation plan to achieve a "no net loss" from site wetland impacts.**

Information regarding the stormwater management plan states that infiltration will be directed into a "vegetated buffer". Use of wetland buffers for stormwater infiltration must be consistent with the Stormwater Management Manual for Eastern Washington (EWSM). **The applicant should provide a text narrative in the shoreline permit filing documents which describes how the routing of the stormwater in the proximity of wetlands will be consistent with the EWSM.**

The SEPA checklist states that the project is located within a Rural shoreline environment. Solar panels are stated as being used to run a security light and electricity meter: Production of power for on-site agricultural and domestic purposes would not create a change in use. However, the amount of energy produced for offsite use (if any) should be described. If the majority of power would be produced for off-site use, then the development may need to be also be evaluated as a Shoreline Commercial Use development as well as a Shoreline Utility Use when processing the shoreline permit. Commercial developments are not allowed in Rural Shoreline environments (Kittitas County Shoreline Master Plan, section 23 (3)). It is not clear from The Kittitas Shoreline Master Plan language whether a Shoreline Conditional Use Permit issuance could address that issue.

If you have any questions or would like to respond to these Shorelands/Environmental Assistance comments, please contact **Catherine Reed** at (509) 575-2616 or email at catherine.reed@ecy.wa.gov .

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012
crosepacordinator@ecy.wa.gov