



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 7, 2018

Amy Moon  
Energy Facility Site Evaluation Council  
PO Box 47250  
Olympia WA 98504-7250

RE: Addendum to Desert Claims Wind Power LLC, Wetland and Waters of the State Review

Dear Ms. Moon:

The Desert Claim Wind Power Project proposes 0.026 and 0.347 acres of unavoidable permanent impacts to stream and wetland habitats, respectively. Mitigation is to take place onsite and includes the enhancement of Wetlands R73 (17.925 acres), R74 (0.196 acres), and R76 (2.608 acres). The three wetlands will be enhanced by removing existing cattle grazing uses, installing exclusion fencing, and planting bare areas with plug sized herbaceous vegetation. A Credit/Debit analyses was conducted by Grette Associates LLC, for impacted and enhanced wetland habitat associated with the Desert Claim Wind Power Project.

Ecology received the credit/debit worksheets on August 21, 2018, via electronic mail. They were received separate from the Desert Claim Wind Power Project Compensatory Mitigation Plan. Department of Ecology staff preformed a review of the worksheets in accordance with Ecology's 2012 Publication, *Calculating Credits and Debits for Compensatory Mitigation in Wetland of Eastern Washington* (Publication No. 11-06-015) and have the following comments to provide. The majority of discrepancies observed were minor and likely due to rounding numbers upward. However, two discrepancies are worth pointing out as they significantly modify the Habitat Function Credit Balance. One error was found on a credit worksheet and another on a debit worksheet.

**Debit Worksheets**

As previously documented in our August 30, 2018 letter, Wetlands 408 and 409 had errors on their respective rating forms. The errors on each form related to questions H3.0/H3.1. Correction of the errors would increase the Habitat Score for each of the two wetlands, thus altering their respective Habitat Function debit scores in the credit/debit analyses. Please see attached Table 1, Summary of Credits and Debits.

**Credit Worksheets**

An error appears to have occurred during transcribing credit scores for Wetland R76. The worksheet for Wetland R76 showed correct scores for the Habitat Function; however, the scores



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were not properly carried over into Table 4, Summary of Debits and Credits, of the Desert Claim Wind Power Project Compensatory Mitigation Plan. This table shows Wetland R76 to have 10.36 Habitat Function credits. The correct calculation should be 9.06, as Wetland R76 had zero credits for Habitat Function. In addition, there is an incorrect score for the overall Habitat Function credit balance. Table 4 shows a Habitat Function Balance of 6.76. A corrected score would be closer to 5.35, as shown in the attached Table 1, Summary of Credits and Debits.

**Ecology's Findings**

Ecology has provided a summary table, Table 1, of the scores produced during our review for your assessment of the Desert Claims Wind Power Project.

Overall the credit/debit analyses demonstrates a "no net loss" of wetland functions within the project area. The attached Table 1 suggests the project and the proposed compensatory mitigation would not result in a loss of water quality functions, hydrologic functions, nor habitat functions and therefore supports the overall conclusion by Grette Associates LLC.

Ecology looks forward to providing the Energy Facility Site Evaluation Council with technical assistance and expertise in the future. If you have any questions or would like to discuss these comments, please call me at (509)575-2616.

Sincerely,



Lori White  
Wetland/Shoreline/Federal Permit Specialist

cc: Sonia Bumpus, Energy Facility Site Evaluation Council  
David Moore, US Army Corps of Engineers  
Amy Moon

Enclosure

**References Cited**

Hruby, T. 2012. Calculating Credits and Debits for Compensatory Mitigation in Wetlands of Eastern Washington. Washington State Department of Ecology Publication # 11-06-015.

Table 1. Summary of Credits and Debits

<b>DEBITS</b>	Improving Water Quality	Hydrologic Function	Habitat Function
	0.207+0.153+0.468+0.4305+0.918+0.288+0.84	0.242+0.102+0.468+0.369+1.071+0.288+0.72	0.276+0.204+0.604+0.4305+1.224+0.336+0.60
Total (in acre-points)	3.3045	3.26	3.7105
<b>CREDITS</b>			
Enhancement	8.96+0.10+1.3	1.3+0.10+8.96	8.96+0.10+0
Total Credits	10.36	10.36	9.06
<b>BALANCE</b> Credits-debits	<b>7.055</b>	<b>7.1</b>	<b>5.3495</b>