SEPA¹ 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.

 $^{^1\} https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance/$

A.Background

Find help answering background questions²

1. Name of proposed project, if applicable:

DRAFT Ecology Air Quality Program Data Center General Order

2. Name of applicant:

Washington State Department of Ecology

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

300 Desmond Drive SE, Lacey, WA 98503

4. Date checklist prepared:

July 30, 2025

5. Agency requesting checklist:

Washington State Department of Ecology

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

The tentative date to issue the general order is December 31, 2025.

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

No future additions are planned currently. The potential exists for applicants to request changes to the General Order. Any requested changes would be considered and evaluated at that time.

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

Aside from the Coverage Order with conditions, the Technical Service Document (TSD) and the permit application will contain environmental information related to the proposal. Source tests performed as a condition of permit compliance will contain environmental information.

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.

Not at this time.

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

This General Order stands alone for air emissions and does not need any other approvals or permits. It is acknowledged that other permits or requirements might be needed (e.g., water, zoning, dangerous waste, etc.) for the facility, but they are not part of this General Order and would need to be considered separately and distinctly.

² https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background

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

Ecology is proposing to issue a General Order under WAC 173-400-560 for data centers near the cities of East Wenatchee, Malaga, and Quincy, Washington. The General Order requires that specific conditions and compliance measures when an applicant requests coverage. The proposed general order is for data centers using engines with the currently best mitigation for emissions, a maximum number of engines, specific geographical areas, and operational conditions. This General Order limits installation to a maximum of 21 emergency diesel engines. Each engine must not be higher than 4,423 brake horsepower (bhp).

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.

Projects covered by this General Order can include new or expansion of existing Data Center facilities near the cities of East Wenatchee, Malaga, and Quincy, Washington.

Projects include site preparation and construction of data center buildings that include data halls, administrative areas, exterior parking and areas for equipment, maintenance and backup power generation. Electrical substations and/or switchyards and transmission lines, water storage may be included.

Facility specific details will be found in each permit application. Additional details relevant to this checklist may be added, as needed, in a modified SEPA checklist.

This checklist is applicable for locations that match the meteorological and air quality modeling conditions found in Quincy, East Wenatchee, and Malaga. Site and permit application review must confirm that the proposed project meets those criteria, versus assuming that any location in the above listed areas meets criteria.

B.Environmental Elements

1. Earth

Find help answering earth questions³

a. General description of the site:

Unknown. Site description will vary by location of proposed facility.

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

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

Unknown. Site description will vary by location of proposed facility.

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.

Depends on site specific location, but in general soils in the three proposed areas tend to be sands in dunes and terraces of sand to loamy fine sand, typically with five percent or less clay.

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

Unknown. Site description will vary by location of proposed facility.

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.

Unknown. Site description will vary by location of proposed facility.

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

Unknown. Site description will vary by location of proposed facility.

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

Unknown. Facility design and percent of land use by impervious surfaces will depend on proposed project, including building size, stormwater design and the potential for current vacant land on site to account for potential future building expansion.

³ https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth

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

Unknown. A modified SEPA checklist for individual projects is expected to provide these additional details.

2. Air

Find help answering air questions⁴

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.

Construction activities will produce dust from the operation of heavy equipment, excavation, onsite vehicle use and from disturbed surfaces.

Air emissions related to normal operations include vehicle traffic from on-site employees. On-site emergency generators, powered by ultra-low-sulfur No.2 diesel, will operate during emergency power loss with a maximum of 100 hours per year. The maximum 100 hours per year includes engine maintenance and emissions testing. On site emergency generator use may also include diesel-powered generators that provide emergency backup power for secondary processes that support data center function, such as for fire extinguishing systems or pumps.

Air emissions from these generators include:

- Ammonia (NH₃) 0.26 tons per year
- Carbon monoxide (CO) 2.04 tons per year
- Diesel engine exhaust particulate (DEEP) 0.17 tons per year
- Nitrogen dioxide (NO₂) 2.39 tons per year
- Nitrogen oxides (NO_x) 23.85 tons per year
- Particulate matter (PM)
- PM_{2.5} 1.61 tons per year
- PM₁₀ 1.61 tons per year
- Sulfur dioxide (SO₂) 0.47 tons per year
- Volatile organic compounds (VOCs) 1.44 tons per year

Data Centers receiving air emission-related permits via this Data Center General Order will only use emergency generators meeting the emissions standards of Tier IV diesel engines and will only use ultra-low-sulfur No.2 diesel with sulfur content of 15 PPM or

⁴ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air

less, or an alternative commercial fuel (e.g. biofuel) that produces the same or less emissions.

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

No, off-site emissions would not affect this proposal. Modeling performed in support of the general order showed compliance with the National Ambient Air Quality Standards at the project boundary.

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

To be eligible for coverage under the Data Center General Order, applicants must install emissions controls to meet Tier IV diesel engine certification requirements.

3. Water

Find help answering water questions⁵

a. Surface:

Find help answering surface water questions⁶

 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.

Unknown, it will depend on location of facilities utilizing this General Order permit.

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.

Unknown, it will depend on location of facilities utilizing this General Order permit.

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.

Unknown, it will depend on location of facilities utilizing this General Order permit.

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

Unknown, it will depend on location of facilities utilizing this General Order permit.

⁵ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water

⁶ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water

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

Unknown, it will depend on location of facilities utilizing this General Order permit.

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.

Unknown, it will depend on location of facilities utilizing this General Order permit, as well as the facility's design.

b. Ground:

Find help answering ground water questions⁷

- 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.
 - Unknown. Groundwater withdrawals and use will depend on the needs of each individual applicant.
- 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.

Applicants for the Data Center General Order may utilize local municipal sewers or may need to develop on-site septic systems.

Mechanical cooling discharge, if applicable, may be discharged to evaporation ponds, industrial wastewater treatment plant, or to ground depending on project location.

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.

Onsite stormwater runoff from roofs, parking lots, landscaped areas, or disturbed areas during construction will need to be collected and transported, infiltrated, evaporated and detained on-site in accordance with Ecology's Stormwater Management Manual for Eastern Washington.

⁷ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater

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

Stormwater could contain oil and metals from driving surfaces. Even though stormwater will need to be managed and treated using best management practices (such as graded swales, drainage ditches sloped to convey stormwater to a stormwater detention pond, and other practices proved effective in managing stormwater impacts), some small volumes of waste material could enter the ground. Minor amounts of waste material could also enter groundwater via discharge of stormwater to the ground during plant construction and operation. Discharge to surface water should not occur since applicants are expected to adhere to requirements of Ecology's Stormwater Management Manual for Eastern Washington.

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

Currently unknown. Site development specifics will dictate.

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

Depends on the site specific location where the Data Center General Order will be used. However, onsite stormwater runoff from disturbed areas will need to be collected and transported, infiltrated, evaporated and detained on-site in accordance with Ecology's Stormwater Management Manual for Eastern Washington.

4. Plants

a.

Find help answering plants questions

Check the types of vegetation found on the site:
\square deciduous tree: alder, maple, aspen, other
\square evergreen tree: fir, cedar, pine, other
□ shrubs
□ grass
☐ pasture
\square crop or grain
$\hfill\Box$ orchards, vineyards, or other permanent crops.
$\hfill \square$ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
\square water plants: water lily, eelgrass, milfoil, other
\square other types of vegetation

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

The specific kind and amount of vegetation to be removed or altered depends on the site-specific location. Some locations could be previously cleared and graded, while others may alter brush, grass, or shrub steppe. A modified SEPA checklist for individual projects is expected to provide additional details. Applicants are encouraged to consult the WDFW Priority Habitat and Species database or other relevant sources.

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

Unknown. A modified SEPA checklist for individual projects is expected to provide these additional details.

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

Unknown. A modified SEPA checklist for individual projects is expected to provide these additional details.

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

Unknown. A modified SEPA checklist for individual projects is expected to provide these additional details.

5. Animals

Find help answering animal questions⁸

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:

Any of the examples provided, except for shellfish, may be near any of the three locations proposed for this Data Center General Order; East Wenatchee, Malaga, or Quincy.

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

Yes - The US Fish and Wildlife Service (USFWS) list of threatened and endangered (**T&E**) species indicates several potentially occurring species occurring in the areas covered by the General Order. Please see the table below for potential species, but the likelihood of being present is low because of lack of suitable habitat.

⁸ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

Species	Status (WA)	Presence
Columbia Basin Pygmy Rabbit	Endangered	Yes (Grant Co shrub-steppe)
Northern Leopard Frog	Endangered (State)	Yes (Grant Co wetlands)
Ferruginous Hawk	Endangered (State SGCN)	Yes (Horse Heaven Hills)
Townsend's Ground Squirrel	Candidate/Concern	Yes (Columbia Basin grassland)
Western Gray Squirrel	Endangered (WA uplisted)	Potentially occurring in Quincy area
Canada Lynx	Threatened	Potentially occurring in Wenatchee area
Yellow – Billed Cuckoo	Threatened	Potentially occurring in Wenatchee area
Bull Trout	Threatened	Potentially occurring in Wenatchee area

Other Priority Species Present Regionally

Based on WDFW's Priority Habitats & Species list (especially shrub-steppe and wetland habitats around Quincy):

- Greater sage-grouse (Threatened)
- Columbia spotted frog (Candidate)
- Sandhill crane (Endangered)
- Western pond turtle
- Oregon spotted frog
- Various bats (e.g. Townsend's big-eared bat)
- Taylor's checkerspot butterfly
- c. Is the site part of a migration route? If so, explain.

This area is part of the Pacific Flyway (waterfowl, songbirds).

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

None known at this time.

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

None known at this time.

6. Energy and natural resources

Find help answering energy and natural resource questions⁹

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.

Electricity for projects that receive coverage under this proposed General Order must originate from a power provider via existing or newly built electrical grid connections.

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

No.

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

Applicants will likely use energy efficient interior / exterior lighting, mechanical, and building system practices and will comply with the requirement of the Washington Non-Residential Energy Code. Air-side economization for IT cooling could be used to reduce power use associated with cooling. A modified SEPA checklist for individual projects is expected to provide specific project details.

7. Environmental health

Health Find help with answering environmental health questions¹⁰

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.

During operation as a data center, the building will utilize uninterruptible power systems composed of lead-acid batteries and standby emergency power generators that use ultra-low-sulfur No.2 diesel fuel. Refrigerants used in closed-loop HVAC equipment could release if damaged.

During construction, use of heavy equipment creates the potential for spills of gasoline and diesel fuels, damage to batteries (sulfuric acid, lead plates) and spills of vegetable or mineral oil from damaged power transformers.

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

Unknown at this time. Site development specifics will dictate.

https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou
 https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health

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.

Unknown at this time. Site development specifics will dictate.

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.

Data Centers use tools to provide continuous power in case of utility electrical grid outages, including lead acid batteries and emergency generators using ultra-low-sulfur No.2 diesel. Other chemicals stored on site during construction might include typical construction aids such as solvents, temporary fuel or propane tanks.

Chemicals during the operational life of the facility include standard maintenance chemicals such as industrial cleaning products and ultra-low-sulfur No.2 diesel for emergency generators as well as transformer oil within on-site electrical equipment.

4. Describe special emergency services that might be required.

Emergency services for human accidents, fire or chemical release.

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

Batteries are expected to be stored in ventilated cabinets. Operational manuals will describe the measures to take for accidental releases of materials on site. On-site spill kits appropriate for the risk will be used by trained personnel as needed, emergency contractors will respond to larger releases such as diesel fuel or transformer spills.

b. Noise

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

This is dependent on specific site selection, however typical area noise may include vehicular traffic, rail traffic and low flying airplanes.

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

Construction noise will be present. During periods of emergency generator testing and maintenance or loss of grid power, there will be generator noise.

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

Construction activities will comply with applicable local noise ordinances. Generator engine operation for testing and maintenance must be performed between the hours of 7:00 a.m. and 7:00 p.m.

8. Land and shoreline use

Find help answering land and shoreline use questions¹¹

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.

Unknown. Current land use will be dependent upon specific site selection.

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?

Unknown, dependent upon specific site selection.

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?

Unknown, dependent upon specific site selection.

c. Describe any structures on the site.

Unknown, dependent upon specific site selection.

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

Unknown, dependent upon specific site selection.

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

Unknown, dependent upon specific site selection.

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

Unknown, dependent upon specific site selection.

- g. If applicable, what is the current shoreline master program designation of the site?
 Unknown, dependent upon specific site selection.
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Unknown, dependent upon specific site selection.

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

No one will reside in the completed project, the number of people working at the completed Data Center will be dependent on the specific project.

¹¹ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

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

Unknown, dependent upon specific site selection.

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

None.

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

This will be dependent upon specific site selection, however the project will be consistent with zoning and comprehensive plans applicable to the site.

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

None.

9. Housing

Find help answering housing questions¹²

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

None.

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

None.

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

None.

10. Aesthetics

Find help answering aesthetics questions¹³

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

Maximum building height allowed by the proposed Data Center General Order is 59.1 feet tall. For that building height, a minimum height for emergency generator exhaust stacks is 9.8 feet above the roofline of the building.

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

Unknown, dependent upon specific site selection.

https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing
 https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics

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

Unknown, dependent upon specific site selection. We expect applicants will design and construct data centers using the Data Center General Order in accordance with local building and landscaping standards.

11. Light and glare

Find help answering light and glare questions¹⁴

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

The parking lot are expected to be illuminated during evening hours. Vehicle headlights will potentially produce light and glare during evening hours. Building security/perimeter lighting will likely operate at night. Lighting is expected to follow applicable local codes.

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

Unknown, dependent upon specific site selection.

c. What existing off-site sources of light or glare may affect your proposal?
Unknown, dependent upon specific site selection.

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

Applicants are expected to design project lighting to provide a safe level of lighting in the parking areas and around the building. Light fixtures and pole spacing can be designed to minimize light encroachment on adjacent properties.

12. Recreation

Find help answering recreation questions

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

Unknown, dependent upon specific site selection.

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

Unknown, dependent upon specific site selection.

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

Unknown, dependent upon specific site selection.

¹⁴ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions¹⁵

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.

Unknown, dependent upon specific site selection.

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.

Unknown, dependent upon specific site selection.

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.

Unknown, dependent upon specific site selection.

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.

An Inadvertent Discovery Plan will likely be prepared by Data Center General Order applicants prior to site disturbance. If previously unidentified cultural resources are encountered during construction, all work will cease in the vicinity and the plan will be followed, including immediate notification of a Washington State Historic Preservation Officer and Tribal Historic Preservation Officer as needed.

14. Transportation

Find help with answering transportation questions¹⁶

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.

Unknown, dependent upon specific site selection.

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?

Unknown, dependent upon specific site selection.

https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-phttps://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-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).

Unknown, dependent upon specific site selection.

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

Unknown, dependent upon specific site selection.

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?

Unknown, dependent upon specific site selection and facility size.

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.

Unknown, dependent upon specific site selection.

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

None.

15. Public services

Find help answering public service questions 17

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.

Data Centers constructed using the Data Center General Order will require police and fire protection in a manner similar to nearby businesses.

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

Unknown, dependent upon specific site selection and possible use of private, onsite security.

¹⁷ https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services

16. Utilities

Find help answering utilities questions 18

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

Unknown, dependent upon specific site selection.

C.Signature

Find help about who should sign 19

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.



Type name of signee: Philip M. Gent

Position and agency/organization: Air Quality Program Section Manager, Washington

Department of Ecology

Date submitted: 11 August 2025

D.Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet 20

Do not 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.

¹⁸ https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities

¹⁹ https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature

²⁰ https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions

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?

The general order will regulate air emissions from future data centers. The purpose of the general permit is to ensure future data center emissions remain consistent with state and federal emissions standards. Air emission sources from data centers come from the use of diesel motors for emergency power in case of a power failure at the site. These diesel motors emit nitrogen oxides and particulate matter as by-products of combustion. Additional combustion by products will also occur. The emissions from the engines are both criteria air pollutants and toxic air pollutants. Data Centers utilize the emergency power when electrical power is lost onsite. The diesel motors also require regular testing and maintenance to ensure sufficient operations in case of an emergency.

The operation of the engines will generate some noise.

Specific projects initiated under this general order will be required to undergo individual SEPA reviews, consistent with the SEPA law, regulations, and procedures.

This general order is unlikely to increase discharge to water.

Proposed measures to avoid or reduce such increases are:

This general order follows state and federal Clean Air Acts. The regulations adopted implementing these laws impose emission control requirements on sources of air pollutants. These requirements are designed to ensure that any increase in air pollution from a new or modified source of air pollutants will be minimized.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The future emissions regulated under the general order are unlikely to impact plants, animals, fish, or marine life. The amount, type, and frequency of emissions covered by the general order are small and will disperse in the atmosphere rapidly.

• Proposed measures to protect or conserve plants, animals, fish, or marine life are:

This general order follows state and federal Clean Air Acts and the regulations adopted implementing these laws impose emission control requirements on sources of air pollutants. These requirements are designed to ensure that any increase in air pollution from a new or modified source of air pollutants will be minimized.

3. How would the proposal be likely to deplete energy or natural resources?

This proposed general order will regulate air emissions of future data centers under the state and federal Clean Air Acts. The general order is unlikely to have adverse impacts to energy or natural resources.

- Proposed measures to protect or conserve energy and natural resources are:
 None.
- 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?

This general order will be limited to regulating emissions from future data centers, and will not regulate where a data center facility is located in the landscape or its proximity of environmentally sensitive areas. Future data centers will be subject to zoning and land use regulations that regulate critical areas under the Growth Management Act. It is unlikely to use or affect environmentally sensitive areas or areas designated for government protection as it only regulates air emissions. These emissions are allowable under the state and federal Clean Air Acts.

- Proposed measures to protect such resources or to avoid or reduce impacts are:
 None.
- 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?

This proposal is unlikely to have any adverse impacts on land and shoreline use.

- Proposed measures to avoid or reduce shoreline and land use impacts are:
 None.
- 6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The general order will regulate air emissions from emergency power of future data centers. Future data centers may use transportation, public services and utilities for regular operations depending on the location and needs. This general order will not increase demands on transportation or public services and utilities. It is intended to provide power to the facility in case of interruption of public services and utilities occur.

- Proposed measures to reduce or respond to such demand(s) are:
 None.
- 7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

This proposal does not conflict with local, state, or federal laws for the protection of the environment. This general order follows state and federal Clean Air Acts and the regulations adopted implementing these laws impose emission control requirements on sources of air pollutants. These requirements are designed to ensure that any increase in air pollution from a new or modified source of air pollutants will be minimized.