

INTRODUCTION

This application requests Land Use - Zoning approval, including a determination of consistency with Walla Walla County Planning Enabling Act (RCW 36.70) and the Growth Management Act (RCW 36.70A) including the type and general location of all proposed primary and accessory uses/buildings as described in the Proposed development below.

PROPOSED DEVELOPMENT:

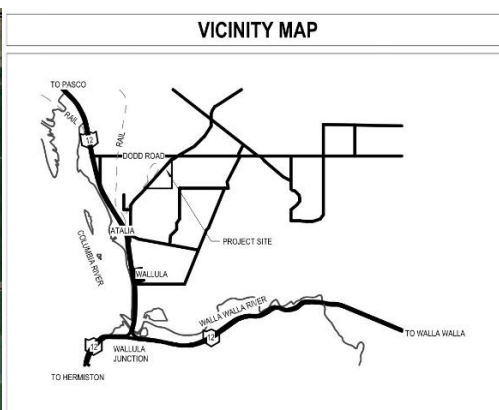
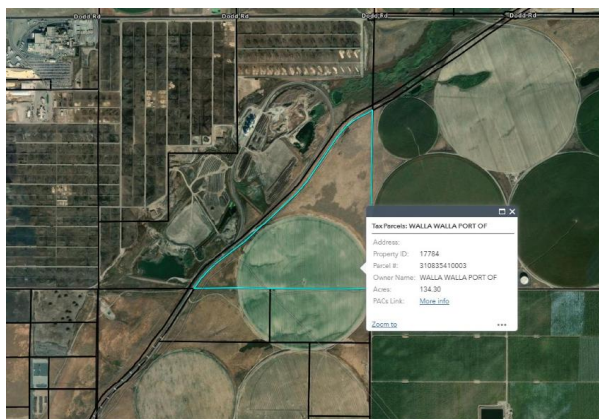
The scope of the proposed data center campus includes (3) single story data center buildings. The first building (Building A) to be constructed will be 217,805 sf with Buildings B and C to follow at 220,354 sf each. One single story 9,675 sf industrial water building (Building E) with industrial water storage tanks and fire water tanks, and one single story 1,400 sf security building (Building D) at the main entry gate. An additional access point at the north will be secondary/emergency use only.

Occupancy for each data center will be approximately fifty (50) employees, the security building will have fewer than thirty, with one person at the guard booth (<100 sf). The water building will not be occupied. Data center buildings would be phased with outbuildings and site development beginning with the first building. Landscape design and building color palettes are integrated to enhance the project.

Site work includes perimeter security fencing, landscaping, retaining walls, storm water and evaporation ponds, septic and backup drain fields, and a power sub-station at plan north of the site. The substation and its access will not be enclosed within the campus security perimeter. The primary campus entry provides security building parking with adjacent vehicle turnarounds. Internal circulation provides access to all sides of the buildings, drive aisles with associated parking stalls are provided, and access to loading docks and generator yards are at each data center building. Please refer to the Site Plan submitted for additional information.

SITE LOCATION:

The site is located between Dodd Road and Worden Road on approximately 134 acres east of US-12.



LOT INFORMATION:

Parcel 3108354100003, Walla Walla County, WA
Property ID: 17784

ZONING DETERMINATION LETTER - Industrial Agriculture Mixed (IA-M)

A Zoning Determination Letter was issued 3/20/2025 by Lauren Prentice, Community Development Director, in response to a Port of Walla Walla request. In it, the 2018 Code Interpretation for a previous data center/server farm project was cited, and the Director concluded that this proposed Attalia data center campus project fit within the land use classification of ‘warehousing and storage’ in the Industrial Agriculture – Heavy (IA-H) zoning district in the Attalia Industrial UGA. This classification was based on the policies of the Walla Walla County Comprehensive Plan for the Attalia Industrial UGA, which contains both IA-M and IA-H zoning. The Director’s conclusion was that this use is allowed in the IA-M district based on internal analysis. (Full letter uploaded as a Supporting Document).

WALLA WALLA COUNTY ZONING ORDINANCE

17.17.020 - Applications for permits.

A. Applications shall be submitted to the department on forms prescribed by the director.

B. Applications shall contain the information required in Subsection 17.17.070(B) and in WWCC Title 14.

C. Applications shall be processed in accordance with the applicable provisions of WWCC Title 14. (Ord. 310 (part), 2005)

[Applicant is required to submit an application for the proposed use pursuant to LU-Zoning determination below.](#)

Zoning:	IA-M
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17.17.070 - Site development permits—Generally.

A. Consolidated Review. Site development permit applications may be submitted with a building permit application and the site development permit review consolidated with the review of the building permit application.

[Applicant has submitted the Land Use – Environmental concurrently. Additional permits will be submitted.](#)

B. Drawing Requirements. Each site development permit submitted for approval must be accompanied by a scale drawing showing lot lines and dimensions, the location of existing structures intended to remain, proposed buildings or improvements, the heights of all structures, parking lot design and location including access and drainage, street right-of-way lines, setbacks, exterior lighting, garbage facilities, signs, landscaping, fences, and any other information deemed necessary by the director to ensure compliance with the provisions of this title. If known, the materials must indicate the proposed or probable use of the development and a brief statement of the type of construction contemplated.

[Applicant has provided a Site Plan with the required content from the available information and current project design documentation. The data center campus building materials are primarily painted tilt-up concrete with painted CMU water building.](#)

C. Development Consistency. The site development permit will be conditioned or amended so that the development is consistent in all respects to this title and other applicable laws and ordinances. (Ord. 310 (part), 2005)

(Ord. No. 371, § III(Exh. A, Pt. E), 8-3-2009; Ord. No. 386, § III(Exh. A, § 13), 8-30-2010)

[See Zoning Determination Letter](#)

17.08.507 - Warehousing and storage.

"Warehousing and storage" means establishments primarily engaged in farm products warehousing and storage, refrigerated warehousing and storage, and general warehousing and storage. (Ord. 269 (part), 2002) [Please see Zoning Determination Letter regarding data center inclusion.](#)

17.18 Development Standards – Density and Dimensions

The following Dimensional requirements apply to all buildings and structures constructed, placed or otherwise established in the IA-M zone. Footnote 22: The provisions of [ch. 17.31](#) shall supersede the minimum lot area requirements and the minimum setback requirements.

1. Minimum lot size: No Limitation
 - a. [Lot size: 109.15 acres](#)
2. Minimum lot coverage: No limitations
Maximum lot coverage: 75%
3. Minimum lot frontage: No requirement
4. Minimum Setbacks:
 - a. Front setbacks: 6 feet
 - b. Side and Rear setbacks: 6 feet

17.20.100 - Table of minimum standards.

Required off-street parking spaces shall be in conformance with the following table and where alternative standards prevail, the greater applies in conflicting computations:

USE	MIN VEHICLE PARKING
Industrial Agriculture - Mixed Warehouses, storage and wholesale business and freight terminals	1 per 2 employees on maximum working shift

[At full build-out, the maximum employee counts across the campus will be 180. Per table, 60 stalls would be required with the applicable EV and ADA stalls. Note that the water building is not staffed and will not have parking. Applicant is providing the counts below:](#)

PARKING SUMMARY	
PHASE 1 PARKING	69 STALLS
PHASE 1 ADA SPACES	5 STALLS
CAMPUS TOTAL PARKING	215 STALLS
CAMPUS ADA SPACES	13 STALLS

Amendments to Zoning Ordinance 70 [Acknowledged](#)

12.06.020 - Adoption of road design standards.

A. The "Walla Walla County Road Design Standards" adopted by Ordinance 435, or as subsequently revised by the board, is hereby incorporated into this title as the Walla Walla county standards for the design and construction of all public and private roads.

B. The Public Works Department is hereby authorized to develop public rules and make minor changes to the text and drawings in order to better implement the Standards as needed and to stay current with changing design, construction technology and methods of construction.
(Ord. No. 375, § III(Exh. A), 11-2-2009; Ord. No. 435, 9-8-2015)

12.06.060 - Arrangement of roads

The following guidelines shall be considered when establishing new or revised roads:

- A. Road patterns should be logical, consistent and understandable to satisfy the needs of emergency and delivery vehicles.
- B. Adequate vehicular and pedestrian access should be provided to all parcels of land.
- C. Vehicular and pedestrian-vehicular conflict points should be minimized.
- D. Ease and cost of maintenance should be considered when designing public roads.
- E. Arterial and collector roads shall be located as designated in the transportation element of the Walla Walla County Comprehensive Plan.
- F. Local access roads should be designed to minimize through traffic movements and excessive speeds.

(Ord. No. 375, § III(Exh. A), 11-2-2009)

12.06.070 - Private roads

Private roads may be approved in exempt land divisions, in developments subject to the requirements of WWCC Title 16, or in developments subject to site plan review. Private roads shall be located on private land and must:

- A. Be consistent with the transportation element of the Walla Walla County Comprehensive Plan;
- B. Meet the standards of this title;
- C. Not be located where the county engineer determines that there is a need for a public road;
- D. Not place a financial burden on the county;
- E. Be unobstructed and maintained for use by emergency, public service and utility vehicles; and
- F. Not pose a threat to public safety.

(Ord. No. 375, § III(Exh. A), 11-2-2009)

Projected access roads, public and private, are designed with the requirements above and are shown in plan as Access Roads X and Y. The Port is currently finalizing their road improvements plan and is being negotiated between the owner and Port.

The proposed development has looped internal access roads capable of allowing a fire truck or emergency vehicle to turn around once inside. Entering the campus is protected by standard security measures. If the emergency vehicle does not need to enter the secure site, there is a vehicle turnaround at the primary entry that is capable of accommodating a fire truck or emergency vehicle turn around on-site.

Please see Traffic Impact Analysis Report – to be submitted when complete

Site Plan Access + Traffic continued:

The proposed development has 50'-0" wide aisles for two-way traffic and 24'-0" wide aisles for one-way traffic.

The proposed development has service aisles that are a minimum of 24'-0" wide

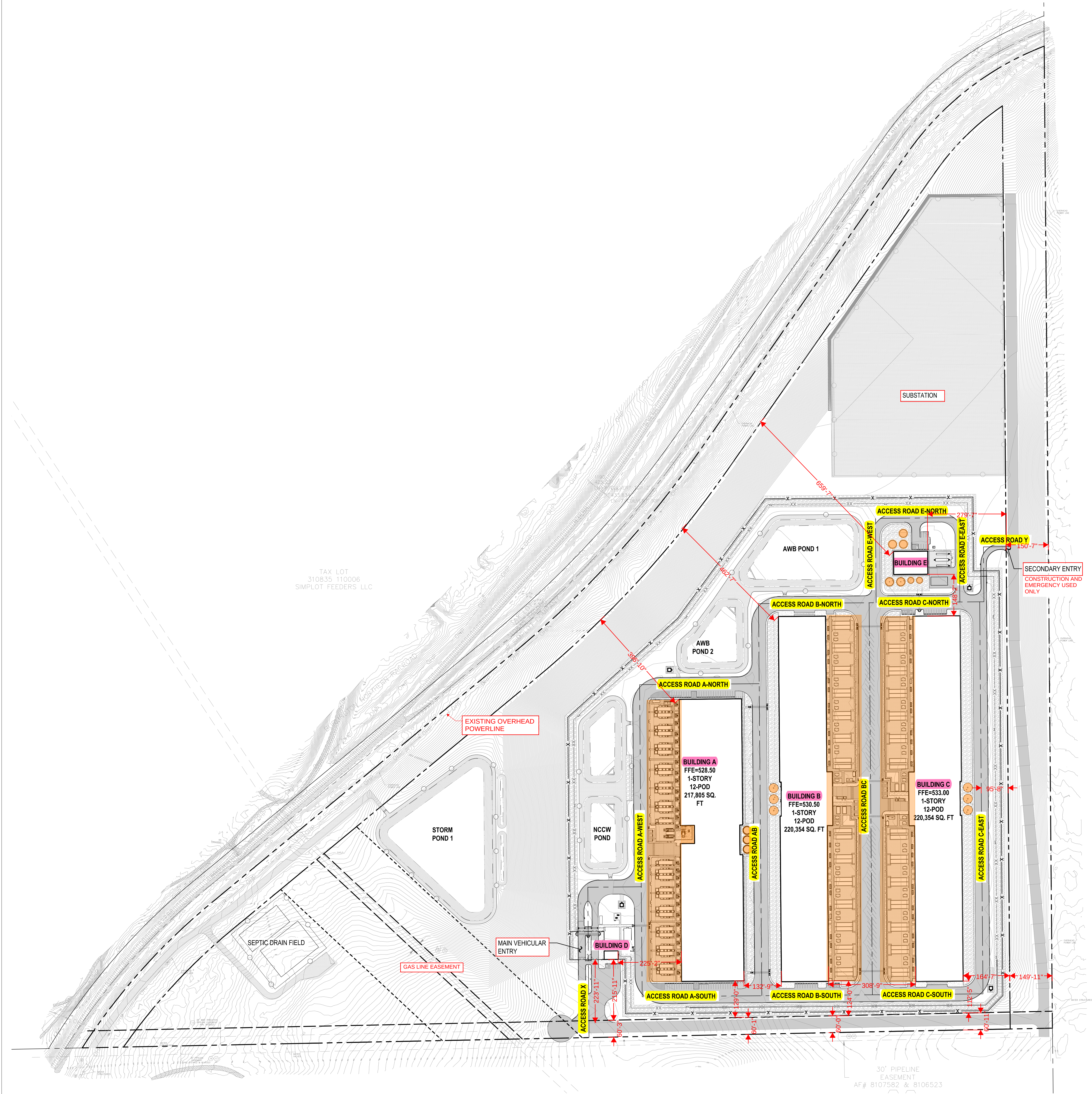
OFF-STREET PARKING DESIGN STANDARDS

A	B	C	D	E
angle degree	stall width	stall to curb	aisle width	Curb length
0	8.5	8.5	12.0	23.0
45	8.5	19.4	12.0	23.0
60	8.5	20.0	15.0	9.8
75	8.5	19.6	24.0	8.8
90	8.5	19.0	24.0	8.5

a. The proposed development incorporates 90 degree and 45 degree parking

b. Stall sizes are as follows:

- 1. 8'-6" standard stall and 9'-0" ADA stall*
- 2. 19'-0" stall to curb (standard and ADA)*
- 3. 24'-0" aisle min width*
- 4. 8'-6" curb length standard and 9'-0" curb length ADA*



- NOTES**
- SEE SHEET C-00002 FOR GENERAL CIVIL NOTES AND ABBREVIATIONS
 - PARCEL NUMBER: 310835410003
 - SEE NARRATIVE FOR ADDITIONAL INFORMATION AND NOTES.
 - THE FOLLOW ITEMS CAN BE FOUND IN TITLE 18 APPLICATION:
WETLANDS AND BUFFERS
HABITAT CONSERVATION AREAS AND BUFFERS
GEOLOGIC HAZARD AREAS AND BUFFERS
FLOOD HAZARD AREAS
CRITICAL AQUIFER RECHARGE AREAS
WATERBODY ORDINARY HIGH-WATER MARK

- LEGEND**
- PROPERTY LINE
 - CENTER/SECTION LINE
 - M30 RATED PRIMARY OUTER FENCE
 - SECONDARY INNER SECURITY FENCE
 - SITE FENCE
 - TOP/TOE OF POND
 - NON-STRUCTURE PERMANENT EQUIPMENT

CONFIDENTIAL

PROJECT ADDRESS
WALLA WALLA, WA 99362

PROJECT DELIVERY PACKAGE
PERMIT

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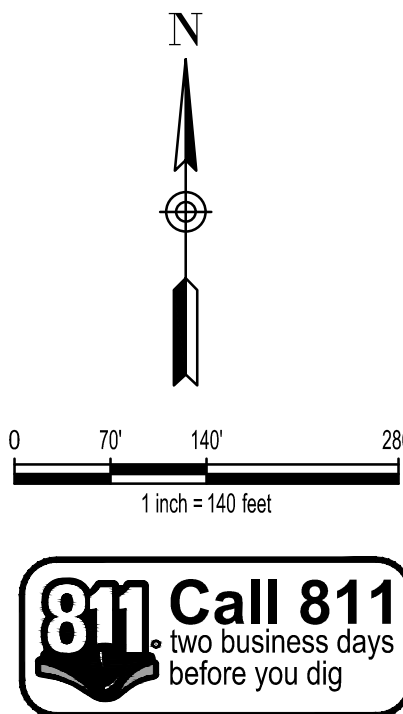
LEGAL NOTICE

ISSUE DATE:	05MAY2026	PROJECT NO.:	2600035
REV.	DATE	DESCRIPTION	DRY/PK
0	05MAY2026	PERMIT	DRN/ENSC/CHKAPP

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MECHANICAL ENGINEER STEVE GRAYSON (206) 266-4002 ATTALIA RD. WALLA WALLA COUNTY	ELECTRICAL ENGINEER SHASHWAT SINGH (913) 931-5071 ATTALIA RD. WALLA WALLA COUNTY
CIVIL ENGINEER KPF CONSULTING ENGINEERS PALLA KASHYAP (206) 822-5822 1601 5TH AVE, SUITE 1600 SEATTLE, WA 98101	STRUCTURAL ENGINEER INTEGRUS ARCHITECTURE RIG GROUP (509) 838-8881 10 S CEDAR ST, SPOKANE, WA 99201
ARCHITECT INTEGRUS JESSE WALT (509) 221-0150 707 SW WASHINGTON ST., STE. 1200 PORTLAND, OR 97205	OTHER CONSULTANT: FIRE PROTECTION YANXUAN XIE (206) 266-1789 ATTALIA RD. WALLA WALLA COUNTY
TELECOM ENGINEER SHASHWAT SINGH (913) 931-5071 ATTALIA RD. WALLA WALLA COUNTY	SECURITY ENGINEER GUIDEPST SOLUTIONS JON JOLIBOIS (425) 577-1229 500 YALE AVENUE N SEATTLE, WA 98109

PROJECT:	BUILDING A
TITLE:	OVERALL SITE PLAN
SHEET NO.:	C-05000
PAPER SIZE:	ARCH E1
SCALE:	VARIABLE
REV:	0





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CRITICAL AREA REPORT FOR PORT OF WALLA WALLA DATA CENTER CAMPUS

Walla Walla County, WA

Prepared for

Amazon Web Services
410 Terry Avenue North
Seattle, WA 98109

Prepared by

Geosyntec Consultants, Inc.
801 5th Ave, Suite 2200
Seattle, WA 98104

April 6, 2026

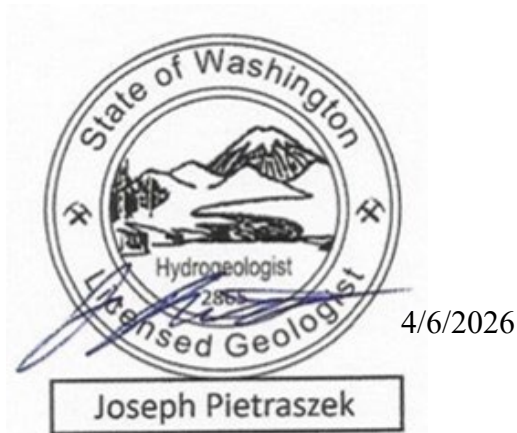
Critical Area Report for Port of Walla Walla Data Center Campus

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Jay Pietraszek, LHG
Principal Hydrogeologist

A handwritten signature in black ink that reads "Logan Uselman".

Logan Uselman, PhD
Senior Hydrogeologist

Project Number: NWW0025

April 6, 2026

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KEY FINDINGS

This report presents Geosyntec Consultants, Inc. (Geosyntec) Critical Area Report and Level One Hydrogeologic Assessment for Amazon Web Service's (AWS) proposed construction of a data center campus located east of Attalia in Walla Walla County, Washington (Site). The Site is comprised of 134 acres located approximately 0.4 miles south of Dodd Rd and approximately 1.4 miles east of Highway 12. This report is intended to satisfy the requirements outlined under Walla Walla County Code, Chapter 18.08 - Critical Area Protection (Walla Walla 2009) and updated under Walla Walla County Ordinance No. 476 (Walla Walla 2019).

All critical areas designated by Walla Walla County (under 18.08.035) were reviewed. The Site is located within the Urban Growth Area but does not intersect any wetland designations, frequently flooded areas, geologically hazardous areas, or fish and wildlife habitat conservation areas. The Site lies within a critical aquifer recharge area (CARA) designated wellhead protection area (WHPA) based on 10-year travel time for the Simplot Feeders well. The Simplot Feeders well is completed to 915 feet below ground surface (ft bgs) and screened within the basalt aquifer from 625 to 915 ft bgs. Groundwater within the basalt aquifer is characterized by multiple different flow zones with low permeability between units.

Three single story buildings are planned for construction onsite along with one substation, multiple water storage tanks, auxiliary water building, evaporation pond, stormwater infiltration pond, and a septic drain field.

Based on the results of our assessments, we reached the following conclusions:

- The susceptibility of the basalt aquifer from surface activities on Site is low due to the interbedded nature of the high and low permeable zones, depth of the aquifer, and planned activities on the Site.
- There is potential susceptibility of the shallower alluvium aquifer from activities on Site, but no WHPAs for wells completed in the alluvium aquifer were identified proximal to the Site.

We recommend that engineering for the proposed project proceed with the following provisions/mitigation measures out of an abundance of caution for critical areas:

- Construct all stormwater facilities in accordance with the 2024 Stormwater Management Manual for Eastern Washington, Washington State Department of Ecology General Stormwater Construction Permit provisions, Walla Walla County Code Title 11 provisions, and any other local regulations, and implement all applicable best management practices (BMPs).
- Construct all on-site septic systems in accordance with Washington Administrative Code (WAC) 246-272B Large On-Site Sewage Systems, Washington Department of Health Septic Permit for Large On-Site Sewage provisions, and local regulations and implement all applicable BMPs.

1. INTRODUCTION

Geosyntec has prepared this Critical Area Report for AWS to identify critical areas in the vicinity of a proposed acquisition property located in Walla Walla County, Washington (County), and if present, provide a preliminary evaluation of potential project impacts to the designated critical areas. As detailed below, the Site is located within the 10-year time of travel WHPA for a potable domestic supply well at the Simplot Feeders site located to the west of AWS's proposed parcel. Per County code requirements, the WHPA designation and the proposed septic discharges from the AWS site require a Level One Hydrogeologic Assessment. This report will be referenced in the State Environmental Policy Act (SEPA) Checklist for the Site and is intended to fulfill the critical areas protection reporting requirements stipulated in County Code Chapter 18.08 for a Critical Area Report (18.08.095) and Level One Hydrogeologic Assessment (18.08.230) (Walla Walla 2009).

AWS is proposing to construct a data center campus on approximately 134 acres of parcel ID 310711000001 located east of Attalia, Washington (Site; Figure 1). The property is currently used by the Port of Walla Walla for agricultural use, but is zoned as Industrial Agriculture – Mixed and is within the County's Urban Growth Area (Figure 2). Three single story buildings are planned for construction on the Site along with one substation, multiple water storage tanks, an auxiliary water building, an evaporation pond, a stormwater infiltration pond, and a septic drain field. The overall concept plan for the Site is presented on Figure 3.

This report describes site information, subsurface stratigraphy, and groundwater conditions for the Site and also assesses potential impacts to identified critical areas as a result of completing the proposed construction of the Site.

1.1 Site Location

The Site is located in western Walla Walla County east of Attalia, Washington but within the County's designated Urban Growth Area (Figure 2). The Site is located approximately 0.4 miles south of Dodd Rd and approximately 1.4 miles east of Highway 12 (southeast portion of T12N R31E S35). Currently, there is no access to the Site, and it will need to be constructed via an extension of Attalia East Road.

The Columbia River flows southerly approximately 2 miles west of the Site. Land use in the area is predominantly irrigated agricultural. Additional adjacent land uses include a Simplot Feeders-owned feedlot adjacent to the west of the Site. Ground elevations slope westerly on the Site and range from about 450 to 550 feet. The elevation of the Columbia River is roughly 100 feet or more below any portion of the Site.

There is small natural drainage swale (likely a relict flood channel) that slopes southwesterly towards the Columbia River and is adjacent to the southwestern side of the Site. The bottom of the drainage appears to be about 30 feet lower than the ground elevation at the property boundary. Surface and shallow subsurface runoff from the Site likely drains into this drainage. The portion of the drainage that is directly adjacent (and down-gradient) of the Site is part of the feedlot. Small surface impoundments (ponds) are evident in aerial imagery that may be used as part of feedlot operations. The degree of historical engineering required to create these ponds is unknown.

The only delineated critical area on or directly adjacent to the Site boundary is a designated WHPA representing the 10-year time of travel zone for a potable water supply well at the nearby Simplot Feeders site (Figure 2). This WHPA encompasses most of the Site. No other County-designated critical areas are present on or proximal to the Site, as noted below:

- The CARA for the Shallow Gravel Aquifer (as established under County Ordinance No. 476) does not extend onto the Site (Figure 2);
- No part of the Site is located within the Walla Walla River Watershed (or within delineated boundary of its associated shallow gravel aquifer);
- No wetlands are located proximal to the Site and the Site is not within a floodway or fringe zone (as delineated by the County);
- The potential liquefaction susceptibility is assumed low with a seismic design class of D;
- The Site has a very low slope with slight to no potential rating for soil susceptibility; and
- No fish or wildlife habitat conservation areas are present near the Site and no priority habitats and species were identified.

1.2 Walla Walla County Critical Aquifer Recharge Area Regulations

The County's CARA map (Figure 2) and the Washington State Department of Health (DOH) Source Water Assessment Program (DOH 2026) indicate that the majority of the Site is within a WHPA for the Simplot Feeders supply well.

All proposed Site activities fall under activities allowed in CARAs without requiring approval or submission of a critical areas report (Section 18.08.220), except the proposed on-site septic system (Walla Walla 2009). The planned on-site septic system will have an average daily flow of 3,825 gallons per day requiring the completion of a Level One Hydrogeologic Assessment in accordance with the additional performance standards outlined in code 18.08.250 (Walla Walla 2009).

2. LEVEL ONE HYDROGEOLOGIC ASSESSMENT

Information obtained from area well logs and regional geologic reports show two primary geologic units: unconsolidated to semi-consolidated sediments underlain by basalt bedrock. Shallow (i.e., alluvial) and unconfined groundwater is generally present at depths ranging between approximately 20 to 60 ft bgs. The basalt is part of the Columbian River Basalt Group (CRBG). Groundwater conditions in the CRBG are well understood and basalt aquifers are the target source for many of the production wells in the region (e.g., Bauer and Hansen 2000).

Information on local hydrogeologic conditions obtained from area well logs is consistent with the known regional conditions and shows that groundwater in the basalt is first intersected in fracture zones at depths of several hundred ft bgs and is overlain by unsaturated sediments and thick sequences of competent (very low permeability).

The well log for the Simplot Feeders well is included in Appendix A and indicates the well withdraws water from the basalt aquifer. The locations of all wells, springs, surface water features, and CARAs within 1,300 feet of the Site are shown in Figure 4.

2.1 Unsaturated Sediment

Surficial geologic maps show the Touchet Formation on western and central portions of the Site. The Touchet Formation is comprised of unconsolidated sands, silts and gravels overlain locally by aeolian dune sand or disturbed agricultural soil. Information obtained from existing well logs in the area show the total thickness of the unconsolidated sediments ranges between approximately 60 to more than 200 ft bgs¹. Groundwater is generally present in the unconsolidated sediments (forming the alluvial aquifer discussed below) at depths ranging between approximately 20 to 100 ft bgs. In other words, the unsaturated zone in the unconsolidated sediments beneath the Site is 20 to 100 feet thick and consists of wind-deposited loess and fine-grained silts overlying older alluvial and flood-deposited sediments.

The unsaturated zone of the unconsolidated sediments at the Site is characterized by dry, stable soils with no evidence of shallow groundwater expression, seeps, or springs. Several freshwater ponds are located east of the Site that appear to be part of Simplot Feeders animal agricultural operations (Figure 4).

2.2 Alluvial (Shallow Gravel) Aquifer

The shallow alluvium aquifer near the Site is unconfined and consists primarily of unconsolidated sand and gravel deposits that form the uppermost water-bearing unit within the Walla Walla Valley. As noted above, groundwater in the alluvium typically occurs at depths of approximately 20 to 100 ft bgs and some of the variability appears to be a function of the east to west sloping topography towards the Columbia River in the Site vicinity. Groundwater flow in the alluvial

¹ Note that surface topography generally slopes from east to west (towards the Columbia River) and some of the variability in sediment thicknesses and water level depths is attributed in differences in ground elevations.

aquifer is inferred to generally follow surface topography and flow southwest toward the Columbia River.

The permeability of the alluvial aquifer is variable because the material properties of the sediments vary based on the changes in the depositional environment over time. The finer-grained loess deposits at ground surface and relatively fine-grained slackwater deposits in the Touchet Formation can have relatively low permeability that can impeded vertical flow and act as semi-confining layers in areas. Coarser-grained sand and gravel deposits are evident in some areas underlying the finer-grained sediments. Relatively high permeability conditions are present in the coarser-grained deposits with some well logs indicating well yields in excess of 100 gallons per minute (gpm).

Publicly available groundwater chemistry data from the alluvium aquifer was available for three wells located west of the Site by Attalia on the Washington State Department of Ecology (Ecology) EIM Groundwater Map Search (Ecology 2026). Available data suggest that the alluvium aquifer is circumneutral to slightly alkaline (pH between 6.7 and 8.2). Major ions are dominated by calcium, magnesium, sodium, bicarbonate alkalinity, chloride, and sulfate. Total dissolved solids, chloride, sulfate, iron, and manganese occasionally approach or exceed Washington State secondary maximum contaminant levels. Nitrate has been detected above the primary drinking water standard.

Ecology has categorized a draft Nitrate Priority Area of “Very High Nitrate Priority Area” for the Site vicinity, indicating that elevated nitrate concentrations may be present in Alluvial Aquifer (Morgan 2016). As the Site is surrounded by heavy agriculture and livestock operations, it is not surprising that elevated nitrates are likely present because it is well understood that nitrate loading from irrigated agriculture and animal feedlots can contribute significantly to nitrate concentrations in groundwater (Morgan 2016). Because on-site sewage treatment systems can be a source of nitrate to groundwater, a Level 1 Nitrate Balance was completed using the Washington Department of Health (DOH) model (DOH 337-070). Based on best available information, the groundwater nitrate values at the assumed point of compliance (property boundary) area are anticipated to be around 4 milligrams per liter which is below the primary drinking water standard.

2.3 Basalt Aquifers

The entire region is underlain by the Columbia River Basalt Group (CRBG), which was extruded as lava during the Miocene and early Pliocene epochs. This basalt layer, composed of individual lava flows up to 150 feet thick, is typically believed to be at least 4,800 feet thick and slopes generally west. Between individual lava flows are interbedded volcanic ash, fine-grained cinders, and gravelly sediments that form porous zones capable of high groundwater yields. The basalt aquifer system is used extensively for municipal, industrial, and agricultural supply across the region.

The interbedded nature of the basalt flows results in distinct flow zones between the basalt layers. The larger and more competent central parts of the layered basalt flow sequence can be hundreds of feet thick and may contain some joints and fractures but is generally much less permeable than the interflow zones. The competent basalt layers act as aquitards that impede the vertical movement (percolation) of water and create confining conditions in underlying interflow zones.

The piezometric water surface and basalt aquifer flow direction is anticipated to be westerly and toward the Columbia River in the vicinity of the Site.

Groundwater quality in CRBG is generally high. No groundwater data was publicly available for the CRBG near the Site, but regionally, the basalt aquifers are typically calcium-magnesium-bicarbonate to sodium-bicarbonate waters with generally low total dissolved solids. Groundwater is typically neutral to slightly alkaline with low concentrations of metals and nitrates.

3. WELLHEAD PROTECTION AREAS

WHPAs are generally defined as the boundary extent of how far groundwater travels over a 10-year period to the wellhead. State of Washington wellhead protection regulations exclude individual domestic wells and well systems that do not meet the definition of public water supplies (18.08.200).

3.1 Simplot Feeders Replacement Well No. 2

The Simplot Feeders Replacement Well No. 2 is located on the Simplot Feeders property approximately 0.6 miles west of the Site. The WHPA for this well overlaps almost the entire Site, with the southwest portion of the Site located within the 5-year time of travel. This well is a Group A water system. The well report (Start Card W09704) in Appendix A shows the well was completed to 915 ft bgs in a hard grey basalt. The well is screened with double row perforations from 625 to 915 feet bgs and has a 16-inch welded steel casing with a surface seal of cement to a depth of 635 feet bgs in the basalt. The well log indicates multiple zones of solid (competent) basalt present before groundwater is intersected. Static water level is listed at 128 feet below the top of the well. Airlift testing shows yields in excess of 800 gpm, indicating high productivity conditions are present.

Based on the method of well construction and surface seal that extends to more than 600 ft bgs, there is minimal risk of groundwater contamination due to surface activities at the Site.

4. MITIGATION AND BEST MANAGEMENT PRACTICES TO PROTECT GROUNDWATER AND PROMOTE RECHARGE

Group A public water systems have programs in place for protecting source water used as potable water. The owners identify, monitor, limit, and control all facilities and activities that may adversely impact local groundwater source to the extent practicable.

4.1 Groundwater Contamination Susceptibility

The Walla Walla Critical Area Protection Ordinance established WHPAs as the 10-year capture zone based on a simple fixed radius estimate. The fixed radius method is a conservative approach best suited to unconfined aquifers and has been accepted by the DOH as a WHPA standard. The fixed radius method is likely overly conservative for the Site and actual groundwater flow paths and influence from pumping in the basalt aquifer are likely much narrower than represented by the fixed radius. Groundwater could be moving relatively quickly in the basalt aquifer but the several hundred feet of overlying competent basalt prevents vertical migration of water sourced from adjacent parcels. It is much more likely that surface or shallow subsurface water at the Site would flow westerly through the unconsolidated sediments and potentially discharge to the adjacent drainage swale.

The available geologic and hydrogeologic information suggests that any potential land uses on the Site are unlikely to have any influence of down-gradient groundwater in the basalt aquifer. The limited available water quality characteristics also suggest that there is unlikely connectivity of the basalt aquifers with the alluvium aquifer and overlying unsaturated sediment. Additionally, a Critical Area Report completed in May 2023 for the Port of Walla Walla located near to the Site found that surface construction should not impact groundwater wells completed within the basalt aquifer assuming the presence of surface seals for wells determine the WHPAs (Anderson Perry 2023).

While not included as a CARA, the alluvial aquifer is also unlikely to be susceptible to groundwater contamination as a result of construction and planned site activities. Planned grading at the Site is minimal as property has been used for agriculture. The Site is primarily loose crop soil and sparse vegetation.

4.2 Well Site Restrictions and Covenants

For public drinking water wells, the Walla Walla County Recorder's Office requires that a 100-foot sanitary control area is established around any wells. The sanitary control area covenant prohibits construction or maintenance of septic tanks, drain fields, sewer lines, and underground storage tanks; roads, railroad tracks, and vehicle structures; barns, feed stations, grazing animals, and enclosures containing fowl or animal manure; liquid or dry chemical storage related to herbicides, insecticides, hazardous waste; and garbage of any kind. The proposed Site plan will not impact the 100-foot sanitary control area.

Domestic wastewater at both the Site will be handled by on-site septic fields. The proposed septic field for the Site is located approximately 1 mile east of the Simplot Feeders supply well. No mitigation is needed to protect the CARA from domestic wastewater, but BMPs will be used during construction of septic fields.

All water supply tanks will be constructed above ground. No mitigation is needed to protect the CARA pertaining to onsite storage tanks, but BMPs will be used during construction of all water supply tanks.

4.3 Potable Water Supply

The proposed water supply for the Site is to use the Port of Walla Walla domestic Wallula Dodd Water System. Existing potable waterlines run along Ogden Road along the south side of the Site. Potable water supply for the Site should not pose any risk for the WHPA.

Based on a review of the Ecology Well Construction database (Washington 2026), there are approximately 37 water wells located downgradient of the Site with 25 completed in the alluvial aquifer and 12 completed in the CRBG. Whereas CARA WHPAs do not apply to private water wells, the analysis provided above indicates that proposed construction activities on the Site should not pose any risk to private or public water wells located near the Site.

4.4 Surface Water Control

No seeps or springs have been identified on or near the Site. As noted above, several freshwater ponds are located east of the Site and appear to be maintained as a part of the Simplot Feeder operations. Any future development will need to confirm that no surface water features are present on Site and provide groundwater controls, as needed, to capture spring or seeps from grading and ditches. Any diverted water will need to be routed to swales in areas away from the WHPA.

As part of construction on the Site, stormwater infiltration ponds will be constructed on-site. The exact location and sizing of the stormwater infiltration ponds will be determined after the completion of a geotechnical investigation. Each pond will be designed to maintain a minimum of 2 feet of freeboard during the 100-year design storm. Construction stormwater general permits will be secured prior to construction to ensure compliance with county and state ordinances. On-Site stormwater will be managed with BMPs (e.g., stormwater will be directed away from any wellhead) and should not pose any concerns for CARAs. Stormwater mitigation is not anticipated for the Site.

5. CONCLUSION

AWS is proposing to construct a data center campus on a parcel located in Walla Walla County, Washington. The Site consists of construction of buildings, water storage tanks, auxiliary water building, evaporation ponds, stormwater infiltration ponds, and a septic drain fields. The Site intersects with the WHPA for the Simplot Feeders Well. The Simplot Feeders Well is completed in a confined, deep basalt aquifer with a surface seal and casings into the basalt. Surface disturbances like construction activities are not anticipated to negatively impact designated CARAs, therefore:

- The susceptibility of the basalt aquifer from surface activities on Site is low due to the interbedded nature of the high and low permeable zones, depth of the aquifer, and planned activities on the Site.
- There is potential susceptibility of the shallower alluvium aquifer from activities on Site, but no WHPAs for wells completed in the alluvium aquifer were identified proximal to the Site.

All future stormwater will be managed with BMPs and sanitary control area covenants will be maintain. Overall, planned Site development activities present a minimal risk of contaminating the aquifer and would meet the CARA protection requirements of Walla Walla County.

5.1 Limitations

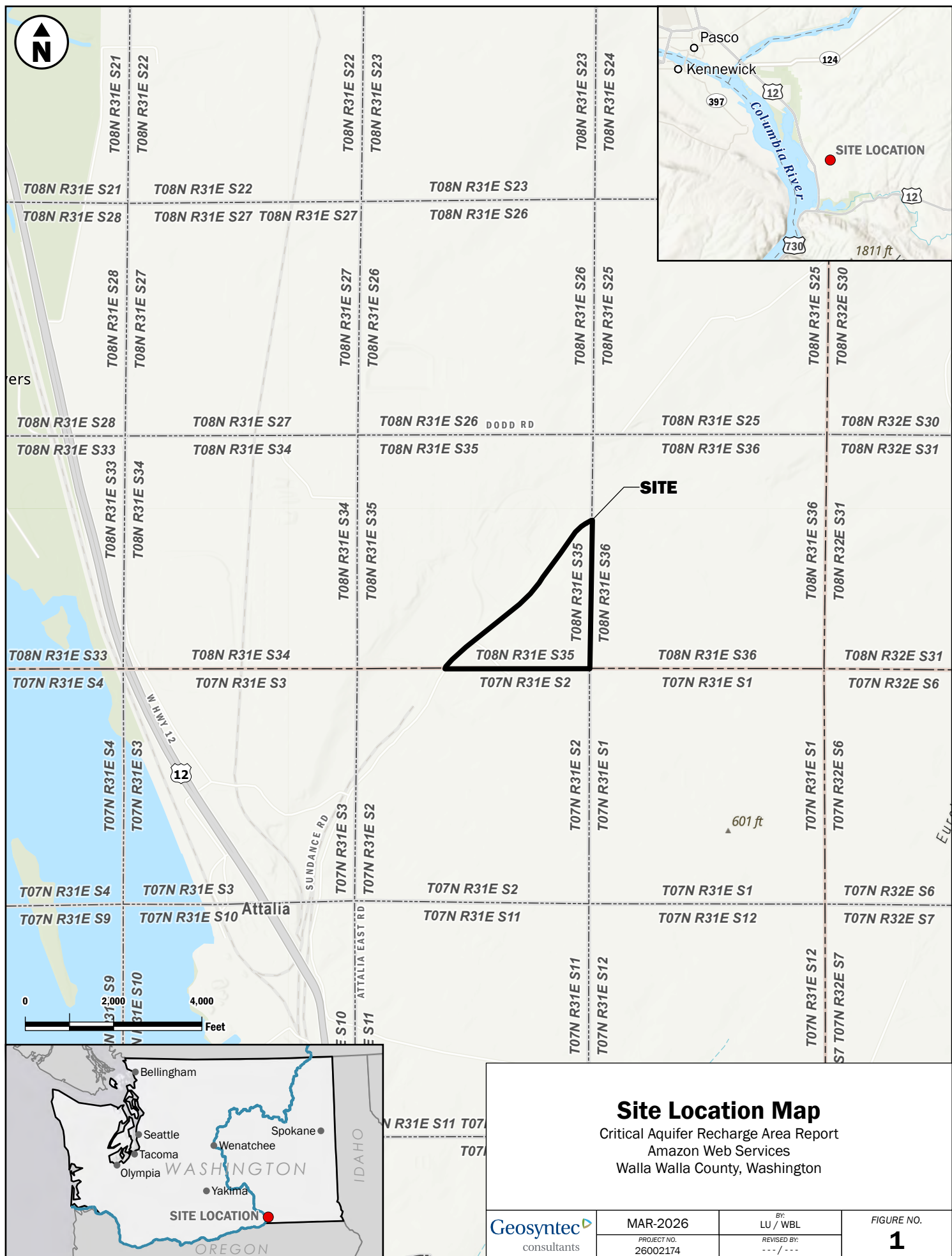
Work for this project was performed for AWS (Client), and this report was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This report does not represent a legal opinion. No other warranty, expressed or implied, is made.

All reports prepared by Geosyntec for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Geosyntec. Geosyntec's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

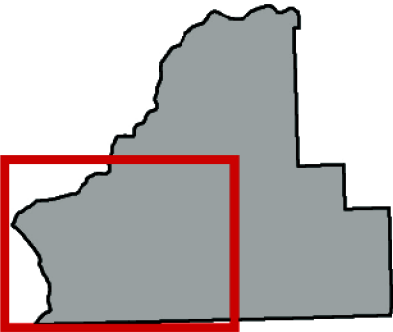
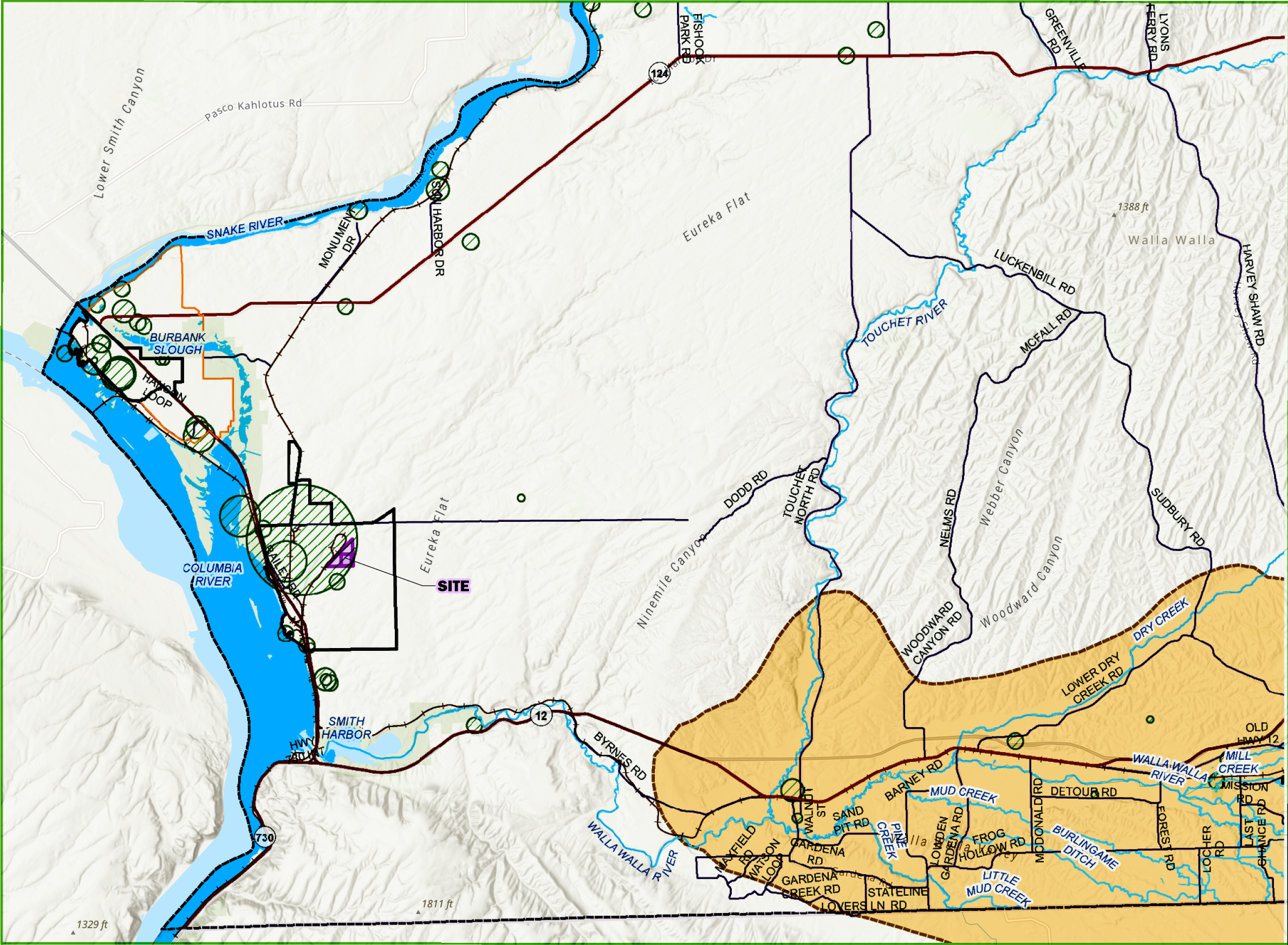
6. REFERENCES

- Anderson Perry. 2023. Critical Aquifer Recharge Area Report Pre22-055 Short Plat. Prepared for the Port of Walla Walla. May. Available at:
https://cms7files.revize.com/wallawallacounty/document_center/commdev/Projects/Rockwool/CARA%20Report,%20Anderson%20Perry,%2005.23.pdf
- Bauer, H.H. and A.J. Hansen. 2000. *Hydrology of the Columbia Plateau Regional Aquifer System, Washington, Oregon, and Idaho*. United States Geological Survey Water-Resources Investigations Report 96-4106.
- DOH. 2026. Source Water Assessment Program Mapping Application. Washington State Department of Health. Accessed on February 4, 2026 at: <https://doh.wa.gov>
- Ecology. 2026. Well Construction database. Washington State Department of Ecology Accessed on February 4, 2026 at:
<https://apps.wa.gov/ecology/wa.gov/WellConstruction/Map/WCLWebMap/WellConstructionMapSearch.aspx>
- Morgan, L. 2016. Washington Nitrate Prioritization Project. Washington State Department of Ecology, Olympia, WA. Publication No. 16-10-011.
- Walla Walla County, WA. 2009. Walla Walla County Code of Ordinances. Walla Walla County Code Chapter 18.08 - Critical Area Protection. Available at:
https://library.municode.com/wa/walla_walla_county/codes/code_of_ordinances?nodeId=TI18EN_CH18.08CRARPR_18.08.260USPRCRAQREAR
- Walla Walla County, WA. 2019. Ordinance No. 476 Adopting the 2018 Period Update of the Walla Walla County Comprehensive Plan with Land Use Map and text Amendments and Adopting Development Regulations Amendments to Titles 8, 14, 16, 17, and 18, and Related Zoning and Critical Area Maps (Docket No. CPA18-001/ZGA18-001). Available at:
https://cms7files.revize.com/wallawallacounty/document_center/commissioners/OtherDocs/Ordinance%20-%20476%20-%20Recorded.pdf?t=202305221301420&t=202305221301420

FIGURES



CRITICAL AQUIFER RECHARGE AREAS - Wellhead Protection Areas - Southwest County



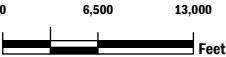
BASE MAP LAYERS

- County Boundary
- Urban Growth Area
- Burbank Rural Activity Center
- State Highway
- Public Road
- Railroads
- Streams
- Rivers/Water Bodies

AQUIFER RECHARGE

- Walla Walla River Shallow Gravel Aquifer
- Boundary Delineated by County¹
- Wellhead Protection Area^{2, 3}

1. See Map CA-1B
2. Designated as Critical Aquifer Recharge Area under Walla Walla County Code Chapter 18.08.
3. Wellhead Protection Area data is maintained by the Washington State Department of Health. The agency's most recent mapping can be viewed online using the Source Water Assessment Program (SWAP) Mapping Application.



Critical Aquifer Recharge Areas

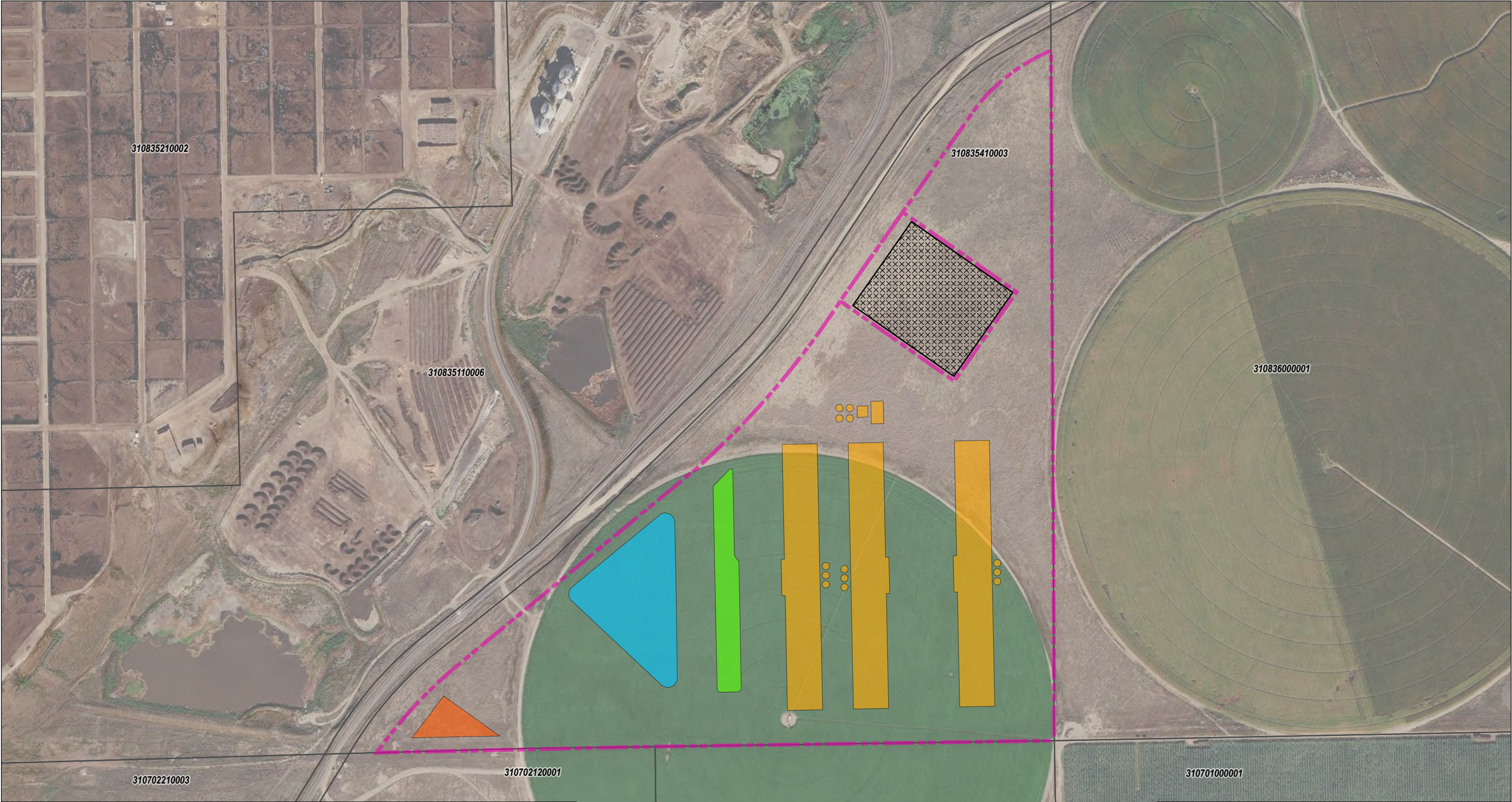
Critical Aquifer Recharge Area Report
Amazon Web Services
Walla Walla County, Washington

Geosyntec
consultants

MAR-2026
PROJECT NO.
26002174

BY:
LU / WBL
REVISED BY:
--- / ---

FIGURE NO.
2



Building / Tank

Proposed Sub Station

Potential Non-Contact Cooling Water Evaporation Pond

Stormwater Infiltration Pond

Potential Septic Field

Future Property Boundary

Walla Walla County Tax Parcel

N

0

225

450

Feet

Geosyntec

consultants

MAR-2026

PROJECT NO.
26002174

BY:
LU / WBL

REVISED BY:
--- / ---

FIGURE NO.

3

Proposed Site Layout

Critical Aquifer Recharge Area Report

Amazon Web Services

Walla Walla County, Washington

Data source credits: None || Basemap Service Layer Credits: © OpenStreetMap (and) contributors, CC-BY-SA, Sources: Esri, Vantor, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NIMA, Geodatasysteisen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS user community

GIS Data: G:\projects\AWS_Infrastructure\AWS_Infrastructure_PDX\GIS\AWS_Infrastructure\AWS_Infrastructure_CARA_Report\AWS_Infrastructure_CARA_Report.aprx; Q3 Proposed Site Layout | User: WBL | Longitude: 117.1171 | Date: 3/24/2025

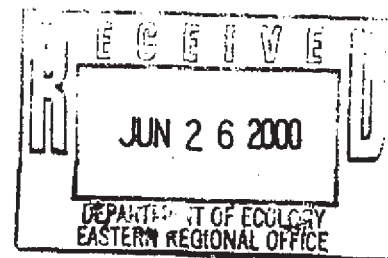
APPENDIX A

Water Well Report

401 0000; THE FCB NUMBER IS (201) 401 0000.

Simplot Feeders

- 0 - 65 Sand and Small Gravel
- 65 - 100 Sand and Cables
- 100 - 106 Broken Weathered Basalt
- 106 - 108 Black Basalt
- 108 - 115 Basalt Weathered Brown Gray
- 115 - 132 Basalt Gray Hard
- 132 - 135 Basalt Vesic Maroon/Lavender
- 135 - 149 Claystone Green Firm to Hard
- 149 - 181 Basalt Gray Hard
- 181 - 185 Basalt Gray Fract
- 185 - 246 Claystone Green some Gray w/occ basalt lense
- 246 - 260 Basalt Black Vesic WB
- 260 - 316 Basalt Gray Hard
- 316 - 324 Basalt Gray Fract
- 324 - 373 Claystone Green Firm but Silty
(363 - 365 Penetration Increased & Lost Circ.)
- 373 - 382 Basalt Gray Vesic
- 382 - 600 Basalt Gray hard w/Continuous Intermittent Fract
(440 - 441 Penetration Increased Dramaticly Mud Thinned Suspect WB)
(490 - 501 Highly Fract/Broken)
- 600 - 615 Claystone Green Firm
- 615 - 621 Claystone Green Firm w/Basalt Lenses
- 621 - 630 Basalt Gray Hard
- 630 - 645 Lava Brown w/occ Claystone Green WB
- 645 - 654 Basalt Gray/Brown Vesic WB
- 654 - 679 Basalt Gray Hard w/occ Fract
- 679 - 682 Basalt Hard Fract Black
- 682 - 689 Basalt Gray Well Fract w/Green Claystone WB
- 689 - 706 Basalt Gray/Brown/Green Vesic w/some Claystone Green
- 706 - 717 Basalt Gray Hard Fract
- 717 - 721 Basalt Gray Hard Well Fract WB
- 721 - 770 Basalt Hard occ Fract WB
- 770 - 830 Basalt Dark Gray Very Hard Fract WB
- 830 - 880 Basalt Dark Gray Very Hard occ Fract WB
- 880 - 885 Basalt Med Hard Gray/Green/Brown Fract WB
- 885 - 913 Basalt Gray/Brown Vesic w/Claystone Green WB
- 913 - 915 Basalt Gray Med-Hard WB



RECEIVED
JUN 21 2000

Zoning Land Use Application

Submitted by: Anonymous user

Submitted time: May 22, 2026, 3:25:54 PM

Project Information

Permit Type

- **Land Use Zoning**

Parcel Number

310835410003

Parcel Address

Site Between Dodd Rd and Worden Rd, Address TBD

Project Description

The project proposed is a data center campus on 134 acres east of US-12, between Dodd Road and Worden Road. This campus will include (3) one-story data center buildings, (1) access control building, (1) water building, (2) fiber sunrooms, (1) stormwater pond, (1) NCCW pond. A substation will be constructed by the utility but the owner will provide the design and construction of the pad.

Occupancy for each data center will be approximately fifty (50) employees, the access building (1.2k sf) will have fewer than thirty, with one person at the guard booth (<100 sf). The water building (12k sf) will not be occupied. Data center A is 217,470 sf and data centers B and C are 220,230 sf each (see site plan). Data center buildings would be phased with outbuildings and site development beginning with the first building. Landscape design and building color palettes are included to enhance the project.

Contact Information

Applicant/Primary Contact First Name

Jesse

Applicant/Primary Contact Last Name

Walt

Applicant Email Address

Jwalt@integrusarch.com

Applicant Phone Number

503.221.0150

Applicant Mailing Address

707 SW Washington St, STE 1200, Portland, OR 97205

Is the Property Owner the same as the Applicant?

No

Property Owner

Property Owner First Name

Amazon Data Services, Inc

Property Owner Last Name

Amazon Data Services, Inc

Property Owner Email Address

cardeom@amazon.com

Property Owner Phone Number

732-921-7070

Property Owner Mailing Address

410 Terry Avenue North, Seattle, WA 98109

Did a WA State licensed Engineer/Surveyor prepare or stamp the documents for this project?

Yes

Engineer/Surveyor of Record

Engineer/Surveyor of Record Name

Puja Kashyap

Engineer/Surveyor Email Address

puja.kashyap@kpff.com

Engineer/Surveyor Phone Number

206.622.5822

Engineer/Surveyor Mailing Address

1601 5th Ave, STE 1600 Seattle,WA 98101

Engineer/Surveyor WA State License Number

41830

Was more than 1 Licensed Engineer/Surveyor used for this project?

No

Are you using a WA State licensed Contractor for this project?

No

Supporting Documents

Supporting Documents

PDF [20260522 Attalia Data Center Campus Narrative.pdf](#)
415.6KB

Supporting Documents

PDF [20260522 Attalia Data Center Campus Overall Site Plan.pdf](#)
7.4MB

Supporting Documents

PDF [Water Availability Form_Supporting Document.pdf](#)
104.2KB

Supporting Documents

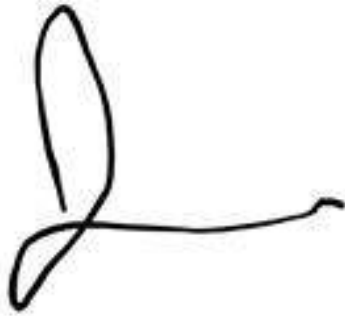
PDF [Zoning Verification Letter 03-20-2025.pdf](#)
142.8KB

Signature Page

Signing as

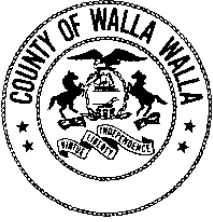
- **Applicant**

By signing this application form, the owner/authorized representative attests:

A handwritten signature in black ink, consisting of a large loop followed by a horizontal stroke that ends in a small hook.

Submitting date

May 22, 2026



Community Development Department

Director: Melissa Shumake

Address: 310 W. Poplar Street, Suite 200, Walla Walla, WA 99362

Email Address: commdev@wwcowa.gov Phone Number: 509-524-2610

Website: https://www.wwcowa.gov/government/community_development/index.php

NOTICE OF INCOMPLETE APPLICATION

Date: 6/23/2026

File Number(s): SDP26-01, SEPA26-05

Type of Application: Site Development Permit, SEPA

Applicant: Amazon Data Services, C/O Jesse Walt

707 SW Washington, Suite 1200

Portland, OR 97205

Project Description: Amazon Attalia Data Center Campus. The campus will include three data center buildings, each approximately 220,000 sf. Additional structures include storage tanks, a security building (1,400 sf), and an industrial water facility (9,675 sf). Site work involves fencing, landscaping, retaining walls, stormwater and evaporation ponds, septic systems, and drainfields, as well as access roads, parking areas, and a pad for the construction of a substation to be completed by a future utility provider. The subject property is located generally along Sundance Road, between Dodd and Worden Road, east of US-12, on a 134-acre property identified as Assessor Parcel Number (APN) 310835410003.

Staff Contact:

Melissa Shumake, Community Development Director

509-524-2610

The application for the above-described project has been reviewed and determined to be incomplete. A Traffic Impact Analysis (TIA) must be submitted to this department to resume processing of the proposed application.

Pursuant to [WWCC 12.50.030\(C\)](#), a TIA may be required as part of the development review process to reach a determination and identify the transportation facilities needed, if any, to achieve concurrency.

To Proceed

- Submit a Traffic Impact Analysis (TIA) prepared in accordance with the Walla Walla County [Traffic Impact Analysis Guidelines \(2010\)](#), based on the anticipated number of trips generated by the proposal.

Walla Walla County Code Section [14.07.050\(B\)](#) requires that the requested information be submitted to the County Community Development Department within sixty (60) days of this notice. Failure to submit the requested information within the required 60 days will result in a null and void application, with no refund of application fees.

The required information must be submitted no later than **8/24/2026**.

Submittals should be sent by email to planning@wwcowa.gov.

Feel free to contact me if you have any questions.

Sincerely,

Melissa Shumake

Community Development Director

509-524-2610

Water Availability Form – Supporting Document 01

DATE: 05/20/2026

TO: Walla Walla County

FROM: Melinda McMillan, Integrus Architecture
Design Project Manager

SUBJECT: Water Availability Form – Supporting Document 01

Regarding the Water Availability Online Form requirements, our team was required to provide information on the well type used and location. This project will be served by the Port of Walla Walla and not dependent on wells. This statement was provide by the owner regarding the agreement.

The Port of Walla Walla will provide potable water and temporary cooling water supply from the existing Wallula-Dodd potable water system (groundwater) via connection to the existing distribution system adjacent to the southern perimeter of the 310835410003 site. The Port of Walla Walla will provide the permanent cooling water supply by January 2029 via new connection to the existing Two River Irrigation water pipeline (approximately 1 mile south of the site) currently operating under Columbia River water rights Certificate S3-21044C(B). The existing irrigation water rights will be converted to municipal/industrial uses via Water Right Change Application to Ecology. The site's peak annual cooling water demand is <60 afy, and domestic water demand is approximately 10 afy.

During the temporary period while using the potable water source for cooling water, non contact cooling water (NCCW) will be recycled onsite to minimize demands, and industrial wastewater (non-contact cooling water brine/reject) will be managed through evaporation ponds. After the permanent cooling water source is online in 2029, NCCW will be discharged to a new industrial reuse system for irrigation on the Port's leased agricultural lands approximately 1 mile south of the site. Based on the high quality of our NCCW (<500 mg/L total dissolved solids), the discharge will be authorized by Ecology as an industrial reuse permit under the state waste discharge program and will reduce the irrigation demands from the local groundwater system. (ADS)

Additional information or documentation beyond this statement and that submitted in the online form would need to be provided by the Port.

707 SW WASHINGTON ST
SUITE 1200
PORTLAND, OR 97205
503.221.0150 | OFFICE
503.295.0840 | FAX

117 S MAIN ST
SUITE 100
SEATTLE, WA 98104
206.628.3137 | OFFICE
206.628.3138 | FAX

10 S CEDAR ST
SPOKANE, WA 99201
PO BOX 1482 (99210)
509.838.8681 | OFFICE
509.838.2194 | FAX

Memorandum
Integrus Project No. # 22600.00
Page 2
05/20/2026

Thank you,

A handwritten signature in black ink, appearing to read 'Melinda McMillan', followed by a horizontal line.

Melinda McMillan, AIA
Integrus Architecture

Water Availability Form – Supporting Doc01

Routing:

Walla Walla County

AWS: Justin Rabe

Integrus Architecture: Brian Piippo, Lexi Buechele

KPFF: Dan Veldee

AFTER RECORDING
RETURN TO:

Davis Wright Tremaine LLP
Attn: Lauren Johnson
560 SW 10th Avenue, Suite 700
Portland, OR 97205

REAL ESTATE EXCISE TAX

MAR 26 2026

EXEMPT # 150946
WALLA WALLA COUNTY
TREASURER

SPECIAL WARRANTY DEED

Grantor: Port of Walla Walla, a Washington municipal corporation
Grantee: Amazon Data Services, Inc., a Delaware corporation
Abbreviated
Legal Description: 11-7-31 LOT 1 SHORT PLAT 6/76 2025-04980
(PORTION 31-07-11) (Walla Walla County, WA)
35-8-31 PTN OF E1/2 LY SLY & ESTLY OF RR
Complete legal descriptions on Exhibit A
Assessor's
Parcel Number: 31-07-11-¹¹00-0001; 31-08-35-41-0003

THE GRANTOR, PORT OF WALLA WALLA, a Washington municipal corporation, for good and valuable consideration in hand paid, bargains, sells, and conveys to the GRANTEE, AMAZON DATA SERVICES, INC., Delaware corporation, all right, title and interest in and to the real estate described in **Exhibit A** (attached hereto and incorporated by this reference), situated in the County of Walla Walla, State of Washington, including any interest therein which grantor(s) may hereafter acquire and subject to those items listed on **Exhibit B** attached hereto and incorporated herein.

In making said conveyance, Grantor reserves unto itself as Grantor all existing water rights appurtenant to the Property and any and all Port-owned utilities, situate, lying, and being in the Property.

DATED this 19TH day of MARCH, 2026.

GRANTOR,
Port of Walla Walla, a Washington municipal corporation

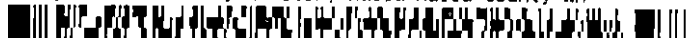
Patrick H. Reay
By: Patrick H. Reay, Executive Director

Special Warranty Deed

Page 1 of 7

4935-4642-1136v.3 0051461-007161

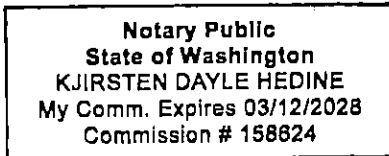
2026-01859 WD
03/26/2026 12:23:08 PM Page 1 of 7 Fees: 309.50
Sheryl R Park County Auditor, Walla Walla County WA



STATE OF WASHINGTON)
) ss
County of Walla Walla)

I certify that I know or have satisfactory evidence that Patrick H. Reay is the individual who appeared before me, and he acknowledged that he signed this instrument, on oath stated that he was authorized to execute the instrument, and acknowledged it as the Executive Director of the Port of Walla Walla to be the free and voluntary act of such party for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this 19th day of March, 2026.




NOTARY PUBLIC in and for
the State of Washington
Residing at Walla Walla
My Commission Expires: 03-12-28



EXHIBIT A

Legal Description

PARCEL 1:

LOT 1 OF WGBP SHORT PLAT NO. 2 SUB25-08 RECORDED AUGUST 20, 2025, IN BOOK 6 OF SHORT PLATS AT PAGE 76, UNDER AUDITOR'S FILE NO. 2025-04980, RECORDS OF WALLA WALLA COUNTY, STATE OF WASHINGTON.

SITUATED IN THE COUNTY OF WALLA WALLA, STATE OF WASHINGTON.

APN: 31-07-11-11-0001

PARCEL 2:

ALL THAT PORTION OF SECTION 35 IN TOWNSHIP 8 NORTH, RANGE 31 EAST OF THE WILLAMETTE MERIDIAN, LYING SOUTH AND EAST OF THE BURLINGTON NORTHERN RAILROAD RIGHT OF WAY.

SITUATED IN THE COUNTY OF WALLA WALLA, STATE OF WASHINGTON.

APN: 31-08-35-41-0003



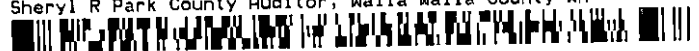
EXHIBIT B

Permitted Exceptions

1. (a) Unpatented mining claims; (b) reservations or exception in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water.
2. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Pacific Power and Light Company, a corporation
RECORDED: April 7, 1914
RECORDING NO.: Auditor's File No. 71053,
records of Walla Walla County, Washington
BOOK/PAGE: 134/255
3. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Pacific Power and Light Company, a corporation
RECORDED: January 6, 1914
RECORDING NO.: Auditor's File No. 69660, records of Walla Walla County,
Washington
4. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Salt Lake Pipeline Company, a corporation
RECORDED: July 16, 1953
RECORDING NO.: Auditor's File No. 364754, records of Walla Walla County,
Washington
ASSIGNMENT OF RIGHT OF WAY INTERESTS TO TESORO LOGISTICS
NORTHWEST PIPELINE LLC, A Delaware limited liability company recorded under
Auditor's File No. 2013-06381, records of Walla Walla County, Washington
Quit Claim deed from Chevron Pipeline Company, formerly Salt Lake Pipeline
Company, a corporation releasing a portion of the right of way granted, recorded under
Auditor's File No. 2002-04067, records of Walla Walla County, Washington
5. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Salt Lake Pipeline Company, a corporation
RECORDED: November 16, 1956
RECORDING NO.: Auditor's File No. 391387, records of Walla Walla County,
Washington
BOOK/PAGE: 279/222
ASSIGNMENT OF RIGHT OF WAY INTERESTS TO TESORO LOGISTICS
NORTHWEST PIPELINE LLC, A Delaware limited liability company recorded under
Auditor's File No. 2013-06381, records of Walla Walla County, Washington
Quit Claim deed from Chevron Pipeline Company, formerly Salt Lake Pipeline
Company, a corporation releasing a portion of the right of way granted, recorded under
Auditor's File No. 2002-04067, records of Walla Walla County, Washington
6. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Two Rivers, a Partnership
RECORDED: February 26, 1976
RECORDING NO.: Auditor's File No. 551168, records of Walla Walla County,
Washington



7. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: H&H Farms a Washington General Partnership
RECORDED: August 31, 1981
RECORDING NO.: Auditor's File No. 8106523, records of Walla Walla County,
Washington
BOOK/PAGE: 129/1259
ASSIGNMENT OF SAID EASEMENT:
ASSIGNEE: LeG row Water Company
RECORDED: December 28, 1989
RECORDING NO.: 8107582, records of Walla Walla County, Washington
8. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Two Rivers Farms, a partnership
RECORDED: December 28, 1989
RECORDING NO.: Auditor's File No. 8908682, records of Walla Walla County,
Washington
ASSIGNMENT OF EASEMENT RECORDED UNDER AUDITOR'S FILE NOS. 2024-
05547 AND 2024-05597, records of Walla Walla County, Washington
9. EXCEPTIONS AND RESERVATION CONTAINED IN DEED:
EXECUTED BY: Glacier Park Company
DATED: 12-18-1989
RECORDED: 12-26-1990
RECORDING NO: 9008936
SAID MINERAL RIGHTS CONVEYED BY DEED:
RECORDED: December 10, 1990
VOLUME AND PAGE: 186/1482
AUDITOR'S FILE NO. : 9008600, records of Walla Walla County, Washington
NOTICE OF CLAIM TO SEVERED MINERAL INTERESTS RECORDED UNDER
AUDITOR'S FILE NOS. 2008-11332 and 2008-11333, records of Walla Walla County,
Washington
10. EASEMENT AS DELINEATED ON THE FACE OF THE PLAT:
RECORDING NO.: Auditor's File No. 9100846 records of Walla Walla County,
Washington
11. EASEMENT AS DELINEATED ON THE FACE OF THE PLAT:
Auditor's File No. 9100846 records of Walla Walla County, Washington
12. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Pacificorp, a corporation, dba Pacific Power and Light Company, its
successors and assigns
RECORDED: December 5, 1990
RECORDING NO.: Auditor's File No. 9008463 records of Walla Walla County,
Washington
BOOK/PAGE: 186/1216
13. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:
IN FAVOR OF: Pacificorp, a corporation, dba Pacific Power and Light Company, its
successors and assigns



RECORDED: February 22, 1993

RECORDING NO.: Auditor's File No. 9301770, records of Walla Walla County, Washington

BOOK/PAGE: 204/929

14. EASEMENT AND THE TERMS AND CONDITIONS THEREOF:

IN FAVOR OF: Qwest

RECORDED: February 13, 2001

RECORDING NO.: Auditor's File No. 0101386 records of Walla Walla County, Washington

BOOK/PAGE: 308/1100

15. EASEMENT EXCHANGE AGREEMENT EXECUTED BY AND BETWEEN THE PARTIES HEREIN NAMED UPON THE CONDITIONS THEREIN PROVIDED BY: BOISE CASCADE CORPORATION, A DELAWARE CORPORATION AND TWO RIVERS, A WASHINGTON GENERAL PARTNERSHIP

RECORDED: March 21, 2003

RECORDING NO.: Auditor's File No. 2003-03822, records of Walla Walla County, Washington

SAID EASEMENT EXCHANGE AGREEMENT ALSO RECORDED UNDER AUDITOR'S FILE NO. 2003-04581

16. DEDICATION OF PUBLIC RIGHT-OF-WAY

GRANTOR: Port of Walla Walla, a Washington municipal corporation

GRANTEE: The Public

RECORDED: May 7, 2024

RECORDING NO.: Auditor's File No. 2024-01127 records of Walla Walla County, Washington

17. RIGHT OF WAY EASEMENT GRANT

GRANTOR: Port of Walla Walla, a Washington municipal corporation

GRANTEE: Cascade Natural Gas Corporation

RECORDED: April 6, 2021

RECORDING NO.: Auditor's File No. 2021-03984 records of Walla Walla County, Washington

18. RIGHT OF WAY EASEMENT GRANT

GRANTOR: Port of Walla Walla, a Washington municipal corporation

GRANTEE: Cascade Natural Gas Corporation

RECORDED: November 5, 2020

RECORDING NO.: Auditor's File No. 2020-11614 records of Walla Walla County, Washington

19. RIGHT OF WAY EASEMENT GRANT

GRANTOR: Port of Walla Walla, a Washington municipal corporation

GRANTEE: Cascade Natural Gas Corporation

RECORDED: July 5, 2019

RECORDING NO.: Auditor's File No. 2019-04814 records of Walla Walla County, Washington



20. Declaration of Covenants, conditions, and restrictions as set forth in instrument recorded under Auditor's File No. 2007-11537.
21. Declaration of Covenants, conditions, and restrictions as set forth in instrument recorded under Auditor's File No. 2019-10370.
22. EASEMENT AS DELINEATED ON THE FACE OF THE SHORT PLAT:
RECORDED: August 20, 2025
RECORDING NO.: Book 6 at Page 76, under Auditor's File No. 2025-04980, records of Walla Walla County, Washington.
23. EASEMENT AS DELINEATED ON THE FACE OF THE SHORT PLAT:
RECORDED: August 20, 2025
RECORDING NO.: Book 6 at Page 76, under Auditor's File No. 2025-04980, records of Walla Walla County, Washington.
24. EASEMENT AS DELINEATED ON THE FACE OF THE SHORT PLAT:
RECORDED: August 20, 2025
RECORDING NO.: Book 6 at Page 76 under Auditor's File No. 2025-04980, records of Walla Walla County, Washington.
25. EASEMENT AS DELINEATED ON THE FACE OF THE SHORT PLAT:
RECORDED: August 20, 2025
RECORDING NO.: Book 6 at Page 76 under Auditor's File No. 2025-04980, records of Walla Walla County, Washington.
26. The effect of any Statement or Note on the face of the Short Plat recorded in Book 6 at Page 76 under Auditor's File No. 2025-04980.
27. EXCEPTIONS AND RESERVATION CONTAINED IN DEED
GRANTOR: Port of Walla Walla, a Washington municipal corporation
GRANTEE: Roxul USA Inc. d/b/a Rockwool, a Delaware for profit corporation
DATED: 07/15/2024
RECORDED: 07/15/2024
RECORDING NO: 2024-03819
28. THE TERMS AND CONDITIONS OF EASEMENT AGREEMENT
GRANTOR: Port of Walla Walla, a Washington municipal corporation
GRANTEE: Roxul USA Inc. d/b/a Rockwool, a Delaware for profit corporation
DATED: 07/15/2024
RECORDED: 07/15/2024
RECORDING NO: 2024-03820
29. Matters disclosed by ALTA/NSPS Land Title Survey by PBS Engineering and Environmental dated 10/7/2025, and revised 1/29/2026, designated Project No. KIM012 240128.



Water Availability Form

Submitted by: Anonymous user

Submitted time: May 20, 2026, 3:19:23 PM

Project Information

Parcel Number

310835410003

Project Description

The project proposed is a data center campus on 134 acres east of US-12, between Dodd Road and Worden Road. This campus will include (3) one-story data center buildings, (1) access control building, (1) water building, (2) fiber sunrooms, (1) stormwater pond, (1) NCCW pond. A substation will be constructed by the utility but the owner will provide the design and construction of the pad.

Occupancy for each data center will be approximately fifty (50) employees, the access building (1.2k sf) will have fewer than thirty, with one person at the guard booth (<100 sf). The water building (12k sf) will not be occupied. Data center A is 217,470 sf and data centers B and C are 220,230 sf each (see site plan). Data center buildings would be phased with outbuildings and site development beginning with the first building. Landscape design and building color palettes are included to enhance the project.

Contact Information

Applicant First Name

Melinda

Applicant Last Name

McMillan

Applicant Email Address

mmcmillan@integrusarch.com

Applicant Phone Number

503-715-3284

Applicant Mailing Address

707 SW Washington St, Portland, OR 97205

Is the Applicant the same as Property Owner?

No

Property Owner

Property Owner First Name

Amazon Design Services, Inc

Property Owner Last Name

Cardenas

Property Owner Email Address

cardeom@amazon.com

Property Owner Phone Number

732-921-7070

Property Owner Mailing Address

410 Terry Avenue North, Seattle, WA 98109

Water Source Information

Water Source

Public / Community Water System / Irrigation District

Public / Community Water System / Irrigation District

Water System Manager Name

Jay Hester

Water System Manager Email Address

jayhester@portwallawalla.com

Individual Water Source (Well)

Will you be utilizing a new permit-exempt well, as defined by the Department of Ecology?

No

Type of Individual Water Well

Use of water for this structure is authorized by a valid water right permit and has not been relinquished.

Water Right Permit Number

The Port of Walla Walla to Provide documentation of infrastructure

Supporting Documents

Supporting Documents

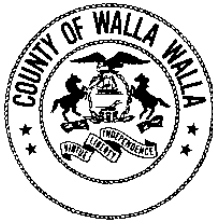
PDF [Water Availability Form_Supporting Document.pdf](#)
104.2KB

Applicant Signature

A handwritten signature in black ink, appearing to be a stylized 'R' or 'H' followed by a horizontal line.

Untitled question 32

May 20, 2026



Community Development Department

310 W. Poplar, Suite 200 | Walla Walla, WA 99362

commdev@co.walla-walla.wa.us | 509-524-2610

Submit to: planning@co.walla-walla.wa.us

https://www.co.walla-walla.wa.us/residents/community_development/index.php

Zoning Determination Letter

Project Name: Project Tree
Site Location: Unknown: Attalia Industrial Urban Growth Area
Zoning: Industrial Agriculture Mixed (IA-M)
Date: 3/20/2025

A zoning confirmation letter was requested for Port of Walla Walla Project Tree by Paul Gerola, Port Economic Development Director.

According to Mr. Gerola, site(s) located at the Port of Walla Walla Wallula Gap Business Park in the Industrial Agriculture Mixed (IA-M) are under consideration. The IA-M district is located within the Attalia Urban Growth Area (UGA).

Project Summary: "Project Tree" is intending on building a large-scale data center warehouse facility. The data center warehouse facility will house a network of computing resources, including servers, storage systems, networking equipment, and security devices. It is designed to store, manage, process, and distribute data efficiently. The data centers warehouse facility provides critical infrastructure for businesses, cloud services, and internet operations, ensuring high availability, redundancy, and security. (email from Paul Gerola, dated February 27, 2025)

In 2018, the Community Development Director issued a Code Interpretation for a data center/server farm project (enclosed). The Director concluded that the project fit within the land use classification of 'warehousing and storage' in the Industrial Agriculture – Heavy (IA-H) zoning district in the Attalia Industrial UGA. This classification was based on the policies of the Walla Walla County Comprehensive Plan for the Attalia Industrial UGA, which contains both IA-M and IA-H zoning. Since Project Tree seems to be similar in character to the project/use considered in 2018, and the policies are the same for both of the Industrial Agriculture zoning districts, I would conclude that this use is allowed use in the IA-M district pursuant to the enclosed analysis.

As a permitted use, such a proposal would be subject to Type 1 or Type 2 Administrative Review under WWCC 14.09.020. Development permit decisions for Type 1 and 2 reviews are made by the director, there is no public hearing or discretionary land use/zoning review. These decisions are appealable to the Walla Walla County Hearing Examiner. Presumably the project would not be categorically exempt from review under the State Environmental Policy Act (SEPA), so this project would be subject to Type 2 review.

Lauren Prentice
Community Development Director

SEPA Environmental Checklist

Submitted by: Anonymous user

Submitted time: May 21, 2026, 12:53:34 PM

Purpose of Checklist

Is this Checklist for a Non-project proposal?

No

A. Background

1. Name of Proposed Project

**Amazon Web Services, Port of Walla Walla Data Center (AWS Campus)
Development**

2. Applicant First Name

Amazon Data Services, Inc.

2. Applicant Last Name

Inc.

3. Applicant Email Address

rowclaux@amazon.com

3. Applicant Phone Number

(928) 278-2434

3. Applicant Mailing Address

410 Terry Ave, Seattle, WA 98104

3. Is the Primary Contact the same as the Applicant?

Yes

4. Date checklist prepared:

May 21, 2026

5. Agency Requesting Checklist

Walla Walla County

6. Proposed Timing of Schedule (including phasing, if applicable)

The proposed project includes construction and operation of a data center campus, (Site). This campus is anticipated to be constructed in the next 3 years.

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

No

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

- **Critical Area Report (CAR) (Geosyntec Consultants, Inc., 2026)**
- **Traffic Impact Analysis (Pending)**

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal?

No

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

Port of Walla Walla

- **Water Customer Service Agreement**

Walla Walla County

- **Land Use/Site Development Permit**
- **Building Permit(s)**
- **Critical Areas Permit (if needed)**
- **Grading and Excavation Permit**
- **Utility Connection Permits**
- **Right-of-Way Use Permits**
- **Fire Department Final Approval**

Washington Department of Ecology

- **Construction Stormwater General Permit**
- **Individual State Waste Discharge Permit**
- **Air Quality Notice of Construction and Second Tier Health Risk Assessment**
- **Water Right Change Application**
- **Fuel Storage Permit (Underground Storage Tank License, if necessary)**

Washington State Department of Health

- **Large on-Site Septic (LOSS) Operating Permit**

Columbia Rural Electric Association

- **Substation Permit**

US Fish and Wildlife Service/National Marine Fisheries Service

- **Endangered Species Act Consultation**

State Historic Preservation Office – National Historic Preservation Act Section 106

- **Section 106 SHPO Clearance**

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.

The proposed project consists of constructing and operating one data center campus (see site plan):

The Campus will consist of:

- **A total of 658,510 square feet of data center buildings**
 - o **Consisting of 3 one-story data center buildings (21,217,804 square feet to 220,353 square feet each)**
 - o **9 water tanks (35.65' diameter), totaling 8,984 square feet**
- **A 9,940 square foot water treatment building**
 - o **7 water tanks (20' to 28' diameter), totaling 3,993 square feet**
- **1 electrical substation totaling 506,385 square feet**
- **4 evaporation ponds totaling 197,271 square feet**
- **A 148,109 square foot stormwater infiltration pond**
- **An 80,000 square foot septic field**

Site access will require widening, paving, and/or extending existing roads, and constructing a new internal access road. Earthwork will be required and will include cutting, filling, and grading. The Port of Walla Walla will supply domestic and industrial use water under existing water rights. (Continued in Att. 1 SEPA Checklist)

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 proposed project is located in Walla Walla County, Washington, west of Attalia East Road, and north of Ogden Road, south-east of the City of Burbank. The site is approximately 134 acres.

B. Environmental Elements

1. Earth

a. General Description of the Site

- **Rolling**

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

The steepest slope on the site is approximately 16 percent.

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 the review of the United States Department of Agriculture's Natural Resources Conservation Service (USDA NRCS) Soil Survey Map and the Walla Walla County Natural Resources map, the following soil units are mapped at the site surface:

- **Ac = Active dune land**
- **AfC2 = Adkins loamy fine sand, 0 to 15 percent slopes, eroded**
- **HoC2 = Hezel loamy fine sand, 0 to 15 percent slopes, eroded**
- **Qd = Quincy-Duneland complex**
- **QfD2 = Quincy fine sand, 0 to 30 percent slopes, eroded**
- **QmB2 = Quincy loamy fine sand, 0 to 8 percent slopes, eroded**
- **QuC2 = Quincy loamy fine sand, 8 to 15 percent slopes, eroded**

Agricultural lands of long-term commercial significance in Walla Walla County are designated through the County Comprehensive Plan and implemented by zoning, including Primary Agriculture, Exclusive Agriculture, and General Agriculture districts. The project site is not located within a designated agricultural resource land... (Continued in Att. 1 SEPA Checklist)

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

No

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.

Filling, excavation, and grading will be necessary for constructing buildings, parking, road improvements, stormwater facilities, evaporation pond, LOSS drainfield and trenching for utilities.

The expectation is that the existing soil on-site will be used to balance the site and thus no import of fill is anticipated for this project other than aggregate material used for pipe bedding, road base course, and other engineering purposes.

Campus Site: Approximate earthwork quantity: Cut = 1,134,015 cubic yards, Fill = 1,014,550 cubic yards

f. Could erosion occur because of clearing, construction, or use?

Yes

Generally describe

The proposed development may result in some minor short-term erosion associated with earthwork and windy or wet weather. There are no severe or very severe NRCS erosion hazard areas in the project area, the potential for erosion is limited. Construction will require coverage under the NPDES Construction Stormwater General Permit, which includes a Stormwater Pollution Prevention Plan (SWPPP) and Temporary Erosion and Sediment Control (TESC) Plan.

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

The site will be covered with approximately 55 acres of impervious surfaces.

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

Permanent cut-and-fill slopes will be constructed with inclinations no steeper than 2½H:1V and protected from both wind and water erosion. A Temporary Erosion Control (TESC) Plan and a Stormwater Pollution Prevention Plan (SWPPP) will be prepared and utilized during the construction project. The SWPPP will contain recommended Department of Ecology Best Management Practices, such as filter fabric fence, mulching, and hydroseeding to control and reduce the impacts of erosion and sedimentation.

2. Air

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 will result in the temporary generation of dust from earthwork and exhaust emissions from construction equipment and vehicles. Dust from construction is generally composed of larger particles that settle fairly rapidly. Thus, dust is generally confined to the vicinity of the project area and can be managed using onsite dust control measures (e.g., watering).

Heavy equipment operation and workers' vehicles will generate exhaust emissions with the potential for short-term increases in particulate matter, carbon monoxide, and nitrogen oxides.

The amount of emissions to the air related to construction activities will be minimal and short-term occurring during the construction period.

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 and routine testing and maintenance... (Continued in Att. 1 SEPA Checklist)

b. Are there any off-site sources of emissions or odor that may affect your proposal?

No

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

AWS will develop these further in coordination with Ecology air permitting. To the extent practicable, vehicle and equipment emissions will be minimized by turning vehicles/equipment off when not in use. As necessary, the project site will be sprinkled with water during construction to control dust. All critical emergency generators will be EPA Tier-4 compliant and will exclusively use ultra-low sulfur diesel fuel to minimize emissions.

3. Water

a. Surface

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)?

No

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters?

No

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 or dredge material will be placed or removed from surface water or wetlands.

4. Will the proposal require surface water withdrawals or diversions?

Yes

Give a general description, purpose, and approximate quantities if known.

The Port has existing water rights that divert water from an intake on the Columbia River west of the project site (Water Right Certificate S3-21044C). Expected annual quantities are approximately 76-acre-feet. These existing water rights are used for irrigation and will be converted to municipal/industrial uses to support the AWS proposal. In addition to surface water, the project will move forward with a connection to the Port of Walla Walla's groundwater system (discussed later). Water use will include domestic and industrial operational needs associated with data center facilities, including building systems necessary to support equipment operation and site safety.

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

No

6. Does the proposal involve any discharge of waste materials to surface waters?

No

b. Ground

1. Will groundwater be withdrawn from a well for drinking water or other purposes?

Yes

Give a general description of the well, proposed uses and approximate quantities withdrawn from the well.

Drinking water will be provided by the Port of Walla Walla from the Port's existing water rights, a summary of which is provided in the Port's Water System Plan (Anderson Perry & Associates, Inc., 2021), for both domestic and industrial purposes.

2. Will water be discharged to groundwater?

Yes

Give a general description, purpose, and approximate quantities if known.

Groundwater will be discharged via LOSS for domestic use and land applied or evaporated for industrial use.

3. 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 material will be discharged into the ground from septic systems or other sources.

The facility ponds will be designed with redundant capture and detection features such that no stored or transferred concentrate water will be discharged to groundwater. To ensure that discharge does not occur, the pond will be double lined with a leak detection and collection system. The lower liner has small high-density polyethylene (HDPE) studs that face the upper liner, which creates a cavity between the two liners. Any water that penetrates the upper liner will be conveyed to a leak detection/collection sump. The liner will be 60 mil HDPE to further minimize any leakage risk due to freeze-thaw action.

c. Water Runoff (including Stormwater)

1. Describe the source of runoff (including stormwater) 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.

Rainfall on the site will be collected in a series of catch basins and conveyed to a new water quality treatment swale before discharging to the new stormwater infiltration pond on-site.

2. Could waste materials enter ground or surface waters?

Yes

Generally describe

Construction activities such as fueling, and equipment operation and maintenance can create the potential for spills or minor leaks of fuel, oil, hydraulic fluid or other material into the soil that could make their way into the groundwater. As previously discussed, construction will require coverage under the NPDES Construction Stormwater General Permit, which includes a Stormwater Pollution Prevention Plan (SWPPP) and Temporary Erosion and Sediment Control (TESC) Plan. Additionally construction BMPs to contain waste and prevent spills will be implemented (e.g., secure waste receptacles, containment of any chemicals, etc.).

During operations, common pollutants from parked vehicles may collect on impervious surfaces and be washed into the stormwater system. Common pesticides and nutrients from landscaping areas (if developed) may also enter the stormwater system. The storm water runoff and associated pollutants will be treated for water quality... (Continued in Att. 1 SEPA Checklist)

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

No

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

No impacts will occur with effective implementation of the groundwater and surface water protection measures.

The Department of Ecology was consulted during development of this Checklist. The following is planned to occur to ensure no impacts would occur to groundwater:

- **No hazardous waters shall be stored at the Project site.**
- **Ecology will review and approve documentation that describes the basis of design for project elements related to non-contact cooling water.**
- **An Operations and Maintenance (O&M Manual) will be submitted for Ecology approval, which will include specific protocols for routine monitoring of the leak detection system..**

The facility is designed with redundancy in storage volumes and liner systems. If the detection system and protocols suggest potential for a leak through a primary liner, the suspect pond could be transferred by pumping to another isolated pond and the system inspected and repaired as needed.

4. Plants

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

- **shrubs**
- **grass**
- **crop or grain**
- **orchards, vineyards, or other permanent crops.**

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

Shrubs and grass will be removed during earthwork operations. Some areas currently in agriculture will not be replanted with crops.

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

Per the WADNR Natural Heritage Program, yellow wildrye (*leymus flavescens*) may occur on the site, but no evidence of the yellow wildrye was identified at the site. Yellow wildrye grows on unstable sand dunes and disturbed sandy soils, which are not located onsite of the proposal area.

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

Revegetation is planned with native species for disturbed areas not covered by impervious surfaces.

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

None known.

5. Animals

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.

- **Hawks and other birds of prey**
- **Deer, small rodents**
- **None**

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

The project site is located within the mapped Ferruginous Hawk breeding range identified by WDFW Priority Habitats and Species; however, suitable nesting or roosting habitat is not present within the site. The site lacks cliffs, elevated perching structures, large expanses of undisturbed shrub steppe or grassland habitat, and adequate disturbance free conditions required for ferruginous hawk breeding. No Ferruginous Hawks were observed on site. Based on these findings, occurrence or breeding at the site is unlikely, and the proposed project is not expected to affect this species.

Washington ground squirrel, WGS, (*Uroditellus washingtoni*) is a priority species in Washington and a federal species of concern. This species has not been found to occur within the project area; however, they have been known to occur in southern Walla Walla. The project area does not contain suitable habitat, and no evidence of the species was observed on site.

c. Is the site part of a migration route?

Yes

Explain

The site is part of the Columbia Plateau Regional Biodiversity Corridor, per WDFW PBS.

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

A qualified biologist will conduct pre-construction survey if construction starts during the nesting season (Feb 1 - July 31). The survey would be conducted within one week prior to the start of vegetation clearing to confirm that no active nests will be impacted within the project area.

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

None known.

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The site will utilize electrical energy for power, cooling and minor heating. Diesel fuel will be utilized by the standby generator system in case of emergencies.

b. Would your project affect the potential use of solar energy by adjacent properties?

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.

This project will utilize the most energy efficient mechanical systems practicable and will meet or exceed the requirements of the Washington Non-Residential Energy Code.

7. Environmental health

a. Health

1. 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?

Yes

Describe

The proposed development construction activities have potential environmental health hazards associated with the use and operation of heavy construction equipment.

After construction, the data center buildings will utilize special systems for assurance of continuous power for critical computer systems. On-site treatment will utilize antiscalants in operation of the reverse osmosis (RO) system. The antiscalant will be discharged with the brine/reject from the RO and managed on-site through brine evaporation ponds. The RO skids will also use an acid and caustic cleaning procedure, which will occur every few months. When the Site transitions to surface water, chlorine will be added to ensure stored water does not grow bacteria. Chlorine will be dosed at low levels (1 ppm at the auxiliary water building and 2 ppm at the building connection), and the NCCW does not expect to see any detectable chlorine concentrations. A monitoring system will... (Continued in Att. 1 SEPA Checklist)

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

The site has been used for agricultural purposes since the 1980s, and site representatives indicated that pesticides and herbicides have been used on-site for farming purposes. While it is possible that small amounts of agricultural chemicals or petroleum products may have been used or stored at the site in the past, because there are no historical structures on-site, it is unlikely that pesticides and/or herbicides were stored or mixed in significant quantities. There is no evidence of known or suspected past releases.

3. 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.

Two 8-inch non-highly volatile liquid pipelines traverse the PDX 100 site. The pipelines are protected by a 33 foot wide easement.

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

The proposed development construction and operation activities have common potential environmental health hazards associated with the use of oil, fuel, and other lubricants during operation and maintenance of heavy construction equipment.

Diesel fuel will be stored on site for the operation of emergency power generators. The fuel will be stored in the belly tanks of the generators and an above-ground tank for the top-off system.

5. Describe special emergency services that might be required.

There will be diesel fuel stored on site.

In the event of a significant chemical spill, specialized spill response services may be required. The project operator would utilize a contracted, third party spill response company to manage such incidents, thereby limiting demands on local emergency responders.

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

Best management practices will be implemented during all construction activities to reduce environmental health hazards.

Bulk storage of diesel fuel will be aboveground. Double walled tanks located in an exterior utility yard will be used. All fuel oil piping will be double walled and have monitoring sensors to detect leakage.

b. Noise

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

Traffic noise from nearby roads (primarily from US12), agricultural uses from surrounding plots, and multiple factories/plants that operate 24/7 (notably the Tyson Fresh Meats and Packaging Corporation of America plants) are not expected to affect the proposed development.

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)?

Short-term: Localized noise of short duration commonly associated with construction of a project of this type and operation of construction equipment is likely to occur as a result of this project.

Long-term: Noise from cooling systems and ventilation equipment would operate at various loads depending on outdoor temperature and humidity. The standby emergency generator system will operate periodically for testing and maintenance and continuously during a power outage in accordance with the Walla Walla County Code. Noise modeling was completed and model results show that constant mechanical sources of noise are below regulatory limits at all property boundaries and at distant residential properties . Noise model results of intermittent generator maintenance and testing show that the levels comply with the 70 dBA noise limit at the adjacent industrial properties south of the site with construction of a 25-foot noise barrier on the south end of the...

(Continued in Att. 1 SEPA Checklist)

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

Some potential mitigation measures that will be employed where feasible to minimize noise during construction include:

- **Ensuring that construction equipment and vehicles are equipped with properly sized and maintained mufflers, engine intake silencers, and/or engine enclosures.**
- **Turning off vehicles and equipment when not in use.**
- **Where feasible, equipment operators will drive forward instead of backwards to minimize the use of back-up alarms (these are exempt from noise standards).**
- **Noise from material handling will be minimized by requiring operators to lift rather than drag material.**
- **Timing the noisiest activities for the time of day when noise levels are highest.**

Mitigation measures that will be employed during long-term operations include:

- **Construction of an end-cap generator yard wall at the south end of building 1 and use of acoustical enclosures and exhaust mufflers for the generators at building 1.**
- **Use of enhanced acoustical... (Continued in Att. 1 SEPA Checklist)**

8. Land and shoreline use

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 site is agriculture, operated by the Port of Walla Walla. Land to the north and west is a feedlot operated by Simplot Feeders. Land immediately to the west is operated by the Packaging Corporation of America (PCA). Land immediately to the east is agricultural, operated by the State of Washington and Firstfruits Farms, LLC. Land immediately to the south is agricultural land, operated by the Port of Walla Walla. There are no anticipated impacts to current land uses on nearby or adjacent properties.

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 non-forest use?

The site has been used for farming with pivot irrigation. None of the site contains designated resource farmland. The project will convert approximately 134 acres of farmland to industrial land, with buildings, ponds, etc.

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

No.

d. Describe any structures on the site.

None.

e. Will any structures be demolished?

No

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

The site is zoned as Industrial Agriculture – Mixed (IA-M) based off the Walla Walla County Zoning Map.

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

The comprehensive plan designation of the site is Industrial (Map LU-2), as the site is within the Wallula Gap Business Park area of the Attalia Urban Growth Area (UGA).

h. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

i. Has any part of the site been classified as a critical area by the city or county?

Yes

Specify

There are no wetland designations, frequently flooded areas, geologically hazardous areas, or fish and wildlife habitat conservation areas mapped on the site per Walla Walla County Code (WWCC) Chapter 18.08.

The Site intersects with the well head protection area (WHPA) for the Simplot Feeders Well. The Simplot Feeders Well is completed in a confined, deep basalt aquifer with a surface seal and casings into the basalt. Surface disturbances like construction activities are not anticipated to negatively impact designated critical aquifer recharge areas (CARAs), therefore:

- **The susceptibility of the basalt aquifer from surface activities on Site is low due to the interbedded nature of the high and low permeable zones, depth of the aquifer, and planned activities on the Site.**
- **There is potential susceptibility of the shallower alluvium aquifer from activities on Site, but no WHPAs for wells completed in the alluvium aquifer were identified proximal... (Continued in Att. 1 SEPA Checklist)**

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

No one will reside in the completed project. Approximately 275 people will work in the project during construction, and an average of 45 people per shift (for a total of 180 per day) will work at the project after construction.

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

This project will not displace any people.

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

No measures are proposed.

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

The proposed project is consistent with the current zoning and the comprehensive plan designation.

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

The proposed project is consistent with the current zoning and comprehensive plan design.

9. Housing

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

None

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

None

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

No measures are proposed.

10. Aesthetics

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

The proposed building heights will be approximately 25 to 35 feet to the principal parapet elevation, and roof access stair enclosures will be up to 43 feet above adjacent grade. Top of rooftop mechanical equipment and water storage tanks will be up to 50 feet tall.

The primary exterior building material is painted concrete tilt-up panels with painted accent colors. Smaller buildings on site are constructed from un-painted concrete masonry units and accessory structures are prefinished metal.

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

The view of the existing agricultural land will be replaced with the view of the new data center facilities. Section B.4.d of this checklist describes landscaping revegetation.

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

The proposed project will be designed in accordance with Walla Walla County Codes.

11. Light and glare

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

The proposal will produce light and glare from multiple sources operating at different times throughout the day. Fixed exterior lighting—including site pole-mounted lighting (1.5 FC with 20-30 ft. illumination width), loading docks (1.5 FC measured 60' from dock), building exterior (1 FC), and parking lots (1.5 FC)—operates continuously during nighttime hours via photocell control, activating automatically at dusk and remaining on until dawn. Indoor lighting from office areas is visible through windows primarily during business hours (7 AM - 6 PM weekdays), while data hall areas remain windowless with no exterior visibility. Vehicle headlights and taillights produce intermittent light and glare during operational hours in parking areas, loading docks, and access roads. Additionally, the building's glass windows and metal cladding on facades may produce some daytime glare from reflected sunlight, particularly during morning hours on east-facing... (Continued in Att. 1 SEPA Checklist)

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

No. Light from vehicle headlights and exterior lighting is common throughout the industrial business areas in the vicinity and does not create safety hazards or interfere with views.

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

No existing off-site sources of light or glare will affect our proposal.

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

The project will incorporate lighting designed to reduce impacts. Lights will be cut off fixtures where appropriate on the exterior, and interior lighting will be controlled by sensors. Outside lighting for safety and security will be directed outside the immediate vicinity.

12. Recreation

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

Recreational opportunities in the vicinity of the site include Madame Dorion Memorial Park (2.8 miles from the Site), History of Wallula Historic Monument (3.6 miles from the Site), Twin Sisters Rock hiking area (4.4 miles from the Site), and Burbank Slough – Mc Nary National Wildlife Refuge (6.6 miles from the Site).

b. Would the proposed project displace any existing recreational uses?

No

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

No mitigation measures are proposed.

13. Historic and cultural preservation

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

No

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries.

There were no landmarks, features, or other evidence of Indian or historic use or occupation identified.

c. 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.

There were no landmarks, features, or other evidence of Indian or historic use or occupation identified.

d. 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.

No archaeological resources were identified in the project area, though the Department of Archaeology and Historic Preservation (DAHP) classifies the project area as High to Very High Risk to encounter archaeological resources. Future investigations will include conducting subsurface testing in the project area.

e. 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.

There are no measures proposed to avoid, minimize, or compete for loss or disturbance as there are no anticipated resources. Regardless, an Inadvertent Discovery Plan will be prepared and followed in case of unexpected discovery of cultural resources during project construction.

14. Transportation

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 to the project site is from Attalia East Road and Boise Cascade Road. Additional roadway extensions are planned to reach the campus. Additional improvements at intersections along Highway 12 may be needed depending on construction timelines of other roadway improvement projects in the area. Highway 12 improvements are planned and conducted by WSDOT, independent of this proposal, and tentatively scheduled for summer 2027.

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?

There are no park and ride facilities or bus stops in the site vicinity per Washington Access Transit Map, so it is not anticipated that trips will be taken via public transport. The town of Wallula, approximately 1.5 miles south of the project site, is served by one bus station, located at 150 Columbia Way, Touchet, WA 99360. There may be an employee shuttle to/from nearby communities to encourage carpooling.

c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways?

Yes

Generally describe (indicate whether public or private)

Any improvements, if needed, will be evaluated and identified in the Traffic Impact Analysis (TIA) report.

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

No

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 non-passenger vehicles). What data or transportation models were used to make these estimates?

Trip generation calculations were performed to demonstrate what the proposed data center land use will generate. Trip generation was estimated using data published by the Institute of Transportation Engineers (ITE) in their Trip Generation, 12th Edition, an industry standard tool recognized by WSDOT and the local jurisdictions. The Trip Generation publication uses data provided from sites around the country to extrapolate an average rate for project trips over a range of facility sizes. Using ITE land use code (LUC) 160, Data Center, the proposed project is anticipated to generate approximately 485 average daily trips (ADTs) with 46 AM peak hour trips (one hour between 7:00 AM and 9:00 AM) and 33 PM peak hour trips (one hour between 4:00 PM and 6:00 PM).

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?

No

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

Any proposed measures, if needed, will be evaluated and identified in the TIA report.

15. Public services

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

Yes

Generally describe

The proposed project will require fire and police protection provided by Walla Walla County. The project will have onsite private security, site access control, and battery/fuel storage and handling procedures.

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

The proposed buildings will conform to applicable fire safety regulations and night-time security lighting will be provided on the building exterior and in the parking area. Furthermore, onsite private security, site access control, and battery/fuel storage and handling procedures will reduce the need for public emergency services.

16. Utilities

a. Check utilities currently available at the site:

- **water**

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.

The only utilities currently present at the site are water infrastructure for a center pivot irrigation system. All utilities will be coordinated and constructed to serve this new facility including electricity, potable water, refuse service, telephone, and sanitary sewer (LOSS).

Electricity: Columbia Rural Electric Association

Water: Port of Walla Walla, construction to tie into existing service line

Refuse: Republic Services or other local provider

Telephone/Internet: Multiple Providers

Septic System: On-site private septic field

Wastewater: Port of Walla Walla

Signature Page

Name of Signee

Daniel Chang

Position and Agency/Organization

Consultant, Geosyntec Consultants Inc., on behalf of Amazon Web Services, Inc.

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.

A large, empty rectangular box for a signature, with a handwritten signature of "Daniel Chang" in black ink at the bottom.

Submitting date

May 21, 2026

Supporting Documents

Supporting Documents

PDF [SEPA Checklist_Wallula_One Campus_05-20-2026.pdf](#)
444.4KB

Supporting Documents

PDF [Critical Area Report_20260406_Final.pdf](#)
11.6MB

Supporting Documents

PDF [202605 Attilia Campus_Land Use - Title 18 Environment_Applica...](#)
234.5KB

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 questions](#)²

1. Name of proposed project, if applicable: Amazon Web Services, Port of Walla Walla Data Center (AWS Campus) Development

2. Name of applicant: Amazon Data Services, Inc.

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

Rowena Claux, Sr. Regional Environmental Engineer

(928) 278-2434

Mailing Address: 410 Terry Ave, Seattle, WA 98104

4. Date checklist prepared:

May 21, 2026

5. Agency requesting checklist:

Walla Walla County

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

The proposed project includes construction and operation of a data center campus, (Site). This campus is anticipated to be constructed in the next 3 years.

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

No.

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

- Critical Area Report (CAR) (Geosyntec Consultants, Inc., 2026)
- Traffic Impact Analysis (Pending)

8. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None known.

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

Port of Walla Walla

- Water Customer Service Agreement

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

Walla Walla County

- Land Use/Site Development Permit
- Building Permit(s)
- Critical Areas Permit (if needed)
- Grading and Excavation Permit
- Utility Connection Permits
- Right-of-Way Use Permits
- Fire Department Final Approval

Washington Department of Ecology

- Construction Stormwater General Permit
- Individual State Waste Discharge Permit
- Air Quality Notice of Construction and Second Tier Health Risk Assessment
- Water Right Change Application
- Fuel Storage Permit (Underground Storage Tank License, if necessary)

Washington State Department of Health

- Large on-Site Septic (LOSS) Operating Permit

Columbia Rural Electric Association

- Substation Permit

US Fish and Wildlife Service/National Marine Fisheries Service

- Endangered Species Act Consultation

State Historic Preservation Office – National Historic Preservation Act Section 106

- Section 106 SHPO Clearance

10. 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.)

The proposed project consists of constructing and operating one data center campus (see site plan):

The Campus will consist of:

- A total of 658,510 square feet of data center buildings

- Consisting of 3 one-story data center buildings (21,217,804 square feet to 220,353 square feet each)
- 9 water tanks (35.65' diameter), totaling 8,984 square feet
- A 9,940 square foot water treatment building
 - 7 water tanks (20' to 28' diameter), totaling 3,993 square feet
- 1 electrical substation totaling 506,385 square feet
- 4 evaporation ponds totaling 197,271 square feet
- A 148,109 square foot stormwater infiltration pond
- An 80,000 square foot septic field

Site access will require widening, paving, and/or extending existing roads, and constructing a new internal access road. Earthwork will be required and will include cutting, filling, and grading. The Port of Walla Walla will supply domestic and industrial use water under existing water rights. Domestic wastewater is proposed to be disposed via LOSS. Non-contact industrial wastewater will be stored in an evaporation pond and be land-applied offsite during the irrigation season. Power will be provided by Columbia Rural Electric Association; standby/backup generators will be used in event of power failure. Onsite fuels storage is planned though use of aboveground storage tanks.

11. 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 proposed project is located in Walla Walla County, Washington, west of Attalia East Road, and north of Ogden Road, south-east of the City of Burbank. The site is approximately 134 acres.

B. Environmental Elements

1. Earth

[Find help answering earth questions](https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth)³

a. General description of the site:

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

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

The topography of the site is generally gently sloping to the west with 5-10 percent average slopes. The Site has approximately 100 feet of elevation change with the highest point being on the east line.

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

The steepest slope on the site is approximately 16 percent.

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 the review of the United States Department of Agriculture's Natural Resources Conservation Service (USDA NRCS) Soil Survey Map and the Walla Walla County Natural Resources map, the following soil units are mapped at the site surface:

- Ac = Active dune land
- AfC2 = Adkins loamy fine sand, 0 to 15 percent slopes, eroded
- HoC2 = Hezel loamy fine sand, 0 to 15 percent slopes, eroded
- Qd = Quincy-Duneland complex
- QfD2 = Quincy fine sand, 0 to 30 percent slopes, eroded
- QmB2 = Quincy loamy fine sand, 0 to 8 percent slopes, eroded
- QuC2 = Quincy loamy fine sand, 8 to 15 percent slopes, eroded

Agricultural lands of long-term commercial significance in Walla Walla County are designated through the County Comprehensive Plan and implemented by zoning, including Primary Agriculture, Exclusive Agriculture, and General Agriculture districts. The project site is not located within a designated agricultural resource land; therefore, no agricultural land of long-term commercial significance would be affected.

The site **does not** contain agricultural land of long-term commercial significance.

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

There are no surface indications or known history of unstable soils in the immediate vicinity.

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.

Filling, excavation, and grading will be necessary for constructing buildings, parking, road improvements, stormwater facilities, evaporation pond, LOSS drainfield and trenching for utilities.

The expectation is that the existing soil on-site will be used to balance the site and thus no import of fill is anticipated for this project other than aggregate material used for pipe bedding, road base course, and other engineering purposes.

Campus Site: Approximate earthwork quantity: Cut = 1,134,015 cubic yards, Fill = 1,014,550 cubic yards

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

The proposed development may result in some minor short-term erosion associated with earthwork and windy or wet weather. There are no severe or very severe NRCS erosion hazard areas in the project area, the potential for erosion is limited.

Construction will require coverage under the NPDES Construction Stormwater General Permit, which includes a Stormwater Pollution Prevention Plan (SWPPP) and Temporary Erosion and Sediment Control (TESC) Plan.

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

The site will be covered with approximately 55 acres of impervious surfaces.

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

Permanent cut-and-fill slopes will be constructed with inclinations no steeper than 2½H:1V and protected from both wind and water erosion. A Temporary Erosion Control (TESC) Plan and a Stormwater Pollution Prevention Plan (SWPPP) will be prepared and utilized during the construction project. The SWPPP will contain recommended Department of Ecology Best Management Practices, such as filter fabric fence, mulching, and hydroseeding to control and reduce the impacts of erosion and sedimentation.

2. Air

[Find help answering air questions](#)⁴

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 will result in the temporary generation of dust from earthwork and exhaust emissions from construction equipment and vehicles. Dust from construction is generally composed of larger particles that settle fairly rapidly. Thus, dust is generally

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

confined to the vicinity of the project area and can be managed using onsite dust control measures (e.g., watering).

Heavy equipment operation and workers' vehicles will generate exhaust emissions with the potential for short-term increases in particulate matter, carbon monoxide, and nitrogen oxides.

The amount of emissions to the air related to construction activities will be minimal and short-term occurring during the construction period.

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 and routine testing and maintenance. The facility will comply with operational limits and Best Available Control Technology (BACT) emission controls that will be specified in Ecology's air quality permit. Recent BACT determinations for data centers have determined that use of Tier 2 certified generator engines meets BACT, however, AWS proposes to install after control (SCR and cDPF) on the critical generator engines such that they are Tier 4 compliant. Operations and emission controls will operate within specified limits from the Department of Ecology.

The proposed project will be a minor source with respect to new source review:

- Less than 100 tons per year of all criterial pollutants.
- Less than 10 tons per year of any individual Hazardous Air Pollutants (HAP).
- Less than 25 tons per year of combined HAPs.

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.

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

AWS will develop these further in coordination with Ecology air permitting. To the extent practicable, vehicle and equipment emissions will be minimized by turning vehicles/equipment off when not in use. As necessary, the project site will be sprinkled with water during construction to control dust. All critical emergency generators will be EPA Tier-4 compliant and will exclusively use ultra-low sulfur diesel fuel to minimize emissions.

3. Water

[Find help answering water questions](#)⁵

a. Surface:

[Find help answering surface water questions](#)⁶

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.**

There are no streams, ponds, or wetlands identified at the campus. The campus is located approximately 0.4 miles from the Columbia River.

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.**

The project will not require work over, in or adjacent to any shorelines of the state.

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 or dredge material will be placed or removed from surface water or wetlands.

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

The Port has existing water rights that divert water from an intake on the Columbia River west of the project site (Water Right Certificate S3-21044C). Expected annual quantities are approximately 76-acre-feet. These existing water rights are used for irrigation and will be converted to municipal/industrial uses to support the AWS proposal. In addition to surface water, the project will move forward with a connection to the Port of Walla Walla's groundwater system (discussed later). Water use will include domestic and industrial operational needs associated with data center facilities, including building systems necessary to support equipment operation and site safety.

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

The project site is not located 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.**

This proposal does not involve any discharges of waste materials to surface waters.

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>

b. Ground:

[Find help answering ground water questions](#)⁷

- 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.**

Drinking water will be provided by the Port of Walla Walla from the Port's existing water rights, a summary of which is provided in the Port's Water System Plan (Anderson Perry & Associates, Inc., 2021), for both domestic and industrial purposes. Groundwater will be discharged via LOSS for domestic use and land applied or evaporated for industrial use.

- 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 material will be discharged into the ground from septic systems or other sources.

The facility ponds will be designed with redundant capture and detection features such that no stored or transferred concentrate water will be discharged to groundwater. To ensure that discharge does not occur, the pond will be double lined with a leak detection and collection system. The lower liner has small high-density polyethylene (HDPE) studs that face the upper liner, which creates a cavity between the two liners. Any water that penetrates the upper liner will be conveyed to a leak detection/collection sump. The liner will be 60 mil HDPE to further minimize any leakage risk due to freeze-thaw action.

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.**

Rainfall on the site will be collected in a series of catch basins and conveyed to a new water quality treatment swale before discharging to the new stormwater infiltration pond on-site.

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

Construction activities such as fueling, and equipment operation and maintenance can create the potential for spills or minor leaks of fuel, oil, hydraulic fluid or other material into the soil that could make their way into the groundwater. As previously

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>

discussed, construction will require coverage under the NPDES Construction Stormwater General Permit, which includes a Stormwater Pollution Prevention Plan (SWPPP) and Temporary Erosion and Sediment Control (TESC) Plan. Additionally construction BMPs to contain waste and prevent spills will be implemented (e.g., secure waste receptacles, containment of any chemicals, etc.).

During operations, common pollutants from parked vehicles may collect on impervious surfaces and be washed into the stormwater system. Common pesticides and nutrients from landscaping areas (if developed) may also enter the stormwater system. The storm water runoff and associated pollutants will be treated for water quality prior to infiltration as required by the Stormwater Management Manual for Eastern Washington.

Industrial wastewater discharged as land application water will follow Ecology water quality parameter limits pursuant to an approved State Waste Discharge Permit.

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

The project will not affect drainage patterns in the vicinity of the site.

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

No impacts will occur with effective implementation of the groundwater and surface water protection measures.

The Department of Ecology was consulted during development of this Checklist. The following is planned to occur to ensure no impacts would occur to groundwater:

- No hazardous waters shall be stored at the Project site.
- Ecology will review and approve documentation that describes the basis of design for project elements related to non-contact cooling water.
- An Operations and Maintenance (O&M Manual) will be submitted for Ecology approval, which will include specific protocols for routine monitoring of the leak detection system..

The facility is designed with redundancy in storage volumes and liner systems. If the detection system and protocols suggest potential for a leak through a primary liner, the suspect pond could be transferred by pumping to another isolated pond and the system inspected and repaired as needed.

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?

Shrubs and grass will be removed during earthwork operations. Some areas currently in agriculture will not be replanted with crops.

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

Per the WADNR Natural Heritage Program, yellow wildrye (*leymus flavescens*) may occur on the site, but no evidence of the yellow wildrye was identified at the site. Yellow wildrye grows on unstable sand dunes and disturbed sandy soils, which are not located onsite of the proposal area.

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

Revegetation is planned with native species for disturbed areas not covered by impervious surfaces.

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

None known.

5. Animals

[Find help answering animal questions](https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals)⁸

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:**
Hawks and other birds of prey
- **Mammals: deer, bear, elk, beaver, other:** Deer, small rodents

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>

- **Fish: bass, salmon, trout, herring, shellfish, other:** None

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

The project site is located within the mapped Ferruginous Hawk breeding range identified by WDFW Priority Habitats and Species; however, suitable nesting or roosting habitat is not present within the site. The site lacks cliffs, elevated perching structures, large expanses of undisturbed shrub-steppe or grassland habitat, and adequate disturbance-free conditions required for ferruginous hawk breeding. No Ferruginous Hawks were observed on site. Based on these findings, occurrence or breeding at the site is unlikely, and the proposed project is not expected to affect this species.

Washington ground squirrel, WGS, (*Urocitellus washingtoni*) is a priority species in Washington and a federal species of concern. This species has not been found to occur within the project area; however, they have been known to occur in southern Walla Walla. The project area does not contain suitable habitat, and no evidence of the species was observed on site.

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

The site is part of the Columbia Plateau Regional Biodiversity Corridor, per WDFW PBS.

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

A qualified biologist will conduct pre-construction survey if construction starts during the nesting season (Feb 1 - July 31). The survey would be conducted within one week prior to the start of vegetation clearing to confirm that no active nests will be impacted within the project area.

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

None known.

6. Energy and natural resources

[Find help answering energy and natural resource questions](#)⁹

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The site will utilize electrical energy for power, cooling and minor heating. Diesel fuel will be utilized by the standby generator system in case of emergencies.

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

There will be no effect on potential use of solar energy by adjacent properties. Although the county of Walla Walla does not specify any building height requirement for

⁹ <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>

Industrial Agriculture mixed zoning, the proposed buildings will be approximately 25 to 35 feet tall and water storage tanks will be around 50 feet tall.

- 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.**

This project will utilize the most energy efficient mechanical systems practicable and will meet or exceed the requirements of the Washington Non-Residential Energy Code.

7. Environmental health

[Health Find help with answering environmental health questions](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)¹⁰

- 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.**

The proposed development construction activities have potential environmental health hazards associated with the use and operation of heavy construction equipment.

After construction, the data center buildings will utilize special systems for assurance of continuous power for critical computer systems. On-site treatment will utilize antiscalants in operation of the reverse osmosis (RO) system. The antiscalant will be discharged with the brine/reject from the RO and managed on-site through brine evaporation ponds. The RO skids will also use an acid and caustic cleaning procedure, which will occur every few months. When the Site transitions to surface water, chlorine will be added to ensure stored water does not grow bacteria. Chlorine will be dosed at low levels (1 ppm at the auxiliary water building and 2 ppm at the building connection), and the NCCW does not expect to see any detectable chlorine concentrations. A monitoring system will be designed to stop NCCW discharge and initiate sodium bisulfate dosing if elevated chlorine levels are detected.

Batteries used for power continuity will use Lithium-Ion technology. All battery usage would be compliant with manufacture handling and use instructions.

The data center buildings will be supported by a standby generator system which will use low sulfur fuel. During maintenance, testing, and use during emergency power outages the generators will operate and emit toxic air pollutants (TAPs). All TAPs will either be below the acceptable source impact level (ASIL) screening thresholds or are determined by the Tier 2 health risk assessment that adverse health impacts are unlikely to occur as result of this project.

The project will also include diesel fuel storage at the site. Diesel fuel storage could lead to fire or spill, and mitigations are proposed below.

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

¹⁰ <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>

The site has been used for agricultural purposes since the 1980s, and site representatives indicated that pesticides and herbicides have been used on-site for farming purposes. While it is possible that small amounts of agricultural chemicals or petroleum products may have been used or stored at the site in the past, because there are no historical structures on-site, it is unlikely that pesticides and/or herbicides were stored or mixed in significant quantities. There is no evidence of known or suspected past releases.

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.

Two 8-inch non-highly volatile liquid pipelines traverse the PDX 100 site. The pipelines are protected by a 33 foot wide easement.

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

The proposed development construction and operation activities have common potential environmental health hazards associated with the use of oil, fuel, and other lubricants during operation and maintenance of heavy construction equipment.

Diesel fuel will be stored on site for the operation of emergency power generators. The fuel will be stored in the belly tanks of the generators and an above-ground tank for the top-off system.

4. Describe special emergency services that might be required.

There will be diesel fuel stored on site.

In the event of a significant chemical spill, specialized spill response services may be required. The project operator would utilize a contracted, third-party spill response company to manage such incidents, thereby limiting demands on local emergency responders.

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

Best management practices will be implemented during all construction activities to reduce environmental health hazards.

Bulk storage of diesel fuel will be aboveground. Double walled tanks located in an exterior utility yard will be used. All fuel oil piping will be double walled and have monitoring sensors to detect leakage.

b. Noise

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

Traffic noise from nearby roads (primarily from US12), agricultural uses from surrounding plots, and multiple factories/plants that operate 24/7 (notably the

Tyson Fresh Meats and Packaging Corporation of America plants) are not expected to affect the proposed development.

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)?

Short-term: Localized noise of short duration commonly associated with construction of a project of this type and operation of construction equipment is likely to occur as a result of this project.

Long-term: Noise from cooling systems and ventilation equipment would operate at various loads depending on outdoor temperature and humidity. The standby emergency generator system will operate periodically for testing and maintenance and continuously during a power outage in accordance with the Walla Walla County Code. Noise modeling was completed and model results show that constant mechanical sources of noise are below regulatory limits at all property boundaries and at distant residential properties. Noise model results of intermittent generator maintenance and testing show that the levels comply with the 70 dBA noise limit at the adjacent industrial properties south of the site with construction of a 25-foot noise barrier on the south end of the generator yard for building 1 and use of enhanced acoustical enclosures for the generators at buildings 2 and 3. Modeled sound levels at the distant residences are well below the applicable noise limits.

Sound levels of emergency use of generators during power outages are exempt from the regulatory limits.

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

Some potential mitigation measures that will be employed where feasible to minimize noise during construction include:

- Ensuring that construction equipment and vehicles are equipped with properly sized and maintained mufflers, engine intake silencers, and/or engine enclosures.
- Turning off vehicles and equipment when not in use.
- Where feasible, equipment operators will drive forward instead of backwards to minimize the use of back-up alarms (these are exempt from noise standards).
- Noise from material handling will be minimized by requiring operators to lift rather than drag material.
- Timing the noisiest activities for the time of day when noise levels are highest.

Mitigation measures that will be employed during long-term operations include:

- Construction of an end-cap generator yard wall at the south end of building 1 and use of acoustical enclosures and exhaust mufflers for the generators at building 1.
- Use of enhanced acoustical generator enclosures and exhaust mufflers for the generators at buildings 2 and 3.

The combined noise sources (diesel generators and exterior cooling and air handling equipment) will be designed to comply with the applicable County daytime and nighttime noise ordinance limits at the property lines and closest dwellings when all equipment operates at its design load.

8. Land and shoreline use

[Find help answering land and shoreline use questions](#)¹¹

- 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 site is agriculture, operated by the Port of Walla Walla. Land to the north and west is a feedlot operated by Simplot Feeders. Land immediately to the west is operated by the Packaging Corporation of America (PCA). Land immediately to the east is agricultural, operated by the State of Washington and Firstfruits Farms, LLC. Land immediately to the south is agricultural land, operated by the Port of Walla Walla. There are no anticipated impacts to current land uses on nearby or adjacent properties.

- 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?**

The site has been used for farming with pivot irrigation. None of the site contains designated resource farmland. The project will convert approximately 134 acres of farmland to industrial land, with buildings, ponds, etc.

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

No.

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

None.

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

Not applicable.

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

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>

The site is zoned as Industrial Agriculture – Mixed (IA-M) based off the Walla Walla County Zoning Map.

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

The comprehensive plan designation of the site is Industrial (Map LU-2), as the site is within the Wallula Gap Business Park area of the Attalia Urban Growth Area (UGA).

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.

There are no wetland designations, frequently flooded areas, geologically hazardous areas, or fish and wildlife habitat conservation areas mapped on the site per Walla Walla County Code (WWCC) Chapter 18.08.

The Site intersects with the well head protection area (WHPA) for the Simplot Feeders Well. The Simplot Feeders Well is completed in a confined, deep basalt aquifer with a surface seal and casings into the basalt. Surface disturbances like construction activities are not anticipated to negatively impact designated critical aquifer recharge areas (CARAs), therefore:

- The susceptibility of the basalt aquifer from surface activities on Site is low due to the interbedded nature of the high and low permeable zones, depth of the aquifer, and planned activities on the Site.
- There is potential susceptibility of the shallower alluvium aquifer from activities on Site, but no WHPAs for wells completed in the alluvium aquifer were identified proximal to the Site.

All future stormwater will be managed with BMPs and sanitary control area covenants will be maintained. Overall, planned Site development activities present a minimal risk of contaminating the aquifer and would meet the CARA protection requirements of Walla Walla County.

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

No one will reside in the completed project. Approximately 275 people will work in the project during construction, and an average of 45 people per shift (for a total of 180 per day) will work at the project after construction.

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

This project will not displace any people.

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

No measures are proposed.

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

The proposed project is consistent with the current zoning and the comprehensive plan designation.

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

The proposed project is consistent with the current zoning and comprehensive plan design.

9. Housing

[Find help answering housing questions](#)¹²

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

None.

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

None.

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

No measures are proposed.

10. Aesthetics

[Find help answering aesthetics questions](#)¹³

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

The proposed building heights will be approximately 25 to 35 feet to the principal parapet elevation, and roof access stair enclosures will be up to 43 feet above adjacent grade. Top of rooftop mechanical equipment and water storage tanks will be up to 50 feet tall.

The primary exterior building material is painted concrete tilt-up panels with painted accent colors. Smaller buildings on site are constructed from un-painted concrete masonry units and accessory structures are prefinished metal.

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

The view of the existing agricultural land will be replaced with the view of the new data center facilities. Section B.4.d of this checklist describes landscaping revegetation.

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

The proposed project will be designed in accordance with Walla Walla County Codes.

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

11. Light and glare

[Find help answering light and glare questions](#)¹⁴

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

The proposal will produce light and glare from multiple sources operating at different times throughout the day. Fixed exterior lighting—including site pole-mounted lighting (1.5 FC with 20-30 ft. illumination width), loading docks (1.5 FC measured 60' from dock), building exterior (1 FC), and parking lots (1.5 FC)—operates continuously during nighttime hours via photocell control, activating automatically at dusk and remaining on until dawn. Indoor lighting from office areas is visible through windows primarily during business hours (7 AM - 6 PM weekdays), while data hall areas remain windowless with no exterior visibility. Vehicle headlights and taillights produce intermittent light and glare during operational hours in parking areas, loading docks, and access roads. Additionally, the building's glass windows and metal cladding on facades may produce some daytime glare from reflected sunlight, particularly during morning hours on east-facing surfaces and afternoon hours on west-facing surfaces.

Evaporation ponds will be lined with black liners, which will reduce the amount of sunlight (glare) reflecting off the pond surface.

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

No. Light from vehicle headlights and exterior lighting is common throughout the industrial business areas in the vicinity and does not create safety hazards or interfere with views.

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

No existing off-site sources of light or glare will affect our proposal.

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

The project will incorporate lighting designed to reduce impacts. Lights will be cut off fixtures where appropriate on the exterior, and interior lighting will be controlled by sensors. Outside lighting for safety and security will be directed outside the immediate vicinity.

12. Recreation

[Find help answering recreation questions](#)

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

Recreational opportunities in the vicinity of the site include Madame Dorion Memorial Park (2.8 miles from the Site), History of Wallula Historic Monument (3.6 miles from the

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>

Site), Twin Sisters Rock hiking area (4.4 miles from the Site), and Burbank Slough – McNary National Wildlife Refuge (6.6 miles from the Site).

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

The project will not displace any existing recreational uses.

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

No mitigation measures are proposed.

13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions](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-p)¹⁵

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.

There are no buildings on the site.

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.

There were no landmarks, features, or other evidence of Indian or historic use or occupation 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.

No archaeological resources were identified in the project area, though the Department of Archaeology and Historic Preservation (DAHP) classifies the project area as High to Very High Risk to encounter archaeological resources. Future investigations will include conducting subsurface testing in the project area.

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.

There are no measures proposed to avoid, minimize, or compete for loss or disturbance as there are no anticipated resources. Regardless, an Inadvertent Discovery Plan will be prepared and followed in case of unexpected discovery of cultural resources during project construction.

¹⁵ <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-p>

14. Transportation

[Find help with answering transportation questions](https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation)¹⁶

- 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 to the project site is from Attalia East Road and Boise Cascade Road. Additional roadway extensions are planned to reach the campus. Additional improvements at intersections along Highway 12 may be needed depending on construction timelines of other roadway improvement projects in the area. Highway 12 improvements are planned and conducted by WSDOT, independent of this proposal, and tentatively scheduled for summer 2027.

- 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?**

There are no park and ride facilities or bus stops in the site vicinity per Washington Access Transit Map, so it is not anticipated that trips will be taken via public transport. The town of Wallula, approximately 1.5 miles south of the project site, is served by one bus station, located at 150 Columbia Way, Touchet, WA 99360. There may be an employee shuttle to/from nearby communities to encourage carpooling.

- 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).**

Any improvements, if needed, will be evaluated and identified in the Traffic Impact Analysis (TIA) report.

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

The proposed data center facilities will not directly use water, rail, or air transportation.

- 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 non-passenger vehicles). What data or transportation models were used to make these estimates?**

Trip generation calculations were performed to demonstrate what the proposed data center land use will generate. Trip generation was estimated using data published by the Institute of Transportation Engineers (ITE) in their *Trip Generation*, 12th Edition, an industry standard tool recognized by WSDOT and the local jurisdictions. The *Trip Generation* publication uses data provided from sites around the country to extrapolate an average rate for project trips over a range of facility sizes. Using ITE land use code (LUC) 160, Data Center, the proposed project is anticipated to generate approximately

¹⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

485 average daily trips (ADTs) with 46 AM peak hour trips (one hour between 7:00 AM and 9:00 AM) and 33 PM peak hour trips (one hour between 4:00 PM and 6:00 PM).

- 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.**

The proposed project is not anticipated to interfere with the movement of agricultural or forest products.

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

Any proposed measures, if needed, will be evaluated and identified in the TIA report.

15. Public services

[Find help answering public service questions¹⁷](#)

- 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 proposed project will require fire and police protection provided by Walla Walla County. The project will have onsite private security, site access control, and battery/fuel storage and handling procedures.

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

The proposed buildings will conform to applicable fire safety regulations and night-time security lighting will be provided on the building exterior and in the parking area. Furthermore, onsite private security, site access control, and battery/fuel storage and handling procedures will reduce the need for public emergency services.

16. Utilities

[Find help answering utilities questions¹⁸](#)

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

The only utilities currently present at the site are water infrastructure for a center pivot irrigation system. All utilities will be coordinated and constructed to serve this new facility including electricity, potable water, refuse service, telephone, and sanitary sewer (LOSS)

- 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.**

Electricity: Columbia Rural Electric Association

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>

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>

Water: Port of Walla Walla, construction to tie into existing service line

Refuse: Republic Services or other local provider

Telephone/Internet: Multiple Providers

Septic System: On-site private septic field

Wastewater: Port of Walla Walla

C. Signature

[Find help about who should sign](https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature)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.

X

Type name of signee: Robb Truedinger

Position and agency/organization: AWS Director of Environment

Date submitted: **DATE**

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