STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
PO Box 43172 • Olympia, Washington 98504-3172

Memorandum

To: Sonia Bumpus, SEPA Responsible Official, Energy Facility Site Evaluation Council (EFSEC) Director, (360) 664-1363
From: Amí Hafkemeyer, EFSEC Director of Siting and Compliance, (360) 664-1305
Date: April 4, 2025

RE: Environmental Review and Staff Recommendation for State Environmental Policy Act (SEPA) Review and SEPA Determination for *Carriger Solar*

PROPOSAL: The Carriger Solar, LLC Project (Project) is a 160 megawatt (MW) solar photovoltaic (PV) electric generating facility, including a 63 MW battery energy storage system (BESS) in Klickitat County. The project is proposed by Cypress Creek Renewables, LLC (CCR), (Applicant). The Project Lease Boundary spans 2,108 acres of privately owned land. Within the Project Lease Boundary, the Project Area would occur on 1,326 acres and would represent the maximum Project footprint proposed within the ASC. The Project Area includes a 30-foot corridor associated with the project collector line in the Knight Road right of way (ROW), the 30-foot corridor associated with the project access road and collector line within the Bonniville Power Administration (BPA) ROW and the areas within the solar array fence lines minus exclusion areas where sensitive resources such as wetlands and streams are being avoided. Project components include:

- PV modules
- Single-axis tracking systems
- Ground mount posts
- Underground and above ground cabling
- Inverters and transformers
- Overhead collector lines
- Meteorological station
- BESS capable of storing 63 MW
- Project substation
- 500 foot-long overhead 500-kilovolt (kV0) generation-tie transmission line
- Operations and maintenance (O&M) building

- Access and service roads
- Fences
- Gates and security lighting
- Microwave or other telecommunications towers

The Carriger Solar Project would interconnect with the Bonneville Power Administration (BPA) transmission system at the BPA Knight Substation, which is located adjacent to and west of the Project Lease Boundary. A 500-foot-long overhead 500 kV generation-tie transmission line would extend from the Project substation to the BPA Knight substation.

CASE NUMBER: EFSEC Docket No. EF-230001

APPLICANT: Cypress Creek Renewables, LLC

LOCATION: The Project would be located approximately 2 miles west/northwest of the City of Goldendale in unincorporated Klickitat County, WA. See Attachment 1: *Application for Site Certification Figure 11: Transportation Routes.*

A. ENVIRONMENTAL RECORD and EXHIBITS

The environmental review conducted by EFSEC included analysis based on the following documents which are included in the environmental record. The documents listed are available for review on EFSEC's website at: https://www.efsec.wa.gov/energy-facilities/carriger-solar.

Acronym	Description	Date
DNR 2002	A Progress Report on the National Fire Plan in Washington State	September, 2002
WSDOT 2008	Guidance on Preparing Cumulative Impact Analyses	February, 2008
USDA 2022	2022 Census of Agriculture	2022
ASC	Carriger Solar Application for Site Certification	February 10, 2023
Attachments A-L	Subject area and relevant information attachments to ASC	February 10, 2023
VIA	Visual Impact Assessment	April 18, 2023
UDP	Unanticipated Discovery Plan	April 25, 2023
ESA	Phase 1 Environmental Site Assessment	May 17, 2023
DR-1	Data Request Response 1	June 16, 2023
VMP	Draft Vegetation Management Plan	June 16, 2023
STA	Supplemental Traffic Assessment	August 23, 2023
LUC	EFSEC Council Order No. 889 - Land Use Consistency Order	September 25, 2023
CCR 2/15	Applicant's Response to Klickitat County Comments on the STA	February 15, 2024
WDFW 2024	Washington Shrubsteppe Restoration and Resiliency Initiative	March 1, 2024

Acronym	Description	Date
CRS	Revised Cultural Resource Survey Report	May 21, 2024
SVIA	Supplemental Visual Impact Assessment	July 16, 2024
TSL	Transportation Scoping Letter	August 30, 2024
WWR	Amended Wetlands and Waters Report	October 10, 2024
TCPS[1]	Yakama Nation Traditional Cultural Property Study of the Carriger Solar Project	October 11, 2024
CCR 11/7	Applicant's Response to Washington Department of Agriculture Comments	November 7, 2024
CCR 1/23[1]	Applicant's Response to the Yakama Nation's TCPS Summary Memo	January 23, 2025
CCR 3/5	Applicant's Layout Changes Adjacent to DNR Parcel	March 5, 2025

The environmental review also consisted of input or recommendations from state and local agencies, tribes, and EFSEC's consultant as listed below.

Commenter and Acronym	Description	Date of Input	Form of Comment
David Witt, Department of Archaeology and Historic Preservation (DAHP) DAHP 1	DAHP Comments on the Cultural Resources Survey	03/14/2023	Written
Casey Barney, Yakama Nation YN 1	YN Comments on the Cultural Resources Survey	03/30/2023	Written
Michelle Huppert, WA Dept. of Fish and Wildlife (WDFW) WDFW 1	WDFW comments on the ASC	05/08/2023	Written
Jeremy Paris, WSP WSP	WSP ASC Review Technical Memorandum	05/24/2023	Written
Mike Ritter and Amber Johnson, WDFW WDFW 2	WDFW meeting with EFSEC and CCR	06/08/2023	Verbal
Kelly McLain, WA Dept. of Agriculture (WSDA) WSDA 1	WSDA comments on the ASC	08/03/2023	Written
Shone Voelckers, YN YN 2	YN comments on TCPs	08/03/2023	Written
Casey Barney, YN YN 3	YN comments on the Cultural Resource Survey	08/24/2023	Written

[1] This document is exempted from disclosure by RCW 42.56.300(3)(c) and is not available on the EFSEC website or any other publicly accessible source.

Commenter and Acronym	Description	Date of Input	Form of Comment
Casey Barney, YN YN 4	YN comments on the Cultural Resource Survey	12/08/2023	Written
Jeff Hunter, Klickitat County KC 1	KC comments on Draft Traffic Assessment	01/04/2024	Written
Casey Barney, YN YN 5	YN comments on the Cultural Resource Survey	03/05/2024	Written
Casey Barney, YN YN 6	YN comments on the Cultural Resource Survey	07/02/2024	Written
David Witt, DAHP DAHP 2	DAHP concurrence letter on the CRS	07/11/2024	Written
Heather Durkee, WA Dept. of Ecology (WDOE) WDOE 1	WDOE comments on the Draft WWR	09/26/2024	Written
Jeff Hunter and Nathen Erickson, KC KC 2	KC comments on Transportation Scoping Letter	10/10/2024	Written
Michelle Huppert, WDFW WDFW 3	WDFW comments on the Draft Vegetation Management Plan	10/22/2024	Written
Jason Lugo, WA Dept. of Transportation (WSDOT) WSDOT	WSDOT comments on Transportation Scoping Letter	10/28/2024	Written
Kelly McLain, WSDA WSDA 2	WSDA concurrence on Applicant's monitoring plan	11/06/2024	Written
Heather Durkee, WDOE WDOE 2	WDOE concurrence letter on the WWR	11/06/2024	Written
Jessica Lally, YN YN 7	TCPS Summary Memo[2]	12/11/2024	Written
Jessica Lally and Shona Voelckers, YN YN 8	YN Meeting with EFSEC	02/07/2025	Verbal
Jessica Lally, YN YN 9	YN Comments on the Applicant's TCP Commitments Proposal	02/07/2025	Written

[2] This document is exempted from disclosure by RCW 42.56.300(3)(c) and is not available on the EFSEC website or any other publicly accessible source.

B. STAFF REVIEW OF THE ENVIRONMENTAL INFORMATION

CCR submitted an application on February 10, 2023 which EFSEC used for conducting the SEPA environmental review.

EFSEC staff visited the site on April 25, 2023 and April 16, 2024.

The following sections correspond with elements of the environment listed in Washington Administrative Code (WAC) 197-11-444 and with the sections in the environmental checklist WAC 197-11-960. They were also used to organize and document EFSEC's environmental review for the *Carriger Solar* proposal. Additional information (listed in Part A above) was provided by the Applicant and by Washington regulatory subject matter experts to EFSEC and used as part of the environmental review. The mitigation identified here is in addition to commitments the Applicant has supplied in their application, which would be required. Please note that the information normally required for the SEPA Environmental Checklist is included in the application.

The review of all elements listed below is based, at a minimum, on information in the Applicant's Application for Site Certification (ASC). When additional information is relevant to a particular topic, it is referenced in parentheses.

1. EARTH

- The information provided by the Applicant regarding environmental impacts as they relate to earth satisfies the informational requirements of the SEPA checklist. (WSP)
- 5.3 acres of the Project Lease Boundary are mapped as having slopes greater than 15 percent and, as a result, are identified as geologically hazardous areas by Klickitat County's Critical Areas Ordinance due to the risk of erosion. No other Project lands are within geologically hazardous areas. (ASC; Attch. A)
- Approximately 1,794 acres (85.1%) of the Project Lease Boundary contain soils classified by the Natural Resources Conservation Service (NRCS) as moderately prone to water erosion. Approximately 232 acres (11%) contain soils classified as severely prone to water erosion. (ASC; Attch. A)
- For areas with identified geological hazards (e.g., seismic hazards, 15 percent or greater slopes, erosive soils, collapsible soils, high risk flood areas, etc.), the Applicant would avoid the areas to the greatest extent feasible and implement strategies to reduce impacts when avoidance is not possible. (ASC; Attch. S)
- The Applicant would implement a series of construction commitments outlined within the Geotechnical Engineering Report including:
    - Shoring up excavated trenches deeper than four feet.
    - Grading the surface to divert stormwater away from open excavation to the extent possible.
    - Over excavating the subgrade for shallow concrete foundations by at least 6 inches and placing geotextile fabric.
    - Considering the soils to be very sensitive to compaction when wet.
    - Adding at least 10 inches of crushed rock to road surfaces to mitigate for soil softness.

- Planning to pre-drill at all proposed post locations.
- Development of a site-specific report to evaluate corrosion potential and interpret soil corrosivity test results. (ASC; Attch. K)

- Prior to construction, the Applicant would prepare and implement an Erosion and Sediment Control Plan (ESCP), Construction and Operational Phase Stormwater Pollution Prevention Plans (SWPPPs), and a Vegetation and Weed Management Plan (VWMP) that would incorporate Best Management Practices (BMPs) from the 2019 Stormwater Management Manual for Eastern Washington and include measures designed to minimize erosion. (ASC)

Mitigation:

- To limit erosion, compaction, and disturbance of natural soil profiles, soil disturbance would be postponed when soils are excessively wet, such as following a precipitation event.

2. AIR

- The information provided by the Applicant regarding environmental impacts as they relate to air quality satisfies the informational requirements of the SEPA checklist. (WSP)
- The primary sources of air emissions from the Project are vehicle exhaust and fugitive dust. Emissions from both sources are anticipated to be low and would account for less than 1 percent of emissions within Klickitat County. Air emission impacts are primarily of concern during the construction and decommissioning phases of the project when project activities and vehicle use would be at their greatest. (ASC)
- The ASC includes a series of applicant commitments that would reduce air quality impacts. These include:
  - Vehicles and equipment used during construction would be properly maintained to minimize exhaust emissions.
  - Operational measures such as limiting engine idling time and shutting down equipment when not in use would be implemented.
  - Graveling of permanent access roads.
  - Watering or other fugitive dust-abatement measures would be used as needed to control fugitive dust generated during construction. When applied, the Applicant will use water or a water-based environmentally safe dust palliative such as lignin for dust control.
  - Construction materials that could be a source of fugitive dust would be covered when stored.
  - Traffic speeds on unpaved roads would be limited to 25 miles per hour to minimize generation of fugitive dust.
  - Truck beds would be covered when transporting dirt or soil.
  - Carpooling among construction workers would be encouraged to minimize construction-related traffic and associated emissions.
  - Erosion-control measures would be implemented to limit deposition of silt to roadways, to minimize a vector for fugitive dust.
  - Replanting or graveling disturbed areas would be conducted during and after construction to reduce wind-blown dust. (ASC)

Mitigation:

- Limit traffic speeds on unpaved areas to 15 mph, rather than the Applicant-proposed 25-mph limit. This mitigation measure would reduce the anticipated fugitive dust emissions associated with the Project.

3. WATER

Water Quality

- The information provided by the Applicant regarding environmental impacts as they relate to water quality satisfies the informational requirements of the SEPA checklist. (WSP)
- The Applicant's Amended Wetlands and Waters Report (WWR) identified 16 stream segments encompassing 90.74 acres within the boundaries of the Project Lease Boundary. Of these, 1 was assessed as perennial, 4 were assessed as intermittent, and 11 were assessed as ephemeral. Using the Washington State Department of Natural Resources Forest Practices Application Mapping Tool water type classification system for streams, 2 of the streams are considered Type F, meaning they meet the physical criteria to be used by fish, while the remaining 14 streams are considered Type N, meaning they do not meet the physical criteria to be used by fish. (ASC; WWR)
- In accordance with the Critical Area Ordinance for Klickitat County, the Applicant will provide all intermittent and ephemeral streams with a 25-foot buffer and will provide the one perennial, potentially fish-bearing, stream with a 150-foot buffer. (ASC; WWR)
- The Applicant has identified a minimum of three road crossings across streams (2 intermittent, 1 ephemeral), while acknowledging that additional overhead or directionally bored transmission line crossings may be required once design is finalized. The Applicant has also identified two locations where Project fencing is anticipated to cross ephemeral streams. The details of the engineering design of all crossings will be included in a Joint Aquatic Resource Permit application that will include mitigation measures to minimize impacts to streams and be submitted prior to construction. (ASC, Attch. A)
- The ASC includes a series of applicant commitments that would reduce impacts associated with stream crossings. These include:
    - Implementation of BMPs from WAC 220-660-120, the 2019 Stormwater Management Manual for Eastern Washington, and Ecology's Construction Stormwater General Permit.
    - Staging of materials and equipment to prevent contamination of waters of the state.
    - Development of the Construction and Operation SWPPPs, ESCP, and Spill Prevention and Countermeasure Plan (SPCC).
    - Installation and maintenance of temporary erosion and sediment control measures.
    - Completing work in dry conditions with no flowing water present or with the implementation of BMPs such as silt curtains or silt fencing.
    - Installation of adequately sized and designed culverts at permanent road crossings that would be periodically inspected. (ASC)
- The Applicant has identified streams within the Project Lease Boundary that are connected with fish-bearing streams and will engage with WDFW to determine whether a Hydraulic Project Approval is necessary once final design is complete. (ASC)

- The WWR identified 41 wetlands encompassing 76.12 acres within the boundaries of the Project Lease Boundary. The Project would not result in any impacts to wetlands or wetland buffers. (WWR)
- Using on the Washington State Rating System for Eastern Washington, 19 of the identified wetlands were determined to be Category II wetlands, 10 were Category III, and 12 were Category IV. The Applicant will provide each wetland with a 75 to 200-foot buffer, depending on the categorization, as required by Klickitat County and WDOE. (ASC; WWR)
- WDOE staff visited the site on April 16, 2024 to examine several areas of interest, identified additional wetlands, and recommended edits to the WWR. Following additional Applicant evaluation and incorporation of the recommended edits, WDOE concurred with the determinations made within the WWR. (WDOE 1, WDOE 2)
- The entire Project Lease Boundary is located outside of the 100-year floodplain. (ASC; Attch. L)
- 35 acres of new impervious surfaces are proposed for the Project. The Applicant has committed to meeting all WDOE requirements to maintain natural drainage patterns and reduce runoff rates from impervious surfaces. (ASC)
- As the Project Area is generally very flat, minimal grading would occur and existing drainage patterns and natural infiltration would be maintained. (ASC)
- During construction and operation of the Project, stormwater would be retained on-site and be treated by infiltration in compliance with applicable codes. The Applicant would prepare an ESCP, Construction Phase SWPPP, Operations Phase SWPPP, and VWMP, which would incorporate BMPS from the WDOE Stormwater Management Manual for Eastern Washington. (ASC)

<u>Water Quantity</u>

- The information provided by the Applicant regarding environmental impacts as they relate to water quantity satisfies the informational requirements of the SEPA checklist. (WSP)
- Depending on soil moisture levels, approximately 16.3 million gallons of water would be used during construction for dust suppression. This water may be sourced either from an existing on-site well with a valid water right to be confirmed by WDOE or by purchasing water from a permitted off-site source and hauling it to the Project Area. (ASC)
- During the operation, approximately 244,000 gallons of water per year would be used for panel washing and approximately 37,000 gallons of water per year are anticipated to be needed for the O&M building, resulting in an anticipated annual use of 281,000 gallons of water. This water may be sourced either from an existing on-site well with a valid water right to be confirmed by WDOE or by purchasing water from a permitted off-site source and hauling it to the Project Area. (ASC)
- The Applicant will verify the source and availability of water prior to the start of construction. As the Project will not involve a new withdrawal, diversion, retention, or use and will instead use existing permitted water rights, the Applicant does not anticipate any net increase in total or consumptive water use within the regional aquifer. (ASC)
- Impervious surfaces would cover approximately 2.6% (35 acres) of the Project Area and are not anticipated to significantly alter stormwater infiltration patterns. Stormwater runoff from impervious surfaces would generally be accommodated through natural

infiltration in vegetated areas or, if necessary, through the design and installation of engineered stormwater features such as detention basins. (ASC)

Mitigation:

Water Quality

- The Applicant has committed to the use of clear spanning for overhead transmission lines or directional boring for underground transmission lines that cross streams. When either construction method is used, the Applicant would operate equipment and machinery from the top of the stream bank and outside of riparian areas and surface waters. Any fuel, oil, or lubricants required for the operation of this equipment or machinery would be stored away from watercourses when not immediately needed.
- The Applicant has committed to the preparation of an SPCC Plan to reduce the likelihood of an accidental release of a hazardous or regulated liquid and expedite the response to and remediation of the release should one occur. This Plan is to be completed and submitted to EFSEC for review prior to the start of construction. This Plan is to include a requirement that spill response equipment be stored in all Project vehicles (not to include personal vehicles) accessing the site during construction, operation, and decommissioning. Additionally, this Plan is to include a requirement that an oil pan be placed beneath heavy equipment when stored or not in regular use on site.
- An employee training plan is to be included as part of the SPCC Plan. For the duration of the Project, employees and workers on site would receive appropriate training according to the employee training plan to ensure that any spills are reported and responded to in an appropriate manner. This would include training on the use of spill response equipment and orientations identifying the location of hazardous materials, proper storage of hazardous materials, and location of spill response equipment to ensure that workers are competent in spill response.
- Project construction and decommissioning work, especially work near streams, would be minimized during rainy periods and heavy rain.

Water Quantity

- Prior to the start of construction, the Applicant would provide an executed agreement and/or permit to EFSEC that identifies the source, availability, and quantity of water intended to be supplied to the Project for construction and operation.
- During periods of drought conditions or water shortage, as declared by any state or local government agency, water use would be minimized or postponed where possible or additional alternate off-site water supplies would be identified.
- The Applicant would ensure that water rights held by the landowner in relation to the irrigated farmlands within the Project Boundary are maintained and returned to the landowner following Project decommissioning. These rights can be retained either by meeting identified minimum water usage rates on an annual basis or by placement of the rights within a trust for the duration of the Project. This would be documented and provided to EFSEC prior to the start of operations.

4. PLANTS

- The information provided by the Applicant regarding environmental impacts as they relate to plants and ecosystems satisfies the informational requirements of the SEPA checklist. (WSP)
- A review of plant species known to occur or potentially occur within Klickitat County was conducted by the Applicant. Based on that assessment, one special status species is rated as having a moderate likelihood of occurrence within the Project Area, six species are rated at a low-to-moderate likelihood, and 30 species are rated at a low likelihood. (Attch. F)
- The Applicant consulted with WDFW on March 30, 2022 to discuss their planned botanical and vegetation communities surveys and, following WDFW concurrence with their methodology and timing, performed these surveys on April 5-7, May 11-13, and June 22-24 of 2022 (Attch. F)
- One special status plant species, the state-threated foxtail mousetail (*Myosurus alopecuroides*) has been identified within the Project Lease Boundary; a population of approximately 700 individuals was identified in three small vernal pools covering approximately 0.015 acres. The Project has been sited to avoid this area and the identified vernal pools have been provided a 200-foot buffer. As this species is a vernal pool obligate with widely scattered and naturally sparse populations, the Project's avoidance of vernal pools suggests that impacts to this species are unlikely. (ASC; Attch. F)
- WDFW is satisfied with the Project site plan revisions to minimize impacts to sensitive plants. (WDFW 1)
- 12 state and/or county listed noxious weed species were identified during field surveys. Field bindweed (*Convolvulus arvensis*), medusahead (*Taeniatherum caput-medusae*), and ventenata (*Ventenata dubia*) were the most abundant weed species observed. (Attch. F)
- Prior to construction, and in consultation with WDFW, the Applicant will prepare a Wildlife Habitat Management Plan (HMP) that includes details regarding habitat avoidance, minimization, and mitigation. This plan will be reviewed and approved by EFSEC prior to implementation. (ASC)
- Following consultation with WDFW, the Applicant prepared a Draft Vegetation Management Plan (VMP) that includes plans on how to avoid, minimize, or mitigate impacts to vegetation resources, including methods for effective revegetation of temporarily disturbed areas and control of noxious weeds. (WDFW 1, WDFW 2, VMP)
- WDFW staff reviewed the VMP, stated that the Applicant had effectively incorporated WDFW's previous input, and had no further comments to provide on the Plan. (WDFW 3)
- Prior to construction, and in consultation with WDFW and the Klickitat County Noxious Weed Control Board, the Applicant will prepare a Final Vegetation and Weed Management Plan (VWMP) that includes details on the plan for control of noxious weeds and revegetation of temporarily impacted areas. This plan will be reviewed and approved by EFSEC prior to implementation. (ASC)
- Pursuant to WAC 463-72-040, the Applicant would prepare an Initial Site Restoration Plan (ISRP) addressing planned site restoration following the conclusion of the Project's operating life. The ISRP will detail restoration goals for site reclamation, which will include mitigation measures to be employed, Project components to be removed, and

restoration of soil and vegetation. The Applicant would submit this initial plan to EFSEC for approval at least 90 days prior to the start of construction. (ASC)

Mitigation:

- Prior to the start of construction the Applicant would prepare a Vegetation and Weed Management Plan to be reviewed by WDFW and the Klickitat County Noxious Weed Control Board and approved by EFSEC which is to include the following mitigation measures, though further mitigation may be imposed as necessary:
    - a list of habitat-appropriate native species under considering for seeding in areas where passive revegetation is unsuccessful,
    - a description of the Applicant's herbicide plan, including a commitment to prohibit the use of any herbicides restricted by WAC 16-230-600 and a description of how the Applicant plans to reduce herbicide drift and non-target impacts,
    - procedures for inspecting vehicles and workers equipment and education for workers on species identification and control measures, and
    - measures to preserve soil quality for revegetation, including retaining topsoil to be reused when re-seeding to preserve some of the native seedbank.
- The Applicant's Vegetation and Weed Management Plan would include a commitment to, within 60 days of Project completion, create an as-built report that documents the amount of modified habitat, temporary disturbances, and permanent impacts associated with the Project. Vegetation monitoring of modified habitat would be conducted annually for a minimum of three years. EFSEC would review these monitoring reports for progress in meeting measurable success criteria for revegetation and impose remedial management actions if success criteria are not being reached. At the end of the revegetation monitoring period, areas of modified habitat and temporary disturbance that have met the established success criteria would be eligible for offset by the Applicant at the respective ratios. Areas that have not met the success criteria after the end of the revegetation monitoring period would be considered permanent impacts and would be added to the offset requirement.
- The Applicant would create a Detailed Site Restoration Plan (DSRP), as required by WAC 463-72-050, that would include a description of revegetation to be undertaken during decommissioning. The DSRP would be prepared and submitted for approval by EFSEC prior to Project decommissioning for revegetation of temporary and permanent disturbance areas, including modified habitat. The DSRP would include methods, success criteria, monitoring, reporting, and adaptive management for revegetation at the end of the Project life. The DSRP would incorporate any lessons learned from implementing the revegetation related to the temporary disturbance from Project construction.
- Construction would avoid removing or disturbing trees or snags within the Project Lease Boundary. Disturbance to trees includes any disturbance, including topping, within the drip-line of the tree (i.e., the area from the edge of the outermost branches), which preserves an intact root system. Disturbance within the drip-line of the tree should be avoided as this can lead to tree mortality. The avoidance area within the drip-line of trees in work areas should be delineated using snow fencing or similar measure to improve the visibility of avoidance zones. Trees or snags would not be removed without pre-approval from EFSEC. Where tree disturbance cannot be avoided by the Project (e.g., near

transmission lines), the number and location of the trees and snags would be provided to EFSEC, along with a statement justifying why avoidance cannot be achieved, and a mitigation plan. The mitigation plan would include replanting trees and snags at a 3:1 ratio within the Project Lease Boundary to maintain the diversity of habitat structures provided by trees and would require approval by EFSEC prior to proceeding.

- The environmental orientation provided to workers on site would include information on special status plant species. This would include diagnostic characteristics, suitable habitat descriptions, and photos of special status plant species with potential to occur within the Lease Boundary. A protocol would be established for any chance find by workers, who would notify supervisory staff on site prior to proceeding with work. Work within proximity to any chance find would not proceed until the supervisory staff have informed the environmental monitor and the monitor has approved the resumption of normal work activities.

5. ANIMALS AND HABITAT

- The information provided by the Applicant regarding environmental impacts as they relate to animals and habitat satisfies the informational requirements of the SEPA checklist. (WSP)
- The Applicant performed habitat surveys within the Project Lease Boundary on April 4-7, May 11-13, and June 22-24 of 2022. (Attch. C)
- Six habitat types were identified within the Project Lease Boundary, including four WDFW Priority Habitats.
    - WDFW Priority Habitats:
        - 228 acres of dwarf shrub-steppe
        - 21 acres of eastside (interior) riparian-wetlands
        - 11 acres of ponderosa pine forest and woodlands (includes eastside oak)
        - <1 acre of eastside (interior) grasslands
    - Other Habitats:
        - 1,727 acres of agriculture, pastures, and mixed environs
        - 24 acres of urban and mixed environs (ASC; Attch. C)
- The Project would result in the following habitat impacts:
    - Dwarf shrub-steppe
        - 0.9 acres of permanent impacts
        - 34.2 acres of altered habitat impacts
        - 21.6 acres of temporary impacts
    - Eastside (interior) grasslands
        - 0.3 acres of temporary impacts
    - Agriculture, pasture, and mixed environs
        - 39.2 acres of permanent impacts
        - 1,020.5 acres of altered habitat impacts
        - 209.3 acres of temporary impacts (ASC)
- WDFW is satisfied with the Project site plan revisions to minimize impacts to Priority Habitats and wetlands and recommends that altered habitat impacts to Priority Habitats be mitigated for at a 2:1 ratio. (WDFW 1)

- Prior to construction, and in consultation with WDFW, the Applicant will prepare an HMP that includes details regarding habitat avoidance, minimization, and mitigation. This plan will be reviewed and approved by EFSEC prior to implementation. (ASC)
- WDFW owns and operates the Goldendale Fish Hatchery, a restricted-access facility that produces trout for stocking streams and rivers throughout the region, which is located at the origination point of Spring Creek adjacent to and west of the Project Lease Boundary. Most of the streams in the Project Lease Boundary ultimately flow into Spring Creek, but the Applicant's avoidance of most of the onsite streams, and mitigation plans for those streams that will be impacted, should result in no significant impacts to the Goldendale Fish Hatchery, Spring Creek, or groundwater quantity and quality in the local aquifer (ASC, Attch. C).
- The Project Lease Boundary is not sited near or within any known bird or bat migratory corridors or Important Bird Areas (IBA). The nearest identified IBA is the Columbia Hills IBA located approximately 6 miles to the south. (DR-1)
- The Applicant performed general wildlife surveys on May 9-10 of 2022. (Attch. C)
- 39 special status wildlife species were identified with the potential to occur in the Project Lease Boundary including 26 birds, 1 fish, 2 invertebrates, 8 mammals, and 4 reptiles and amphibians. 28 of these species are state-listed as endangered, threatened or candidate species, 7 are federally listed as endangered, threatened, or candidate species under the Endangered Species Act, and 19 are federally listed as Birds of Conservation Concern. (Attch. C)
- During wildlife surveys, 44 bird species and 5 mammal species were observed within the Project Lease Boundary. Observations included 2 special status bird species (Lewis's woodpecker and wild turkey) and 2 special status mammal species (mule deer and western gray squirrel). No federally endangered, threatened, or candidate species were observed. (Attch. C)
- The Project has been sited to avoid western gray squirrel habitat to the extent practical. Known western gray squirrel nesting habitat will be protected by a permanent 50-foot buffer and a seasonal 400-foot activity buffer from March 1 to August 31 to prevent disturbance during breeding season. (ASC)
- WDFW is satisfied with the avoidance measures that the Applicant has proposed for the western gray squirrel. (WDFW 1; WDFW 2)
- Perimeter fencing would be composed of separate smaller units in lieu of a single large array to facilitate wildlife movement. Project fencing would be sited outside of all riparian and wetland habitats, including associated buffers and the ephemeral drainages that are commonly used by mule deer. (ASC; Attch. A; Attch. C)
- The Applicant would conduct nest clearance surveys prior to ground disturbance activities scheduled to occur during bird breeding season (late February to early August) to avoid construction-related impacts to ground-nesting birds, including wild turkeys. (ASC; DR-1)
- The Applicant has modified the Project's initial fencing plan to instead use an 8-foot-high fence with no barbed-wire and a 6-inch wire mesh opening. This type of fencing will reduce visual barriers to wildlife and allow movement across fence barriers by small species. (SVIA)
- WDFW is satisfied with the wildlife corridors provided by Project siting and fencing (WDFW 1).

- The Applicant performed raptor nest surveys on March 29-30, May 4, and May 9-10 of 2022. (Attch. D)
- During raptor nest surveys, 18 nests were detected, including one in-use Swainson's hawk nest, two in-use red-tailed hawk nests, two in-use great horned owl nests, two in-use common raven nests, and 11 small inactive nests with unknown species determinations. A single ferruginous hawk, a state-endangered species, was also observed perching during these nest surveys, though no breeding behavior was observed, and the individual was presumed to be migrating through the area. None of the inactive nests were consistent with potential golden eagle or ferruginous hawk nests. (Attch. D)
- Noise, activity, and heavy equipment use during Project construction is anticipated, though these disturbances are anticipated to be similar to those associated with the existing agricultural practices within the Project Lease Boundary. Disturbance during Project operation is expected to be mostly limited to infrequent employee use of light-duty trucks and water trucks for panel washing. (ASC)
- Overhead power lines have been limited to a single approximately 500-foot-long segment connecting the Project substation with the BPA Knight Substation, with other short sections of the collector line network where trenching or directional drilling may not be feasible or practical. All overhead lines will be designed and constructed to minimize avian electrocution according to the Avian Power Line Interaction Committee standards. (ASC)
- There will be a direct loss of foraging habitat for raptor species due to the presence of solar panels, though the altered habitat underneath the panels should continue to serve as prey species habitat and the dispersed nature of the solar arrays should continue to provide raptors with foraging habitat in the area. (ASC)
- The Applicant would prepare an HMP in consultation with WDFW that outlines measures that would be taken to avoid, minimize, and mitigate for impacts to wildlife habitat from construction and operation of the Project. (ASC; Attch. C)

Mitigation:

- If, during the preparation of the ESCP, Construction Phase SWPPP, Operations Phase SWPPP, or VWMP, it becomes evident that the Project may result in impacts to Spring Creek or the groundwater in the local aquifer that would negatively impact the Goldendale Fish Hatchery, EFSEC may impose additional mitigation in consultation with WDFW to ensure the continued effective operation of the hatchery.
- During final project micrositing, the Applicant would consider if incremental expansion of Project wildlife corridors is practicable through intra-site relocation of solar arrays.
- The Wildlife Habitat Management Plan may identify additional impacts to Priority Habitats. All impacts to Priority Habitats would be mitigated for at the following ratios:
    - Eastside (interior) grass
        - 1:1 for permanent impacts
        - 0.5:1 for altered habitat impacts
        - 0.1:1 for temporary impacts
    - Dwarf shrub-steppe
        - 2:1 for permanent impacts
        - 2:1 for altered habitat impacts
        - 1:1 for temporary impacts

- In order to achieve "no net loss of habitat functions and values" as required by WAC 463-62-040, the Applicant would continue to coordinate with WDFW and EFSEC to determine appropriate compensatory mitigation for habitat impacts. Mitigation would be achieved either through implementation of a conservation easement on sufficiently similar lands as those being impacts or through funding of an EFSEC-designated conservation project.
- All exterior trash containers would be wildlife resistant.
- The Applicant would avoid the use of pesticides, including rodenticides, during Project construction and operation. If the use of pesticides is required, the Applicant would develop a management plan for submission to and approval by EFSEC that describes how the Applicant would avoid and/or otherwise minimize potential impacts on wildlife, including all potentially directly or indirectly impacted special status species.
- The Applicant would limit construction disturbance by identifying sensitive areas on mapping and flagging any sensitive areas including wildlife features, such as wildlife colonies, active nests, dens, and wetlands in the field. The environmental monitor would conduct ongoing review during construction to ensure that flagged areas are avoided.
- The Applicant would maintain a database of identified wildlife carcasses found within the Project area, especially on or along roadways and wildlife corridors, through construction and operation as part of the operational procedures. The Applicant would report mortalities annually to EFSEC and propose additional mitigation for areas under the control of the Applicant with frequent mortalities or wildlife crossing observations. Additional mitigation measures may include, but are not limited to, speed control, signage, temporary road closures (e.g., during migration periods), or fencing changes.
- Vegetation clearing and grubbing would avoid local bird breeding periods, when feasible, to reduce potential destruction or disturbance of nesting birds. If avoidance of this period is not feasible, additional mitigation measures, such as pre-construction surveys for and buffering of active bird nests, would be undertaken.
- All roadways constructed for the Project during the construction and operation phases would be removed and restored during decommissioning. The Applicant would provide EFSEC with rationale and propose additional mitigation measures for EFSEC review and approval if roadways are not decommissioned post-operation.

6. ENERGY AND NATURAL RESOURCES

- The information provided by the Applicant regarding environmental impacts as they relate to energy and natural resources satisfies the informational requirements of the SEPA checklist. (WSP)
- The Project is not expected to consume or remove significant quantities of energy or other natural resources during construction or operations. (ASC)
- Non-renewable resource use includes some construction materials and fossil fuels that would power construction vehicles, equipment, and operational vehicles. The quantity of non-renewable resources required for construction are stated to be typical of commercial construction facilities of a similar size. (ASC)
- Local service providers have sufficient availability to supply the materials, electricity, and fuel needs of the Project. (ASC)

Mitigation:

- The Applicant would install high-efficiency electrical fixtures, appliances, and security lighting in the O&M facility, BESSs, and substation to reduce energy needs for the Project's operations stage.
- The Applicant would remove all concrete foundations associated with the Project to a level of no less than 4 feet below the surface of the ground during decommissioning, unless some portions of the foundations are requested to be maintained by the landowner.
- To retrieve as much of the natural resources used in construction and operation of the Project as possible, the Applicant would demolish and remove all Project-related equipment and facilities from the Lease Boundary upon Project decommissioning. The Applicant would recycle all components of the Project that have the potential to be used as raw materials in commercial or industrial applications. For any Project components that the Applicant deems non-recyclable, the rationale for that determination shall be presented to EFSEC for approval prior to the disposal of the components. If the Applicant intends to leave any portion of the facility, including concrete foundations, they must submit a request to EFSEC in an update to their decommissioning plan.

7. ENVIRONMENTAL HEALTH

- The information provided by the Applicant regarding environmental impacts as they relate to environmental health satisfies the informational requirements of the SEPA checklist. (WSP)
- The Applicant completed a Phase I Environmental Site Assessment which identified a single documented Recognized Environmental Condition (REC), specifically a debris pile that may contain lead-based paint. This REC, while within the Project Lease Boundary, is not within the Project Area and will not be disturbed by the Project. (ASC; ESA)
- Pesticides and herbicides have been applied in a typical manner during the historic agricultural uses of the Project area, but no evidence has been observed that the site contains potentially hazardous materials. (ASC)
- The Applicant would develop a Spill Prevention, Control, and Countermeasure Plan to prevent spills during construction and identify measures for rapid release response. (ASC)
- The BESS units would contain a protection system to avoid risks of fire and spills. (ASC)
- The Applicant would prepare an Emergency Plan, Fire Control Plan, Best Management Practices, Environmental Health Plan, and Site Restoration Plan to mitigate and minimize the risk of hazardous spills, fire, or other emergencies in coordination with the Klickitat County Department of Emergency Management and Klickitat County Fire Protection District 7. (ASC)

Mitigation: No additional mitigation measures for environmental health identified.

8. LAND AND SHORELINE USE

- The information provided by the Applicant regarding environmental impacts as they relate to land and shoreline use satisfies the informational requirements of the SEPA checklist. (WSP)

- No Shorelines of Statewide Significance or Shorelines of the State are located within or adjacent to the Project Lease Boundary. (ASC)
- The EFSEC Council has determined that the Project is consistent with the Klickitat County Comprehensive Plan. The southern two-thirds of the Project is located in Klickitat County's Energy Overlay Zone, which permits solar energy facilities outright, and the northern one-third of the Project is located in the Extensive Agriculture district, where it would be eligible to apply for a conditional use permit. (LUC)
- There is no anticipated impact from the Project on land ownership. (ASC)
- The Project will impact approximately 70 acres of irrigated farmland and 1,152 acres of arable farmland, representing approximately 0.2% of all farmlands in Klickitat County. (ASC; USDA 2022)
- 93.7 percent of the Project Area soils are classified as prime farmlands or farmlands of statewide importance. Where high value agricultural soils such as these cannot be avoided, WSDA recommends that the amount of gravel and hard medium added to the site be limited as much as possible. (WSDA 1)
- Construction activities and Project operations may result in soil compression, cracking, and loss of organic material on farmlands. WSDA recommends the implementation of soil sampling to better track impacts on soil health during Project operation. (WSDA 1)
- The Applicant will develop a Soil Monitoring Plan in coordination with WSDA for EFSEC approval prior to construction. This plan would include a baseline soil test conducted prior to construction and regular sampling during operations. If monitoring shows a decline in soil conditions attributable to the Project, adaptive management mitigation would be implemented, which could include period grading and/or mowing, water dispersal events, tilling of the soil, or application of soil amendments. (CCR 11/7; WSDA 2)
- Project termination and decommissioning would include a restoration of the Project area to its original condition. This would include removal of Project components, restoration of soil and vegetation, and return of lands to potential agricultural use. (ASC)

Mitigation:

- Prior to decommissioning, the Applicant would submit a Detailed Site Restoration Plan, per WAC 463-72-050, for restoring the site to its preconstruction character. This would assist in preventing Project activities from resulting in a permanent conversion of a land use that is not in alignment with the Lease Boundary's current Klickitat County Comprehensive Plan designation (Extensive Agricultural District). The Applicant would be responsible for working with landowners to return all agricultural land to its preconstruction status. If future site conditions or land ownership no longer allows for the land to be returned to agricultural production, the Applicant would submit a request to EFSEC for an alternative land use that would be in alignment with the Lease Boundary's preconstruction rural character and resource value. If the Detailed Site Restoration Plan requests an alternative land use, EFSEC may require that the Applicant provide additional mitigation to offset impacts from a permanent conversion of the land. EFSEC's authority over the Project Lease Boundary only lasts until decommissioning and restoration is complete; land conversion that may occur after that period would not be considered a Project impact.

- During Project decommissioning, all gravel and aggregate material will be removed from lands intended to be returned to agricultural use.

9. SOCIOECONOMICS

- Per WAC 463-60-535, EFSEC is required to assess socioeconomic impacts associated with the Project including, but not limited to, the impact of the Project on "population, work force, property values, housing, health facilities and services, education facilities, governmental services, and local economy."
- The information provided by the Applicant regarding environmental impacts as they relate to housing and jobs satisfies the informational requirements of the SEPA checklist. (WSP)
- No residences will be displaced by the Project, with a minimum 500-foot setback provided from the closest non-participating residence. (ASC)
- The Project is located in a rural, sparsely populated area of Klickitat County. Land use planning documents do not identify the area of the Project Lease Boundary for future residential growth, so the Project is not anticipated to displace any substantial future housing (ASC).
- The Project is anticipated to support approximately 250 workers during construction, with an estimated 100 of these to be sourced locally. During operation, the Project would support four workers to be located in Klickitat County. (STA; Attch. J)
- According to occupational data for Klickitat County, the area is anticipated to have sufficient availability to meet Project needs for local workforce. (Attch. J)
- A housing study of Klickitat County identified approximately 1,207 vacant housing units and multiple rental properties, hotels, and motels available for temporary housing. This far exceeds the anticipated peak of approximately 150 non-local workers. (Attch. J)
- EFSEC incorporates the principles of environmental justice, as defined in RCW 70.A02.010(8), into its project reviews in an effort to ensure that there are no disproportionate environmental and health impacts to vulnerable and overburdened communities.
- EFSEC staff have made use of tools such as the Environmental Protection Agency's EJScreen and the Washington State Department of Health's Washington Tracking Network and concur with the finding that the Project is not anticipated to result in disproportionate impacts to vulnerable and overburdened communities.

Mitigation:

- Prior to decommissioning, the Applicant would provide a new housing analysis that would include up-to-date housing information to determine if current socioeconomic analysis and Project impacts on housing are appropriate or if additional mitigation is needed to address temporary housing availability.

10. NOISE AND VIBRATION

- The information provided by the Applicant regarding environmental impacts as they relate to noise and vibration satisfies the informational requirements of the SEPA checklist. (WSP)
- Project noise during the construction and decommissioning phases would cause short-term unavoidable impacts significant enough to temporarily interfere with speech

communication outdoors and indoors with windows open. Construction noise would vary significantly depending on several factors including age, condition, type, and model of equipment and type of operations being performed. (ASC; Attch. H)

- Project construction will typically occur during daytime hours, Monday through Friday. The Applicant will further implement the following noise reduction measures:
    - Maintain construction tools and equipment in good operating order according to manufacturers' specifications.
    - Limit use of major excavating and earth-moving machinery to daytime hours.
    - To the extent practicable, schedule construction activity during normal working hours on weekdays when higher sound levels are typically present and are found acceptable. Some limited activities, such as concrete pours, will be required to occur continuously until completion.
    - Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks.
    - For construction devices that use internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible.
    - Limit possible evening shift work to low-noise activities such as welding, wire pulling, and other similar activities, together with appropriate material-handling equipment. Potential evening work would be limited to the final electrical tie-in at the BPA substation.
    - Use a complaint resolution procedure to address any noise complaints received from residents. (ASC)
- Project noise during the operation phase is anticipated to comply with the most stringent 50 dBA nighttime limit at all noise sensitive receptor (NSR) sites and comply with all applicable regulatory limits. (ASC; Attch. H)

Mitigation:

- Avoid laydown and equipment storage/parking areas closer than 2,500 feet from the nearest NSR location. These laydown and storage areas would have more noise sources for longer periods of time than other areas; therefore, setting these locations further from NSR locations would limit the sound level and the duration that such equipment can impact an NSR.
- Monitor noise during nighttime operations (between 10 p.m. and 7 a.m.), when operations have the potential to impact Class A NSRs to ensure that operations do not exceed state noise limits. When nighttime operations do not have the potential to exceed state noise levels, monitoring would not be required.
- Perform noise monitoring during operations, at a frequency and at locations identified in coordination with EFSEC for the first 180 days of operation. Noise monitoring results would be adjusted appropriately for extraordinary weather events (e.g. high wind, rain, etc.) that significantly influence noise levels. Additional mitigation (e.g., noise barriers, etc.) and subsequent noise monitoring would be required if the facilities are receiving and documenting ongoing substantiated noise complaints and/or operational noise levels exceed maximum permissible noise levels as indicated in WAC 173-60-040.

11. VISUAL AND AESTHETICS

- The information provided by the Applicant regarding environmental impacts as they relate to visual and aesthetics satisfies the informational requirements of the SEPA checklist. (WSP)
- Limited sensitive receptor sites were identified in the vicinity of the project. No designated scenic resources, National Scenic Byways, or All America Roads are located within 10 miles of the Project Lease Boundary. The nearest designated scenic resource is the Columbia River Gorge National Scenic Area, located over 12 miles to the southwest. Residences are sparse in the area, though there are a few moderately trafficked roadways, most prominently SR 142 and Knight Road, that would be within the viewshed of the Project. There are also several recreational opportunities in the vicinity of the Project, including the Goldendale Gold Club, three City parks, and Goldendale Observatory State Park. (VIA)
- The Applicant assessed the level of visual change from seven Key Observation Points (KOPs) using the Bureau of Land Management (BLM) contrast ration system to evaluate visual and aesthetic impacts. This assessment indicated that the Project would introduce many new visual elements into the area, though these new elements would be largely consistent with other horizontal and vertical lines and geometric shapes associated with existing electric transmission lines, roads, and the built environment visible throughout the landscape. The Project would also not block views of the surrounding hills, agricultural lands, or landmarks. (VIA)
- Due to topography and distance, the Project would not be visible from the Columbia River Gorge National Scenic Area or the City of Goldendale. Visual impacts to Goldendale Observatory State Park and other recreational opportunities are expected to be minor. (VIA)
- Visual impacts would primarily be experienced by drivers on Knight Road and SR 142. Three KOPs associated with these roads were determined likely to receive moderate contrast and visual impact ratings from the Project. Visual impacts were anticipated to be most pronounced along those portions of Knight Road where the Project would site panels on both sides of the road. (VIA)
- To address these impacts, the Applicant increased the fence setback along SR 142 by 30 feet (minimum 100 feet) and the fence and panel setbacks along Knight Road by 25-40 feet (minimum 100 feet for fence, minimum 120 feet for panels). Updated visual simulations with these setbacks confirm that visual impacts to motorists on these roads would be less than significant. (SVIA)

Mitigation:

- Avoid complete removal of vegetation beneath solar arrays during construction, where possible, to reduce contrast between the exposed soil and adjacent undisturbed areas during project operation.
- To the extent practicable, design BESS to blend with the adjacent agricultural character, including selecting materials and paint colors to reduce contrast with the existing setting. By mimicking design characteristics of agricultural structures in the area, the BESS facilities would appear consistent with the area's agricultural setting, including the overall visual scale of those existing structures.

- Choose the type of proposed overhead transmission structure (H-frame or monopole) to best match the adjacent transmission lines and to minimize visual clutter from the introduction of different structure types into the landscape, which would result in increased visual contrast.

12. LIGHT AND GLARE

- The information provided by the Applicant regarding environmental impacts as they relate to light and glare satisfies the informational requirements of the SEPA checklist. (WSP)
- The Project is not anticipated to introduce any substantial new source of nighttime lighting. External safety lighting will be installed at the primary access points, the Project substation, BESS, and O&M building, but all lighting will provide the minimum illumination needed, be downward-facing, and shielded. Non-essential lighting will be controlled by motion sensors. (ASC)
- Glare analysis of potential glare hazards concluded that the Project would introduce a source of yellow glare (potential for after-image) at sections of SR 142, Knight Road, and the 2-mile final approach path for Runway 07 at Goldendale Municipal Airport. (ASC; Attch. G)
- The yellow glare is predicted to impact Knight Road for less than two minutes a day at sunrise in June, SR 142 for less than 50 minutes a day at sunrise and just before sunset in May through August, and the final approach for Runway 07 for less than 100 minutes per day in the morning hours. (ASC; Attch. G)
- The FAA's policy is that glare from solar panels is similar to the glare that pilots routinely experience from water bodies, glass windows, and parking lots and that glare is most impactful to airports when it affects the cabs of air traffic control towers. As Goldendale Municipal Airport does not possess an air traffic control tower, there are no significant impacts expected to the airport as a result of glare. (ASC)
- Due to the Project's proximity to the Goldendale Municipal Airport, it will exceed Notice Criteria and would be required to file FAA Form 7460-1 with the FAA Obstruction Evaluation/Airport Airspace Analysis Group at least 45 days prior to the start of construction. (ASC)
- The Project would use anti-reflective coating on solar panels to minimize glare. (ASC)

Mitigation: No additional mitigation measures for light and glare identified.

13. RECREATION

- The information provided by the Applicant regarding environmental impacts as they relate to recreation satisfies the informational requirements of the SEPA checklist. (WSP)
- WDFW has identified the 234-acre Goldendale Fish Hatchery Wildlife Unit, part of WDFW Game Management Unit 388, which is located adjacent to and west of the Project Lease Boundary, as a resource that may be impacted by the Project. WDFW has stated that this Unit is used for hunting of pheasant, quail, duck, and mule deer, stocking and fishing of trout, and is the only public land in Klickitat County where pheasants are stocked and released. Hunting is also available on a 570-acre DNR land parcel located in the center of and adjacent to the Project and on several parcels southwest and northeast the Project Lease Boundary through WDFW's Private Lands Program. (ASC; Attch. C)

- The Project will not result in any changes or limitations to access to any identified publicly accessible hunting or fishing lands in the vicinity of the project, but noise, dust, and other activities during the construction phase could negatively impact the experience of hunters and fishing and result in avoidance behavior in game animals. These impacts will be intermittent and temporary during construction, with operation phase noise received in identified hunting areas being comparable to existing sound levels. (ASC; Attch. H)
- The Project is not located within 1 mile of any public recreational lands identified in the Klickitat County Comprehensive Plan, with the closest recreational opportunity being the Goldendale Golf and Country Club, located approximately 1.3 miles east of the Project Lease Boundary. The Project is not anticipated to have any significant impacts on access or quality of experience for any recreational lands. (ASC)
- Two DNR parcels are located in proximity to the Project, with one located in the center of and adjacent to the Project and the second located approximately one mile to the west. Neither of these publicly accessible parcels have specifically identified recreational uses but are anticipated to be used recreationally by members in a variety of ways including hunting, bird and wildlife watching, and hiking. Apart from increased traffic on nearby roadways during construction, the Project will not have any impacts to access of these parcels. (ASC)
- To address potential impacts to visual aesthetics and quality of experience to the adjacent DNR parcel located in the center of the Project Lease Boundary, the Applicant has increased fence and panel setbacks where the Project abuts the parcel on its northern and southern boundary. Setbacks for fences and panels were increased by 50 feet along the northern boundary (minimum 100 feet for fence, minimum 140 feet for panels), fence setbacks were increased by 80 feet along the southern boundary (minimum 100 feet), and solar panel setbacks were increased by 50 feet along the southern boundary (minimum 125 feet). (CCR 3/5)

Mitigation: No additional mitigation measures for recreation identified.

14. HISTORIC AND CULTURAL RESOURCES

- The information provided by the Applicant regarding environmental impacts as they relate to historic and cultural resources satisfies the informational requirements of the SEPA checklist. (WSP)
- In accordance with RCW 80.50.060(8), EFSEC has made an effort to engage all federally recognized tribes in "early and meaningful participation and input during siting review," including providing regular updates on the application process review and an open dialogue on impacts and potential mitigation to resources, rights, or interests reserved by the tribes. (ASC; YN 1; YN 2; YN 3; YN 4; YN 5; YN 6; YN 7; YN 8; YN 9)
- The Applicant is conducting ongoing outreach to the Confederated Tribes of the Warm Springs Reservation of Oregon, Wanapum Tribe, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Grande Ronde, Confederated Tribes of the Umatilla Indian Reservation, and Nez Perce Tribe. (ASC)
- The Confederated Tribes of the Umatilla Reservation declined to comment on the Project and deferred to Tribes closer to the Project Lease Boundary. (ASC)

- 23 archaeological sites and 2 historic properties were identified with the Project Lease Boundary during field surveys. An additional 19 historic properties were identified on parcels adjacent to the Project area. (CRS)
- As currently proposed, the Project has been designed to avoid all impacts within a 30-meter buffer around NRH-listed or unevaluated/potentially eligible resources. (CRS)
- If any pre-contact-era or NRH-eligible historic-era archaeological resources are impacted by the Project's final design, the Applicant would obtain the requisite DAHP excavation permit and perform all necessary archaeological work. (CRS)
- In the event unrecorded archaeological resources are identified during Project construction or operation, work within 100 feet of the find would be halted and directed away until the discovery can be assessed and cleared in accordance with the Applicant's Unanticipated Discovery Plan. (UDP)
- The Yakama Nation provided substantial technical review of the Cultural Resources Survey through multiple revisions. The Applicant addressed all comments and concerns raised by the Yakama Nation specific to the Cultural Resources with the publication of the Revised Cultural Resources Survey and the Yakama Nation stated that they had no further comments specific to the document. (YN 1; YN 3; YN 4; YN 5; YN 6; CRS)
- DAHP has reviewed the Revised Cultural Resources Survey provided by the Applicant and concurs with the findings and recommendations included within the Survey. (DAHP 1; DAHP 2)
- The Yakama Nation informed EFSEC that one or more Yakama Nation Traditional Cultural Properties (TCPs) were known to be present in the vicinity of the Project and there was an anticipated need for the Yakama Nation to perform a TCP Survey (TCPS) to appropriately identify impacts and mitigation associated with TCPs. (YN 2)
- The Yakama Nation produced a TCPS, which confirmed the presence of one or more TCPs within the vicinity of the Project that would be impacted by Project actions. The types and degrees of impact varied based on the traditional practices and areas associated with the TCP(s), but included:
    - Loss of abundance or access to traditional plants through direct loss, loss of re-seeding populations, influx of disturbance species, introduction of herbicides, and installation of fence barriers. (TCPS; YN 7)
        - The existing lands within the Project Area are largely agriculture and pasture, which are planted by farmers and ranchers with non-native species for agricultural purposes. These lands are additionally home to noxious weeds that largely go unmanaged under current land use. Project impacts to native habitats are limited to approximately 57 acres, only 35.1 acres of which will experience non-temporary impacts. (ASC; CCR 1/23)
        - The Applicant will be required to create and implement a Vegetation and Weed Management Plan that will include, among other mitigation, a commitment to treat noxious and invasive weed species, a plan for herbicide use and dispersal to avoid impacts to non-target plants, and a requirement to reseed temporarily impacted habitats with native seed mixes. (ASC)

- Impacted visual landscapes from the placement of solar panels and fencing, representing the first facility of this size and scope in the region. (TCPS; YN 7; YN 8)
    - While the location of individual TCPs cannot be discussed within this document due to the sensitivity of the information, EFSEC has worked with the Applicant to implement several site redesigns to reduce visual impacts to identified TCPs.
- Diminishment of cultural experience through both physical obstructions, reduced aesthetic visual quality, and changes to traditional uses and landscapes. (TCPS; YN 7; YN 8)
    - While the location of individual TCPs cannot be discussed within this document due to the sensitivity of the information, EFSEC has worked with the Applicant to implement several site redesigns to reduce quality of experience impacts to identified TCPs.
    - Apart from temporary increases in traffic conditions during Project construction and decommissioning, there will be no impacts to access of any lands outside of the Project's legal control. All lands currently accessible to Yakama Nation tribal members will remain accessible throughout the Project's life. (ASC; CCR 1/23)
    - The Applicant has proposed, upon the start of construction, the deeding of approximately 40 acres of land in the northwest corner of the Project Lease Boundary to the Yakama Nation for the purposes of preservation and traditional uses. The Yakama Nation has considered this proposed Applicant commitment, stated that the deeding of these lands would not have a mitigative effect on the Project's significant impacts to TCPs, and did not express an interest in pursuing the proposal. (CCR 1/23; YN 8)
- Impacts to traditional tribal hunting practices and locations through the introduction of barriers to game wildlife movement, diminishment of the regional aquifer through Project water use, reduction in grazing habitat for game wildlife, and potential avoidance behavior from game wildlife during Project construction and operation. (TCPS; YN 7; YN 8)
    - EFSEC has worked with the Applicant and WDFW to ensure that sufficient east-west and north-south wildlife passages remain available in the final Project design as multiple sizeable gaps have been left between fenced-in solar arrays. (WDFW 1)
    - Project activities that will increase noise, light, and dust, resulting in wildlife avoidance behavior, will primarily be limited to the period of Project construction. (ASC)
    - The Applicant has no intention of using site surface or ground water for the Project and will most likely source water from a local municipal water provider with a valid water use permit. This would result in a net reduction of on-site water use when compared to the current agricultural use. (CCR 1/23)
    - EFSEC is aware of a reasonably foreseeable development that tentatively plans to site adjacent to this Project. EFSEC's assessment of cumulative impacts of the combined projects impacts on wildlife movement is

included below in this Environmental Review and Staff Recommendation.

- The TCPS found that, without mitigation, the Project would result in significant impacts to cultural use and experience associated with one or more Yakama Nation TCPs, impacts that would be compounded by impacts from reasonably foreseeable developments in the area. (TCPS; YN 7; YN 8)
- The Yakama Nation identified mitigation measures that, while not fully alleviating or addressing all identified impacts, it believes would be an effective starting point for technical discussions. The recommended mitigation measures, with EFSEC response actions, are included here:
    - Washington State could consider siting regulations that limit adjoining projects or favor projects that secure surrounding parcels for non-industrial use. (YN 7)
        - As required by SEPA, EFSEC considers cumulative impacts to all environmental resources from Projects when considered in combination with past, present, and reasonably foreseeable development. This Environmental Review and Staff Recommendation includes a discussion of multiple anticipated cumulative resource impacts from this Project when considered in combination with a reasonably foreseeable solar facility that EFSEC is aware of in the vicinity of this Project. With regards to siting decisions, EFSEC reviews and permits projects that are submitted to it; projects typically go through extensive siting deliberations and decisions prior to submitting an application to EFSEC and the agency does not site any projects itself. Any statewide regulatory decisions about adjoining projects would need to be reached by the Governor and/or Legislature. Such a decision would be beyond EFSEC's authorities.
    - Washington State land managers and permitting agencies could consider omitting state lands from industrial developments where lands have been identified as containing sensitive tribal resources. Alternatively, applicants may consider the lease of state lands but agree to preserve the current (undeveloped) status of the parcels. (YN 7)
        - EFSEC does not have the ability to determine permitting policies for state lands or the authority to prohibit projects from siting on state lands. This Project is not sited on any state lands, though there are 2 DNR parcels and 1 WDFW parcel located within 1 mile of the Project Lease Boundary. EFSEC has assessed anticipated Project impacts to these lands and developed mitigation which could be imposed by EFSEC that it believes will reduce resource impacts to a level below significance. (ASC)
        - EFSEC explored whether specific state lands of concern to the Yakama Nation could potentially be leased by the Applicant and placed under a conservation easement to secure them from development. EFSEC determined that the lands of concern had already been leased to a different entity unrelated to this Project and that there was no regulatory avenue available to EFSEC that would facilitate transfer of the lease, or otherwise preserve or secure the lands from future development.

    - Due to the geographic area associated with one or more TCP(s), full documentation has been challenging. The project proponent could provide a grant of funds to the Yakama Nation Cultural Resource Program for continued documentation of the archaeological/historical aspects of this/these TCP(s) beyond the current study. This would alleviate some impact to TCPs by providing means to protect and perpetuate the larger cultural property. (YN 7)
        - The Applicant has committed to contributing up to $100,000 toward the funding of this effort. (CCR 1/23)
- The Yakama Nation has been presented with several initial Project redesigns implemented by EFSEC and the Applicant, the Applicant's proposed commitments in response to the TCP impacts identified by the Yakama Nation, and potential further Project redesigns contemplated by EFSEC. After consideration, the Yakama Nation has stated that the responses are not sufficient to avoid, minimize, or mitigate the project's specific and cumulative significant impacts to the TCP(s) that they have identified in their TCPS. Subsequent to this response from the Yakama Nation, EFSEC and the Applicant implemented the proposed Project redesigns that had been presented to the Yakama Nation for consideration. (YN 8; YN 9)
- EFSEC concurs with the Yakama Nation on the presence of the TCP(s), and related impacts identified in the TCPS, but believes that the Applicant's commitments and site redesigns implemented by the Applicant at EFSEC's direction are sufficient to reduce TCP impacts to a level below significance. Cumulative impacts are addressed later in this Environmental Review and Staff Recommendation, but EFSEC similarly believes that this Project's contribution to cumulative impacts is less than significant.

Mitigation: No additional mitigation measures for historic and cultural resources identified.

15. TRANSPORTATION

- The information provided by the Applicant regarding environmental impacts as they relate to transportation satisfies the informational requirements of the SEPA checklist. (WSP)
- The Project would be accessed primarily from SR 142, a two-lane paved route classified by WSDOT as a Rural Major Collector Road, and Knight Road, a two-lane paved county road classified by WSDOT as a Minor Collector. Additional local access to the Project will be provided by two gravel county roads, Butts Road and Mesecher Road. (ASC)
- New service roads and access points constructed for the Project would be private, located inside the Project fence line, and would not provide any new travel routes for area residents. (ASC)
- The Project will likely receive equipment at the Port of Portland, 115 miles southwest of the Project Lease Boundary, and transport the equipment by semi tractor trailer truck to the site by travelling east along Interstate 84, north along US Route 97, and west along State Route (SR) 142. Equipment is also anticipated to arrive by truck from locations north of the Project by travelling south along US Route 97 and west along SR 142. All heavy vehicles associated with construction will access the site from the east via the US Route 97/SR 142 intersection and will result in approximately 20 semi tractor trailer truck trips per day during the 16-month construction schedule. (STA, CCR 02/15)

- The Applicant will pursue a formal road haul agreement with financial securities, as required by the County, prior to construction. This will include a detailed breakdown of vehicle trip generation by type to serve as the basis for a pavement analysis to be conducted for Knight Road to mitigate for impacts of heavy vehicle use. (STA)
- Peak construction activities are anticipated to occur during 8 to 10 months of the approximate 16-month construction schedule. During this period, the site is anticipated to support up to 250 construction workers at one time, resulting in 526 worker vehicle trips per day. During the non-peak 6- to 8-month period of construction, the site is anticipated to support approximately 100 construction workers per day. This would result in approximately 210 worker vehicle trips per day during this time. (STA)
- Klickitat County provided comments on the Supplemental Traffic Analysis including:
    - Concerns with the potential use of SR 142 to the west of the Project and Tom Miller/W Darland St/Wing Rd/Van Hoy Rd to the south of the Project due to road conditions, travel time, and weather.
        - The Applicant has indicated that the trip distribution will be updated to reflect no anticipated Project travel along these routes.
    - Concerns with anticipated haul routes for heavy vehicles.
        - The Applicant has confirmed that heavy vehicles will only access the site from the east via the US Route 97/SR 142 intersection
    - Concerns with potential access to the site from Hill Road, Pine Forest, and Fairgrounds Road.
        - The Applicant has confirmed that there is no anticipated use of these roads by Project-related construction vehicles.
    - A recommendation that the Applicant consult the "Guidelines for Geotechnical Evaluation of Klickitat County Roads" in preparation for the Geotechnical Evaluation that will be performed on Knight Road.
        - The Applicant has confirmed that it will follow the guidance published in the referenced document as it conducts the Geotechnical Evaluation (KC 1; CCR 2/15)
- A Traffic Impact Analysis (TIA) will be produced in accordance with WSDOT and Klickitat County guidelines prior to construction. In preparation, the Applicant has produced a Traffic Scoping Letter (TSL) for EFSEC, WSDOT, and Klickitat County review that outlines key elements of transportation analysis that will be included in the TIA, specifically:
    - Project Description
    - Planned Roadway Improvements
    - Transportation Demand Management
    - Project Construction Trip Generation Estimates
    - Project Trip Distribution Patterns
    - Study Area and Transportation Network
    - Analysis Periods
    - Traffic Safety Evaluation
    - Traffic Mitigation

  The finding and mitigation recommendations will be reviewed by EFSEC, WSDOT, and Klickitat County prior to finalization. (TSL)
- Klickitat County provided comments on the TSL including:

    - Concerns that the trip distribution specific to northbound traffic on US 97 is not accurate
        - The TSL indicates that all Project traffic heading northbound on US 97 will exit at the SR 142 intersection, but Klickitat County believes that approximately 50% of northbound US 97 traffic will exit further south and use S Columbus Avenue/Old 97 S to reach SR 142.
        - Klickitat County would therefore recommend that the Applicant contact WSDOT to determine whether the S Columbus Ave/US 97 intersection should be analyzed in the TIA and the City of Goldendale to determine whether the S Columbus Ave/E Main St/W Main St intersection should be analyzed in the TIA.
    - The County noted that, while the SR 142/Mill Avenue intersection is listed to be analyzed, based on current trip distribution projections showing no Project traffic on N Mill Avenue, analysis may be unnecessary.
    - The County wishes to ensure that trip counts and distributions for Knight Road, Mesecher Road, and Butts Road are included in the TIA.
    - The County wants to ensure that the trip counts and distributions reflect the likely endpoints of Project traffic, whether that be the O&M building, laydown yards, or elsewhere
    - The County wants to ensure that trip counts and distributions reflect traffic to and from anticipated gravel and water sources for the project. (KC 2)
- WSDOT reviewed the TSL and provided no recommended changes to the methodology for the upcoming TIA other than that the intersections of US 97 & S Columbus Ave/Old 97 and Mill Ave & SR 142 (Broadway St) be included as study intersections. (WSDOT)
- A Safety Management Plan, including a Traffic Control Plan, would be developed consistent with WSDOT and Klickitat County design standards to facilitate safe movement of vehicles in the vicinity of the construction zone. This Plan would be prepared in accordance with 23 Code of Federal Regulations §655 Subpart F. (STA)
- Project vehicles would be parked at designated areas of the Project site and off public roads. (ASC)
- Operations traffic would include limited worker commutes for up to four permanent staff and occasional water truck trips to support panel washing (approximately 3-4 truck trips per day over a 2-3 week period). (ASC)

Mitigation:

- The Applicant would incorporate the guidance on methodology and intersection inclusions provided by Klickitat County and WSDOT into the TIA that they will prepare prior to construction. If, following consultation with WSDOT and Klickitat County, EFSEC finds the mitigation proposed within the Draft TIA insufficient, EFSEC may impose additional mitigation to offset project impacts to State and County roads prior to approving the Final TIA.
- To ensure that no changes have occurred since the traffic analysis originally provided prior to construction, a third-party engineer would provide a traffic analysis prior to decommissioning. The traffic analysis would evaluate all modes of transportation (e.g., waterways, rail, roads, etc.) used for the movement of people and materials during decommissioning via the haul route(s) in Washington State.

- The analysis of impacts from decommissioning is based on existing laws and regulations at the time when the ASC was submitted to EFSEC. To ensure that no changes have occurred to laws and regulations used in this analysis, the Applicant should consult with WSDOT and Klickitat County on the development of a decommissioning-stage Traffic and Safety Management Plan prior to decommissioning. The Traffic and Safety Management Plan must include a safety analysis of the WSDOT-controlled intersections (in conformance with the WSDOT Safety Analysis Guide) and provide mitigation or countermeasures where appropriate. The analysis would review impacts from decommissioning traffic and be submitted to WSDOT for review and comment prior to decommissioning activities.

16. PUBLIC SERVICES

- The information provided by the Applicant regarding environmental impacts as they relate to public services satisfies the informational requirements of the SEPA checklist. (WSP)
- Minor temporary impacts to public services and utilities are anticipated during construction, but the Project is anticipated to be largely self-sufficient during operation, making continued direct or indirect increases in public services use unlikely. (ASC)
- Use of emergency services may occur during construction and operation. In anticipation, the Applicant will develop a set of emergency plans in coordination with the Klickitat County Department of Emergency Management and Klickitat County Fire Protection District 7. These plans would include an Emergency Management Plan, Fire Control Plan, and Site Restoration Plan. (ASC)
- The Applicant will provide recurring training to fire responders and construction staff to familiarize both with the codes, regulations, hazards, and mitigation processes associated with solar electricity and BESS. This training will include techniques for fire suppression of photovoltaic and high voltage technology. (ASC)
- The non-local share of the construction workforce is anticipated to number 150 workers, resulting in a peak temporary increase in the county population of approximately 0.6%. During operation, the Project would be staffed by four permanent personnel. As a result, the Project is not expected to significantly affect the use of public services and facilities during construction or operation. (ASC; STA)

Mitigation:

- On an annual basis, the Applicant would provide Klickitat County Fire Protection District 7 the opportunity to review all relevant fire response plans and update the plans based on feedback received by the District. Any changes to the plans would be submitted to EFSEC for approval.

17. UTILITIES AND WASTE MANAGEMENT

- The information provided by the Applicant regarding environmental impacts as they relate to utilities and waste management satisfies the informational requirements of the SEPA checklist. (WSP)
- Depending on soil moisture levels, up to 16.3 million gallons of water may be used during the 15-month construction period for dust suppression. This water may be sourced either from an existing on-site well with a valid water right to be confirmed by WDOE or

by purchasing water from a permitted off-site source and hauling it to the Project Area. (ASC)

- During construction, portable toilets would be used for sanitary waste. (ASC)
- During operations, the O&M building will need water for general personnel use and periodic panel washing is planned. Combined, these would result in the use of approximately 281,000 gallons of water per year, which would be supplied by 3-4 water truck trips per day over a period of 2-3 weeks. Washwater is expected to infiltrate into the ground surface at or near the point of application. This water may be sourced either from an existing on-site well with a valid water right to be confirmed by WDOE or by purchasing water from a permitted off-site source and hauling it to the Project Area. (ASC)
- During operation, a licensed professional would be contracted to install an on-site septic system for the sanitary wastes produced from the O&M facility. (ASC)
- Waste generated during construction would be similar to commercial construction projects of a similar size. Roosevelt Regional Landfill in Klickitat County has ample capacity for the anticipated Project waste generated during construction and operation. (ASC)
- Construction materials, used batteries and components, and spent solar panels would be recycled to the extent practicable and in coordination with licensed subcontractors, recycling facilities, and/or authorized sites. (ASC)
- As a solar power generating facility, the Project is expected to produce the majority of its own electricity needs. (ASC)

Mitigation: No additional mitigation measures for utilities and waste management identified.

Cumulative Effects:

Loss and degradation of Priority Habitat:

Klickitat County represents the western extent of shrub-steppe habitat in Washington, with approximately 456,000 acres of shrub-steppe (approximately 6% of the state total) located within the county. Development and land conversion pressures are the primary threats to this Priority Habitat, with 60-80% of Washington's historic shrub-steppe having been lost or degraded as a result. WDFW is concerned that cumulative effects of multiple energy projects located in close proximity to one another within the range of shrub-steppe would result in habitat fragmentation and loss of ecological connectivity between the remaining blocks of shrub-steppe, in addition to the direct loss of shrub-steppe from project footprints. EFSEC is aware of at least one reasonably foreseeable solar development in close proximity to this Project. Combined, these projects could serve to isolate pockets of Priority Habitat, reduce connectivity and genetic exchange between plant and animal populations, and result in the loss and degradation of habitat through the effects of solar panel placement (WDFW 2024).

The Applicant has sited Project facilities on previously disturbed (e.g. cultivated agricultural cropland, modified grasslands, and pasture) to the greatest extent feasible and has minimized proposed impacts to Priority Habitats as much as practicable. Additionally, the Applicant would implement compensatory mitigation for all impacts to Priority Habitat and develop a Vegetation and Weed Management Plan and Wildlife Habitat Management Plan in coordination with WDFW that would include measures for revegetation and monitoring following Project

construction and restoration following Project decommissioning. EFSEC has determined that altered habitat impacts, meaning those areas of habitat that will remain within the Project Area, but underneath solar panels, can still serve a limited role in supporting plant and wildlife species dependent on the shrub-steppe habitat type. However, EFSEC recognizes that this altered habitat still represents a substantial reduction in the quality, sustainability, and recoverability of fragile habitats like shrub-steppe and other Priority Habitats. As a result, EFSEC has required that all altered habitat impacts to Priority Habitats be mitigated for at the same ratio as permanent impacts to reduce the degree of impacts to these habitats and encourage this and future Applicants to minimize impacts to Priority Habitats as much as possible. EFSEC will continue to encourage applicants to avoid direct and indirect impacts to Priority Habitats such as shrub-steppe and develop mitigation to address cumulative impacts.

Wildlife movement/habitat connectivity:
Presently, there is little resistance (i.e., any type of significant development) on this landscape for animal movement and this Project would impact priority habitats, dependent species, and connectivity, as well as result in short- and long-term behavioral changes and impact populations dynamics across a large landscape. Large, fenced areas, such as solar facilities, have the potential to adversely affect wildlife movement. No priority habitat linkages important for wildlife movement connectivity were identified within the Project Lease Boundary, but mule deer and western gray squirrel use and movement across the site has been confirmed based on the presence of preferred habitat and observations during field surveys (Attch. C). Conversations between the applicant, WDFW, and EFSEC throughout the siting process have acknowledged that habitat connectivity in the area is a topic of importance. EFSEC is aware of at least one reasonably foreseeable solar development proposed in the area, and EFSEC and WDFW continue to evaluate proposals in the area with an emphasis on maintaining habitat connectivity through the region.

Each solar project can cover hundreds to thousands of acres. The Carriger Solar Project would cover 1,326 acres, most of which would be enclosed in fencing. The Project design includes multiple considerations that recognize the impact that this Project would have on wildlife movement, including, but not limited to, developing, in coordination with WDFW, wildlife corridors through the Project area where practicable, leaving corridors along streams and wetlands open, and restricting fencing to surround smaller, consolidated arrays rather than larger contiguous areas. In general, the site provides and will continue to provide local connectivity functions and value. Wildlife movement would be able to occur around and between solar arrays where allowed by fencing, including multiple north-south and east-west corridors in between sets of arrays.

Some species, such as deer and elk, are very wary of fencing or movement restrictions and may need wildlife passages as wide as 1-2 miles in width, and potentially larger, in order to maintain effective movement. As additional projects which fence large areas are constructed, such as the reasonably foreseeable development that EFSEC is aware of, wildlife movement and connectivity could be more substantially affected. Maintaining effective wildlife corridors to allow the movement of large and small animal species will remain a focus of EFSEC environmental review of future projects. Additional wildlife corridors would be identified and protected as mitigation for future large, fenced projects in this rural area. EFSEC expects that

any future development in the area would demonstrate, through site design and coordination with EFSEC and WDFW, an effort to maintain the continuity of wildlife movement corridors through the region and through the Carriger Solar Project.

Visual aesthetics

The existing visual setting surrounding the Project Lease Boundary is primarily rural agricultural with sparse, dispersed rural residences. The agricultural uses of the lands in the area are primarily crop cultivation, mostly dryland wheat, and grazing pastures. The flat-to-gently rolling terrain allows for a viewshed with many distant, unobstructed sightlines of several substantial natural features, including Mount Adams to the northeast, the Simcoe Mountains to the north/northeast, and the Columbia Hills to the south of the Project Lease Boundary. The visual character of the area is distinctly rural with no large-scale facilities of the nature of this Project. The Carriger Project has been sited and designed to ensure that no significant impacts result to visual aesthetics from this project alone, but when combined with other reasonably foreseeable developments, cumulative impacts to visual aesthetics could result in significant impacts to visuals in the area. EFSEC anticipates assessing any future projects in the area to determine whether the combination of several large facilities detracts from the existing visual character of the area.

EFSEC is aware of a planned solar facility that is tentatively sited on lands adjacent to the Carriger Project that EFSEC expects would cumulatively contribute to regional visual impacts when combined with those from the Carriger Project. The Carriger Project has gone through substantial redesign based on concerns about visual impacts, including expanding setbacks from prominent roadways and public lands and avoiding the placement of panels in locations that were determined to dominate views from nonparticipating residences. EFSEC would anticipate placing similar conditions on the reasonably foreseeable adjacent development to ensure that the projects do not combine to result in strong visual impacts. The most substantial visual impacts anticipated for the Carriger Project were for those stretches of Knight Road where panels would be located on both sides of the road. Based on the preliminary site plan for the reasonably anticipated development, there would be additional sections where the projects would, jointly, have panels on both sides of the road. EFSEC anticipates that setbacks would be similar for both projects so that motorists along this roadway do not experience significant impacts to their views during travel. EFSEC appreciates that the Applicant for this Project has increased their setbacks along all sections of Knight Road, even where their panels were not on both sides, as this allows for more effective management of potential cumulative impacts.

Traditional Cultural Properties (TCPs)

The Yakama Nation has indicated that there are one or more Yakama Nation TCP(s) in proximity to the Project that have been documented by the Yakama Nation Cultural Resources Program during a formal TCP Survey (TCPS). TCPs can consist of natural or human-constructed resources that have historic, cultural, religious, or other significance to a living community and are important in maintaining the continuing cultural identity of that community. The Yakama Nation considers most impacts to TCPs to be significant due to the historic and continued degradation and loss of these properties, resulting in comparatively few remaining TCPs that are of heightened sensitivity and particularly vulnerable to any new effects from development. The Yakama Nation considers the area around this Project particularly vulnerable, as there are no

substantial commercial or industrial developments in the area, and the siting of this Project here may both change the character of the region and perhaps encourage the siting of other large energy facilities nearby. Yakama Nation staff have stated that they anticipate Project actions would result in significant TCP impacts both specific to this Project and cumulatively, when combined with other reasonably foreseeable developments. EFSEC is aware of one proposed solar energy development that is tentatively to be sited adjacent to this project; cumulative TCP impacts are expected.

EFSEC has worked with the Applicant for this Project on multiple Project redesigns to reduce anticipated impacts to TCPs. EFSEC believes that these redesigns, when combined with other Applicant commitments outlined in this Environmental Review and Staff Recommendation and other referenced documents, reduce individual Project TCP impacts to a level below significance. While specific descriptions and geographic boundaries for the TCP(s) identified in the TCPS cannot be discussed here due to the sensitive nature of the information, EFSEC anticipates that the reasonably foreseeable adjacent solar energy development will have substantial TCP impacts. When combined, the cumulative impacts may rise to the level of significance as well. However, when reviewing environmental impacts under its responsibilities as the SEPA Lead Agency, EFSEC should only consider a specific project's individual contribution to cumulative impacts when assessing significance and developing mitigation (WSDOT 2008). EFSEC has determined that, following redesign and Applicant commitments, this Project does not significantly contribute to what EFSEC believes may be a significant cumulative impact. Requiring further mitigation of this Project as a result of cumulative impact contributions from a reasonably foreseeable development would be inappropriate.

EFSEC is aware that the development of renewable, particularly solar, energy facilities is proliferating throughout Eastern Washington. These solar facilities, when in close proximity, such as the adjacent reasonably foreseeable development to this Project, are difficult to distinguish visually from one another and can effectively combine into a single, much larger, visual impact on sensitive viewsheds and TCPs. The combined footprint can also result in a further decrease in quality of experience for tribal members who continue to perform traditional practices on nearby lands, further limit available habitat for game animals relied upon for traditional hunting, and fragment and eliminate seedbanks for native plant species important to TCPs. EFSEC will consider cumulative impacts for any projects sited in proximity to this Project and determine whether those impacts could be reduced through mitigation. This mitigation would be determined by the nature and degree of cumulative impacts and could include measures such as relocation of components away from sensitive areas, the imposition of undeveloped buffer lands between new and existing projects to break up their combined impacts, or other measures as needed; significant TCP impacts would result in substantial mitigation being identified by EFSEC. Depending on the availability and effectiveness of mitigation measures, any identified significant TCP impacts may remain significant and require further review in an Environmental Impact Statement.

The information shared with EFSEC by the Yakama Nation through their TCP Survey provides EFSEC review staff with a much-improved understanding of the natures and locations TCPs in the area. This, in turn, allows EFSEC to more accurately assess impacts from this and future projects and design mitigation that will be more effective in avoiding or minimizing impacts to

TCPs. EFSEC recognizes the cultural value of TCPs and the importance of minimizing impacts to what TCPs remain following a history of loss, degradation, and destruction and will continue to seek discussion with affected Tribes on how to best use the SEPA process to identify and reduce cumulative impacts from development on or near these sites.

Fire response emergency services

The Project is located in the service area of Klickitat County Fire Protection District 7. District 7 is a rural fire response district with 2 career firefighters and 140 volunteer firefighters spread across 10 stations covering approximately 250 square miles of primarily agricultural and undeveloped lands surrounding the City of Goldendale. The primary station for District 7, Station 1, is located in Goldendale approximately 3.5 miles from the nearest point of the Project and 8 miles from the most distant point of the Project. Station 2 is located approximately 2-to-9 miles west of the Project. Given the coverage area of District 7, it can be assumed that most of their deployments are in response to single house fires and wildfires. As assessed by DNR in 2000, District 7 is at risk of wildfire due to the area fire history, type and density of vegetative fuels, extreme weather conditions, topography, and distance of structures from fuel sources (DNR 2002). The construction of a commercial/industrial project of the size and scope of the one considered here would present a unique form of fire risk on this community and may stress fire response expertise and resources.

The Applicant has committed to developing a set of emergency plans, including an Emergency Management Plan and Fire Control Plan, formed in coordination with the Klickitat County Department of Emergency Management and District 7. The Applicant would provide recurring training to fire responders to familiarize them with the hazards and suppression and control techniques associated with photovoltaic and high voltage technologies such as those that would be installed at the Project. District 7 would also be provided an opportunity to review these emergency plans on an annual basis and recommend changes and updates that would be incorporated with EFSEC approval.

While this Project is not anticipated to result in significant impacts to fire response services, EFSEC is aware of a reasonably foreseeable solar development that is planned for construction adjacent to this Project. This reasonably foreseeable development would also be located in the service area of District 7 and would present individual and cumulative fire risks that would require mitigation. The proximity of the two projects would increase the risk of additional photovoltaic and high voltage technologies serving to fuel a larger outbreak, either from a fire originating at either facility or from an external wildfire. The location of multiple large commercial/industrial facilities in the response area of an otherwise-rural fire response district increases the risk of overtaxing the District's resources. EFSEC will consider cumulative impacts to fire response services for future projects under review in this area and may impose mitigation such as the development of coordinated Fire Control Plans, financial contributions towards the training and equipping of District responders, or other relevant mitigation.

APPLICABLE SEPA RULES

Mitigated Determination of Nonsignificance (DNS).

WAC 197-11-350 specifies when a Mitigated DNS is issued.

> WAC 197-11-350. (3) Whether or not an applicant requests early notice under subsection (2), if the lead agency specifies mitigation measures on an applicant's proposal that would allow it to issue a DNS, and the proposal is clarified, changed, or conditioned to include those measures, the lead agency shall issue a DNS.

Comment period

WAC 197-11-340 identifies 5 circumstances when a 14-day comment period is required.

> WAC 197-11-340 (2) (a) An agency shall not act upon a proposal for fourteen days after the date of issuance of a DNS if the proposal involves:
>
> > iv) a DNS under WAC 197-11-350 (2), (3) or 197-11-360(4)

Consistent with WAC 197-11-350, EFSEC has identified conditions that would allow it to issue a DNS, or the applicant has clarified or changed their proposal to include additional measures that allow EFSEC to issue a DNS. The DNS should be identified as mitigated, and a 14-day comment period should be provided.

Nothing in this environmental review or the associated SEPA Mitigated DNS shall preclude further review or conditioning of future development proposals for the subject property.

I have reviewed and considered the referenced material in Part A for Carriger Solar. I have identified no probable significant adverse environmental impacts if the mitigation measures identified in part B are included in a DNS and in the Site Certification Agreement. I hereby recommend a Mitigated Determination of Nonsignificance with a 14-day public comment period.

Amí Hafkemeyer
EFSEC Director of Siting and Compliance

04/04/2025
Date

Attachment 1: Figure 11: Transportation Routes