STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

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REVISED MITIGATED DETERMINATION OF NONSIGNIFICANCE
Pursuant to Chapter 463-47 WAC and WAC 197-11-350
For the Carriger Solar Project

Date of Issuance: June 16, 2025

Lead Agency: Washington Energy Facility Site Evaluation Council (EFSEC)

SEPA Responsible Official: Sonia Bumpus, sonia.bumpus@efsec.wa.gov, (360) 664-1363

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Agency File Number: EFSEC Docket No. EF-230001

Description of 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 Bonneville 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.

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

Applicant: Cypress Creek Renewables, LLC
3402 Pico Blvd.
Santa Monica, CA 90405

SEPA Threshold Determination: EFSEC has issued a Mitigated Determination of Non-Significance (MDNS) under WAC 197-11-350 based on a determination that the enclosed mitigating conditions, along with required compliance with applicable county, state, and federal regulations and permit requirements, would mitigate any significant adverse impacts on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This determination was made after the review of the application and other information on file with the lead agency and existing regulations applicable to the proposal (see attached memo from EFSEC staff). The Environmental Review and Staff Recommendation, and the Application for Site Certification (ASC) are available at the EFSEC website: https://www.efsec.wa.gov/energy-facilities/carriger-solar.

Mitigating Conditions:

Resource	Impact	Mitigation
Earth	Erosion	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.
Air	Dust Emissions	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.
Water	Quality – Stream Crossings	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.
	Quality – Spill Prevention Control	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.
	Quality – Employee Training	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.
	Quality – Streams	Project construction and decommissioning work, especially work near streams, would be minimized during rainy periods and heavy rain.
	Quantity – Water Source	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.
	Quantity – Drought	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.
	Quantity – Water Rights	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.
Plants	Vegetation and Weed Management Plan	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 consideration 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.
	As-Built Report	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.
	Restoration Plan	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 for final approval 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.
	Trees	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 measures 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.
	Special Status Plant Species	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.
Animals and Habitat	Goldendale Fish Hatchery	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.
	Wildlife Corridors	During final project micrositing, the Applicant would consider if incremental expansion of Project wildlife

	corridors is practicable through intra-site relocation of solar arrays.

Habitat Mitigation Ratios	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
	  o 1:1 for permanent impacts
	  o 0.5:1 for altered habitat impacts
	  o 0.1:1 for temporary impacts
	• Dwarf shrub-steppe
	  o 2:1 for permanent impacts
	  o 2:1 for altered habitat impacts
	  o 1:1 for temporary impacts

Habitat Mitigation	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.
Trash Containers	All exterior trash containers would be wildlife resistant.
Pesticides	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.
Sensitive Area Flagging	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.
Mortality Monitoring	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.
	Bird Breeding	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.
	Roadway Removal	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.
Energy and Natural Resources	High-Efficiency Fixtures	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.
	Foundation Removal	The Applicant would remove all concrete foundations associated with the Project to a level of no less than 3 feet below the surface of the ground during decommissioning, unless some portions of the foundations are requested to be maintained by the landowner.
	Decomissioning	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.
Environmental Health	BESS Replacement Chemistry	When the BESS is due for replacement, the Applicant would assess all battery chemistries that are widely commercially available for BESSs at the time of replacement. A comparative report of such chemistries

		shall be submitted to EFSEC along with the Applicant's recommendation for chemistry selection for EFSEC's approval.
Land and Shoreline Use	Site Restoration Plan	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.
	Gravel Removal	During Project decommissioning, all gravel and aggregate material will be removed from land intended to be returned to agricultural use.
Socioeconomics	Decommissioning Housing Analysis	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.
Noise and Vibration	Laydown Yards	Avoid primary laydown and equipment storage/parking areas, defined as those containing 20% or more of Project equipment and materials, closer than 1,200 feet from the nearest non-participating NSR location. Avoid ancillary laydown and equipment storage/parking areas, meaning those with less than 20% of Project equipment and materials, closer than 800 feet from the nearest non-participating NSR location.
	Nighttime Hours	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.
	Noise Monitoring	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.
Visual and Aesthetics	Vegetation Removal	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.
	BESS Design	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.
	Transmission 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.
	Natural Screening	To reduce visual impacts from the Project to the adjacent DNR parcel, a combination of natural screening tools, which may include earthen berms, rock piles, native vegetation, or other natural methods, would be installed along the border of the Project and the northern boundary of the DNR parcel. The final design of this natural screening shall be submitted to EFSEC for approval prior to the start of construction and would be maintained throughout Project operation.
Historic and Cultural Resources	Tribal Engagement	Maintain ongoing engagement with affected Tribes to facilitate identification, location, quantification, and mitigation of potential impacts to TCPs when practical. Tribal review of site/engineering plans would provide

		input to guide design and avoidance without confidential disclosure of sensitive locations. ~~This engagement should also include opportunities to evaluate the effectiveness of any implemented mitigation measures throughout the Project's lifecycle. Appropriate mitigation measures may include (but are not limited to) the demarcation of "no-go," culturally sensitive areas to be avoided by contractors through Project redesign, refinement, or maintenance of safe access by Tribes.~~
Transportation	Traffic Impact Analysis	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 on State and County roads prior to approving the Final TIA.
	Decommissioning Traffic Analysis	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.
	Decomissioning	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.
Public Services	Fire Response Plans	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.
	Water Cistern	The Applicant would install a 10,000-gallon, opaque, enclosed water cistern to store water for potential fire suppression needs. The location and access for the cistern would be developed in coordination with Klickitat County Fire Protection District 7. It would be kept in good working order throughout the Project's lifespan, including performing maintenance such as sediment removal or tank integrity testing as appropriate.

Public Comment: A 14-day public comment period for the MDNS was provided. Comments on the MDNS and the environmental impacts of this proposal were submitted between April 7 and April 20, 2025.

SEPA Responsible Official: Sonia Bumpus, EFSEC Executive Director, sonia.bumpus@efsec.wa.gov, (360) 664-1363

Signature  Date June 16, 2025
(electronic signature or name of signor is sufficient)

Attachment:

1. April 4, 2025 Environmental Review and Staff Recommendation
2. June 13, 2025 Supplemental Staff Memo Post SEPA Comment Period