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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: July 14, 2025

RE: Supplemental Memorandum Post RMDNS Comment Period - 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 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 (kV) 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.

On April 7, 2025, EFSEC issued a Mitigated Determination of Non-Significance (MDNS) for the Carriger Project for public comment. The public comment period ended on April 20, 2025, during which EFSEC received 7 public comment letters. All of these comments were reviewed, and several issues were raised for consideration that are best addressed by a revision to the MDNS. A Revised Mitigated Determination of Non-Significance (RMDNS) was issued on June 16, 2025 for public comment. The public comment period ended on June 22, 2025; a total of 16 comments were received by EFSEC. All of these comments were reviewed and several substantive comments merited revisions to the RMDNS. EFSEC is making the following edits to address environmental impact, consistency, and clarity concerns associated with the RMDNS that were raised in public comments:

6. ENERGY AND NATURAL RESOURCES

- A comment noted that there was an inconsistency with a mitigation measure related to concrete foundation removal between the RMDNS and the draft Site Certification Agreement (SCA). The RMDNS required that concrete foundations be removed to a depth of 3 feet below the surface of the ground during site restoration. The draft SCA required that such foundations be removed to a depth of 4 feet below the surface. The depth outlined in the draft SCA is the correct depth. The existing RMDNS measure is, therefore, being corrected to 4 feet.

Revised Mitigation: 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.

7. ENVIRONMENTAL HEALTH

- A comment was received in relation to a new mitigation measure that was added in the first RMDNS requiring the completion of a comparative BESS chemistry assessment by the Applicant that be submitted to EFSEC alongside a recommendation on final chemistry for any replacement BESS during the Project's lifetime. The comment noted that the mitigation language did not indicate what criteria should drive the Applicant's recommendation and EFSEC's final approval of the replacement BESS battery chemistry. The mitigation language has been revised to indicate that the final replacement BESS battery chemistry should be the chemistry that best minimizes potential impacts to environmental health and public safety.

Revised Mitigation: 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 the chemistry selection that best minimizes potential impacts to environmental health and public safety for EFSEC's approval.

11. VISUAL AND AESTHETICS

- A request was received from the Applicant that a new mitigation measure added in the first RMDNS regarding natural screening infrastructure along a 0.5-mile border with an adjacent DNR parcel be updated to clarify that the measure is requiring visual screening, not a complete visual barrier. EFSEC has updated the language in the mitigation measure to reflect that this visual screening will be periodic in nature.

Revised Mitigation: 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 periodically 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.



Amí Hafkemeyer
EFSEC Director of Siting and Compliance

07/14/2025

Date