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Q2. <b>Email</b>	dbarta@gorge.net
Q3. Are you part of an Agency or Organization?	No
Q4. Share any comment  Please read my uploaded comments. Thank you.	
Q5. Upload your document (optional)	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/a5e9816ce60d8ef5d6a5817b19b654a7d9f55e82/original/1745212963/850edecf77693fd4e95530606e179487_EFSEC%20COMMENTS%20CARRIGER%204%2020%2025%202.docx?1745212963
Q6. Upload a picture (optional)	not answered
Q7. Did you also share a video?	No
Q8. What is the title of your video?	not answered

Thank you for the opportunity to comment on the Carriger Solar project proposed for the area 2 miles northwest of Goldendale centered in a rural residential area. Cypress Creek Renewables made their appeal to EFSEC a few days after a moratorium was put in place in Klickitat County for industrial scale solar. The Klickitat County Board of Commissioners at the time appropriately wanted to review land use planning and needed a window to do that. Cypress Creek, who had been in contact with your organization for several years regarding this project, then filed for an EFSEC permit. Though the initial moratorium did not result in a change of county land use planning, the Klickitat County Planning Commission subsequently reviewed utility scale solar in the Goldendale and Centerville Valleys and placed a prohibition on utility scale solar in those areas. Carriger Solar violates that zoning prohibition.

Specific to the MDNS made public on or about April 4, 2025, several things jump out. First, on page 17 of the Environmental Review and Staff Recommendation..., the document once again brings up that part of the project is in the EOZ and the northern third is not. On January 12, 2021, the Klickitat County Board of Commissioners passed a resolution making all projects tying into the BPA substation liable to the conditional use process (see page 12 of the BOCC meeting minutes for Jan 12 2021). Whether it is (incorrectly) only the northern third or the whole project, there are few identified conditions placed on Carriger. Very little has changed from the applicant's original application to the present iteration.

On page 22 the document says it is not located within a mile of any public recreational lands. This is curious because the prior page outlines the public uses of the Goldendale Fish Hatchery for breeding and stocking fish, and for hunting from about Sept. 1 each year through January 31 of each succeeding year. The document makes fairly nebulous statements about monitoring the effects of construction and water runoff on the fish hatchery. Is a tank or two of dead fish the point at which EFSEC mitigates, or is there an actual scientific monitoring plan so that dead fish don't result?

On August 11, 2023, Director Bumpus said in her letter to Carriger "At this point in our review, we believe the Project may have significant impacts to the environment and we are considering the issuance of a *determination of significance*. For the purposes of SEPA, significance is defined as "a reasonable likelihood of more than a moderate adverse impact on environmental quality," with the additional understanding that an impact "may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred" (WAC 197-11-794)." After reviewing maps and acreages, it appears that the project reduced solar acreage by about 40 acres..maybe 4 %. Director Bumpus further said "The Project would introduce many new visual elements to the area that would contrast with the existing visual character, most prominently solar arrays that are tan, gray, white, and brown in color and linear in structure." I'm pretty sure that the project would be general dark gray and black. Those would be the two most predominant new colors to the landscape. We are talking about just under two square miles of panel surface in a condensed area. It will unequivocally permanently alter the visual landscape of the area of a rural residential subarea right between the city of Goldendale and the view toward Mt. Adams.

On page 9 of the MDNS document, regarding the proposed BESS facility, the determination is that if the units are painted differently, they won't be so obvious. There is little or no addressing of the safety issues with lithium storage facilities, nor the several hundred people who live northeast, east, and southeast of that site. This area has strong prevailing westerly winds about half the year, and more gentle west breezes about another quarter of the year. In the event of a fire in the BESS, the hundreds of people who need to be evacuated will be semi dispersed and difficult to notify. If it happens in winter it will be even worse.

Though Director Bumpus brought appropriate concerns—and the Yakama Nation's concerns are largely confidential—it does not appear that very much was done about them. Fences on Knight Road were moved a little bit, a few panels were deleted, but the resulting MDNS does not correspond to the concerns of August 11, 2023. The document still says 1326 acres of panels. What was really changed?

Finally, in the southwest part of the map, Carriger exerts control over a parcel they do not even lease and a parcel that is not owned by any of the project lessors. Carriger has destroyed that parcel's economic value and made it undevelopable and unsellable. Someone needs to figure out why they have a control boundary surrounding an unleased parcel.

Again, thank you for the chance to comment. I hope you will take into account the full scope of what you may be allowing in a rural residential area, especially when you your findings openly state that there are additional leases on state ground and private parcels nearby. Even though Klickitat County has a utility scale solar prohibition in place right now, and EFSEC apparently intends to violate that, how will you tell the next solar company 'no' when you gave Cypress Creek pretty much free reign? Should these rural residents expect 9,000 acres on culturally significant lands surrounding public fishing and hunting areas?

Sincerely,

Dave Barta Goldendale