

From: [Gene Callan](#)
To: [EFSEC \(EFSEC\)](#)
Cc: loriz@klickitatcounty.org; [Dan Christopher](#)
Subject: Carriger / Cypress Creek Industrial Solar Project, Klickitat County, Washington
Date: Sunday, February 19, 2023 4:12:25 PM

External Email

Good Afternoon EFSEC Council,

I have been on your website trying to find a way to provide written testimony against this project but was not successful in locating that option. Therefore, I am submitting this email for the record requesting that EFSEC rejects Carriger's application for an industrial solar project here in Klickitat County. Please consider the following:

1. **OVERVIEW.** Our County has an existing solar moratorium in place on land where this project lies. This moratorium was in place before Carriger / Cypress Creek submitted their application to EFSEC. Furthermore, Carriger / Cypress Creek has not applied for permit at this time to Klickitat County. We are going through a process in our County to review these industrial solar projects based on existing land-use ordinances while potentially adopting revised energy overlay criteria.
2. **PERSONAL OBSERVATIONS.** I live in the middle of this project at 38 Knight Road, Goldendale, Washington. Besides destroying the historically ag related benefits of our region, the industrial solar use will reduce the value of my real estate by at least 50%. This reduction has been supported by private real estate appraisals.
3. The long lasting, negative environmental implications of these industrial solar projects have been articulated by many and are too numerous to list here...but it is ironic to me that a green, renewable-energy project would embrace siting on such valuable ag land considering existing zoning and pending new water, soil and air toxins.
4. The socio-economic section of the Carriger report is a joke. In a nutshell, they take the short-term construction jobs, minimal operational jobs and somehow apply crazy multipliers that skew the results. Then, the report has the audacity to graphically compare these benefits to the 'obvious dismal agricultural' benefits of our land. Maybe they have factored in some way to consume the metal and glass panels as a food group somewhere down the road? It's offensive and wrong to come into a region with over 150 years of rich agricultural history and compose such rubbish. That said, this is how they end that chapter of the report:

"The estimates provided in this report are based on the best information available and all reasonable care has been taken in assessing that information. However, because these estimates attempt to foresee circumstances that have not yet occurred, it is not possible to provide any assurance that they will be representative of actual events. These estimates are intended to provide a general indication of likely future outcomes and should not be construed to represent a precise measure of

those outcomes.”

It is tempting to go on and on about the many reasons why these industrial solar projects are not being properly sited, but at this time I will simply repeat our request. Please reject the Carriger application because our County has had a moratorium in place before this application was submitted and we need time to listen to our citizens, review our existing land use ordinances while adopting revised energy overlay criteria.

Thank you for your time,

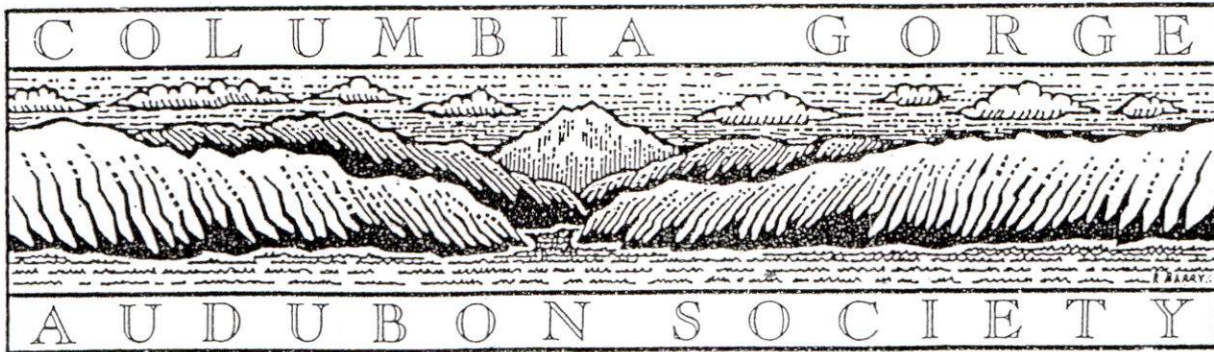
Gene Callan

GENE W. CALLAN, AIA

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RECEIVED

TO: State of Washington Energy Facility Siting Evaluation Council
621 Woodland Square Loop
Olympia, WA 98504-3172

MAY 04 2023

From: Columbia Gorge Audubon Society
Dave Thies
PO Box 1393
White Salmon, WA 98672
509-364-3578

ENERGY FACILITY SITE
EVALUATION COUNCIL

DATE: April 25, 2023

RE: Public comment on the proposed Carriger Solar, LLC project proposed for Klickitat County, Washington, EFSEC Docket #: EF230001, (11 pages). We request that our comments be included with the other public comments in the project file.

THE PROJECT'S EXECUTIVE SUMMARY

Since most people only read the Executive Summary the focus is generally kept positive and the negative is glossed over or absent. In order of occurrence, the bold type notes points made in the Executive Summary, followed by our comments.

THE HABITAT AND WILDLIFE SURVEY OCCURRED IN APRIL, MAY AND JUNE OF 2022. (The survey only lasted nine days, but you had to dig a lot deeper in the document to discover this, along with the fact that no night surveys were conducted. This is not even close to an adequate biological assessment.)

SURVEYS CONSISTED OF WALKING NON-CULTIVATED AREAS. (No mention that the farm-ranch areas involve more than 80% of the total area, nor that these lands also provide habitat, nor that these open areas provide important "edge" habitat for both on-site priority habitat and for adjacent forests. There was no mention that the important

farm-ranch area was surveyed from vehicles.)

A BIOLOGIST OBSERVED 44 BIRD SPECIES AND 5 MAMMAL SPECIES. (Considering the brief duration of the survey, the fact that no night survey was conducted, and the fact that only one season was surveyed, this represents a fairly rich finding of wildlife. However, we believe that an adequate survey conducted at intervals over the period of a year would reveal many more species that were missed in the wildlife survey.)

TWO BIRD SPECIES AND TWO MAMMAL SPECIES FOUND ARE SPECIAL STATUS SPECIES. (That leaves 40 other special status species with potential to occur on this site according to the report on Table B-1 and B-2, but this was not mentioned in the Summary. Nor was it mentioned that 28 of these species are listed by the Washington Department of Fish and Wildlife (WDFW) as endangered, threatened, candidate or priority species.)

NO FEDERALLY ENDANGERED, THREATENED, OR CANDIDATE SPECIES WERE OBSERVED. (Placing the focus on the words "federal" and "observed" resulted in the following important species not being accounted for in the Executive Summary: The Habitat and General Survey Report, Appendix B-1 and B2, lists the monarch butterfly as not seen with a moderate chance of occurrence, is a federal candidate species of concern; the ferruginous hawk was seen and is listed by the state as an endangered and priority species; the loggerhead shrike was not seen, has a high chance of occurrence, is state listed as candidate and priority species; the prairie falcon was not seen, has a high chance of occurrence and is listed by the state as a priority species; the black-backed woodpecker was not seen, has a moderate chance of occurrence, is listed by the state as candidate and priority species; the Townsend's big eared bat was not seen but has a moderate chance of occurrence and is state listed as candidate and priority species; the Townsend ground squirrel was not seen but has a moderate chance of occurrence, is listed by the state as a candidate and priority species; the white tailed jackrabbit was not seen but has a moderate chance of occurrence, is state listed as candidate and priority species; and the striped whipsnake was not seen but has a moderate likelihood of occurrence, is state listed candidate and priority species. It is interesting how focusing on two words kept all this out of the Executive Summary.

WILDLIFE WAS CONCENTRATED IN THE PRIORITY HABITAT. (This comment suggests that wildlife only uses the areas that would be set aside and do not use the farm and ranchlands. This assumption assists the proposed project but ignores known wildlife behavior and contradicts what locals see all the time. Surveyors walking and in vehicles are likely to have kept wildlife in the priority habitat where there is more cover. Many species will remain under cover in the woods until night, when they will seek water and look for or hunt for food in the more exposed farm and ranch lands.)

NO WILDLIFE HABITAT CONCENTRATION AREAS OR PRIORITY HABITAT LINKAGES IMPORTANT FOR WILDLIFE MOVEMENT CONNECTIVITY WERE

IDENTIFIED IN THE SURVEY AREA. (This conflicts with the previous statement that wildlife was concentrated in priority habitat and with the decision to allow unfenced wildlife corridors. Many species disperse unless they are migrating. The April-May-June survey totally missed major early spring and early winter migrations.)

The Executive Summary ends with three recommendations, but the last is most significant: "AVOID PRIORITY HABITATS TO THE EXTENT FEASIBLE." (A project of well over a thousand acres will have significant impact on priority habitats. Project construction, the project itself, the loss of the farm and ranch lands, the maintenance, the coming and going: all of this would heavily impact the project site and the surrounding area. When a study states that Priority Habitat should be avoided "to the extent feasible," it reflects the fundamental truth that the project will always be prioritized over everything else.

COMMUNITY ENGAGEMENT

The proponent touts their outreach to locals (Community Engagement, Application for Site Certification, p. 8), but then clarify that when public feedback was given it was used to "inform further outreach and educational messages to the public." This means they received insight on how to handle the public and keep the project on track. All the while, this project and all of the other energy projects have greatly benefited from EOZ streamlining, which has greatly limited real public involvement and impact.

EOZ EXPANSION

The fact that only the southern portion of this project is within the EOZ raises the question of EOZ expansion. It is inevitable that boundary pressures will occur as build-out progresses within the EOZ, especially when the proposal is contiguous to the EOZ boundary and/or straddles the boundary, as it does here. Also, as energy build-out occurs and accelerates, the entire area will become more impacted and degraded, and that will be used to justify further development. It also needs to be said that impacts do not respect man-made boundaries; the land, the wildlife and people living outside of the EOZ will also be impacted.

The likely future expansion of the EOZ around this proposed project, and in other locations, should be a matter of interest for the EFSEC, since it is a likely impact of this project and of renewable development in general.

VISUAL SETTING

The Application for State Certification tellingly dismisses the projects impact on the

visual setting. "Where the Project is visible, the Project components would be consistent with other horizontal and vertical lines and geometric shapes visible throughout the landscape . . ." (Carriger Solar Project, C Site Summary, Part 1, page 11). This statement is designed to put you to sleep. Those vertical lines and geometric shapes are roads, fences, power lines, farm buildings and the like, which admittedly consists of "1% percent of the rural project area." (Carriger Solar, LLC Project, Urban and Mixed Environs, 4.2.1.3, p. 16). This is a good example of, "When the project conflicts with 99% of the area land uses, compare it to the 1% that it is more similar too." And let's face it, a huge industrial solar facility is not even similar to, or consistent with, the 1% of rural development they compare the project to.

You need to consider the reality that this project would totally change what people would be seeing out there: it would no longer be a rural setting, instead the area would be dominated by a very large industrial setting. When you change a view from rural green and tan to a depressing solar array black, it is a major change, and it should not be glossed-over with a glib visual analysis such as you are offered in this report. As handled, this visual analysis only serves to add insult to injury. This land use conversion attempt demands a huge visual sacrifice by local residents and by others passing through the area. Both the county assessor and real estate agents know what you see from a property has real economic impacts.

WILDLIFE IMPACTS

This large proposed industrial project would have equally large wildlife impacts. Your opportunity to access information about these impacts are limited by the proponent, who's focus is on moving the project forward, and by the wildlife agencies which are likely concerned about budgetary reductions if they too diligently dare to expose this projects negative wildlife impacts. Public input is what is left, and that is too often ignored as self-serving or dismissed as unprofessional.

You are reassured in the Application for State Certification that fencing setbacks (Part 1, p. 10) will protect wetlands, dwarf shrub-steppe, Western Gray Squirrel Priority Habitat and provide corridors for wildlife like turkey and mule deer. Fencing is presented as a help to wildlife, but it is a hindrance. This proposed project (along with the fences), is situated between mountains to the north and east and low elevation winter habitat along the Klickitat River to the west, and therefore is a significant impediment to wildlife migration. The length of the fencing maximizes the impacts on wildlife. The corridor provided along Spring Creek is not nearly wide enough to serve as a practical wildlife corridor.

Although the report claims no priority linkage for wildlife movement was identified in the Project Survey Area (Carriger Solar, LLC Project, p. 10), one obvious wildlife migration corridor is Spring Creek, which the proponent states they will not fence off to

provide wildlife access. This creek serves the WDFW Goldendale Fish Hatchery and flows through the proposed project and into the nearby Little Klickitat River Canyon, which then flows into the Klickitat River. Other feeder creeks, also cut through the site and descend down draws and canyons that end up in the Klickitat River. All of these creeks, draws and canyons provide likely migrations corridors linking the nearby mountains with low elevation winter habitat near and along the Klickitat River.

The nine-day April-May-June wildlife survey entirely missed early spring and early winter wildlife migrations, and obscured the identification of migration corridors. Missing seasonal migrations explains the failure to find "wildlife movement linkages." We consider the short duration of the habitat-wildlife survey (a mere 9 days by one biologist), the lack of night surveys, and the failure to survey during periods of annual migration to be significant faults of the wildlife survey.

We found it unfortunate that a minimum habitat-mapping unit of one acre was implemented for this study. (Carriger Solar, LLC Project, p. 7) A lot of wetlands, streams and ponds can be missed being reported with that standard.

When discussing impervious surfaces the report fails to list the largest and most significant ones: the solar panel arrays, and instead focuses attention on the more minor and smaller impervious surfaces like roads and buildings. (Application for Site Certification, Part 1, p. 11). No doubt there is an out-dated technical-legal reason for not including the solar panels as impervious surfaces, but that does not change the fact that water will run right off of the panels and onto reduced ground cover vegetation or bare ground. The shade of the panels and the "Weed Management Plan" (herbicides) would assure minimum or no ground cover. Cleaning solutions would likely be used on the solar panels and gears would be lubricated. Picture a hard extended rain falling on a thousand plus acres of solar panels. We have serious doubts that all of the named protective plans offered in the report will be adequate to handle the degree and quality of run-off that will likely come from this project during heavy rains. (Application for Site Certification, Project Summary, p. 11). We do not recall the name of the document, but we do remember that the Klickitat Wild and Scenic River was designated a zero pollution impact river by the Forest Service.

The Washington Department of Fish and Wildlife Goldendale Fish Hatchery and the WDFW Klickitat Wildlife Area Complex are both located adjacent to the proposed project. In one way or another, some of the run-off (with chemical pollutants) from the project site will eventually pass down the creek servicing the fish hatchery and through the Wildlife Area Complex. (Maps used: Carriger Solar, LLC Project, Figure 1b, Project Location Topographical Map and a Klickitat County map. I also visited the hatchery and drove around the project site.) The attempt to site this project adjacent to a fish hatchery and a designated wildlife area could reasonably be taken as a true reflection of the proponents regard for wildlife. It should be noted that WDFW considered the retired farm fields they manage in their Klickitat Wildlife Area Complex significant enough to

acquire and save. The adjacent WDFW Wildlife Area Complex land appears to be the same, or a very similar to much of the land proposed for solar development.

Considering the brief duration and timing of the wildlife and habitat surveys, a robust and diverse wildlife population was noted in the study of the proposed project area. However, a review of the Habitat and General Wildlife Report reveals that the above-mentioned survey limitations have obviously resulted in missing most of the Special Status wildlife species likely using this area. (Appendix B, 2022 Habitat and General Wildlife Report, p. B-1 and B-2.)

You should be aware that once farm, range and forestlands are lost to renewable industrialization it is unlikely they will ever be return to their original use. Those lands are lost for good. In this case, metal stakes will be driven into the ground to support the solar panels. Despite protests to the contrary, at the end of the project's life, those metal stakes would likely never be pulled from the ground. Pounding those metal stakes into hard ground will be noisy, and it would take quite awhile to do the job. That process would have a very significant impact on "noise sensitive receptors," (Application for State Certification, Part 1 p. 12) - their description of the local residents - and it would also significantly impact surrounding wildlife. If noise devices would be used to scare birds from flying over the solar panels, that would also impact the birds, other wildlife and local residents. The noise impacts would be significant enough that proponents and regulators would likely dodge truthfully answering questions about noise in one way or another.

The Carriger Solar assessment of habitat within the project area only focuses on about 15% of the land. Agricultural fields and rangelands represent almost all of the rest of the property. These agricultural and rangelands are ignored as valuable habitat, despite their symbiotic relationship with recognized on-site and adjacent priority woodland habitat.

For comparison, consider the large Conboy Lake National Wildlife Refuge (NWR) in western Klickitat County. Like the proposed Carriger Solar proposed project area, the Conboy NWR consists mostly of agricultural fields with seasonal wetlands and surrounding forests. The elk (along with many other species) on the Conboy NWR use the fields for food and water, and when stressed, the elk, like many other species, seek cover in the wooded areas. We are not claiming that the Conboy and the Carriger site are the same, only that they have similarities that should be considered because the Conby NWR is recognized as a spectacular national wildlife refuge. We also note that National Audubon Society's Columbia Hills Important Bird Area, not far to the south of this proposed project, was commonly referred to as a wasteland by windpower advocates, suggesting that denigrating the significance of impacted environments is a common practice for renewables.

Carriger Solar tries to obscure the relationship existing between on-site agriculture-rangelands and adjacent priority woods when their survey states that mule deer stick

close to the woodlands, unless there is irrigated alfalfa available. (Carriger Solar, LLC, Project, p. 11). The suggestion here is that the mule deer will not stoop to eat unirrigated alfalfa. Then, four pages later, it is revealed that, about 25% of the Project Survey Area (almost 500 acres) was mapped as improved pastures, including alfalfa. (Carriger Solar, LLC Project, p. 15). It was not clarified whether the alfalfa fields were irrigated or not. However, dry land farmers know very well where seasonal sub-irrigation occurs, and even if alfalfa fields are not irrigated, it is unlikely the deer would pass it by. Like it or not, alfalfa is a prime source of food for mule deer. Unfortunately, the farm-rangeland and priority habitat woodlands are textually separated (in the project report) from the birds and animals, and this tends to obscure animals-habitat interactions and needs. (Carriger Solar, LLC Project, pages 8-20).

CORPORATE ENVIRONMENTAL ASSESSMENT

As you are assessing this site for industrial energy development, you should take into account the fact that the environmental survey hired by the proponent is not an independent review. The proponent paid for this survey and it left out critical information, and obscured, minimized and spun information to suit the developer. We have included samples of this in our public comment. In thirty years of reading and commenting on wildlife surveys, we have only seen one that stated the project should not be built, and that was not an energy project. We never saw that environmental assessment company again.

With this in mind, we hope that you will not just accept the survey presented to you as the final word on the environmental importance of the study area, but that you will instead consider this corporate environmental survey - and especially it's conclusions - with a great deal of skepticism.

THE TRUE SIZE OF THE PROJECT

It is critical that you ascertain the true intended size of this project before it is certified. This may include later "phases" or "stages" planned or considered for future development. FESEC should ask the proponent if they are talking with off-site landowners about the benefits of having solar on their properties? Are they talking with off-site landowners about land lease possibilities? Are they seeking additional land leases off-site, or do they already have additional off-site land leases? Is the proponent dealing with suppliers and making future arrangements or agreements for more solar equipment than can be used in the present project proposal? You cannot assess the site unless you know the true size of the intended site. Keeping site expansion plans secret is a common proponent practice that serves the proponent - but not public - interest.

PLANS TO MAKE PLANS

Proponent representatives stated that before construction they will have in place plans that will prevent all potential problems, but they did not say those plans would be available for your review before an EFSEC certification decision. (EFSEC Goldendale information meeting, 4-25-2023) The high water mark of proponent responsibility will occur during the FESEC certification process. Plans for protecting the site are integral to the proper siting of this (and every) proposal. (To see some of the plans not yet made, see Carriger Solar Project, B Project Summary, bottom of p. 11.) If the plans to protect this site are inadequate, the siting procedure will be flawed. You should see and review the actual protection plans before you certify this proposal. "SEPA requires state and local governments to identify possible environmental impacts before making decisions." (2022 Habitat and General Wildlife Survey Report, p. 4.) EFSEC is a state appointed Council acting for the state and having the responsibility for the proper evaluation of project siting. If you do not or cannot review the actual plans to prevent disaster, then the FESEC will be severely hindered in your certification review.

THIS PROJECT WOULD ADD TO CUMMULATIVE IMPACT

It is undeniable that this project would contribute to the cumulative negative impacts of industrial renewables in Klickitat County, and would do so for the lifetime of the project. However, this fact is ignored by our federal and state governments, and (usually by) our county government. The fact is we do not know the extent of the negative cumulative impacts on people or wildlife living here. Are we reaching a social and wildlife tipping points after thirty some years of renewable energy development? We do not know, but FESEC should know the answers to these questions to properly consider this project proposal.

We believe people living near this solar project are being severely impacted, even now, before a decision has been made. We believe people living in the Goldendale Valley are stressed by this project because it foretells what is coming to their valley. Everywhere people look they see renewable projects and they know a lot more is coming. The public stress level in the Goldendale Valley has resulted in a partial solar moratorium and other county commission actions reflecting concern for their citizens. Furthermore, we believe citizen stress level is elevated throughout the county due to renewable development. One of the land owners who hopes to have part of the proposed Carriger solar project sited on his land told the FESEC that the people are the problem, saying that if the people were not here there would be no social impact. (FESEC Goldendale informational meeting, 4-25-2023). He may get his wish if renewable developments continue arriving here with proposals. We believe eventual county depopulation will be a likely impact of renewable energy build-out, and that it will happen one project at a time.

If depopulation does occur, it would greatly assist energy facility build out in the EOZ and eventually throughout the entire county. Of course this would devastate our citizens, our lands and our wildlife, but it would be to the great benefit of the entire energy industry.

DECOMMISSIONING

Decommissioning is definitely the weak link in the lifetime of energy projects. A real workable decommissioning plan should be in place as an integral part of the certification process for this project, and for every project. The profits of this project will occur during the lifetime of the project, but at the end of its lifetime there will only be costs. LLC's are not called Limited Liability Corporations for nothing. Without an adequate decommissioning plan assuring the project owner will pay for site clean up and restoring the land, those costs would likely be left for the public to pay, probably by a Super Fund clean up. Decommissioning needs to be guaranteed and locked in, and payments towards decommissioning need to start on day one. A plan to make a decommissioning plan is not a decommissioning plan.

A real bond to cover the entire future decommissioning process should be required. The bondholder should be in the position to over-see and force implementation of, and compliance with the plan for decommissioning during the facilities lifetime. We are extremely concerned that if a real decommissioning process is not required for this (and every) energy facility, the public will be stuck with a huge Super Fund clean-up cost. In fact, we believe that is usually, perhaps always, the real plan for decommissioning.

Furthermore, insurance should be required for this (and every) energy facility so that damages by acts of nature - such as fire, erosion, flooding, wind, hail and unforeseen disasters - will be covered and cleaned up.

RECOMMENDATIONS

We join with our county commissioners in asking for an Environmental Impact Statement (EIS) on this project, and we further recommend that FESEC delay a decision on certification until you can review an EIS.

We join with our county commissioners in asking for a study of the social impacts of this (and every) energy project. We believe those impacts are severe and deserve to be brought to light. This study should include predicted negative economic impacts on local landowners.

We ask that if you certify this project it should only be after reviewing all the actual plans to prevent negative impacts, and after you review an EIS.

We ask that if you certify this project you should require bonding to cover decommissioning expenses, and insurance to cover natural events that may cause extensive damage to the project.

REEVALUATING SITING PRIORITIES

Proponents have challenged us for our solution for providing clean energy, and we believe some members on the council have probably also wondered about that too. While there is great divergence of opinion in Klickitat County on the need and effectiveness of renewable energy, we believe there is a real need for renewable energy, and we definitely do not want nuclear. However, we maintain that corporate sized renewable energy projects are not a good future path due to significant negative impacts on the people, the landscape, the environment, and because of the historic power of large renewable energy corporations influencing and controlling of our governments.

Therefore, we recommend a decentralization of future renewable energy production. The funding, tax breaks and other financial subsidies now going to a few renewable energy corporations should instead be redirected to small scale household renewables, public building renewables, and business building renewables. Decentralization of new renewable energy production would be less vulnerable to foreign or domestic attack, would involve less infrastructure, would greatly reduce the negative impacts on people and the environment, would provide broad based long standing economic stimulation where it is most needed, and would add balance to corporate control of energy production. Seeing domestic electric bills cut in half would guarantee the popularity of such a program.

This recommendation should not be taken as an excuse to dismiss our opposition to this proposed project. Our concerns about this project are based on real issues and real problems that are detailed in this public comment.

We need a renewable energy future we can support, because we cannot support this one, and we cannot support this project.

LIMITED SUPPORT FOR THE PROJECT

Support for the project was limited to the proponents, three landowners who would like the proposed project on their lands, people speaking for a steel workers union and a laborers union, and our former economic development director. Perhaps one or two members of the audience gave the project limited support, or at least did not oppose. All

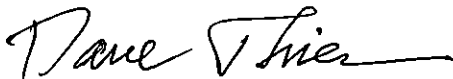
the other speakers were in opposition to the proposed project. Although the people turning out in the Grange Hall only represent a small portion of the general population of the county, we would be very happy to see the issue of renewable energy build-out voted on by county citizens. The proponents and boosters: our guess, not so happy.

THE FESEC GOLDENDALE PUBLIC MEETING

Thank you for coming all the way to Goldendale and allowing public comment, even though this was not a public hearing. However, it was unfortunate that the first hour was wasted before actually starting the meeting. You knew how many people wanted to speak and you should have known that first wasted hour would cut into public comment time, resulting in the usual individual comment period being reduced to only two minutes. We believe this lost time disproportionately benefited the proponent and those supporting the project.

Another problem was the lengthy introductions and the proponent's power point presentation, both which could have been handled just as easily - and with more effect - by using written handouts, and it would have avoided a lengthy power point SNAFU. Handouts would have saved time and given us information that we could have taken home for further study.

I sincerely apologize for making comments that were not limited to the proposed site. I did not know about that restriction until minutes before I spoke. However, I do not retract those comments, as I believe them to be true and pertinent.



Dave Thies, President
Columbia Gorge Audubon Society

5/12/2023

Ami Hafkemeyer
EFSEC Manager
Washington Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172
Via email: amihafkemeyer@efsec.wa.gov

Re: Site Certification Hearing Comments for Carriger Solar, LLC Project

Ms Hafkemeyer,

Below are my comments and a list of concerns for the Site Certification Hearing for the proposed Carriger Solar Project, located in Klickitat County in the Knight Road area.

These comments are in addition to my and all other comments submitted for the Public Information Hearing.

Prior comments have touched on the inadequacies of the application and the need for a full and robust EIS to ensure that all considerations and protections are in place prior to the decision to approve this application. I would like to add the below for consideration and for the record.

Application part 2

All items are understated and provide minimal studies and information for site approval. Land use is primarily agricultural. Crop yield is incorrect and understated. Site density is incorrect which would allow for large impacts on residents' view shed, property values, and quality of life.

The studies submitted do not fully consider the impacts on fisheries. There has been nothing studied or submitted to address the underground connected aquifers that all drain into the Little Klickitat River. The Little Klickitat River is a significant fish-bearing stream that holds Mid-Columbia Steelhead, a listed species. Years of work by WDFW, Yakama Nation, and Klickitat County under the Governors Salmon Recovery Plan have been done on the Little Klickitat River which has been well documented. Studies must be conducted to protect the water quality and quantity of the Little Klickitat River. Change in aquifers could result in loss of water or turbidity from runoff impacting the required CFS and TMDLS to maintain healthy fisheries and protect the Mid-Columbia Steelhead.

Thank you for your time and consideration.

Lori Zoller
District #2 Klickitat County Commissioner
loriz@klickitatcounty.org

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: Carriiger Land Use- May 16 Meeting
Date: Monday, May 15, 2023 10:01:08 AM
Attachments: [Data Request 5-9-23.xlsx](#)

From: Gene Callan <Gene@gbdarchitects.com>
Sent: Monday, May 15, 2023 9:40 AM
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>; Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>
Cc: loriz@klickitatcounty.org; Dan Christopher <danc@klickitatcounty.org>; Jacob Anderson <jacoba@klickitatcounty.org>; mattchiles <mattchiles@horseshoebendbranch.net>
Subject: Carriiger Land Use- May 16 Meeting

External Email

Good Morning - Joanne Snarski & the EFSEC Council,

I have provided written and verbal testimony many times over the last 2-3 years asking that we pause to digest the extreme negative impact that industrial solar will have on the Goldendale Valley of Klickitat County. Please add this email to the record.

1. **COMMON SENSE- SENSITIVELY SITED WITH MINIMAL AG CONFLICTS.** Even though this next meeting is a specific land-use session, one must use common sense to determine if this project is sensitively sited while minimizing agricultural conflicts. This common sense seems to be missing from the conversation as we all debate land-use language, RCW requirements and the entitlement process.

For example, our Extensive Agricultural zone states: *The purpose of the extensive agriculture district is to encourage the continued practice of farming on lands best suited for agriculture and to prevent or minimize conflicts between common agricultural practices and various nonfarm uses.* (By the way, our County's Comp Plan of 1977 refers to this zone as Exclusive Agricultural land. As you know, Exclusive has a completely different definition than Extensive.)

In addition, our EOZ states: *Each energy resource project will be subjected to individualized review and the imposition of conditions based on site specific information which will be tailored to address project impacts in accordance with the siting criteria. The ultimate goal is to achieve a predictable but sensitive siting process which effectively and efficiently addresses project impacts.*

Common sense tells us that we are simply rezoning ag land to industrial.

2. **ENVIRONMENTAL IMPACT STATEMENT (EIS) REQUIRED BY E.O.Z.** I have seen the Data Request list (attached) generated by EFSEC to Cypress Creek. I assume this is simply the start of a document requiring more information and NOT a comprehensive list of Klickitat County

concerns. The detailed requirements of our Energy Overlay Zone state that every energy project must go through a separate EIS process. EFSEC has no legal right to overrule this agreement and requirement. The following is a partial list of factors that should be considered within the confines of the EIS:

- a. **THIS IS OUR HOME- VALUE & POTABLE WATER.** My wife and I live at 38 Knight Road, Goldendale, Washington- adjacent to the proposed Carriger industrial solar project. We have recently commissioned a comprehensive Uniform Agricultural Appraisal Report by a well-respected appraisal company. The appraisal's evaluation recognizes, among other things, the scenic beauty of the Goldendale valley and its rich agricultural land.
Ironically, these are the same points that the preamble to many of our County's land use regulations state. We also have estimates of how much the proposed industrial solar will de-value our land. In addition, our domestic water well is within a few hundred feet of the panels. We have started a program to regularly test our potable water as we expect all this data will be needed for future legal battles.
- b. **TRIBAL SET ASIDE LANDS.** Engage the local native American tribes and set aside gathering lands.
- c. **HEAVY EQUIPMENT / CONSTRUCTION TRAFFIC & NOISE.** The recent construction of the electrical substation and transmission towers in our area resulted in a large amount of heavy construction traffic on Knight road. Large trucks would arrive in the early morning hours turning off Highway 142 and gaining speed as they drove north. Later, on the return trip, they would engage their exhaust brakes ¼ mile from our house leaving them on as they attempt to slow down as they encounter the stop sign at Highway 142. In addition, driving thousands and thousands of metal piles to support the solar panel's structure will create a severe noise impact. Noise levels over 85 decibels shall not be allowed within 2,500' of a residence. A financial penalty shall be implemented before issuing of permit.
- d. **FENCING.** Industrial chain line security fencing is planned for the perimeter of each parcel. If this project is allowed, this fencing should be on the inboard side of a large, native material landscaped berm that completely hides the fencing from neighbors and roadways- setback from the road by 200' or more depending on topography.
- e. **FLORA & FAUNA.** Cypress's wildlife report was not complete. A longer time frame is needed to review and analyze impacted species.
- f. **AIRPORT.** Cypress's statement that our municipal airport will not have a glare issue is not a complete analysis. Show site specific FAA studies on approach angles, take-off angles, while incorporating future airport master plans.
- g. **BATTERY STORAGE.** This element needs eliminated from the project. The environmental disaster potential is simply too great to leave to chance.

- h. **SETBACKS.** All setbacks from neighboring property should be at least 2000' or larger depending on topography.
3. **ANCESTOR RIGHTS?** At April's informational meeting, there was a point made by a few landowners that because they have lived here longer than others, this somehow gives them the right to override the spirit our land use regulations and de-value neighboring land. My wife's family homesteaded in this county in the 1880's and has their name (William & Arvilla Imrie) on the County's pioneer monument, but this still doesn't give us any more land use rights than someone who bought a parcel last year. In fact, only the native American tribal members would have the right to use that as a land use argument. Just because we have lived here longer than our neighbor is not an argument for more land-use rights.
4. **DECOMMISSIONING 50 YEAR BOND.** A complete decommissioning 50-year security bond shall be paid for and guaranteed by the developer. The details of this pre-bonding document and payment shall be organized and agreed upon before issuing of any permit.
5. **MADE IN THE USA.** No Chinese materials or panels shall be allowed in the construction of the project.
6. **VIRTUAL ONLY?** For such an important meeting impacting the future of our County, this meeting should be in person with a virtual option.....and not simply virtual. This meeting should be postponed until this is ironed out.

Please submit this information into the file on citizen's testimony. If this meeting is not postponed, then please sign me up to speak.

Regards,

Gene Callan

Gene Callan
38 Knight Road, Goldendale, WA 98620
101 Bar Ranch, LLC
Winged A Ranch, LLC
(503) 708-3750
gene@gbdarchitects.com

Good day EFSEC,

My name is Elaine Harvey and I am a lifelong resident of Klickitat County and a member of the Kamiltpah Band (Rock Creek Band). We have already experienced detrimental impacts the solar industry has had to our cultural resources located on the Lund Hill Solar Project and the many different wind projects in the county. We are the local tribal people of this land and we can be contacted to discuss tribal cultural resources in this county. We still fish, hunt, and gather on the lands in the area and continue to lose more lands to green energy projects in the Klickitat County.

- 1.) This proposed project will impact the local tribes of this land which include the Klickitat and Kamiltpah (Rock Creek) bands who continue to reside here in the Klickitat Valley. We have never left our ancestral lands! This proposed project is within our First Food Gathering Areas (Knight Road, Hill Road, and Fish Hatchery Road, etc.). We continue to harvest our traditional foods within these areas. The project proponents state they will construct the **CARRIGER INDUSTRIAL SOLAR PROJECT** on privately owned lands; however, the impact solar panels will have on the ephemeral, perennial streams, ground water, and local aquifer will directly impact the **TRIBAL FIRST FOODS** in this area. There are scientific studies that determined that solar panels will warm up the land directly within the project site which will in turn cause un-natural warming and evaporation of the surface and subsurface water sources. This un-natural warming of land and water evaporation will then impact **TRIBAL FIRST FOODS** which rely upon those water resources.
- 2.) The land proposed for this **INDUSTRIAL SOLAR PROJECT** is not zoned for Industrial uses. The land is currently in agriculture, range, and rural. Six to eight foot fences with barbwire is not consistent with the current land use and existing fences in the project area. The solar project will impact the views from the City of Goldendale to view the Simcoe Mountains and Mt. Adams.
- 3.) This proposed project is within the Klickitat County's Energy Overlay Zone; hence, shall require a full EIS and NOT be allowed to go through the **EXPEDITED EFSEC TRACKING PROCESS!**
- 4.) There is a current Solar Moratorium enacted by the Klickitat County Commissioners. The Carriger Company has no respect for the Klickitat County current moratorium.
- 5.) Klickitat county does not have a finalized Critical Ordinance and Shoreline Masterplan in place. How can this project proceed? EFSEC is a Washington State agency and so is the Department of Ecology (who requires counties to have these protection documents in place). There is a conflict!
- 6.) All federally listed ESA listed and state listed species and their critical habitat needs to be preserved and solar projects should not impede these people. Ferruginous hawks, steelhead, and soon to be grey squirrels habitat need to be protected. There is so much more I can discuss but you heard all the verbal testimony. Much of southern Klickitat canyon is important for winter deer habitat and with more green energy projects coming onboard, then the wildlife will be subjected to more loss of habitat. There are Western Grey Squirrels and Ferruginous Hawks within the projected project footprint.

Thank you for your time,
Elaine Harvey
(509)261-2360

I'm Steve Heitmann. My wife and I live 10 miles from White Salmon. I designed and built a 20kW solar system, so we can live 100 percent off-grid for 8 months and 90% off-grid for 4 months during winter. I'm a research engineer with several decades' experience, and I've been a strong proponent and user of solar technology since 1974.

Although I strongly support solar clean energy generation, I do not support megasolar farms in the Pacific Northwest region. I also agree with the Klickitat County commissioner's statements. In addition, consistency with EFSEC's existing land use criteria in no way implies that those criteria are complete.

In fact, EFSEC needs to complete significantly more groundwork before it can consider certifying any large-scale clean energy project in the state. I base this conclusion on reading RCW 80.50. Until this groundwork is complete, we should go beyond Klickitat County's moratorium and get an injunction against all large-scale clean energy projects in the state.

Regional clean energy generation is soon-to-be urgently needed, as the Pacific Northwest population steadily increases, agricultural demand increases, and the need for electric vehicle (EV) battery charging is increasing rapidly--all this is increasing regional power demands, while potentially, in the foreseeable future, overloading the power grid. And hydroelectric clean-energy generation is already at capacity, forcing out of state power purchases.

Without more regional power generation, the cost of residential and commercial power will continue to increase. According to the January 2023 Klickitat P.U.D newsletter, *"Utilities are facing reduced supply and increased demand within the power market. This combined with increased load and cost of doing business reinforces the rate increase decision was prudent to ensure ongoing reliability & stability."*

Increasing regional power generation is important and somewhat urgent. Nonetheless, it's not so urgent that we need to risk sacrificing our best possible clean-energy future with hastily made decisions. And this is what we're risking by prematurely approving, let alone expediting, any large-scale energy project, including the Carriger Solar, LLC's project application.

Why? The big picture is that we are shifting to greater reliance on clean electric energy, electric cars, electric trucks, and electric airplanes. This is new territory: The electric grid architecture is over a century old, and the electric energy generation needed soon will far exceed the nation's (and grid's) existing capacity.

"Many estimates suggest electricity demand could more than double by 2050 to reach net zero."—Bill Gates

The planning decisions and the energy generation plants we build in the next few years based on today's groundwork will have consequences 50 years hence, possibly even longer. Let's now put in place the best possible planning for the best sustainable clean energy generation, for the long-term, and for sustained community quality of life.

What groundwork is needed?

EFSEC Needs a Certification Process Reflecting Unanimity of Purpose

We need to start by improving EFSEC's certification process. We—meaning WA state, all counties, cities, native American communities, and energy companies—need to work together to establish *one* set of certification criteria for clean energy projects that is designed to accommodate all affected. That means EFSEC needs to accommodate *by law* requirements specified by each potentially affected jurisdiction.

RCW 80.50.020(6) <https://bit.ly/44vZkb7> could be modified to specify inclusivity. For example, RCW 80.50.020(6) could specify "'Certification' means a binding agreement between an applicant and *all affected jurisdictions* which shall embody compliance to the siting guidelines, in effect as of the date of certification, which have been adopted pursuant

to RCW 80.50.040 as now or hereafter amended as conditions to be met prior to or concurrent with the construction or operation of any energy facility. 'All affected jurisdictions' means the following: (6a) Washington state (6b) each affected county (6c) affected Native American lands (6d) each affected city or town (6e) any affected bordering state."

If a proposed project can't meet negotiated certification criteria, then it probably needs to be redesigned, relocated, or terminated.

As it is, we have a patchwork quilt of city and county ordinance's, concerned citizen's, including Native American's, driving loosely or incoherently defined requirements that EFSEC can consider. However, EFSEC is not mandated by law to meet those requirements and get approval by all affected jurisdictions to certify a project.

Without an inclusive certification process, we will face similar problems that are already happening in cities throughout California. Large construction companies are bypassing city or county ordinances by getting CA state approval based on laws these companies' lobbyists helped write. Just one example: <http://bit.ly/3XWshZY>

EFSEC Needs "Cradle to Grave" Requirements

EFSEC includes preliminary and operating requirements. Additionally, EFSEC must establish stringent requirements for end-of-life recycling as a part of the certification process. Spent solar panels, batteries, and electronic components must be properly recycled and not end up in landfills, where soil and water can be contaminated. EFSEC must establish a costly consequence for any energy company that ignores these requirements at end-of-life for any energy system component.

We all know that technological innovation occurs at an ever-faster pace. Today's high-tech megasolar plant will be tomorrow's forgotten pile of obsolete junk. When it becomes obsolete and before it's forgotten, hundreds of acres of solar-farm junk need to be completely removed, and the land restored. Energy companies must be responsible for restoring the land or waterways when they decide to move on to the next more profitable energy technology.

EFSEC Needs to Require Safe Alternatives to Lithium Energy Storage

The necessary groundwork includes evaluating battery technologies other than Lithium. Yes, there are several safer and just as effective battery technologies that are available on the market today (I own stock in them, so I won't list them here). They should all be evaluated, and EFSEC certification should require use of the safest and most recyclable battery technologies.

When EFSEC is required by state law to certify clean energy projects only when the negotiated requirements of all concerned are met, Washington State's EFSEC could serve as a model for all states.

Good Groundwork Includes Identifying Alternatives to Megasolar Farms

Comprehensive due diligence requires that we evaluate all viable clean energy generation technologies before making decisions about Klickitat County's clean energy future. The "pro" and "con" discussion about megasolar farms is stuck in the past, as it's not concurrent with advances in new technologies. We need to widen the scope of discussion of clean energy generation to address good alternatives to massive solar farms.

Moreover, from a cost-effective and profitability perspective, the Pacific Northwest (PNW) region and Klickitat County is not an especially good location for utility-scale megasolar farms due to low solar irradiance levels during six months of the year. These monthly Solar Irradiance maps support this assertion (check 120degrees longitude, 46 degrees latitude). <https://bit.ly/41Lh114> . *Please note residential- and small-scale solar is cost-effective in the PNW.*

Yes, there are good alternatives to megasolar farms in the PNW. The "right tool for the job" also applies to methods of clean energy production. Solar arrays are a good choice for small-scale residential and business roof-top power

generation. But this method is inadequate for meeting a substantial portion of the future daily power needs of WA state.

According to the U.S. Energy Information Administration (EIA) <https://bit.ly/41CEkwM>, for year 2022, Washington state generated including 7.64% of its total power from land-based wind, 2.98% from coal-fired generators, and only 0.079% from solar PV panels. This total was less than needed. Consequently, 4.95GWh was imported from other states <https://bit.ly/41HyhaX> (tab: *Consumption by Source*)

The Carriger solar farm's projected generation is 160MW. To put this in perspective, at end of 2022, this would eliminate WA state's power deficit and eliminate only 37% of Washington state's coal-fired plants. It would soon fall behind meeting WA state's growing power demands.

The first good alternative is offshore wind generators. ONE average-size land-based wind generator produces 2 MegaWatts (MW) at peak output and requires 1.5 acres, almost all of which is available for crop or livestock production. This ONE wind generator is equivalent to about 2-3 acres covered with 6,200 325W solar PV panels at peak output. Unless it's an agrivoltaic solar farm, virtually none of the land can be used for livestock or crops, and it could disrupt ecosystems and block wildlife thoroughfares.

Ocean winds are even better for generating wind power because they are more constant and tend to be strongest during hours of peak power demand. In September 2022, development of offshore floating wind generation was incentivized by the federal government.

Washington State's offshore wind generation potential is 29.4 GigaWatts. Even if only 10% of the total potential is developed, that's 5 times more peak power generated than all three proposed Klickitat County megasolar farms combined! Moreover, one offshore wind generator can produce up to 18MW. That is, ten offshore wind generators would produce more power than the proposed Carriger solar farm.

Other good alternatives. Agrivoltaic farms enable many small solar farms combined to contribute more power than a single mega solar farm. They are more robust without one point of failure. Furthermore, agrivoltaic farms can use existing grid-tie infrastructure. They aren't limited to locations near high-power transmission lines. And they double for livestock or crop production. Please see <https://agrivoltaic.solar>

Another possibility is to install agrivoltaic farms on land already used for wind farms. Imagine a "ribbon" of solar panels between each wind-generator mast. Such an installation could produce an estimated 180MW or more (20MW more than the Carriger solar farm). Moreover, the land would remain usable for crop or livestock production.

And there are other possibilities that go beyond wind and solar. We need to look at green hydrogen-based fuel cells. And yes, we need to include the possibility of much safer Thorium (not uranium) based Molten Salt Reactors (MSRs). Lastly and definitely not least, we need to investigate developing a "smart grid" distributed local network architecture that enhances the existing grid system.

Let's make sure we have a complete understanding of the technology and alternatives. We need to ensure we put in place the right planning and approval processes for the long-term to meet our future clean energy needs. For people, for state and county, and for energy businesses long-term profitability, let's aspire to achieving a win-win-win sustainable clean energy future.

MCCABE MEADOWS PROTECTIVE COVENANTS

Mccabe Meadows is a 240 acre development that was created by James Farrer and consists of 12 parcels which are approximately 20 acres each in size. In 2005 Mr Farrer created protective covenants for Mccabe Meadows. October 12th 2005, he signed them and had them notarized. October 14th 2005 the protective covenants were recorded with Klickitat County. Each buyer of a parcel in Mccabe Meadows acknowledge these protective covenants when they purchased the property.

My wife Amy and I bought 2 parcels in McCabe Meadows development in 2012 and took comfort in the protective covenants knowing it limited to the type of uses that could be done with the land.

Cypress Creek Renewable has leased 6 parcels, totaling approximately 120 acres from three different land owners, none of whom live in the Mccabe Meadows development. This is in direct violation of the protective covenants and not consistent with the land uses in the development.

McCabe Meadows covenants state;

The undersigned owners of real property in Klickitat County, Washington known as McCabe Meadows pursuant to a general plan for the benefit of their said property, and of all successive owners of portions hereof, hereby declare and impose the following protective covenants the same to apply generally to the property and to its owners and occupants.

Section I Property Affected:

This section lists the 12 parcels including the six parcels that are part of the Carriger project.

Section III covenant regarding uses:

Second sentence; Any owner or occupant may make ordinary residential and recreational uses of the portion of the property in which that owner or occupant has interest". Industrial scale solar and Lithium ion battery storage are definitely not a residential or recreational use. This is a direct violation of the protective covenants and not consistent with the current land uses and should not be allowed.

Section V covenants regarding activities: The last sentence states "No noxious thing or use of the property shall be allowed. Solar panels if cracked or broken have noxious and toxic materials that could easily contaminant the soil and private wells in Mccabe meadows. Two acres of Lithium ion battery storage directly behind residences is a noxious and toxic

time bomb. It could contaminant the air, soil and private wells and would be an extreme fire hazard to the residences if a fire did happen. Again this project is a violation of the protective covenants and current land uses in the development and should not be allowed.

When Mr Farrer wrote these covenants its clear that he intended for land in this development to be used for residential or recreational purposes, not industrial uses like solar. When parties bought property in the development, based on the protective covenants they would have never imagined industrial solar being allowed.

Protective covenants case law:

Protective covenants are a legally binding contract between the land owners.

Protective covenants that are consistent with applicable law, will not be superseded or terminated by zoning ordinances that are not consistent with the protective covenants.

In March of 2023, My wife (Amy Hanson) spoke with Joanne Snarski of EFSEC, about our protective covenants in McCabe Meadows. She stated that EFSEC had not run into this before and she would have to consult with the Assistant Attorney General about it. She was advised by the AG office that EFSEC has authority over state law, county and city ordinances and zoning but **NO** authority over protective covenants.

By EFSEC 's own admission they have no authority over our protective covenants , therefore that portion of the Carriger project within the McCabe Meadows development cannot be approved.

I have attached a copy of the protective covenants and parcel maps that show the parcels in McCabe Meadows being leased for the Carriger solar project.

Thank you,
Russ Hanson
!0 Tucker Hill Rd
Goldendale WA



1057430
Page: 1 of 5
10/14/2005 09:54A
Klickitat Co.

AFTER RECORDING SEND TO:
James D. Farrer
3275 Hwy 142
Goldendale, WA 98620

MCCABE MEADOWS PROTECTIVE COVENENT

The undersigned owners of real property in Klickitat County, Washington known as McCabe Meadows pursuant to a general plan for the benefit of their said property, and of all successive owners of portions hereof, hereby declare and impose the following protective covenants the same to apply generally to the property and to its owners and occupants.

I. PROPERTY AFFECTED: The real property to which these Protective Covenants pertain, referred to herein for convenience as "the property," is legally described as:

PARCEL 2 - 05152600001000
THE N1/2 OF THE SE1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, W.M.

PARCEL 3 - 05152600001100
THE S1/2 OF THE SW1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, W.M.

PARCEL 4 - 05152600000600
THE S1/2 OF THE SE1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, W.M.

PARCEL 5 - 05153500001400
THE N1/2 OF THE NW1/4 OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, W.M

PARCEL 6 - 05153500001500
THE N1/2 OF THE NE1/4 OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, W.M.

PARCEL 7 - 0515350000700
THE S1/2 OF THE NW1/4 OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, W.M

PARCEL 8 - 05153500000800
THAT PORTION OF THE EAST HALF OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, W.M. LYING NORTH OF THE BPA RIGHT OF WAY AND DESCRIBED AS FOLLOWS: BEGINNING AT THE NW CORNER OF THE S1/2 OF THE NE1/4 OF THE NW1/4 OF SAID SECTION 35; THENCE S88°51'16"E 661.07'; THENCE S08°59'48"W 1601.16' TO SAID BPA ROW; THENCE S72°59'30" W 407.26'; THENCE N00°42'20" W 1713.94' TO THE POINT OF BEGINNING.



1057430

Page: 2 of 5
10/14/2005 09:54A
Klickitat Co.

PARCEL 9 - 05153500000900
THE N1/2 OF THE NW1/4 OF THE NE1/4 OF SECTION 35, T 5 N, R 15 E, W.M.

PARCEL 10 - 0513500000200
THE S1/2 OF THE NW1/4 OF THE NE1/4 OF SECTION 35, T 5 N, R 15 E, W.M.

PARCEL 11 - 05153500001100
THAT PORTION OF THE EAST HALF OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, W.M. LYING NORTH OF THE BPA RIGHT OF WAY AND DESCRIBED AS FOLLOWS: BEGINNING AT THE NE CORNER OF THE S1/2 OF THE NE1/4 OF THE NW1/4 OF SAID SECTION 35; THENCE N88°51'16"W 661.07'; THENCE S08°59'48"W 1601.16 TO SAID BPA ROW; THENCE N72°59'30"E 580.27'; THENCE N00°42'20"W 764.28' THENCE S89°15'08"E 375.58" THENCE N00°52'10"W 639.26' TO THE POINT OF BEGINNING.

PARCEL 12 - 05153500001200
THOSE PORTIONS OF THE SE1/4 OF THE NW1/4, EXCEPT THE WEST 948.13' THEREOF: AND OF THE SW1/4 OF THE NE1/4; ALL LYING NORTH OF THE BPA RIGHT OF WAY AND ALL IN SECTION 35, T 5 N, R 15 E, W.M.

PARCEL 13 - 05153500001300
THOSE PORTIONS OF THE SE1/4 OF THE NW1/4 AND THE SW1/4 OF THE NE1/4 LYING SOUTH OF THE BPA RIGHT OF WAY, ALL IN SECTION 35, T 5 N, R 15 E, W.M.

II. NATURE, SCOPE AND DURATION: These protective covenants shall run with the land and be binding on all persons, natural and corporate, holding any proprietary right or possessory interest in any portion of the property. They shall remain in full force and effect for a period of fifty years following the recording of this instrument.

III. COVENANT REGARDING USES: All uses made of the property shall comply with applicable governmental regulations. Any owner or occupant may make ordinary residential and recreational uses of the portion of the property in which that owner or occupant has interests.

IV. COVENANTS REGARDING IMPROVMENTS AND STRUCTURES: Structures which may be erected and placed on the property include permanent dwellings including mobile homes have 1200 Square Feet or more, and must be New or not to exceed 3 years of age. No truck, camper or motor home shall be considered a permanent dwelling for purposes of this covenant, and the same shall be placed not be occupied by persons on the property either as a permanent or be placed or kept on the property unless all required governmental



1057430

Page: 3 of 5
10/14/2005 09:54A
Klickitat Co.

permits authorizing the placement, construction and/or occupancy or the same have been issued.

V. COVENANTS REGARDING ACTIVITIES: No garbage, refuse or rubbish shall be allowed to accumulate upon any part of the property. No disabled motor vehicles or vehicle hulks shall be kept or stored on any part of the property, except that disabled vehicles may be kept or stored on any part of the property, except that disabled vehicles may be kept and repaired in a fully enclosed garage. No noxious thing or use of the property shall be allowed.

VI. COVENANTS REGARDING PRIVATE ROAD MAINTENANCE: To assure a level of permanent maintenance of the private road system consistent with convenient use thereof for access to portions of the property not directly accessible from public roads, the owner of any portion of the property dependent on the private road system for access to that portion of the property dependent on the private road system for access to that portion shall have a continuing affirmative duty to pay a fair and proportionate share of such necessary costs as are incurred by the owners generally in maintaining the system.



1057430
Page: 4 of 5
10/14/2005 09:54A
Klickitat Co.

DATED this _____ day of _____, 2005

By _____
James D. Farrer

STATE OF WASHINGTON)
) ss.
COUNTY OF KLINKITAT)

ACKNOWLEDGEMENT

On this day before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared James D. Farrer to me known to be the individual described in and who executed the foregoing instrument, as owner of McCabe Meadows, and acknowledged to me that he signed and sealed the said instrument as his free and voluntary act and deed, for the uses and purposes therein mentioned, and on oath stated James D. Farrer is authorized to execute the said instrument.

GIVEN under my hand and official seal the day and year last above written.

Notary Public in and for the State of Washington

My Commission expires: _____



My Commission expires: 10-27-07

Notary Public in and for the State of Washington
James R. Nelson

GIVEN under my hand and official seal the day and year last above written.

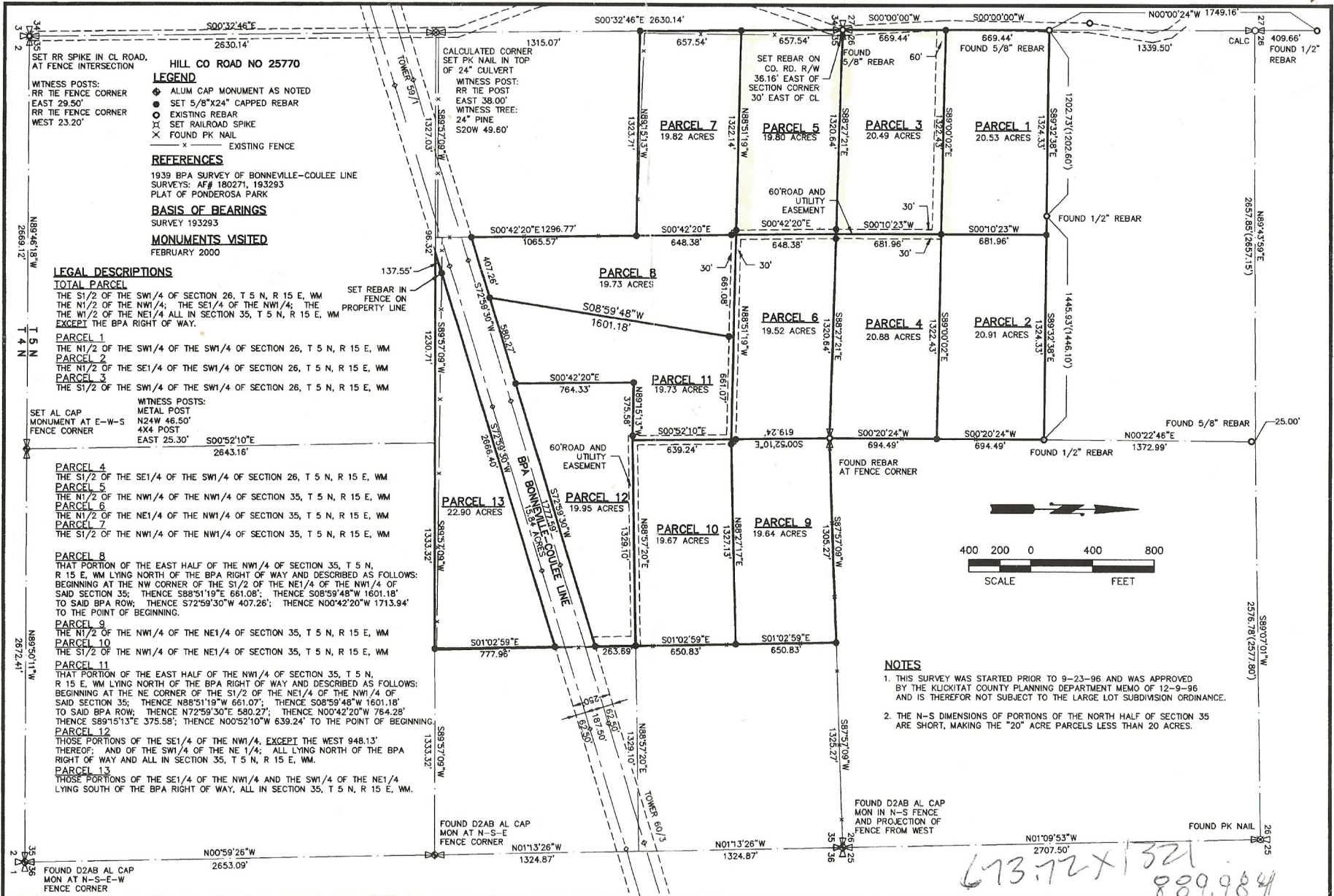
On this day before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared James D. Farrer to me known to be the individual described in and who executed the foregoing instrument, as owner of McCabe Meadows, and acknowledged to me that he signed and sealed the said instrument as his free and voluntary act and deed, for the uses and purposes therein mentioned, and on oath stated James D. Farrer is authorized to execute the said instrument.

ACKNOWLEDGEMENT

STATE OF WASHINGTON)
(ss. COUNTY OF KLIKITAT)

By *James D. Farrer*
James D. Farrer

DATED this 12th day of Oct, 2005



SET RR SPIKE IN CL ROAD, AT FENCE INTERSECTION

WITNESS POSTS:
 RR TIE FENCE CORNER
 EAST 29.50'
 RR TIE FENCE CORNER
 WEST 23.20'

LEGEND
 ◆ ALUM CAP MONUMENT AS NOTED
 ● SET 5/8"x24" CAPPED REBAR
 ○ EXISTING REBAR
 X SET RAILROAD SPIKE
 X FOUND PK NAIL
 X EXISTING FENCE

REFERENCES
 1939 BPA SURVEY OF BONNEVILLE-COULEE LINE
 SURVEYS: AF# 180271, 193293
 PLAT OF PONDEROSA PARK

BASIS OF BEARINGS
 SURVEY 193293

MONUMENTS VISITED
 FEBRUARY 2000

LEGAL DESCRIPTIONS

TOTAL PARCEL
 THE S1/2 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, WM
 THE N1/2 OF THE NW1/4, THE SE1/4 OF THE NW1/4; THE
 THE W1/2 OF THE NE1/4 ALL IN SECTION 35, T 5 N, R 15 E, WM
 EXCEPT THE BPA RIGHT OF WAY.

PARCEL 1
 THE N1/2 OF THE SW1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, WM

PARCEL 2
 THE N1/2 OF THE SE1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, WM

PARCEL 3
 THE S1/2 OF THE SW1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, WM

PARCEL 4
 THE S1/2 OF THE SE1/4 OF THE SW1/4 OF SECTION 26, T 5 N, R 15 E, WM

PARCEL 5
 THE N1/2 OF THE NW1/4 OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, WM

PARCEL 6
 THE N1/2 OF THE NE1/4 OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, WM

PARCEL 7
 THE S1/2 OF THE NW1/4 OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, WM

PARCEL 8
 THAT PORTION OF THE EAST HALF OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, WM LYING NORTH OF THE BPA RIGHT OF WAY AND DESCRIBED AS FOLLOWS:
 BEGINNING AT THE NW CORNER OF THE S1/2 OF THE NE1/4 OF THE NW1/4 OF SAID SECTION 35; THENCE S88°51'19"E 661.08'; THENCE S08°59'48"W 1601.18' TO SAID BPA ROW; THENCE S72°59'30"W 407.26'; THENCE N00°42'20"W 1713.94' TO THE POINT OF BEGINNING.

PARCEL 9
 THE N1/2 OF THE NW1/4 OF THE NE1/4 OF SECTION 35, T 5 N, R 15 E, WM

PARCEL 10
 THE S1/2 OF THE NW1/4 OF THE NE1/4 OF SECTION 35, T 5 N, R 15 E, WM

PARCEL 11
 THAT PORTION OF THE EAST HALF OF THE NW1/4 OF SECTION 35, T 5 N, R 15 E, WM LYING NORTH OF THE BPA RIGHT OF WAY AND DESCRIBED AS FOLLOWS:
 BEGINNING AT THE NE CORNER OF THE S1/2 OF THE NE1/4 OF THE NW1/4 OF SAID SECTION 35; THENCE N88°51'19"W 661.07'; THENCE S08°59'48"W 1601.18' TO SAID BPA ROW; THENCE N72°59'30"E 580.27'; THENCE N00°42'20"W 764.28' THENCE S89°15'13"E 375.58'; THENCE N00°52'10"W 639.24' TO THE POINT OF BEGINNING.

PARCEL 12
 THOSE PORTIONS OF THE SE1/4 OF THE NW1/4, EXCEPT THE WEST 948.13' THEREOF; AND OF THE SW1/4 OF THE NE 1/4; ALL LYING NORTH OF THE BPA RIGHT OF WAY AND ALL IN SECTION 35, T 5 N, R 15 E, WM.

PARCEL 13
 THOSE PORTIONS OF THE SE1/4 OF THE NW1/4 AND THE SW1/4 OF THE NE1/4 LYING SOUTH OF THE BPA RIGHT OF WAY, ALL IN SECTION 35, T 5 N, R 15 E, WM.

NOTES

1. THIS SURVEY WAS STARTED PRIOR TO 9-23-96 AND WAS APPROVED BY THE KLICKITAT COUNTY PLANNING DEPARTMENT MEMO OF 12-9-96 AND IS THEREFORE NOT SUBJECT TO THE LARGE LOT SUBDIVISION ORDINANCE.

2. THE N-S DIMENSIONS OF PORTIONS OF THE NORTH HALF OF SECTION 35 ARE SHORT, MAKING THE "20" ACRE PARCELS LESS THAN 20 ACRES.

673.72 x 1321
 889,984

SURVEY FOR
HILL ROAD PROPERTY
 SECS. 26 & 35, T 5 N, R 15 E, W.M.
 KLICKITAT COUNTY, WASHINGTON

Taylor Engineering, Inc.
 Civil Design and Land Planning
 228 South Columbus Avenue, Suite 104
 Goldendale, Washington 98620
 PHONE (509) 773-4946 FAX (509) 773-5886

DATE: 3-22-05
 SCALE: 1"=400'
 DRAWN BY: JG
 SURVEYED BY: JG/BR
 CHECKED BY: FEC
 SHEET 1 OF 1
 JOB NO. 00-G802A

ACCURACY STATEMENT(WAC 332-130)
 THIS SURVEY WAS PERFORMED USING A LIETZ SET-4 TOTAL STATION, BY FIELD TRAVERSE WITH RELATIVE ACCURACY GREATER THAN 1:5000 MATHEMATICAL ANALYSIS IS BY COMPASS RULE.

NOTE
 NO WARRANTIES ARE MADE AS TO MATTERS OF ENCROACHMENT, ADVERSE POSSESSION, UNWRITTEN TITLE, RIPARIAN CHANGES, FLOOD ZONES ETC.

SURVEYOR'S CERTIFICATE
 THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY ME OR UNDER MY DIRECTION IN CONFORMANCE WITH THE REQUIREMENTS OF THE SURVEY RECORDING ACT AT THE REQUEST OF JIM FARRER IN 02-00.

Frank E. Childs, Jr. 5/24/05
 FRANK E. CHILDS, JR., PLS 18028 DATE



INDEX

1/4	1/4	SEC	T.	R.
26	35			5N 15E

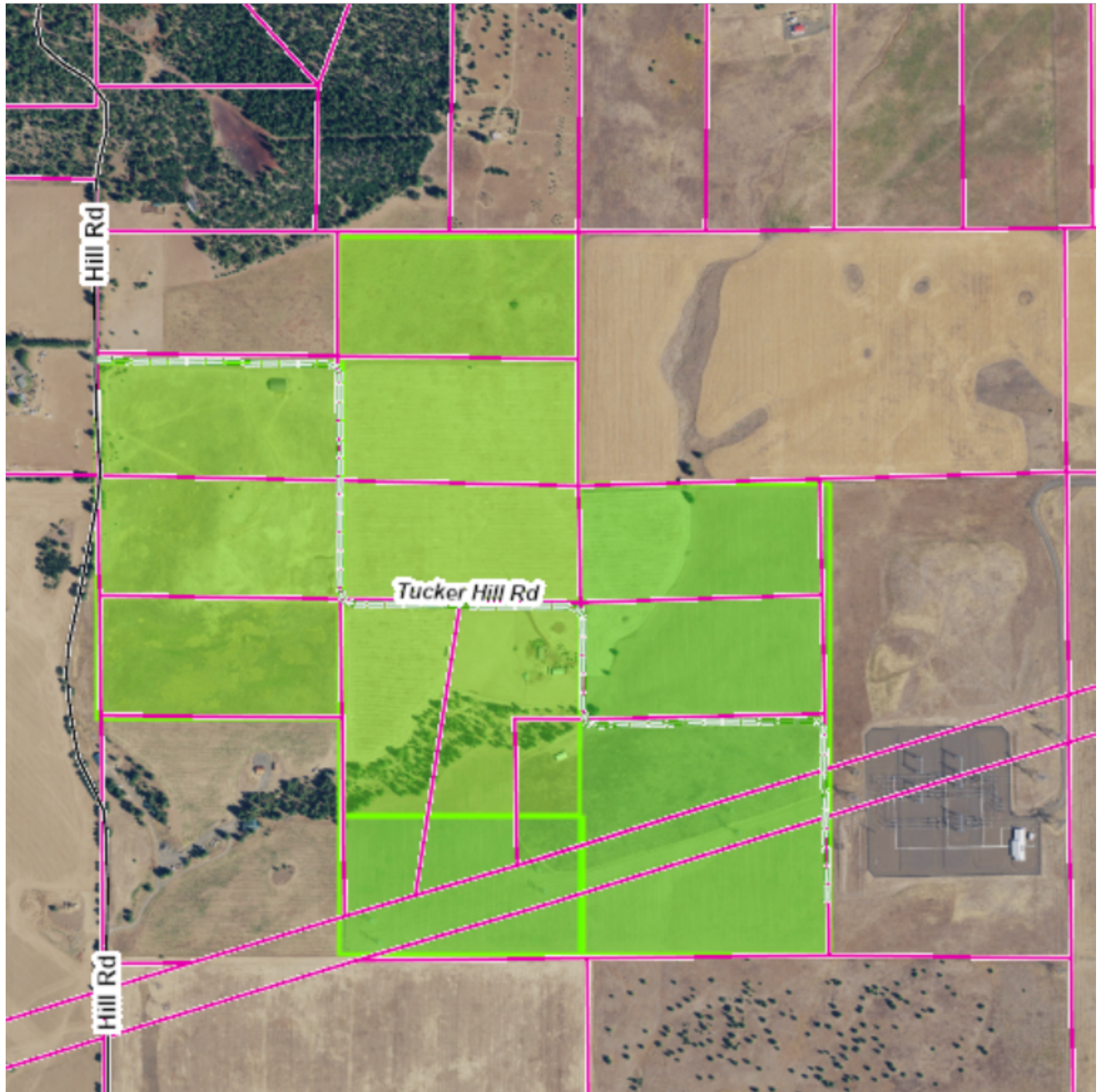
AUDITOR'S CERTIFICATE
 FILED FOR RECORD THIS 25th DAY OF May 2005 AT 3:18 P.M.
 IN BOOK 11 OF SURVEYS AT PAGE 295 AT THE REQUEST OF TAYLOR ENGINEERING INC.

Diana E. ... 1053852
 COUNTY AUDITOR Deputy Auditor

43435 FT

McCabe Meadows development

Customize a Subtitle Here



Legend

County Boundary



Towns (Points)



City Limits



Roads

City

County

Other Govt

Private

State

Parcels



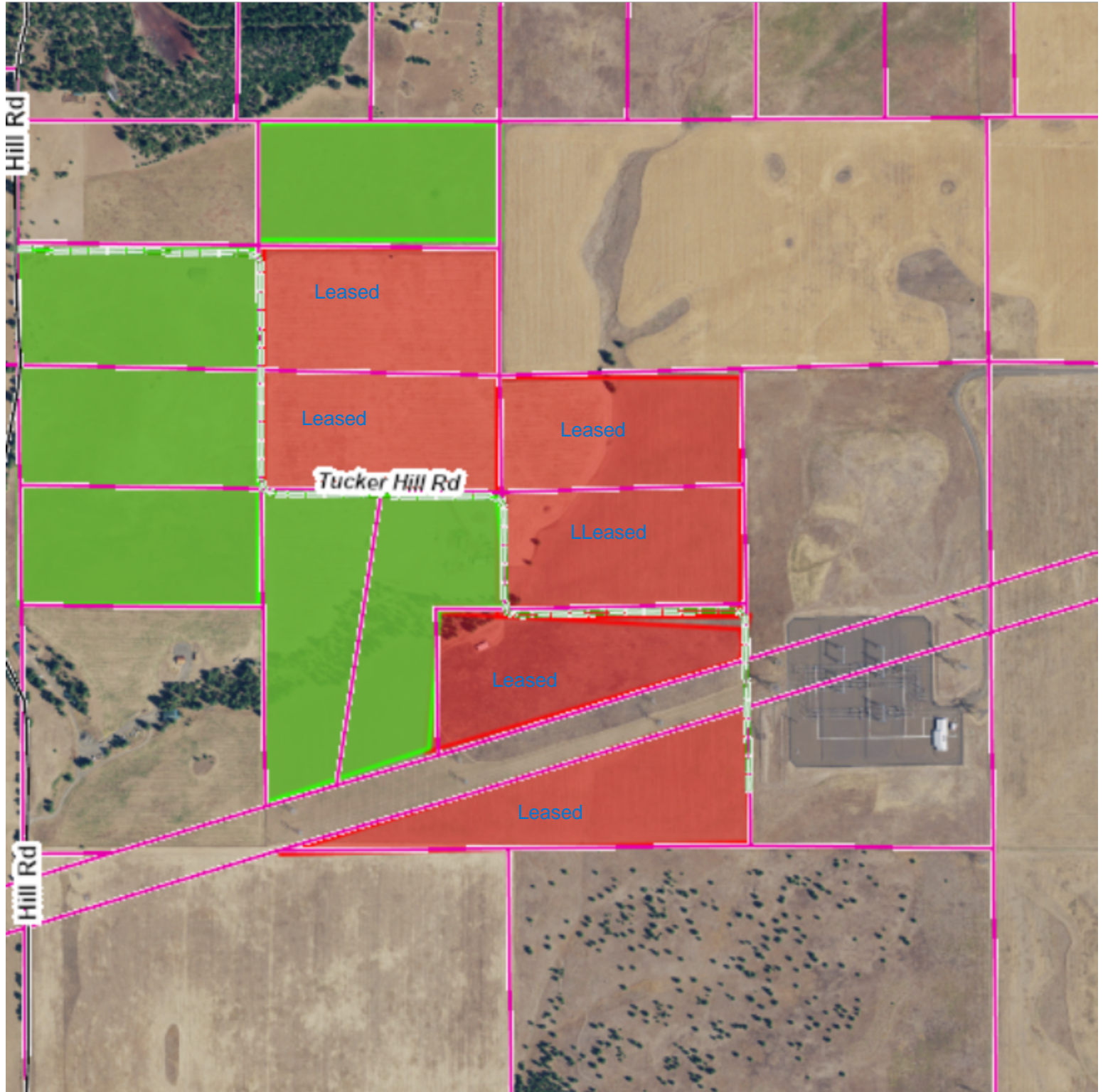
1000 ft



Created by Klickitat County. Klickitat County provides no warranty, expressed or implied, as to the accuracy, reliability or completeness of this data.

Leased land

Customize a Subtitle Here



Legend

County Boundary

Towns (Points)

City Limits

Roads

- City
- County
- Other Govt
- Private
- State

Parcels



1000 ft



Created by Klickitat County. Klickitat County provides no warranty, expressed or implied, as to the accuracy, reliability or completeness of this data.

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. BESS DANGERS
Date: Wednesday, May 31, 2023 9:43:45 PM

From: Hafkemeyer, Ami (EFSEC) <ami.hafkemeyer@efsec.wa.gov>
Sent: Wednesday, May 31, 2023 9:43:36 PM (UTC-08:00) Pacific Time (US & Canada)
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>
Cc: Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>; Bumpus, Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>; Drew, Kathleen (EFSEC) <kathleen.drew@efsec.wa.gov>
Subject: FW: C.E.A.S.E. BESS DANGERS

Please make sure this is filed with the project comments, thank you.

Best wishes,
Ami Hafkemeyer
Director of Siting and Compliance
ami.hafkemeyer@efsec.wa.gov
Office 360.664.1305
Cell 360.972.5833

From: CEASE2020 <cease2020@aol.com>
Sent: Wednesday, May 31, 2023 8:03 PM
To: Hafkemeyer, Ami (EFSEC) <ami.hafkemeyer@efsec.wa.gov>; Bumpus, Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>; Drew, Kathleen (EFSEC) <kathleen.drew@efsec.wa.gov>; Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>; GOVOutBound <GOVOutBound@gov.wa.gov>
Subject: C.E.A.S.E. BESS DANGERS

External Email

EFSEC, if you certify the Carriger solar project you are intentionally endangering many Klickitat County citizens to the fire, explosion and deadly fumes from the 2 acres 63 mw BESS lithium-ion battery storage facility. BESS lithium-ion battery fires explosions and deadly fumes are a real danger. Which are covered up by the manufacturers and the solar industry. This project Carriger should not be certified as the safety health and welfare of the Klickitat County citizens are top priority as the RCW indicates. Tai Wallace from CCR will ensure you the BESS system is safe but that is not true. He lives in Santa Monica, California and doesn't care what happens to Klickitat County citizens. He does not live next a BESS system because he knows the dangers. *I hope that you care more and will not place Klickitat County citizens in danger. Do*

*not certify this project our lives depend on you. Greg Wagner C.E.A.S.E.
CITIZENS EDUCATED ABOUT SOLAR ENERGY*

[south korea lithium-ion battery fire - AOL Search Results](#)

[Lithium battery storage facility in Chandler continues to smolder,](#)

[voluntary evacuations conclude \(fox10phoenix.com\)](#)

[Battery fire at Salt River Project in the US – pv magazine International](#)

[\(pv-magazine.com\)](#)

[MORRIS ILLINOIS lithium-ion battery fire - AOL Search Results](#)

[FDNY: Lithium-ion battery sparked 5-alarm fire in the Bronx - CBS New](#)

[York \(cbsnews.com\)](#)

[australia lithium-ion battery fires - AOL Search Results](#)

[BESS lithium-ion battery fires - AOL Search Results](#)

[moss landing bess lithium-ion battery fires - AOL Search Results](#)

EFSEC's Clean Energy Project Certification Requirements Could Lead the Nation.

In fact, EFSEC has the potential to be the nation's go-to clean energy requirements model. Before this is possible, more groundwork needs to be completed before it can consider certifying any large-scale clean energy project in the state. I base this conclusion on reading RCW 80.50. Until this groundwork is complete, we should pause all large-scale clean energy projects in WA state.

Regional clean energy generation is soon-to-be urgently needed, as the Pacific Northwest population steadily increases, agricultural demand increases, and the need for electric vehicle (EV) battery charging is already increasing rapidly—all this is increasing regional power demands, exacerbated by the coming 2023 El Nino, amplified by climate change, and more drought in a few years hence. Combined, potentially, this will likely overload the existing power grid. And hydroelectric clean-energy generation is already at capacity, forcing out of state power purchases.

Without more regional power generation, the cost of residential and commercial power will continue to increase. According to the January 2023 Klickitat P.U.D newsletter, *"Utilities are facing reduced supply and increased demand within the power market. This combined with increased load and cost of doing business reinforces the rate increase decision was prudent to ensure ongoing reliability & stability."*

Increasing regional power generation is important and somewhat urgent. Nonetheless, *it's not so urgent that we need to risk sacrificing our best possible clean-energy future with hastily made decisions.* And this is what we're risking by prematurely approving, let alone expediting, any large-scale energy project, including the Carriger Solar, LLC's project application.

Why? The big picture is that we are shifting to greater reliance on clean electric energy, electric cars, electric trucks, and electric airplanes. This is new territory: The electric grid architecture is over a century old, and the electric energy generation needed soon will far exceed the nation's (and grid's) existing capacity.

"Many estimates suggest electricity demand could more than double by 2050 to reach net zero."—Bill Gates

The planning decisions and the energy generation plants we build in the next few years based on today's groundwork will have consequences 50 years hence, possibly even longer. Let's now put in place the best possible planning for the best sustainable clean energy generation, for the long-term, and for sustained community quality of life.

What groundwork is needed?

EFSEC Needs a Certification Process Reflecting Unanimity of Purpose

We need to start by improving EFSEC's certification process. We—meaning WA state, all counties, cities, native American communities, and energy companies—need to work together to establish *one* set of certification criteria for clean energy projects that is designed to accommodate all affected.

As it is, we have a patchwork quilt of city and county ordinance's, concerned citizen's, including Native American's, driving loosely or incoherently defined requirements that EFSEC can consider. However, EFSEC is not mandated by law to meet those requirements and get approval by all affected jurisdictions to certify a project.

RCW 80.50.020(6) <https://bit.ly/44vZkb7> could be modified to specify inclusivity. For example, RCW 80.50.020(6) could specify *"Certification' means a binding agreement between an applicant and all affected jurisdictions which shall embody compliance to the siting guidelines, in effect as of the date of certification, which have been adopted pursuant to RCW 80.50.040 as now or hereafter amended as conditions to be met prior to or concurrent with the construction or operation of any energy facility. 'All affected jurisdictions' means the following: (6a) Washington state (6b) each affected county (6c) affected Native American lands (6d) each affected city or town (6e) any affected bordering state."*

If a proposed project can't meet negotiated certification criteria, then it probably needs to be redesigned, relocated, or terminated.

Today the law does not mandate an inclusive certification process. Without this inclusive mandate, we will face similar problems that are already happening in cities throughout California. Large construction companies are bypassing city or county ordinances by getting CA state approval based on laws these companies' lobbyists helped write. Just one example: <http://bit.ly/3XWshZY>

EFSEC Needs “Cradle to Grave” Requirements

EFSEC must establish stringent requirements for end-of-life recycling as a part of the certification process. Spent wind turbine parts, solar panels, batteries, and electronic components must be properly recycled and not end up in landfills, where soil and water can be contaminated. EFSEC must establish a costly consequence for any energy company that ignores these requirements at end-of-life for any energy system component.

Technological innovation occurs at an ever-faster pace. Today’s high-tech megasolar plant will be tomorrow’s forgotten pile of obsolete junk. When it becomes obsolete, hundreds of acres of solar-farm junk need to be completely removed, and the land restored. Energy companies must be responsible for restoring the land or waterways when they decide to move on to the next more profitable energy technology.

EFSEC Needs PV Panel Cleaning Requirements

EFSEC must establish requirements for recycling water or chemicals used for cleaning PV solar panels. Dusty or pollen covered—even a thin film—reduces panels’ efficiency. Cleaning several hundred acres of PV panels with water could result in wasting precious water. Methods should be required to recycle this water. Similarly, if toxic cleaning chemicals are used instead of water, methods should be required to capture and/or recycle these chemicals so that the soil underlying panels won’t be contaminated.

EFSEC Needs to Require Safe Alternatives to Lithium Energy Storage

The necessary groundwork includes evaluating battery technologies other than Lithium. Yes, there are several safe and just as cost-effective battery technologies that are available on the market today. They should all be evaluated, and EFSEC certification should require use of the safest and most recyclable battery technologies.

When EFSEC is required by state law to certify clean energy projects only when the negotiated requirements of all concerned are met, Washington State’s EFSEC could serve as a model for all states.

Good Groundwork Includes Identifying Alternatives to Megasolar Farms

Comprehensive due diligence requires that we evaluate all viable clean energy generation technologies before making decisions about Washington States’s clean energy future. The “pro” and “con” discussion about megasolar farms is stuck in the past, as it’s not concurrent with advances in new technologies. We need to widen the scope of discussion of clean energy generation to address good alternatives to massive solar farms.

Moreover, from a cost-effective and profitability perspective, the Pacific Northwest (PNW) region and Klickitat County is not an especially good location for utility-scale megasolar farms due to low solar irradiance levels during six months of the year. These monthly Solar Irradiance maps support this assertion (check 120 degrees longitude, 46 degrees latitude). <https://bit.ly/41Lh1l4>. *Please note residential- and small-scale solar is cost-effective in the PNW.*

Yes, there are good alternatives to megasolar farms in the PNW. The “right tool for the job” also applies to methods of clean energy production. Above 45 degrees latitude, PV solar arrays are a good choice for small-scale residential and business roof-top power generation. But this method is inadequate for meeting a substantial portion of the future daily power needs of WA state (or any northern state’s location above 45 degrees latitude).

The first good alternative is offshore wind generators. ONE average-size land-based wind generator produces 2 MegaWatts (MW) at peak output and requires 1.5 acres, almost all of which is available for crop or livestock production. This ONE wind generator is equivalent to about 2-3 acres covered with 6,200 325W solar PV panels at peak output. Unless it’s an agrivoltaic solar farm, virtually none of the land can be used for livestock or crops, and it could disrupt ecosystems and block wildlife thoroughfares.

Ocean winds are even better for generating wind power because they are more constant and tend to be strongest during hours of peak power demand. A big plus: more agricultural land is available for cattle and crop production, although the impact, if any, on fishing is still being studied.

Washington State’s offshore wind generation potential is 29.4 GigaWatts. Even if only 10% of the total potential is developed, that’s 5 times more peak power generated than all three of Washington’s currently proposed megasolar farms combined!

in September 2022, development of offshore floating wind generation was incentivized by the federal government.

Other good alternatives. Agrivoltaic farms enable many small solar farms combined to contribute more power than a single mega solar farm. They are more robust without one point of failure. Furthermore, agrivoltaic farms can use existing grid-tie infrastructure. They aren't limited to locations near high-power transmission lines. And they double for livestock or crop production. Please see <https://agrivoltaic.solar>

Another possibility is to install agrivoltaic farms on land already used for wind farms. Imagine a "ribbon" of solar panels between each wind-generator mast. Such an installation on the Washington side alone could produce an estimated 180MW or more (20MW more than the Carringer solar farm). Moreover, most of the land would remain usable for crop or livestock production.

And there are other possibilities that go beyond wind and solar. We need to look at green hydrogen-based fuel cells. And yes, we need to include the possibility of nuclear power plants that use much safer Thorium (not Uranium) based Molten Salt Reactors (MSRs). Lastly and definitely not least, we need to investigate developing a "smart grid" distributed local network architecture that enhances the existing grid system. A high percentage of power is lost in the existing grid's power transmission lines. A "smart grid" architecture would use locally generated power for local use first to minimize power loss. The less efficient existing grid would only be used to import or export power from/to other remote power sellers or buyers.

Let's make sure we have a complete understanding of the technology and alternatives. We need to ensure we put in place the right planning and approval processes for the long-term to meet our future clean energy needs. For people, for state and county, and for energy businesses long-term profitability, let's aspire to achieving a win-win-win sustainable clean energy future.

From: [bnickerson](#)
To: [EFSEC mi Comments](#)
Subject: Cypress Creek Renewables Goldendale Wa
Date: Sunday, June 4, 2023 2:25:11 AM

External Email

No significant impact has been stamped by the Klickitat County planning department by a check list & by a company or companies that are hired by Cypress Creek Renewables. Who has looked into any of these documents & went out to the areas which have been stamped no significant impact to verify that what they wrote in there reports were accurate? Who went out at the same times of year, same time of day, same amount of time & covered same amount of ground as those who wrote those original study findings? Anyone except the company that Cypress Creek Renewables hired?!? My guess is Noone, Noone representing our Citizens, Noone who is worried about a paycheck from the county or state if they don't play along with the boss. I don't need to keep beating an old drum by saying there is so much at stake here, there's soo much that could go wrong with a industrial project this massive that is being PUSHED, think of how they are going to be PUSHING the construction workers & offering bonuses for it to be finished early or at least on-time. We already know mistakes happen, we all know that faulty components happen, we all know the passing of the buck so to speak when catastrophe hits. Noone wants to stand up to the plate & say I screwed up. Our community, our citizens, your neighbors, my neighbors, our wildlife, our water sources & clean air are depending on you to protect us from having such catastrophic damage that cannot be fixed with dollar bills no matter how many they offer. Rural 7 is mostly volunteer fire crew, yes they do have some of the most outstanding citizens that will do the best they can if something fire related happens, however those toxic chemicals will be flowing through with the wind before our firefighters get there. Do you want to be one of the ones that husband, wife, son, daughter, sister or brother inhales any of those toxic chemicals? Do you want to be part of the same getting a glass of water after those toxins have leached into our water supply? You know in your heart that is going to happen. 40 year leases you know the outcome, don't try & fool yourself, don't go with the flow, you already know this is bad all the way around. Please hold onto at least your integrity & put yourself into a superhero status by helping us save our County from anymore bullcrap from outside interest or people without a conscious. Please and thankyou for reading this at least.

Sincerely, BNickerson1@gmail.com

From: [Bumpus, Sonia \(EFSEC\)](#)
To: [CEASE2020](#)
Cc: [EFSEC mi Comments](#)
Subject: RE: C.E.A.S.E. formal complaint June 9th Carriger meeting
Date: Monday, June 5, 2023 1:00:31 PM

Thank you for contacting the **Washington Energy Facility Site Evaluation Council (EFSEC)**, if you are attempting to provide comments or input on an energy project this is the incorrect email address. To ensure your comment is received and added to the appropriate EFSEC project record, please send your comments to comments@efsec.wa.gov.

For emailing questions to EFSEC, please email: efsec@efsec.wa.gov.

Kind regards,
EFSEC

From: CEASE2020 <cease2020@aol.com>
Sent: Saturday, June 3, 2023 7:54 AM
To: Bumpus, Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>; Drew, Kathleen (EFSEC) <kathleen.drew@efsec.wa.gov>; Hafkemeyer, Ami (EFSEC) <ami.hafkemeyer@efsec.wa.gov>; Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>
Subject: C.E.A.S.E. formal complaint June 9th Carriger meeting

External Email

EFSEC, why is CCR asking for an extension on their Carriger solar project? We as impacted citizens demand that we be given access to their extension request documents. How can the citizens comment at this meeting when they do not know the reason for the meeting. EFSEC failed to provide acquaint Due Notice to the citizens by only giving a 6-day notice. EFSEC failed to post this notice in the local papers, at the local libraries, announce the meeting on local radio, and send out USPS notices. This shows EFSEC being bias in favor of the applicant. The citizens are intentionally being excluded from the extension documents needed to participate in this meeting. The citizens have not been

given the Carriger submitted extension documents or adequate time to study those documents in preparation to comment at this meeting. Once again EFSEC is not conducting themselves in a fair and impartial manner by the favoring CCR Carriger solar project. The Carriger extension meeting should be canceled until the extension documents are made available to the citizens. Then re-scheduled the meeting after appropriate has been given to the citizens to review the documents and prepared to make comments at the meeting. Failure to comply is a violation of the citizen's Due Process. EFSEC intends to hold two project meetings on the same date/time. This will cause additional confusion and technical problems. These meetings should be held individually. These issues and problems need to be corrected before the Carriger extension meeting can be held. Place this formal complaint on the CCR Carriger record. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

EFSEC banner graphic



- June 2, 2023 -

Contact: efsec@efsec.wa.gov

**State of Washington
Energy Facility Site Evaluation Council
NOTICE OF PUBLIC MEETING AND REQUEST FOR COMMENTS**

ON REQUESTS FOR EXTENSIONS TO APPLICATION TIMELINES

**INNERGEX Renewable Energy-Wautoma Solar Project
EFSEC Docket No. EF-220355
And
Cypress Creek Renewables, LLC-Carriger Solar Project
EFSEC Docket No. EF-230001**

**JUNE 9, 2023
1 PM-2PM
Virtual Meeting**

EFSEC is currently considering requests by two Applicants for extensions of the time periods to review their applications.

Description of Proposal for Wautoma Solar Project:

On June 9, 2022, the Washington State Energy Facility Site Evaluation Council (EFSEC) received an Application for Site Certification (ASC) from INNERGEX Renewable Energy, to construct and operate a 470-megawatt (MW) solar photovoltaic (PV) generation facility coupled with a 4-hour, 470-MW battery energy storage system as well as related interconnection and ancillary support infrastructure located in unincorporated Benton County, Washington. The ASC and other materials are posted on the EFSEC website: <https://www.efsec.wa.gov/energy-facilities/wautoma-solar-project>.

Description of Proposal for Carriger Solar Project:

On February 10, 2023, the Energy Facility Site Evaluation Council received an Application for Site Certification from Cypress Creek Renewables for the construction and operation of 160-megawatt (MW) solar photovoltaic (PV) generation facility coupled with a 63-MW battery energy storage system as well as related interconnection and ancillary support infrastructure located in Klickitat County, Washington. The ASC and other materials are posted on the EFSEC website: <https://www.efsec.wa.gov/energy-facilities/carriger-solar>.

What is EFSEC proposing to do?

EFSEC is holding a public meeting to consider a request by the Wautoma Solar Project Applicant for an extension of time to review the ASC. RCW 80.50.100 requires EFSEC to complete its review of the application within 12 months or such time as agreed upon by the Council and the Applicant.

At this meeting, EFSEC will also consider a request by the Carriger Solar Project Applicant for an extension of the decision on the Applicant's request for expedited processing. WAC 463-43-050 requires EFSEC to make a determination on the request for expedited processing within 120 days or such time as is agreed upon by the applicant and the Council.

At this meeting, EFSEC staff will present the Applicants' requests. The public will then have an opportunity to provide comments for the Council's consideration.

How can you review the proposal documents?

Copies of each ASC and other materials are available at:

- <https://www.efsec.wa.gov/energy-facilities/wautoma-solar-project>.
- <https://www.efsec.wa.gov/energy-facilities/carriger-solar>
- 621 Woodland Square Loop PO Box 43172 Lacey, WA 98503-3172

How can you provide public comment?

You may comment on both proposals from 1:00 - 2:00 pm or last speaker, whichever comes first on Wednesday, June 9, 2023 on the EFSEC website at <https://comments.efsec.wa.gov>, or in writing to the EFSEC office (see address above). Public comments will also be accepted during the public meeting.

Meeting Location

The public meeting will be held on Wednesday, June 9, 2023, from 1:00 pm – 2:00 pm or last speaker, whichever comes first. This meeting is being held remotely. You may attend the meeting via Microsoft Teams online or via phone at:

- [Microsoft Teams Meeting link](#)
- +1 564-999-2000 Conference ID: 653373523#

To facilitate this remote meeting, EFSEC would like to invite speakers to sign up ahead of the meeting. Anyone wishing to speak during the public meeting should please notify EFSEC by phone at (360) 664-1345 or email at efsec@efsec.wa.gov before 1:00 pm on June 9, 2023.

For more information about the project, contact Amí Hafkemeyer at (360) 664-1305 or ami.hafkemeyer@efsec.wa.gov.

From: [Bumpus, Sonia \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. 5/16/2023 Land Use Consistency hearing testimony for the record
Date: Monday, June 5, 2023 1:18:06 PM

From: CEASE2020 <cease2020@aol.com>
Sent: Sunday, May 14, 2023 6:04 AM
To: CEASE2020 <cease2020@aol.com>
Subject: C.E.A.S.E. 5/16/2023 Land Use Consistency hearing testimony for the record

External Email

EFSEC, Klickitat County has a 150-year rich history of farming and ranching. This purposed project is inconsistent with this land use and is incompatible. In light of this new EFSEC Data Request dated 05/09/2023 the C.E.A.S.E. members request this virtual Land Use Consistency hearing cease and be rescheduled until a later date. If the applicant could provide answers prior to this Land Use Consistency hearing, EFSEC and its consultants would not have adequate time to review their answers to ensure they are accurate. C.E.A.S.E. members, the public and Klickitat County government would not be given adequate to review these answers. Many of these answers provided by Tetra Tech should not accepted considering they are being investigated for fraudulent reporting. EFSEC's questions should be forwarded to and reviewed by the appropriate agencies for accuracy. These are the reasons why this Land Use Consistency

hearing should be cancelled and rescheduled. If this certification process is to be conducted in a fair and impartial manner and in compliance with RCW 42.36 adequate time needs to be given to all parties. C.E.A.S.E. members are requesting that the Land Use Consistency hearing be postponed until a later date.

Greg Wagner C.E.A.S.E. Citizens Educated About Solar Energy

[20230509_DataRequest1.xlsx \(live.com\)](#)

From: [Bumpus, Sonia \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. Carriger Solar Informational Meeting Notice
Date: Monday, June 5, 2023 1:18:27 PM

From: CEASE2020 <cease2020@aol.com>
Sent: Monday, May 22, 2023 7:10 AM
To: CEASE2020 <cease2020@aol.com>
Subject: C.E.A.S.E. Carriger Solar Informational Meeting Notice

External Email

Ms. Snarski, Audubon President Mr. David Thies has informed me that EFSEC refuses to accept his 11-page review of CCR Carriger Wildlife and Habitat study. He was told that his submission was late. I call your attention to the notice EFSEC sent out. In it DOES NOT state a deadline for submitting comments. Attached is a letter EFSEC sent, and it does not state a submission deadline. The first time Audubon President Mr. David Thies or anyone was made aware of a submission deadline was at the beginning of the April 25th meeting when Chair Drew mention it. That was approximately 5 hours before said submission deadline. Far too little time for Audubon President Mr. David Thies to mail in his review of CCR Carriger Wildlife and Habitat study. Also, during the April 25th meeting Ms. Shelly Westlund ask for additional time to comment and the judge told her she could send in additional comments. He never told her of a submission deadline. In light of EFSEC's failing to give Due Notice to Audubon President Audubon President Mr. Daivd Thies and other citizens of a submission deadline you must accept Audubon President Mr. David Thies or anyone's submission. I ask that you correct your error. Please place this email on the record. Thank You, Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

Having trouble viewing this email? [View it as a Web page.](#)

- April 13, 2023 -

Contact: efsec@efsec.wa.gov

State of Washington

Energy Facility Site Evaluation Council

Carriger Solar Project

EFSEC Docket No. EF-230001

NOTICE OF INFORMATIONAL PUBLIC MEETING

April 25, 2023

4:30 PM

Description of Proposal: On February 10, 2023, the Washington State Energy Facility Site Evaluation Council (EFSEC) received an Application for Site Certification (ASC) from Cypress Creek Renewables, LLC for a 160-megawatt (MW) solar photovoltaic (PV) generation facility with battery storage located in unincorporated Klickitat County, Washington. The ASC and other materials are posted on the EFSEC website: <https://www.efsec.wa.gov/energy-facilities/carriger-solar>.

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

Open house: April 25, 2023 4:30pm – 5:30pm: The Applicant and EFSEC staff will be available to answer questions about the Project and the EFSEC review process.

Informational Public Meeting: April 25, 2023, 5:30 – 7 PM or last speaker whichever comes first: As required by RCW 80.50.090 (1) and WAC 463-26-025 EFSEC will hold a Public Informational Meeting. At this meeting, EFSEC Staff and the Applicant will introduce themselves and the Counsel for the Environment, an Assistant Attorney General appointed by the Washington Attorney General, will be introduced and will explain the duties of this position. The Applicant and EFSEC staff will then make presentations. Following the presentations, the public will be invited to provide comments. Speakers will have limited minutes to provide comment, and any additional comments will be directed to be submitted online or postal mail. Duration of speaking time will be announced at the meeting, depending on the number of speakers signed up, to allow as many commenters as possible.

Public Comment: Public Comment will be accepted during the Public Information Meeting. If you are unable to attend these meetings, please send your comments in writing to comments@efsec.wa.gov or at the EFSEC office mailing address below. An online database will also be open during the meeting at <https://comments.efsec.wa.gov/> for submission of written comments.

Meeting Location: The Public Information Meeting will be held partially in person AND virtually via Microsoft Teams.

You may attend the meeting in person at:

Goldendale Grange Hall

228 East Darland Drive

Goldendale, WA 98620

Additional information about the venue such as maps and directions will be available on our website closer to the meeting date:

<https://www.efsec.wa.gov/energy-facilities/carriger-solar>

Please review EFSEC's public meeting rules on our website:

<https://www.efsec.wa.gov/about-efsec/public-meeting-ground-rules>

You may attend the meeting via Microsoft Teams online or via phone at:

- <https://bit.ly/CarrigerInfoMtg>
- Phone number +1 564-999-2000 Conference ID: 99183361#

To facilitate these remote meetings, EFSEC would like to invite speakers to sign up ahead of the meeting. Anyone wishing to speak during the Public Information Meeting, please notify EFSEC by phone at (360) 664-1345 or email at efsec@efsec.wa.gov before 5:00 pm on April 25, 2023.

State Environmental Policy Act (SEPA) Lead Agency: EFSEC

SEPA Threshold Determination: After EFSEC determines the ASC is complete, the SEPA responsible official (EFSEC Director) will make a threshold determination. This requirement is to determine whether an Environmental Impact Statement (EIS) is required prior to considering a recommendation for site certification. The threshold determination will be made based on the probable project impacts identified in the information presented in the ASC. A threshold determination of non-significance (DNS) or mitigated determination of non-significance (MDNS) may be issued if the SEPA responsible official if they determine there will be no probable significant adverse environmental impacts or impacts identified can be mitigated. An EIS is not required if a DNS or MDNS is issued.

For information regarding the Project please contact Joanne Snarski, EFSEC Siting Specialist at (360) 485-1675. If you have special accommodation needs or need language translation services to provide your comment, please contact EFSEC staff at (360) 664-1345 or send an email to efsec@efsec.wa.gov.

NOTE: This is the last notice you will receive automatically. If you wish to continue receiving notices for this project, please visit our website and sign up for the Carriger Solar mailing list at the bottom of the project webpage:

<https://www.efsec.wa.gov/energy-facilities/carriger-solar>

Energy Facility Site Evaluation Council

Sonia Bumpus, EFSEC Director

621 Woodland Square Loop P.O. Box 43172,

Olympia, WA, 98504-3172

You received this message because you are subscribed to updates from State of Washington, Energy Facility Site Evaluation Council.
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This email was sent to cease2020@aol.com using govDelivery Communications Cloud on behalf of: State of Washington, Energy Facility Site Evaluation Council · 621 Woodland Square Loop SE · Lacey, WA 98503

From: [Bumpus, Sonia \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY
Date: Monday, June 5, 2023 1:20:17 PM

From: CEASE2020 <cease2020@aol.com>
Sent: Monday, May 29, 2023 8:26 AM
To: CEASE2020 <cease2020@aol.com>
Subject: C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

External Email

EFSEC, your jobs and future depend on pleasing Inslee. And to that end you must certify any so-called clean energy project any applicant puts before you. All Inslee's clean energy projects are forced upon the citizens east of the Cascades with little regard their future. IF EFSEC is to be fair it is time for you to start certifying so-called clean energy project on the west side of the Cascades, but we all know that won't happen. Out of site is out of mind. You do not want to look at these sites or have them negatively impact your life and future. The EFSEC certifying process was established in favor of the applicant with little regard for the negative impacts on the citizens or the environment. You intentionally ignore the truth about the negative impacts of the so-called clean energy projects you are permitting. You are willing to destroy the environment and the lives of the citizens these projects impact to ensure you have a job. I find it difficult to believe you are that heartless, but it appears to be true. As long as the applicant submits the necessary documents no matter how inaccurate and false, you will certify their project. Truly short sighted on your part. You are creating a future environmental disaster that will impact all the citizens including your children. What will you tell your children when they ask, "Why did you do this"? The future of the state and its citizens is in your hands start doing what best for them and not the applicant. Greg Wagner C.E.A.S.E.

[Why Solar and Wind Are Not the Future \(cornwallalliance.org\)](https://cornwallalliance.org)

[The Dark Side of Solar Power \(hbr.org\)](https://hbr.org)

[Solar farms run into problems with water pollution | Popular Science \(popsci.com\)](https://popsci.com)

[Backlash Against Renewables Surged In 2021, With 31 Big Wind And 13 Big Solar Projects Vetoed Across US \(forbes.com\)](https://forbes.com)

[Solar power becomes 'nightmare' for some Klickitat County residents | Crosscut](https://crosscut.org)

[KUOW - Two Washington bills, two different approaches to renewable energy projects](https://kuow.org)

[Solar farms are booming in Washington state, but where should they go? | The Seattle Times](https://seattletimes.com)

[CFACT official comment on industrial-scale solar arrays in Klickitat County, Washington - CFACT](https://cfact.org)

[What's wrong with solar power? More than you know - Columbia Insight](https://columbiainsight.com)

From: [Don Divers](#)
To: [EFSEC mi Comments](#)
Cc: [Bob Divers](#); [Loren C. Divers](#); [Glen Divers](#); [Ron & Carol Stoker](#); [E. Divers](#)
Subject: Carriger Solar Project -- Comment in Opposition to the Solar Project
Date: Monday, June 5, 2023 3:45:34 PM

External Email

I am Don Divers. My family owns a 210 acre ranch at 123 Olson Rd, Goldendale WA. I also am a partner in another 260 acres of ranch and farm land adjacent to the family property. We grow crops, wildlife, and lease for grazing cattle. We also spend time enjoying the beautiful area.

We are third generation farmers and ranchers in the valley. My grandfather, Robert M Divers homesteaded the property in the late 1800's, farmed the land and raised livestock and farmed the entire valley as a contract harvester. My dad, Robert V Divers grew up on the ranch and eventually farmed across Eastern Wa.

The Goldendale Valley has remained relatively untainted and bucolic since then, with an amazing array of farming, grazing and wildlife habitat. The lack of industrial development influence is what makes this valley special.

The proposed solar field in the heart of the valley and along Highway 142 is the worst idea that has come along in a long time. Not only will it be an eyesore for all who drive by, it will destroy hundreds of acres of crop land, grazing and wildlife habit. The area will be scarified of all vegetation and covered with bright and reflective panels as far as the eye can see. The loss of productive farmland and wildlife habitat is too high a price for a solar project that is better located in remote, desolate, unproductive ground that is unfit for anything else.

The developer obviously has chosen this site for close proximity to the new Bonneville transmission lines to save cost, but that is no reason to allow them to destroy our beautiful valley. I don't see that a full blown EIS has been required or submitted, but I insist one be required to investigate the full extent of the harm this project will do to our beautiful valley.

Remember, developers are just in it for the money. They do not care what the collateral damage is -- they don't live here and don't intend to. They promise a Green proect with increased jobs and increased tax revenue to seduce us into approving their project, but once the project is built, you can't get buyers remorse and remove it. You won't like the outcome. During construction, out of town workers will flood the town just like the wind folks. They don't live here -- they book up the hotels and rentals. Once built and the workers leave, Solar fields do not produce many jobs -- maybe a handfull is all since there is minimal maintenance except for constantly spraying the weeds with Roundup where the hay or wheat used to be -- That is not Green - trading agriculture and habit for solar comes at a high price!. You will find

that they will get bigger end of the stick and we will be left with an eyesore. Don't fall for it - tell them no.

We oppose this project!

Don Divers
123 Olson Rd
Goldendale, WA
626-205-0938

From: [Loren C. Divers](#)
To: [Don Divers](#); [EFSEC mi Comments](#)
Cc: [Bob Divers](#); [Glen Divers](#); [Ron & Carol Stoker](#); [E. Divers](#)
Subject: Re: Carriger Solar Project -- Comment in Opposition to the Solar Project
Date: Monday, June 5, 2023 4:31:30 PM

External Email

Please include the enormous permanent environmental damage roundup does. It may be one of the forever chemicals we have to get rid of.

[Sent from Yahoo Mail for iPhone](#)

On Monday, June 5, 2023, 3:45 PM, Don Divers <dondivers@aol.com> wrote:

I am Don Divers. My family owns a 210 acre ranch at 123 Olson Rd, Goldendale WA. I also am a partner in another 260 acres of ranch and farm land adjacent to the family property. We grow crops, wildlife, and lease for grazing cattle. We also spend time enjoying the beautiful area.

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We oppose this project!

Don Divers
123 Olson Rd
Goldendale, WA
626-205-0938

From: [Don Divers](#)
To: [EFSEC mi Comments](#); [Loren C. Divers](#)
Cc: [Bob Divers](#); [Glen Divers](#); [Ron & Carol Stoker](#); [E. Divers](#)
Subject: Re: Carriger Solar Project -- Comment in Opposition to the Solar Project
Date: Monday, June 5, 2023 4:45:44 PM

External Email

Please sign up and post your own comments. The more people that weigh in, the better.

On Monday, June 5, 2023 at 04:31:28 PM PDT, Loren C. Divers <lorendd@yahoo.com> wrote:

Please include the enormous permanent environmental damage roundup does. It may be one of the forever chemicals we have to get rid of.

[Sent from Yahoo Mail for iPhone](#)

On Monday, June 5, 2023, 3:45 PM, Don Divers <dondivers@aol.com> wrote:

I am Don Divers. My family owns a 210 acre ranch at 123 Olson Rd, Goldendale WA. I also am a partner in another 260 acres of ranch and farm land adjacent to the family property. We grow crops, wildlife, and lease for grazing cattle. We also spend time enjoying the beautiful area.

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We oppose this project!

Don Divers
123 Olson Rd
Goldendale, WA
626-205-0938

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: carriger solar project cypress creek renewables Goldendale wa
Date: Thursday, June 8, 2023 8:14:46 AM

Thanks,
~Joan Owens

NOTE: EFSEC email addresses have changed to @efsec.wa.gov! Please update your EFSEC contacts.

Energy Facility Site Evaluation Council

Executive Assistant

Email: joan.owens@efsec.wa.gov

Phone number: (360) 664-1920

EFSEC Email: efsec@efsec.wa.gov

EFSEC phone number: (360) 664-1345

Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172

Mailstop/P.O. Box: 43172

www.efsec.wa.gov

From: b.nickerson <bjnickerson1@gmail.com>
Sent: Thursday, June 8, 2023 12:49 AM
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>
Subject: carriger solar project cypress creek renewables Goldendale wa

External Email

To whom it may concern, I am writing you in hopes that the concerns of this industrial solar project be heard and not fall upon deaf ears. My thoughts always wonder back to cypress creek using techra for all there studies, 2 of there employees were caught making false reports that favored cypress creek renewables. To me that is a big red flag since cypress creek is still using that company techra for there studies. There are a lot of wildlife who use that area year round, a lot of wildlife who migrate through that area. Some of which are on the endangered species list for both state & federal. Not all those animals & birds live above ground, they burrow under the soil. Knowing that our county has not had a independent study made ourselves is very concerning. Cypress creek isn't going to tell you the negatives about this project, that wouldn't be cost effective for there business. If all these industrial solar applications are approved last I counted it would be more than 15,000 acres bulldozed & covered with solar panels just in our county. Now they aren't going to be looking for the burrowing owls or pygmy rabbit. My other concern is fire. They like to down play how many fires there are with industrial solar projects. This community will for the most part be upwind from this project as the wind blows this direction most the time. In talking to a few of the volunteer firefighters they are saying they are not trained to fight this type of fire, they do not have the

equipment to fight a fire from these batteries or solar panels. From what we have been told there really isn't a way to stop the fires, they have to burn themselves out. All the while putting carcinogenic toxins into the air to be breathed in by citizens who pay taxes in this county, by citizens who live here, by wildlife who are here and those toxins land on everything our plants, soil, water. Then there is the view, it would devastate the beauty we are so blessed to have. I ask you to deny this application. Klickitat county has a chance to make the right decision for once and protect what we have, protect your tax payers, protect your citizens and protect your wildlife. So much is wrong with this it just doesn't make sense for us as a whole, not the greedy chosen few who don't think about their neighbors or being good stewards to the planet and all who are on it. Please stand up to the corporations who have no real intent to be good for our community, their interest is in themselves, looking for easy marks like Klickitat county. You have the chance to protect our county and I hope you do. Thank you for your time

b.nickerson Goldendale wa lived here 50

years

Sent from [Mail](#) for Windows

From: [Owens, Joan \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. formal complaint CCR Carriger solar project
Date: Thursday, June 8, 2023 10:11:29 AM

Thanks,
~Joan Owens

NOTE: EFSEC email addresses have changed to @efsec.wa.gov! Please update your EFSEC contacts.

Energy Facility Site Evaluation Council

Executive Assistant

Email: joan.owens@efsec.wa.gov

Phone number: (360) 664-1920

EFSEC Email: efsec@efsec.wa.gov

EFSEC phone number: (360) 664-1345

Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172

Mailstop/P.O. Box: 43172

www.efsec.wa.gov

From: Hafkemeyer, Ami (EFSEC) <ami.hafkemeyer@efsec.wa.gov>
Sent: Thursday, June 8, 2023 9:48 AM
To: Owens, Joan (EFSEC) <joan.owens@efsec.wa.gov>
Subject: FW: C.E.A.S.E. formal complaint CCR Carriger solar project

I tried to send this to the comments inbox and got a kickback? I'd like to make sure it's filed with the project record.

Best wishes,
Amí Hafkemeyer
Director of Siting and Compliance
ami.hafkemeyer@efsec.wa.gov
Office 360.664.1305
Cell 360.972.5833

From: CEASE2020 <cease2020@aol.com>
Sent: Thursday, June 8, 2023 9:30 AM
To: Drew, Kathleen (EFSEC) <kathleen.drew@efsec.wa.gov>; Bumpus, Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>; Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>; Hafkemeyer, Ami (EFSEC) <ami.hafkemeyer@efsec.wa.gov>; GOVOutBound <GOVOutBound@gov.wa.gov>
Subject: C.E.A.S.E. formal complaint CCR Carriger solar project

External Email

Ms. Drew, in your letter dated May 28,2023 concerning the Horse Heaven Hills project you stated,

The Council is committed to hold informational and land-use consistency hearings in the local community to ensure an opportunity for direct interaction with public commenters. If you are committed to holding Land Use Consistency hearings in person at the local community, you failed to do so for the CCR Carriger solar project in Klickitat County which you held virtually. EFSEC has failed in their duty and requirements and should not make any decision on Carriger Land Use Consistency based on this improperly held hearing on May 16,2023. Any decision should be considered null and void. The Carriger Land Use Consistency hearing should be done over to ensure you follow EFSEC rules and abide by your statement. Place my complaint on the CCR Carriger record. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

From: [CEASE2020](#)
To: [EFSEC mi Comments](#)
Subject: Fw: C.E.A.S.E. formal complaint CCR Carriger solar project
Date: Sunday, June 11, 2023 4:49:15 PM

External Email

----- Forwarded Message -----

From: CEASE2020 <cease2020@aol.com>
To: Drew Kathleen (UTC) <kathleen.drew@efsec.wa.gov>; Bumpus Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>; Snarski Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>; Hafkemeyer Ami (EFSEC) <ami.hafkemeyer@efsec.wa.gov>; govoutbound@gov.wa.gov <govoutbound@gov.wa.gov>
Sent: Thursday, June 8, 2023 at 09:29:48 AM PDT
Subject: C.E.A.S.E. formal complaint CCR Carriger solar project

Ms. Drew, in your letter dated May 28,2023 concerning the Horse Heaven Hills project you stated,

The Council is committed to hold informational and land-use consistency hearings in the local community to ensure an opportunity for direct interaction with public commenters. If you are committed to holding Land Use Consistency hearings in person at the local community, you failed to do so for the CCR Carriger solar project in Klickitat County which you held virtually. EFSEC has failed in their duty and requirements and should not make any decision on Carriger Land Use Consistency based on this improperly held hearing on May 16,2023. Any decision should be considered null and void. The Carriger Land Use Consistency hearing should be done over to ensure you follow EFSEC rules and abide by your statement. Place my complaint on the CCR Carriger record. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

From: [CEASE2020](#)
To: [EFSEC mi Comments](#)
Subject: Fw: C.E.A.S.E. PARTY STATUS
Date: Monday, June 12, 2023 3:15:30 PM

External Email

EFSEC, add my comment to the Carriger record per Ms.Bumpus statement Greg Wagner

----- Forwarded Message -----

From: Bumpus, Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>
To: CEASE2020 <cease2020@aol.com>
Sent: Monday, June 12, 2023, 08:48:20 AM PDT
Subject: Re: C.E.A.S.E. PARTY STATUS

Thank you for contacting the Washington Energy Facility Site Evaluation Council (EFSEC), if you are attempting to provide comments or input on an energy project this is the incorrect email address. To ensure your comment is received and added to the appropriate EFSEC project record, please send your comments to comments@efsec.wa.gov.

For emailing questions to EFSEC, please email: efsec@efsec.wa.gov.

Kind regards,
EFSEC

External Email

Ms. Drew, as founder of C.E.A.S.E. Citizens Educated About Solar Energy and Washington registered non-profit entity I am requesting that C.E.A.S.E. be granted Party Status in the Cypress Creek Renewable Carriger solar project. Greg Wagner

RECEIVED

JUN 20 2013

Energy Facility Site Evaluation Council]
621 Woodland Square Loop S.E.
Lacey, WA 98503

ENERGY FACILITY SITE
EVALUATION COUNCIL

RE: COMMENT: Carriger Solar Project, ZONING-Klickitat County
From: Adrian Bradford, Klickitat County resident, business and property owner

Due to the known problems and the level of potential dangers of this project and level of public objections, I urge this project NOT be approved by EFSEC as submitted.

1. As located it is too close to the dense population of the City of Goldendale
2. Since it will require major batteries for energy storage and the only available batteries are Lithium-ion based which ARE KNOWN to be subject to explosion, it would endanger many people. Safer hydrogen or sodium-ion batteries for commercial level projects may or may not be feasible in the future but they are definitely NOT available currently so cannot be considered alternatives for this project now.

In OVERALL evaluation, commercial/industrial solar farms are very questionable. Since the world-wide pollution possibly also affecting American climates are mostly generated in China and India, not America; a commercial solar installation such as this in WA is very disputable. It upon completion will have close to zero effect on our already clean energy State and County. Our seasonal local air problems are caused by Regional wild fires not local energy generation plants!!! As for generating additional electricity, there are several much more efficient and inexpensive existing methods for our own KPUD to expand, including natural gas.

The only solar installations that are currently stand-alone feasible economically are very small on-site solar panels for operating items such as yard lights, small gates, etc. Those are TOTALLY different than a giant solar farm designed for energy generation that must then be battery stored and later transferred by giant towers carrying high capacity cables to existing public utility central transformers and delivery centers. I have evaluated commercial solar installations directly at our businesses in both WA and CA for GENERATING power and have not found it overall economically feasible. Wind power for direct mechanical benefit, e.g. pumps, can make sense but not solar. We have done our part for years in our major local business to reduce carbon emissions in our equipment and will continue as improvements become available. My namesake and relative was one of the initial engineers from du Pont at Hanford in creating a fuel for nuclear POWER that later became world-wide nuclear powered electricity generators. So my family has directly devoted finances and skills in clean energy for three quarters a century. The risks taken for nuclear power development experiments were not all known at that time but the ones for this commercial solar project are. I am very much in favor of the REMOTE pump storage energy project proposed in Klickitat County where the "storage" is surface water. While it may not lower local electric rates it could attract hi tech economic growth for this region and for our own KPUD by stabilizing available power in the grid because it does not depend upon unpredictables like amount of wind or sunshine. But dangerous giant

batteries near dense population would be both reckless and self-serving for just a few investors and placement of massive close to town solar panels also ruins the permanent environment for residents and ignores majority public objection. Not acceptable.

The only reasons the private out of state developers have chosen to come all the way across America to attempt to develop a giant solar farm in Klickitat County are two:

This location would be adjacent to an existing public utility transformer/distribution/generation center thereby relieving the developer from their own cost of building the transmission towers and lines to carry their own product. This existing utility is however in the densely populated urban area of the City of Goldendale, producing very clean energy already.

The State of WA has one of the few unique ordinances that might allow a developer to by-pass local zoning and land planning and specific public objection by using this unique ordinance. By-passing local zoning is only a benefit to the developer and is not in the best interests of the residents of the Goldendale and are counter to a strong majority of residents/County voters. If this developer wants to build a commercial solar farm in Klickitat County, WA; they must be required to do so on land that is farther away from any dense population. We have approved solar projects already in NE Klickitat County so our residents have already demonstrated their efforts to cooperate, so long as the projects are not an intentional circumvention of local safety needs and zoning.

Respectfully submitted (your web e mail address would not accept e mail)



Adrian Bradford

P.O. Box 416

Lyle, WA 98635

bradmmessage@gmail.com

RECEIVED

JUN 20 2023

ENERGY FACILITY SITE
EVALUATION COUNCIL

From: [Hafkemeyer, Ami \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: Fwd: WPC NEWS: High gas prices on the horizon, plus Sound Transit plans to spend \$235,000 per parking spot and more!
Date: Sunday, June 18, 2023 4:54:53 PM

For filling with the Carriger record please.

Best wishes,
Ami Hafkemeyer
EFSEC Director of Siting and Compliance
ami.hafkemeyer@efsec.wa.gov
Office 360.664.1305
Cell 360.972.5834

From: CEASE2020 <cease2020@aol.com>
Sent: Saturday, June 17, 2023 6:48 AM
To: CEASE SMITH <cease2020@aol.com>
Subject: WPC NEWS: High gas prices on the horizon, plus Sound Transit plans to spend \$235,000 per parking spot and more!

External Email

Hi, read the op-eds and learn more about the real negative impacts of renewables. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY cease2020.org

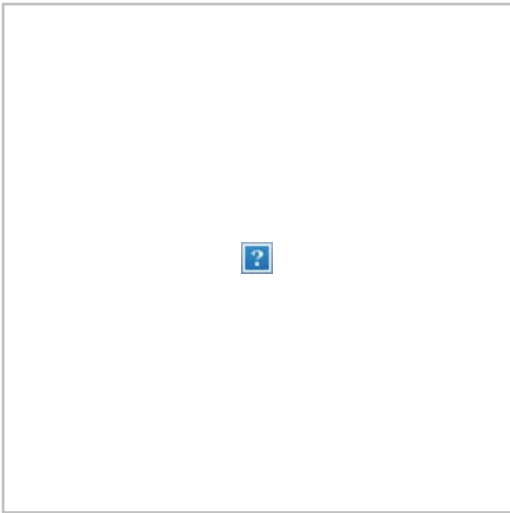


Friend, this is your weekly update with the key news and analysis concerning Washington state policy. Be sure to share it with friends!

AT A GLANCE!

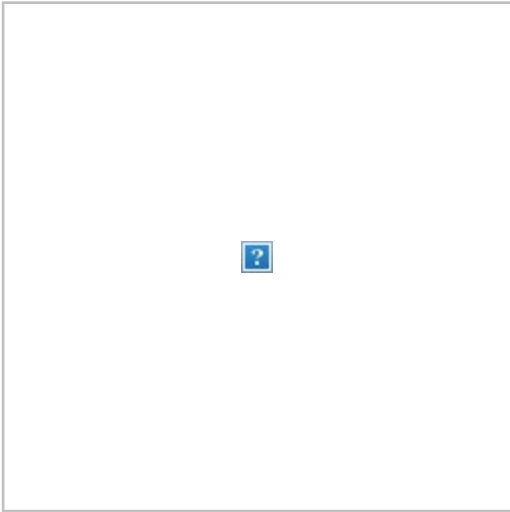
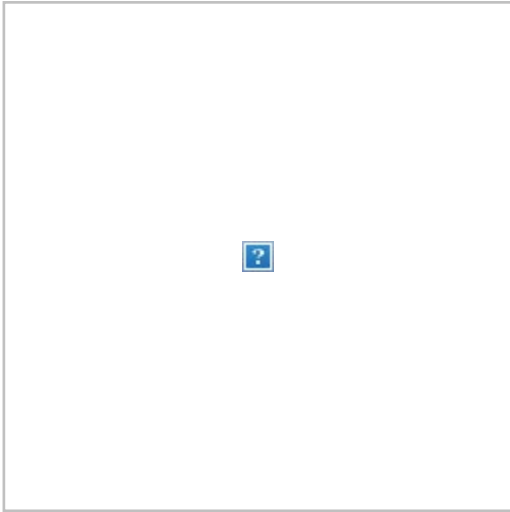
**For those too busy to click and read, here's a list of this week's MUST-KNOWS
More details are available in the blog links below.**

The **Supreme Court** ruled that union **strikes that endanger company equipment** are eligible to be served



lawsuits. This protects consumers and businesses from damage and destructive behavior that can have long-term harmful effects.

Seattle City Councilmember Alex Pedersen has introduced a **2% capital gains income tax on city residents.** It would mirror the state imposed income tax on capital gains by collecting on gains over \$250,000 with a few exemptions.



Sound Transit plans to spend \$350 million on parking structures at three commuter rail stations in Auburn, Kent, and Sumner. The cost factors out to **\$235,000 per parking spot!**



FEATURED LINKS

FROM THE BLOG:

- [Where is the accountability for government “experts” who get it wrong?](#)
- [Supreme Court rules to protect private property from union violence](#)
- [Seattle City Councilmember Proposes Capital Gains Income Tax](#)
- [Sound Transit plans parking garages that will cost more than \\$235,000 per stall](#)
- [How to fix Washington’s anti-innovation rules on carbon-reducing projects](#)

UPCOMING EVENTS:

- **Regional Reception Series** - WPC is hosting receptions around the state where you can hear from our President & CEO as well as our researchers on the latest updates. Happening now and throughout the next few months, [check to see when we'll be hosting near you!](#)
- **WA Policy on the Go is now EVERY OTHER WEEK** so watch for the next event on [Tuesday, June 27](#).
- **YPs Seattle Happy Hour - June 21, 6:00PM** - Join the Young Professionals for a summer happy hour at Saltchuk Marine in Seattle! President & CEO of Saltchuk Marine Organization Jason Childs will be speaking as well as an update from WPC President & CEO Mike Gallagher. [Register here!](#)

OP-EDS, PUBLICATIONS, & MEDIA:

- [Prepare for even higher gas prices this summer](#)
- [Washington State is First-in-the-nation for Getting it Wrong on Long-term care](#)
- [Todd Myers cited on \[un\]Divided with Brandi Kruse](#)
- [Washington cap-and-trade program now adds 45 cents per gallon](#)
- [Latest WA Carbon Auction Likely to Boost Gas Prices \\$.45 Cents](#)
- [WA’s second carbon auction nets \\$500M, gas prices could jump](#)
- [Washington Raises \\$480 Million in Latest Carbon Auction, Group Says it Will Raise Washington gas Prices Another 45 Cents](#)
- [Analysis: The Actual Levelized Cost Of Energy Suggests Green Energy Is Hiding Costs](#)
- [Tensions, gas prices rise as Washington state auctions carbon](#)
- [Additional costs of wind, solar power](#)
- [Supreme Court rules to protect private property from union violence](#)
- [Washington second to only California in fuel price](#)
- [What SHOULD Washington and Jay Inslee do to fix their carbon reduction projects?](#)

For more Washington Policy Center in the news and WPC Op-Eds [click here](#).

FEATURED EVENT



Join the Young Professionals for a summer happy hour at Saltchuk Marine in Seattle! We'll be joined by **Jason Childs** to discuss insights on the economy, the business environment in Washington State and finding opportunity in challenging markets along with WPC's President, **Mike Gallagher**.

Wine, beer, and appetizers will be served.

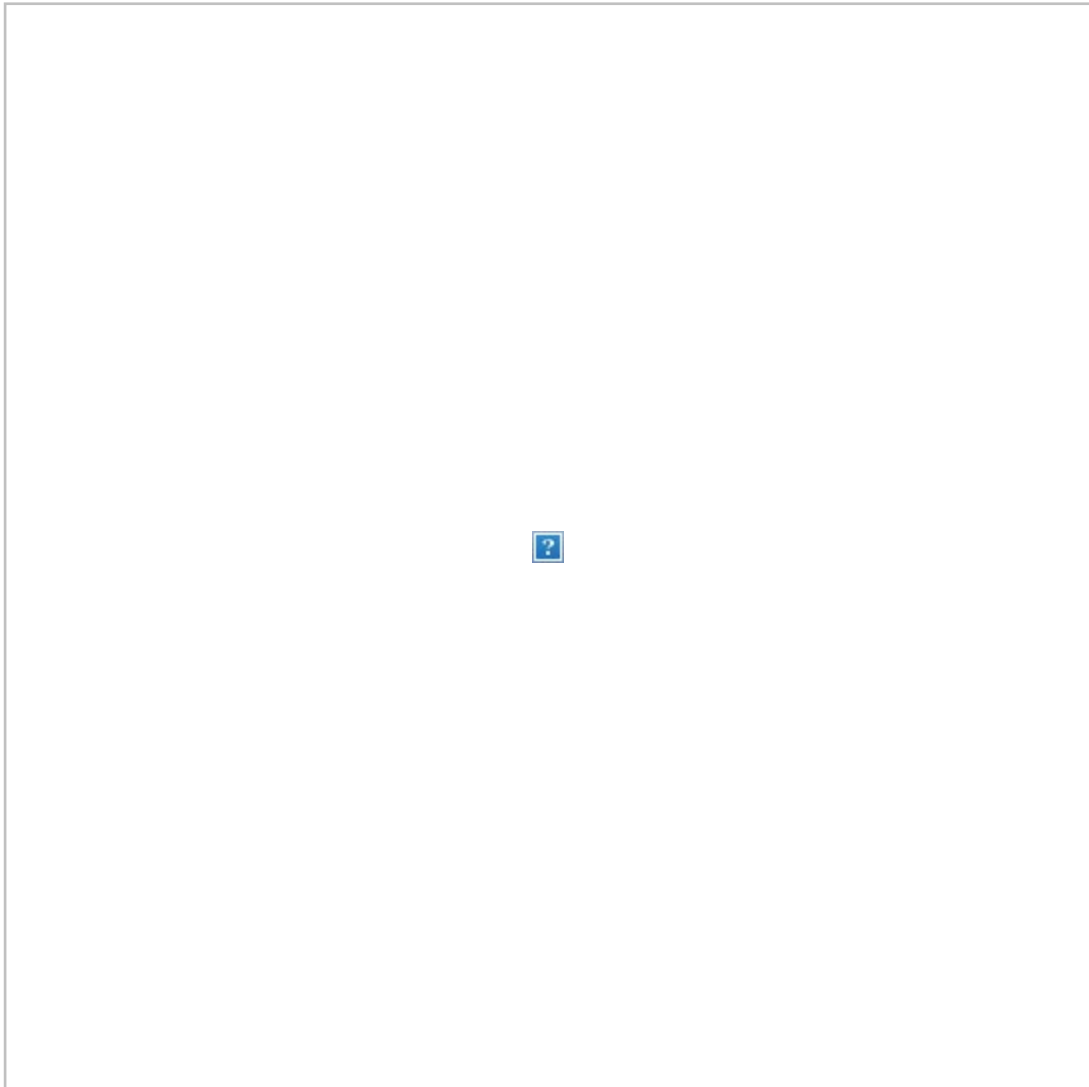
[Register here!](#)

FEATURED OP-EDS

Washington State is First-in-the-nation for Getting it Wrong on Long-term care *as appeared in RealClear Policy*

By Elizabeth Hovde, Director

Center for Worker Rights and Center for Healthcare



“If you can't be a good example, then you'll just have to be a horrible warning.”

— Catherine Aird

Taxpayer-funded safety nets should be reserved for people in need, not widened for

people *not* in need. But Washington state lawmakers have decided otherwise when it comes to long-term care.

In a partisan move, the 2019 Washington state Legislature passed a [law](#) to start a new social program that is meant to be funded by a payroll tax of 58 cents on every \$100 a worker makes.

Starting July 1, a worker making \$50,000 a year will have \$290 extra dollars taken away each year, while a person making \$100,000 loses \$580 and so on, with no income cap. Someday, a person who is heavily invested in this program can apply for an inadequate lifetime benefit of \$36,500 to use for long-term-care services — *if* the worker actually needs long-term care, has paid in 10 or more years without a break of five or more years and has health needs that qualify them under the state's definition as a person needing assistance with daily-life activities. If you've paid into what's being called the [WA Cares Fund](#) your whole working life yet no longer live in Washington state when you need long-term care, you're out of luck. The benefit is not portable, no matter how much you've been required to contribute.

The plan is intended to save the state money on the long-term costs associated with its Medicaid program, and it places taxpayers on the hook for paying the wages of home caregivers. That includes family members.

[Service Employees International Union 775](#), a union representing long-term-care workers, [lobbied](#) heavily for the law, remains a primary supporter of it, and will be giving state-required training to new caregivers who hope to receive taxpayer money from the fund.

Taxpayers, seeing the burden, ulterior motives and unfairness of the law, have been asking the state to repeal it since its inception. First, they tried with an [advisory vote](#) that lawmakers could ignore (and did). Then, voters turned down a [funding measure](#) meant to help the plan along. Most recently, they urged [legislation](#) that had the support of many lawmakers but that was shut down by the state's majority party.

Our population is graying and growing. People are living longer. And more elderly people are using long-term-care services to help them with activities of daily life. Many are also relying on the government to provide their long-term-care needs, driving up state costs. It's no secret in Washington state that hiding one's assets is a part of some people's financial planning near the end of life, so they can qualify for Medicaid long-term-care help instead of paying their own way.

Instead of creating awareness about the issue, cutting taxes on insurance products, encouraging savings and discouraging reliance on Medicaid, which is meant for people in need, Washington state lawmakers chose to become the first state in the nation to create a long-term-care safety net for people in need and people not in need.

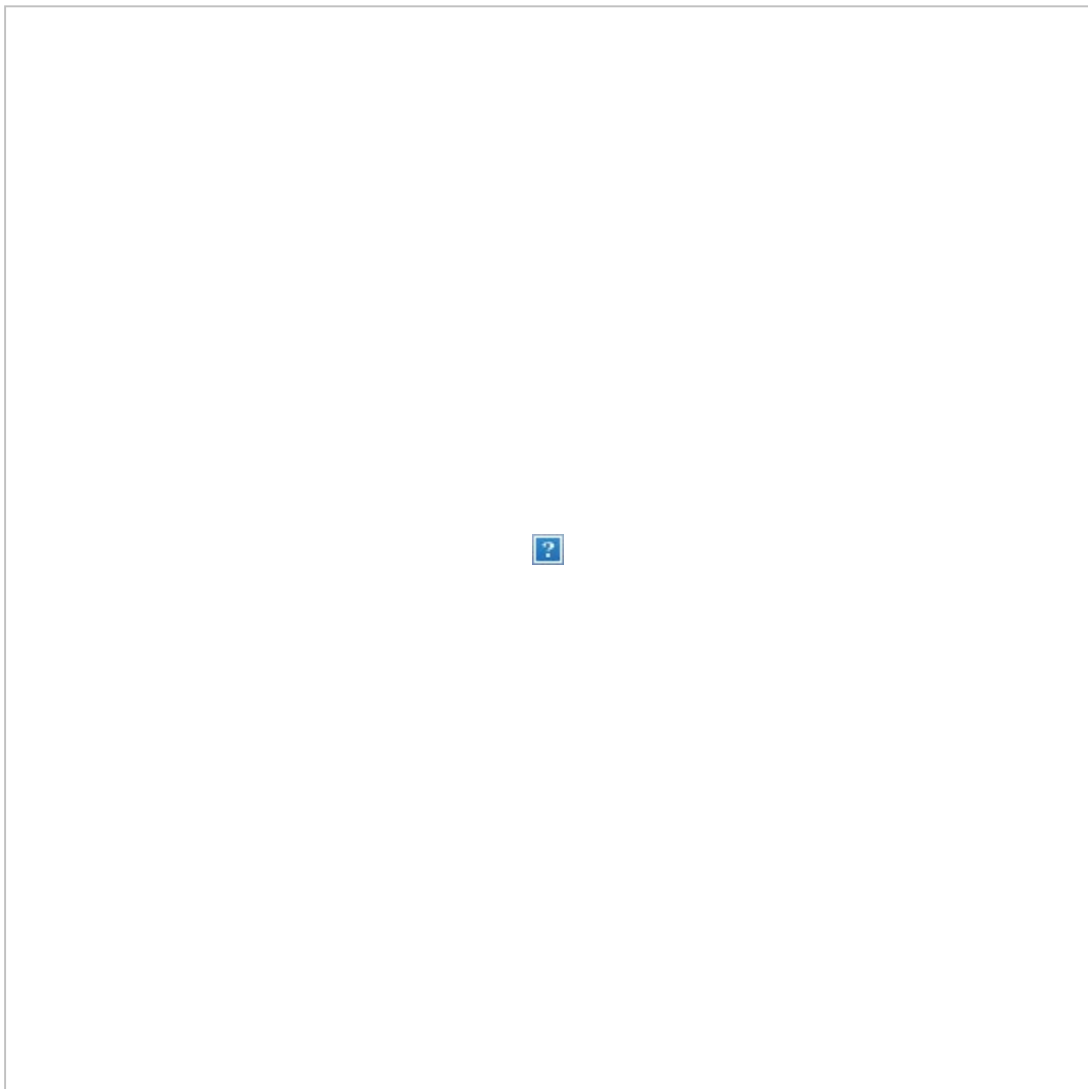
Now lawmakers in other states are watching to see how the Washington state test case goes. Some state legislative bodies, like [New York and Pennsylvania](#), have already seen proposed legislation similar to Washington's misguided House Bill 1087.

[Read the full op-ed here!](#)

Prepare for even higher gas prices this summer

as appeared in The Spokesman Review

By Sean V. O'Brien
Eastern Washington Director



After our state's first carbon auction this past February, industries operating in our state paid a staggering \$300 million to the Washington Department of Ecology to put toward programs the state claims will reduce carbon emissions and fight climate change.

The Climate Commitment Act, signed into law by Gov. Inslee in 2021, created a cap-and-trade program in which the state caps how much carbon industries can emit. The program requires these industries to obtain “emissions allowances” equal to their greenhouse gas emissions. Similar to purchasing stocks and bonds, these allowances are obtained through auctions hosted by Ecology.

In the aftermath of the second auction held this year at the end of May, as much as \$557 million will be brought in – something Washington Policy Center analysis projects will result in a 45 cent per gallon gas price increase for Washingtonians.

The auction’s price of carbon was so high it triggered an extra auction of allowances that must now be held in August.

Since the start of 2023, my colleague Todd Myers, Washington Policy Center’s Environmental Director, has tracked gas prices here and in other states in the region to analyze the impacts of the CCA. No other state is seeing the rate of increases we have been facing since the program’s inception.

After the second auction, the carbon prices increased 15 percent to \$56.01 per metric ton of CO₂, translating to about 45 cents per gallon of gasoline and 54 cents per gallon for diesel – meaning Washingtonians will pay about 84% more than California’s price on carbon.

As Myers states, “Although Washington is paying more for CO₂ emissions than California, that additional cost doesn’t help the environment – it just harms our economy. As long as the governor and agency staff continue to deny that reality, Washington residents will pay a high price for energy, but won’t receive the environmental benefits they are paying for.”

The Spokesman-Review’s own reporting earlier this year highlighted the impact of increasing gas prices on local communities and the fact that residents are crossing the border into Idaho to avoid our high prices at the pump.

In response to questions posed to Gov. Inslee last year regarding the possibility of increased prices under the new law, he claimed, “This is going to have a minimal impact, if any. Pennies. We are talking about pennies.”

But in the aftermath of Myers’ tracking of the state’s statements surrounding the expected outcomes of the program, the Inslee administration quietly scrubbed its website to remove its original claims regarding the potential increases in prices. The Ecology website no longer includes its projections of an increase of “1% to 3% in 2023” gas prices. Instead, they now claim a 1 to 3% increase in the “overall economic impact.”

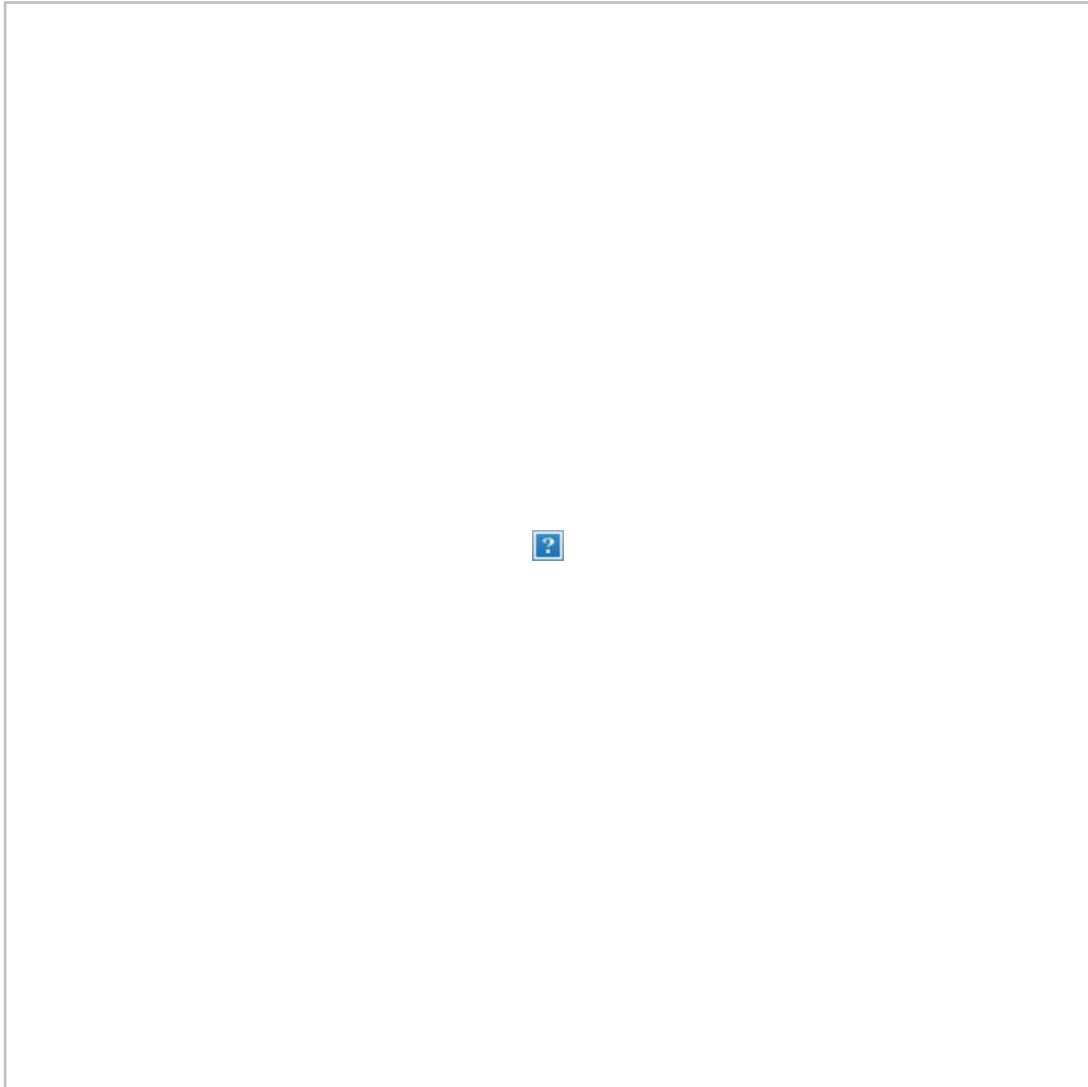
[Read the full op-ed here!](#)

FEATURED BLOGS

Sound Transit plans parking garages that will cost more than \$235,000 per stall

Charles Prestrud, Director

WPC Center for Transportation



The Seattle Times recently ran a story about Sound Transit's plans to spend \$350 million to build parking structures at three commuter rail stations (Auburn, Kent and Sumner). The math works out to about \$235,000 per stall. There was a time not that long ago when you could buy a house in South King County for that price, but now apparently it only buys one parking space.

Parking has always been a sticky issue for Sound Transit. On one hand, free parking at stations has been an effective way to increase access to their service. On the other hand, Sound Transit has tended to view cars as the enemy, and they have had board members who opposed providing parking at stations or anything else that might make it easier to

drive.

The planned parking structures may have seemed like a good idea in 2008 when they were added to the ST2 plan, but over the last fifteen years the price has more than doubled and much has changed. It's no longer obvious spending \$350 million for parking garages is a good investment.

One of the biggest changes has been the decline in transit ridership. It's no secret there was a steep drop-off in ridership during the COVID pandemic. In 2022 Sounder ridership was 70% below pre-COVID levels (see table below). To be fair, ridership has rebounded a bit from the COVID lows in 2021, but demand is still very weak. No doubt Sound Transit and the rail cheerleaders would prefer to extrapolate off a low baseline, but the data also shows that Sounder ridership peaked in 2018, more than a year before COVID hit, and productivity (riders per vehicle service hour) has been trending downward since 2016. The ridership trend raises the question of whether an additional 1,500 parking stalls will be needed in the foreseeable future.

[See the full blog here!](#)

**KNOW SOMEONE WHO SHOULD JOIN THE
WPC TEAM?**

WPC Opportunities Available!

The Washington Policy Center is now accepting applications for the following positions:

WPC's Janet and Doug True Research Internship Program

Washington Policy Center offers part-time internship positions geared toward undergraduate students and recent graduates for each academic quarter including summer. Interns work approximately 12 hours per week. WPC allows flexible hours to work around the intern's class schedule while attending nearby colleges and universities.

Through the Janet and Doug True Research Internship Program, WPC has had the privilege of excellent interns each quarter since 1999. Former WPC interns have gone on to work in Washington D.C., have run for office, have completed prestigious academic endeavors and have begun successful careers in the private sector. Many credit their interest in policy to their time as a WPC intern.

[Click here for more information.](#)

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Support WPC Today!

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From: [CEASE2020](#)
To: [Snarski, Joanne \(EFSEC\)](#)
Cc: [Owens, Joan \(EFSEC\)](#); [Hafkemeyer, Ami \(EFSEC\)](#); [Bumpus, Sonia \(EFSEC\)](#); [Drew, Kathleen \(EFSEC\)](#); [EFSEC mi Comments](#); [Moon, Amy \(EFSEC\)](#); [EFSEC \(EFSEC\)](#); patricia.betts@efsec.wa.gov; [Grantham, Andrea \(EFSEC\)](#); [Greene, Sean \(EFSEC\)](#); [Randolph, Sara \(EFSEC\)](#); [Davis, Osta \(EFSEC\)](#)
Subject: C.E.A.S.E. CARRIGER SOLAR
Date: Sunday, July 2, 2023 7:29:38 AM

External Email

Ms. Snarski, during our phone conversation you told me that the CCR Carriger solar plan had many problems, and it would be adjudicated. How did that change? When and how were all those problems resolved? Have all EFSEC's questions from May 9th been answered and verified to be accurate? How did EFSEC determine that the Carriger project is consistent with local land use and appears to ready to be expedited? The current use of the land is for farming to supply you and your family with food. How is Carriger consistent with that use? EFSEC is violating RCW 89.10.005 Preservation of Farmland Act. Why is EFSEC allowed to break the law? Expediting this project is a way to ensure you please Inslee and secure your job. A conflict of interest and un-ethical conduct. You are destroying the future of your children and other citizens by certifying this project and others. Sadly, you don't care about the harm you are creating. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

July 21, 2023

Subject: Carriger Solar Project Knight Road Goldendale WA

Dear Ms. Bumpus, EFSEC Director,

We are writing today to once again express our concerns about the large- scale solar projects proposed for placement on Knight Road in Goldendale Washington.

Has there been a study on the impact of solar projects on the aquifer and the water table surrounding the projects? Our understanding is that large scale solar projects use a tremendous amount of water. We are concerned about the impact on individual domestic wells surrounding the projects. They will be pulling thousands of gallons of water out of the same aquifers as the individual home owners wells. The impact will not be known until our wells go dry. Multi-billion- dollar corporations can afford to drill wells thousands of feet deep. Few homeowners can afford this. With temperatures rising and yearly rainfall decreasing water issues could easily be in our future.

Though we do not want to see large scale solar projects in our neighborhood or town we can live with property values decreasing by 30%, we can live with thousands of acres of black glass, we can live with 1-2 years of noisy, dusty construction but we CAN NOT live without water.

While the project will be financially beneficial for a few families, the impact on the surrounding families and the community will be devastating. We urge you to rethink the placement of the projects and to deny the applications.

Sincerely,



John Crosland

65 Gosney Loop

Goldendale WA 98620



Sandra Crosland

RECEIVED

AUG 01 2023

ENERGY FACILITY SITE
EVALUATION COUNCIL

To: Energy Facility Site Evaluation Council (EFSEC)

From: Thomas and Candace Holub

44 Rimrock Rd., Goldendale, WA 98620

509.712.5782

Date: August 2, 2023

Re: Stop Carriger/Cypress Creek Solar Project off Knight Road

My name is Tom Holub. I am a resident of Klickitat County, WA. My wife and I have owned 4 ½ acres here since 2006. We are not opposed to solar power in general. We have solar panels on the roof of our house where they belong. I am here to speak because my wife and I are adamantly opposed to the proposed Carriger/Cypress Creek Knight Road industrial solar project.

I attended the Klickitat County Board of Commissioners 6:00 p.m. meeting on August 1, 2023 where the Commissioners voted to extend the moratorium on solar projects over one acre in size, to include most of the area of the valley surrounding Goldendale, WA and Centerville, WA. This is after the Klickitat County Planning Commissioners voted unanimously to continue this moratorium.

Klickitat County Commissioner Lori Zoller reported that when she visited the Newell Road fire near Bickleton, WA and the Lund Hills industrial solar facility last week to obtain information from the fire officials about the fire, this is what she found out from DNR representatives and other fire officials:

1. Efforts were diverted from other areas of the fire in order to focus attention on the wind farms in the area and the Lund Hill solar facility. It was necessary to focus on the Lund Hill solar facility because if the fire got to the solar installation, the whole area would have to be evacuated, including the fire fighters. The fire crews do not have the ability to fight an industrial solar complex fire. The fire would have to be allowed to burn out.
2. They told Commissioner Zoller that if there was a fire at or near the proposed Carriger/Cypress Creek Knight Road industrial solar project that the entire city of Goldendale would have to be evacuated, as well as the surrounding residents of the area.
3. Also, the fire officials told her that fire retardant cannot be dropped from helicopters or airplanes onto an solar facility because the retardent is clay based and would break the solar panels.
4. Airplane and helicopter access to areas around industrial solar is severely restricted due to the extensive grid of overhead wires that carry power from the solar facility.

The valley surrounding Goldendale and Centerville has extreme fire danger for over 6 months a year. The health and safety issues regarding this fire danger is far too much of a risk for the residents of this area.

It would be irresponsible and downright dangerous for EFSEC to approve the Carriger/Cypress Creek Knight Road industrial solar project given the likelihood of fire in this area. The most recent fire in this area happened less than a month ago and came very close to being out of control, threatening the Pondersa Park housing area. The fire danger is extreme every year in this valley.

As stated at a meeting by a Klickitat County Planning Commissioner, “there are tens of thousands of acres in Klickitat County that are appropriate for large-scale solar development, but the valley surrounding Goldendale and Centerville are not appropriate.”

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: Anonymous User completed Share your comment, upload a document or a picture
Date: Tuesday, August 8, 2023 9:33:19 AM

From: Comments WA EFSEC <notifications@engagementhq.com>
Sent: Tuesday, August 8, 2023 9:33:10 AM (UTC-08:00) Pacific Time (US & Canada)
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>
Subject: Anonymous User completed Share your comment, upload a document or a picture

External Email

Anonymous User just submitted the survey Share your comment, upload a document or a picture with the responses below.

Name

Greg and Deborah Wagner

Email

cease2020@aol.cm

Are you part of an Agency or Organization?

Yes (please specify) - C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

Share any comment

The Carriger solar project is inconsistency with the current use of the land proposed for the area near Knight Road. The current use of the land is farming and no solar projects exist in this area. RCW 89.10.005 a state law is to preserve farmland a state law. If this project is certified it will violate state law. Is EFSEC and Governor Inslee allowed to violate state law. Has EFSEC received answers to the May 9,2023 questions? No determination can be made until answers are received and verified. This project will destroy the land for generations to come. It will reduce property values, enjoyment of citizen property, higher utility cost, higher taxes, create no permanent jobs, toxins leaching into the soil and water. Contamination of the potable water aquafer that citizens rely on for drinking water, violating the CAO, destruction of wetlands, wildlife migration corridors, wildlife habitat, and the environment. The reflectivity (glare) from the solar panels will interfere with airplanes at the Goldendale Airport, reflectivity (glare) will annoy citizens. Extreme dangers of fires, explosions and deadly fumes from a fire at a BESS filled with dangerous lithium ion batteries. Injuries and dead have been caused by BESS fires, explosion and deadly fumes. Farmland will be rendered useless for years to come. Food source needed for Americans will be lost making the USA more dependent on a contaminated food source from foreign countries. The cultures and

customs of Klickitat County will be destroyed by this project. CCR are conmen taking advantage of the tax subsidies from the DOE. They do not care about Klickitat County Its citizens the environment wildlife. They only care about their profits. Profits that go back to their parents corporation EQT in Sweden. CCR is no more than a front company for EQT enabling them can launder US tax dollars to a foreign corporation EQT. EFSEC and Inslee are allowing this to happen. RCW 80.50 states that equipment is to be purchased locally. All the solar panels are purchased from communist China or enemy. EFSEC and Inslee are supporter of the communist party when you allowed CCR to purchase solar panels from Communist China. EFSEC is violating RCW 80.50 in multiple areas just to get this project certified to please Inslee. EFSEC does not care who they hurt in the process. That is how communists think. Why don't you certify this project on Bainbridge Island where Inslee lives or next to your homes and see how you like it. EFSEC , Inslee, BLM, DNR and WSU have found 100s of thousands of acres of land for solar development all on the east side of the Cascades. Why don't you site equally across the state? Reason; EFSEC (YOU) and Inslee don't solar in your backyard. None of the state buildings are 100% powered by renewables, EFSEC employees don't drive EVs or live in home 100% powered by renewables, Inslee doesn't support his CETA as he drives and flies in fossil fueled powered vehicles, his home is not 100% powered by renewables. His carbon footprint his enormous while he forces the citizens to sacrifice. A true DICTATOR and HYPOCRIT. Klickitat County citizens appose this solar project and demand that EFSEC does not find the project consistent with our land use. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

Did you also share a video?

No

From: [Anthae360 LLC](#)
To: [EFSEC mi Comments](#)
Subject: Carrier Solar Project Comments
Date: Wednesday, September 6, 2023 11:59:52 AM
Attachments: [Evaluation of Stand-Alone Zero Carbon Residential Solarpdf](#)

External Email

Adding to your possible 'significant impact' I have the following comments from a 25MW solar project that I was involved with as an engineer in Guam.

Disruption of the landscape on hillsides leads to un-mitigatable soil erosion, rutting, and gulching of surface water drainage. Streams that were clear and cool before had become turbid warm washouts. Poor planning and close panel spacing left no remediation possible.

In addition to surface runoff is weed control. Again, poor planning on this project led to weeds and brush over the panels, which had to be constantly weed whacked and eventually used RoundUp for weed control, that, together with warm turbid flash flooding wiped out the aquatic life in the drainage, and polluted a reef structure, killing coral.

In power management, which is a form of environment, the impact of changing sun and clouds and sun and clouds output variation during mid-day, when there is no power demand and the grid is 'low', was so severe the utility was forced to 'load-bank'(e.g. burn off as heat) the power surges, to avoid voltage spikes. The claimed advantage of solar became only a fraction of the solar tax credits they were banking.

I've done a Photoshopped site planning graphic for a smaller solar project, like Carriger presentation. It was disturbing and sobering to see what an actual solar installation looks like after a year or two. Nothing like the photo rendering.

In 1980s I worked on Green Tax Credit projects in California, and today if you Google Earth around Barstow, you'll find square miles of abandoned and rotting solar panels. Once project proponents pocketed the green tax credits, they stopped maintaining the solar fields, now caked in dust and rust, a lifeless dry moonscape burden on the County.

Am not a opponent of solar, only sharing the often gap between green fantasy and moonscape solar reality. I'm sure with adequate planning, and operating and maintenance agreement guarantees, the Carriger Project can be successful.

v/r
Robert A. Marmaduke PE, PEng
360-447-8753

Evaluation of Stand-Alone ‘Zero Carbon’ Residential Solar Power Installations for the Puget Sound Region

Robert A. Marmaduke PE

Marmaduke Consulting™, Anthae360 LLC

January, 2020

Abstract – The science of solar cell technology is more than 50 years old, and rapid development of solar technology for residential and commercial application is already well established in both research and manufacturing. However, the politicization and legislative tax-credit subsidization of solar technology has led to structural mal-investment, when appraised from Mean-Time-Between-Failure Life-Cycle-Cost-Analysis, measured against Dept. of Energy hourly-daily load demands.

Index Terms- Solar power, renewable energy, green technology, distributed power generation

I. INTRODUCTION

This article examines the issue of solar power generation at the residential usage level from a strictly the available-power supply:load aspect, asking if ‘Zero Carbon’ solar power for the Puget Sound Region can be a viable energy ‘alterative’, with a massive structural mal-investment in the form of tax-credit subsidies, and without the necessary requirement that a fully fossil-fuel backup system must always be running, 24x7x365, in order to provide grid power when there is no solar energy, even with ‘home battery systems’ promises to bridge long periods of cold and darkness.

Using twenty (20) years of recorded solar observations for Seattle, available from University of Washington at: <http://www.weatherjon.org/meteo/pages/station/climate.php?var=S>, we first present the amount of solar energy available throughout the day, and the month, through an entire year, then begin the careful engineering cost analysis to develop the supply:demand metrics for solar.

We will show that when angle of incidence is also considered, both hourly and seasonally, solar efficiency %-age is in the single digits. Moreover, this solar panel capacity is only available for four hours at mid-day in January, and for nine hours across longer days in July. The rest of the 24-hour day, panels supply zero power. We will develop those daily-hourly solar output curves.

Lastly, we’ll evaluate the calculated seasonal daily-hourly solar supply curves against Dept. of Energy annual-daily-hourly load curves for residential usage within the Seattle-Tacoma Region, to show that ‘Zero Carbon’ solar technology can by *no means or extent* supply enough power to satisfy the State Government’s new initiative, a ‘Zero Carbon’ fossil-fuel energy ban by 2035.

II. DEVELOPING STANDARDS

It has been established that, above the earth's atmosphere, solar irradiation has an intensity of approximately 1,380 watts per square meter (W/m^2). This is referred to as the ‘Solar Constant’.

From this, a solar power standard test has been established, that a solar panel must provide full nameplate output at 77°F and 1,000 W/m², in order to be certified compliant. A typical panel will produce only 225 W/m² certified nameplate capacity when of the highest quality, and only 180 W/m² at typical retail quality, when tested at the 77°F and 1,000 W/m² standard.

Since the average solar irradiation for Seattle is only 131 W/m², and at no time are solar panels on residential or commercial roofs tracking the sun (remaining perpendicular to incoming solar rays), it's clear that solar installations within Puget Sound operate at average 13% of nameplate capacity. In other words, they produce, on average, only 23 W/m², within the Puget Sound.

A typical solar panel is 5.4-feet x 3.25-feet (17.6 ft², or 1.63 m²). With an example 1200 square foot rambler with 4:12 pitch roof, it can carry no more than 760 square feet of panels, and then with necessary access on three sides, that is reduced to less than 580 square feet (54 m²). This is sufficient space for a 6 x 3 grid of panels, on a South-facing residence, and arranged as follows:

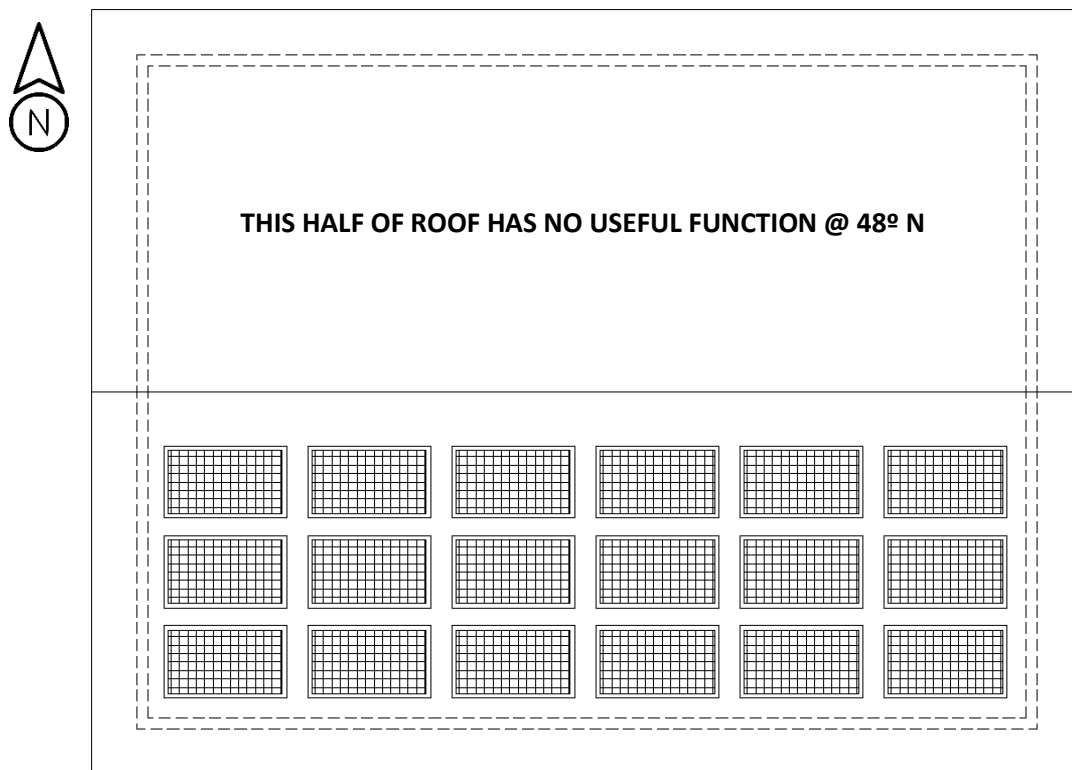


Figure 1 - 18-Panel South-Facing Solar Panel Layout, 40-Foot x 30-Foot (1200SF) Rambler

Eighteen (18) solar panels, even at noon in mid-summer, when aligned optimally with the sun, with average July noon solar insolation of 700 W/m², will produce a peak of 2,200 watts. In mid-winter, when panel alignment angle is no longer optimal with the sun, with average January noon solar insolation of 150 W/m², they produce a peak 400 watts, *not even enough to heat the house*. Even doubling the number of solar panels on a roof oriented to east-west little improves output, because of the compound incident angle, which in morning shades the west roof and afternoon shades the east roof, and both roofs are affected by the seasonal variation in sun declination, as illustrated in Figure 3, Figure 4 and the accompanying table of incident-angle reduction factors.

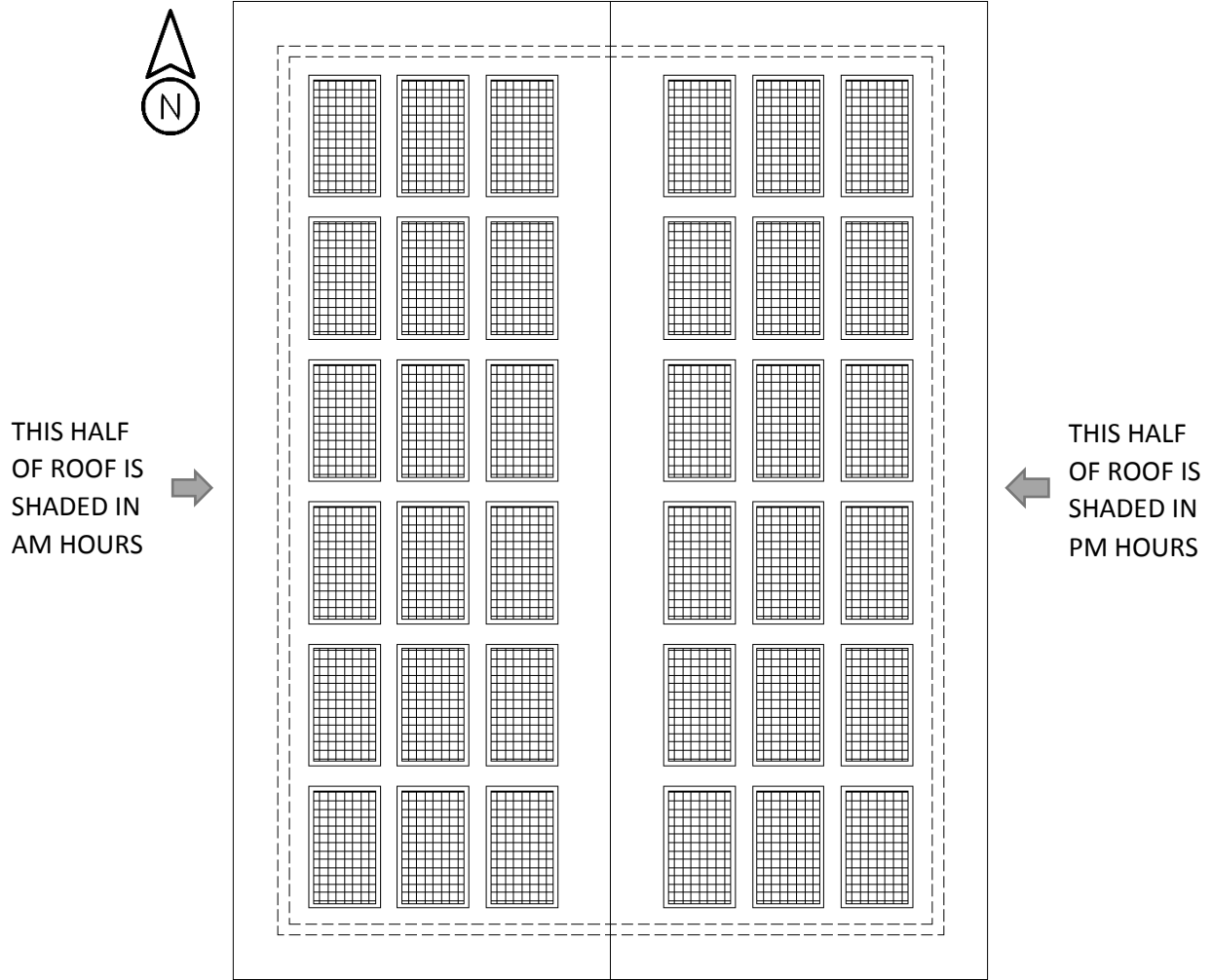


Figure 2 - 36-Panel East-West-Facing Solar Panel Layout, 40-Footer x 30-Footer Rambler

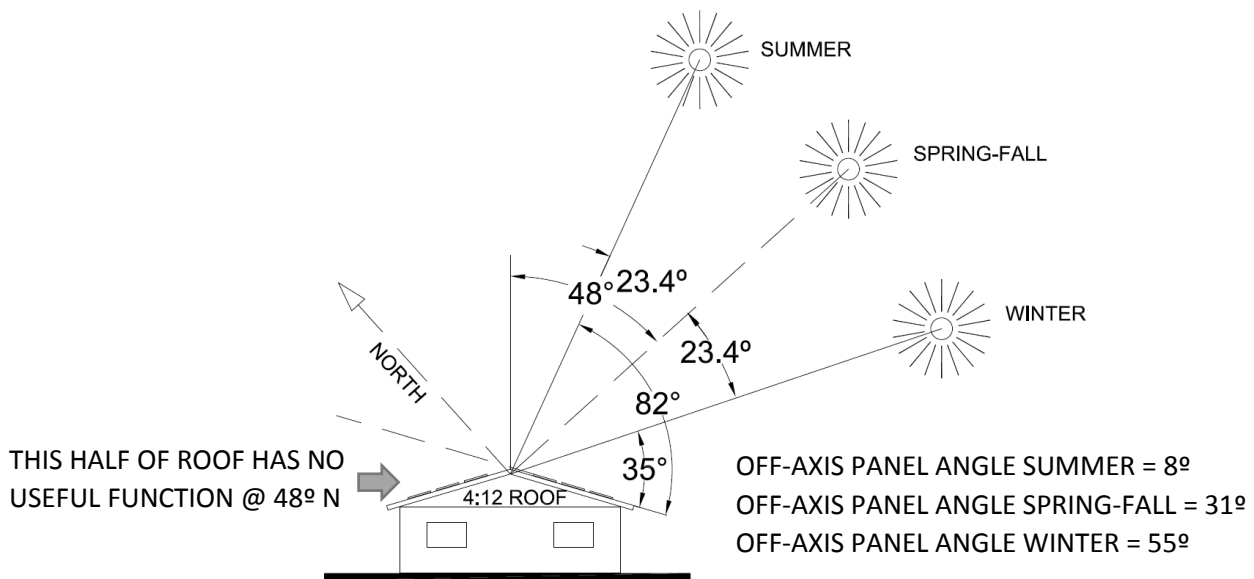


Figure 3 - Annual Solar Declination Angle Change for 48°N Seattle w/ 4:12 Roof (South-facing)

Optimal roof pitch for 48°N has been established at 36° (9:12).¹ 9:12 pitch is an exceptionally steep roof pitch, and is non-characteristic of Seattle residential housing, commonly 4:12 (18°) to 6:12 (27°). Mixed-use multi-family housing often have essentially flat roofs with a slight pitch to drain, and obviously their multi-family demand load exceeds any configuration of rooftop solar capacity. This paper addresses only Single Family ‘rambler’ residences, with non-tracking panels.

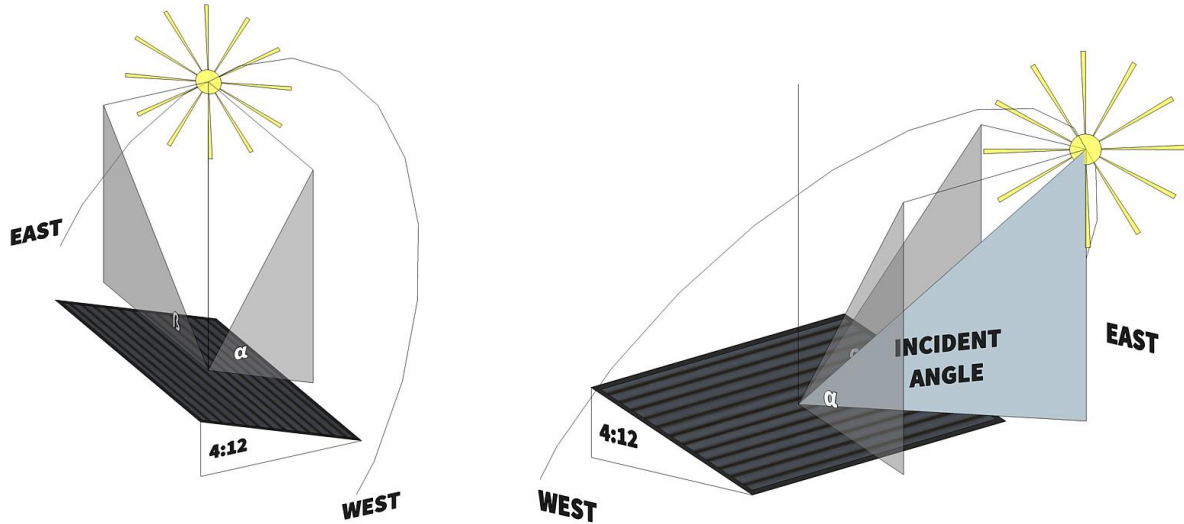


Figure 4 - South Facing Roof Hourly & Seasonally Incident Angle (α = seasonal altitude + roof pitch, β = hourly altitude)

Here α is the seasonal (daily) solar altitude + roof pitch which is assumed constant through the solar day, and β is the hourly altitude above the horizon, which varies according to the sun’s seasonal declination, and due to Seattle’s 48°N latitude, is from 10 hours at winter solstice, to 15 hours at spring and fall equinox, and to 17 hours at summer solstice. Because the trigonometry computations for combined angles on a skewed plane are somewhat cumbersome, only solstice and equinox day-hour calculations are tabulated below, using 3D geometry CAD to measure:

INCIDENT	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON
WINTER	--	--	--	--	80°	71°	65°	61°	60°
SPRING	--	--	--	74°	64°	55°	47°	41°	37°
SUMMER	--	--	74°	63°	52°	41°	31°	24°	15°
FALL	--	--	--	74°	64°	55°	47°	41°	37°
	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM
WINTER	61°	65°	71°	80°	--	--	--	--	--
SPRING	36°	37°	41°	47°	55°	64°	74°	--	--
SUMMER	8°	15°	24°	31°	41°	52°	63°	74°	--
FALL	36°	37°	41°	47°	55°	64°	74°	--	--

We can compute incidental angle efficiency loss reductions for any solar hour throughout the year, then build a table of incident angle efficiency losses per day-hour. The Incident Angle Modifier (IAM) losses account for lower transmission of light through the glass front of solar panels when the sunlight enters at a varying and non-perpendicular angle throughout the day. Industry

¹ - World estimates of PV optimal tilt angles and ratios of sunlight incident upon tilted and tracked PV panels..., Mark Z. Jacobson, Vijaysinh Jadhav, Stanford University, published in Elsevier, Solar Energy 169 (2018) 55-66

measurements are 3% loss at 0° off-angle, to 5% loss at 30° off-angle, and ASHRAE guidelines beyond that incident angle use a general formula: $F_{IAM} = 1 - b_o * (1/\cos(i) - 1) * 100\%$, where b_o is unique to the panel manufacturer, and between 0.05 and 0.10.

IAM FACTOR	
0°	0.970
5°	0.966
10°	0.963
15°	0.960
20°	0.956
25°	0.953
30°	0.950
35°	0.945
40°	0.940
45°	0.935
50°	0.930
55°	0.925
60°	0.916
65°	0.885
70°	0.870
75°	0.820
80°	0.700
85°	0.350
90°	0.000



Figure 5 - Incident Angle Modifier Chart (ref ASHREA Modified w/ Mfg Test Results)

Note that this efficiency chart does not consider dust and pollen contamination, which can blank the solar panel. University of California, San Diego published in the July 25 online issue of Solar Energy, “Researchers found panels that hadn’t been cleaned, or rained on, for 145 days during a summer drought in California, lost only 7.4 percent of their efficiency.” Seattle’s dry record is 55 days, so this report uses a 3% ‘dust blanking’ loss of efficiency in the final power tabulation.

Note also, the chart below shows ‘average’ solar power day-hour values, not the record lowest. On ‘average’ then, half of the days, available power would be LESS than the results calculated. From UW’s Weatherjon.org, we tabulate the hourly W/m2 values, as averaged from 1999-2019. These are across a range, for example, Spring is 416 W/m2 low to 630 W/m2 high (±20%), and subsequent user calculations should impose that -20% Factor of Safety on the power output table, at the peak noon hour, declining to -0% Factor of Safety in the first and final hour of the day:

Sun W/m2	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON
WINTER	--	--	--	--	14	74	143	147	165
SPRING	--	--	--	65	174	302	372	455	508
SUMMER	--	--	50	133	246	401	483	571	629
FALL	--	--	--	4	52	122	195	256	301
	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM
WINTER	149	111	66	15	--	--	--	--	--
SPRING	519	495	430	337	180	90	30	--	--
SUMMER	630	708	624	557	394	201	65	29	--
FALL	297	279	256	139	58	6	--	--	--

III. UW SOLAR INSOLATION RECORDS 1999-2019

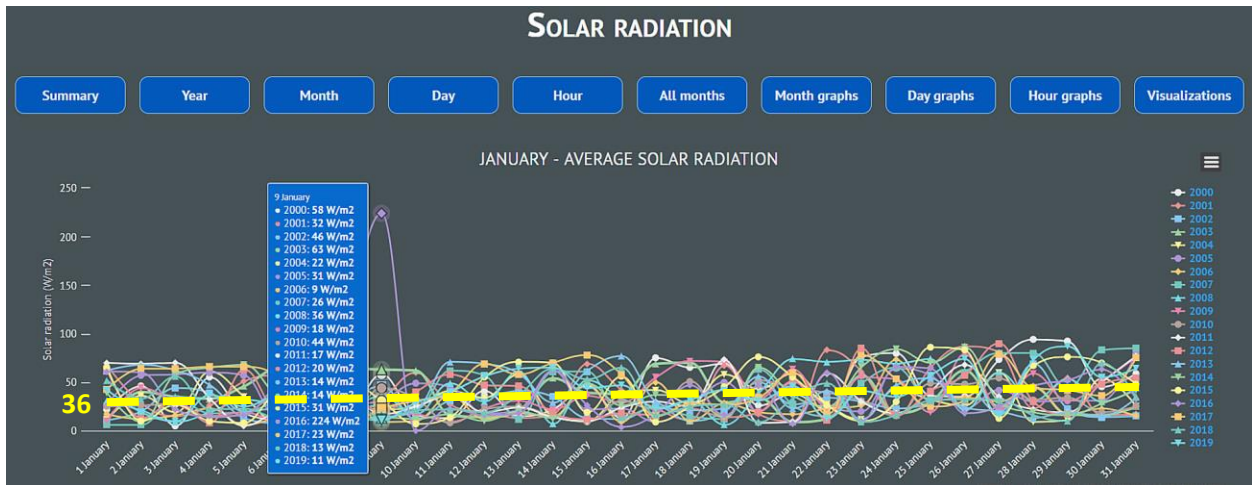


Figure 6- January Average Daily Solar Radiation 36 W/m²

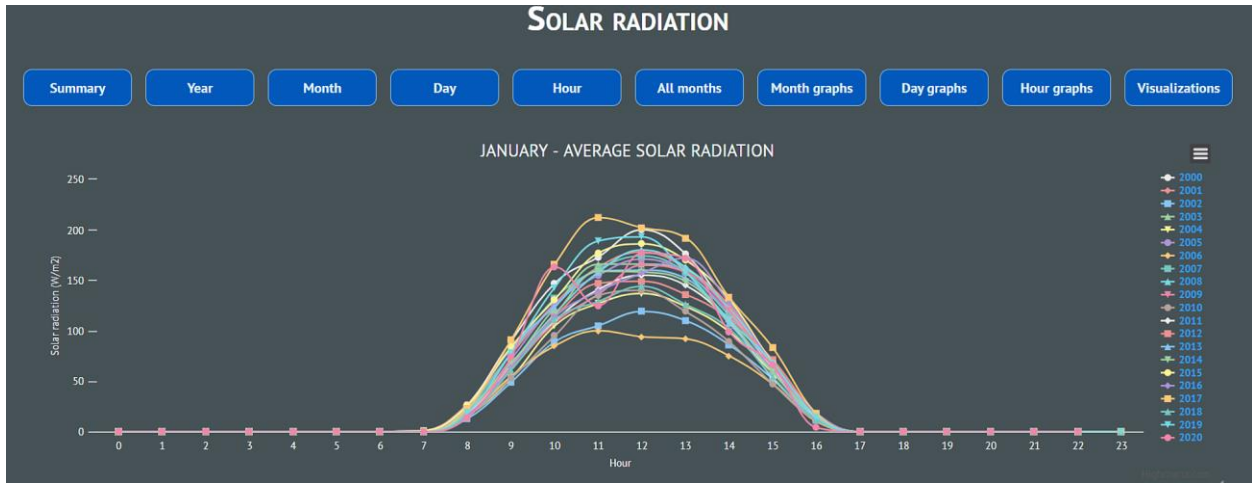


Figure 7 - January Average Hourly Solar Radiation 157 W/m² Peak Hour

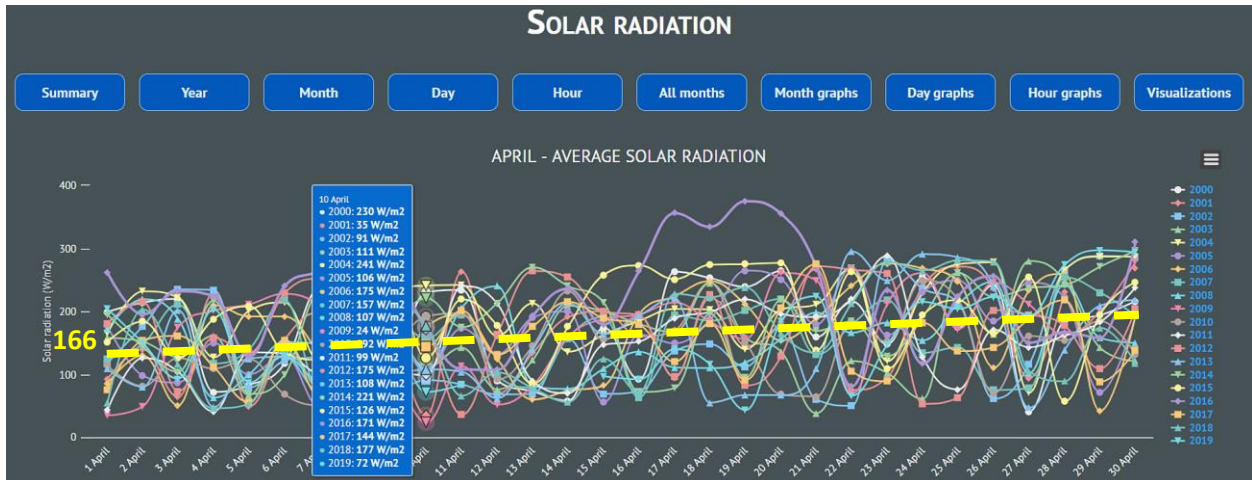


Figure 8- April Average Solar Radiation 166 W/m²

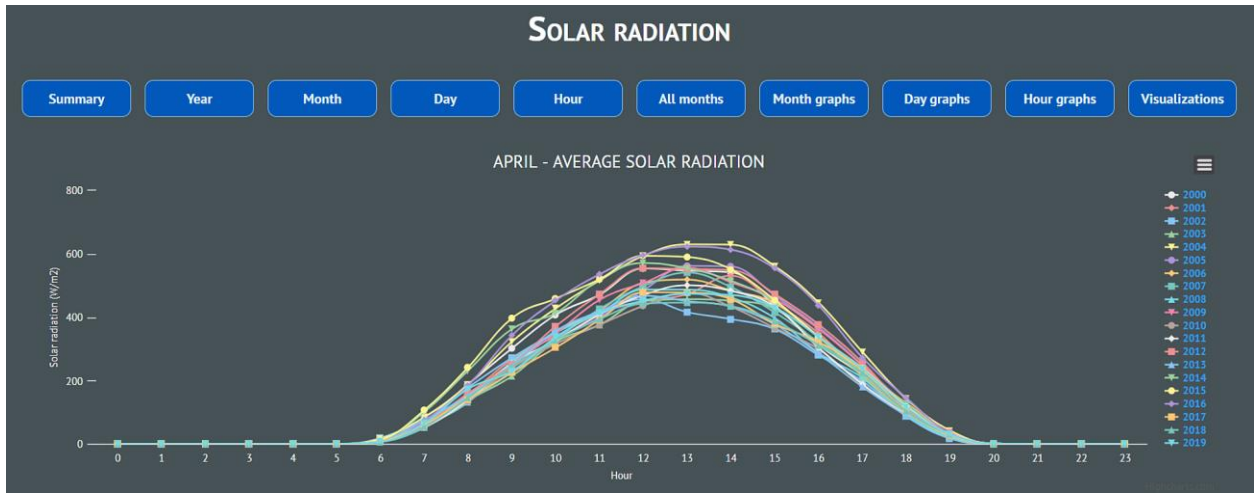


Figure 9 - April Average Hourly Solar Radiation 519 W/m² Peak Hour

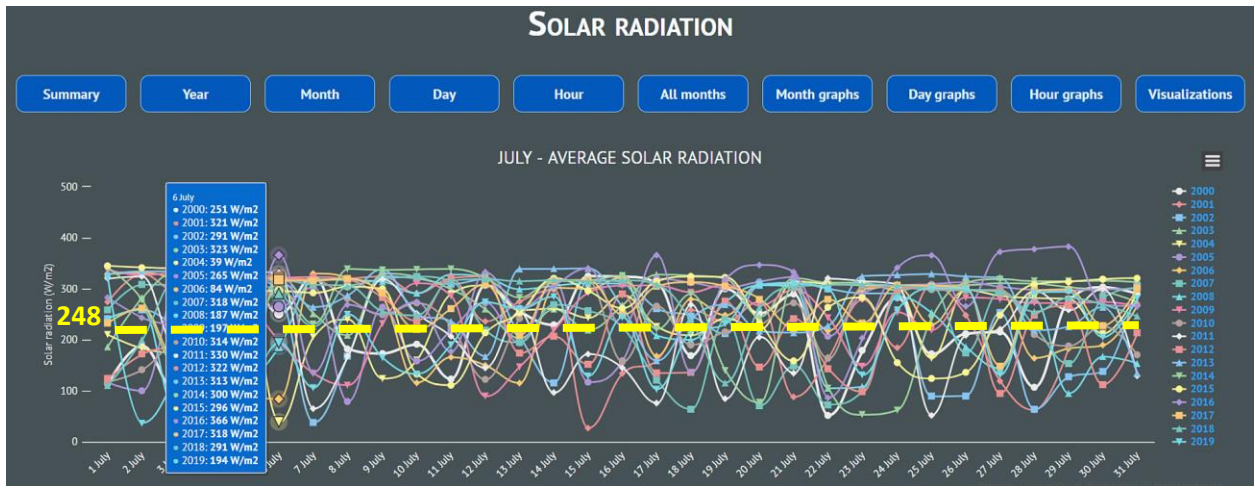


Figure 10 - July Average Solar Radiation 248 W/m²

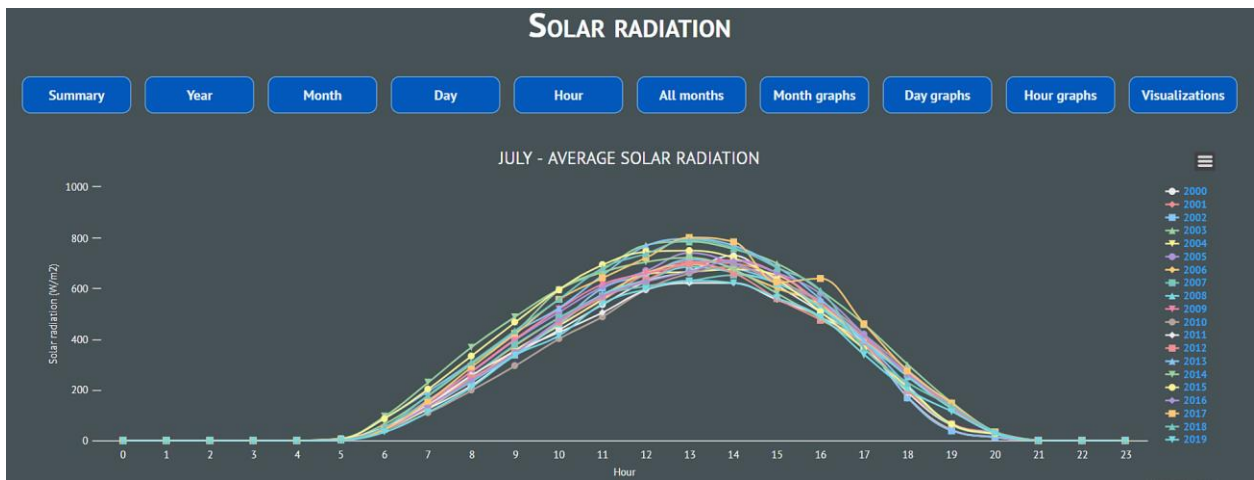


Figure 11- July Average Hourly Solar Radiation 630 W/m² Peak Hour

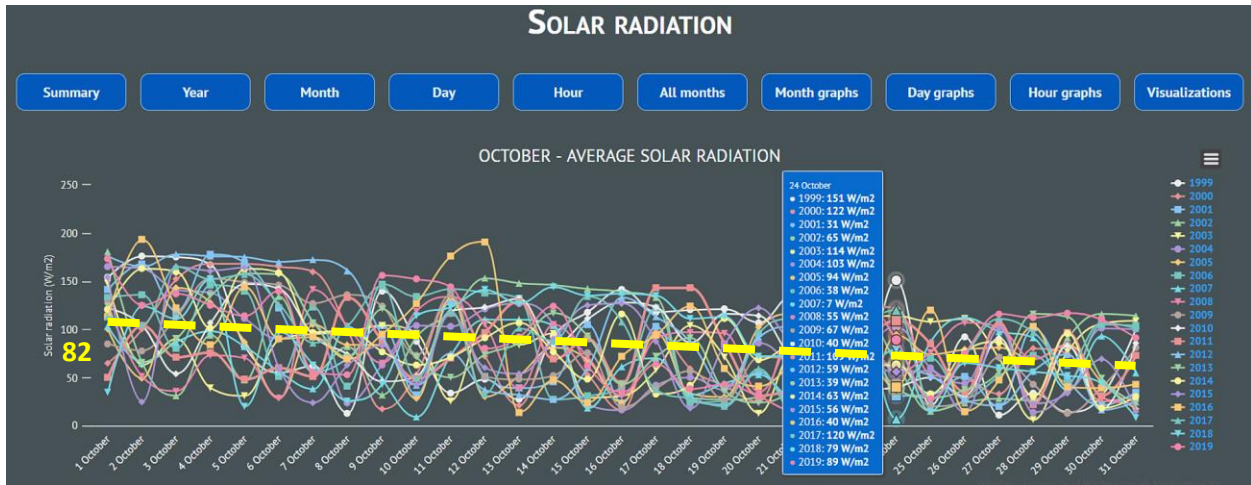


Figure 12- October Average Solar Radiation 82 W/m2

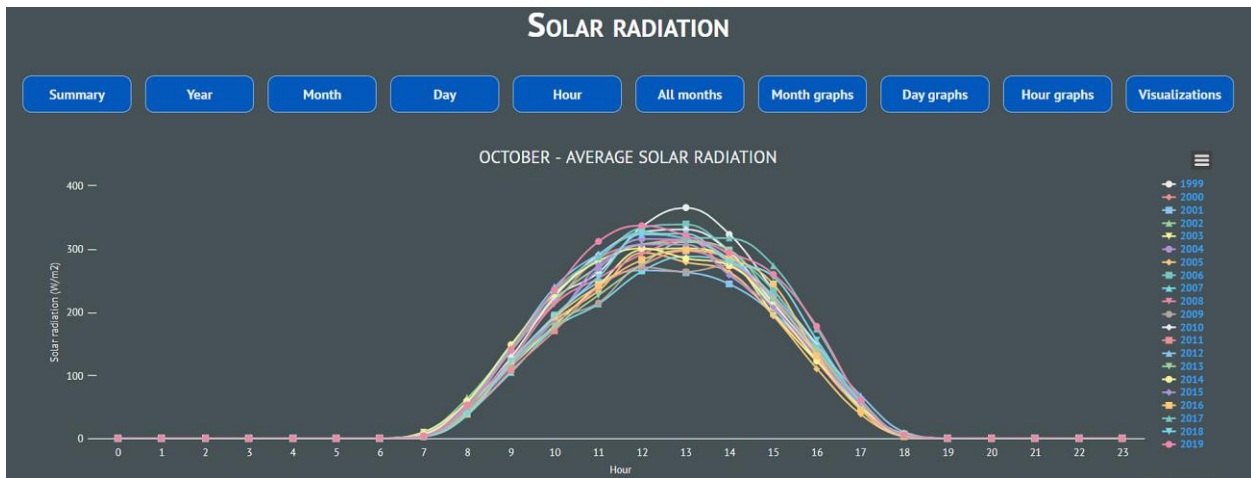


Figure 13- October Average Hourly Solar Radiation 307 W/m2 Peak Hour

The per panel power output is then determined by multiplying the W/m2 solar insolation table, less -20% to -0% Factor of Safety, then by the Incident Angle table, multiplied by the Incident Angle Multiplier loss chart values for those incident angles, to get available solar lighting, then less ~20% panel conversion efficiency, less -10% Life Cycle decline, less -3% dust blanking, reduced again by -9% for DC – AC inverter losses, to give kWh/panel available power supply:

kWh/PANEL	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON
WINTER	--	--	--	--	0.002	0.014	0.028	0.029	0.033
SPRING	--	--	--	0.012	0.034	0.061	0.076	0.093	0.105
SUMMER	--	--	0.009	0.026	0.050	0.082	0.100	0.119	0.132
FALL	--	--	--	0.001	0.010	0.025	0.040	0.053	0.062
	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM
WINTER	0.030	0.021	0.013	0.002	--	--	--	--	--
SPRING	0.107	0.102	0.088	0.069	0.036	0.017	0.005	--	--
SUMMER	0.133	0.149	0.130	0.116	0.081	0.041	0.013	0.005	--
FALL	0.061	0.058	0.053	0.028	0.012	0.001	--	--	--

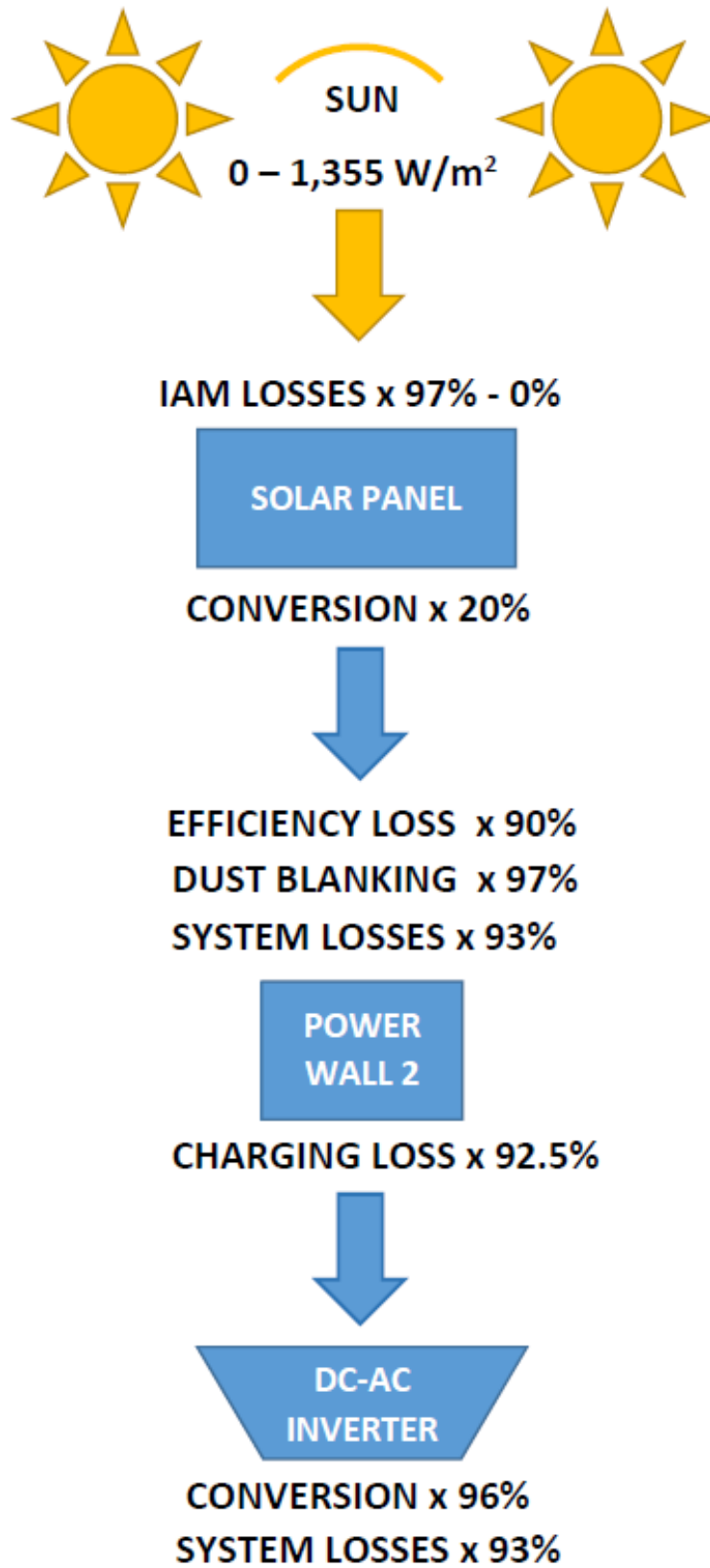


Figure 14 - Determining Per Solar Panel Seasonal Hourly Power Supply

IV. MATCHING SUPPLY WITH DEMAND

Determining supply was very concise, with a high-confidence level. Determining demand is also.

US Department of Energy publishes hourly-daily residential load demand for Seattle-Tacoma at: https://openei.org/datasets/files/961/pub/EPLUS_TMY2_RESIDENTIAL_BASE/USA_WA_Seattle-Tacoma.727930_TMY2.csv including both electrical and gas appliance usage values. This report converts the 'gas heating' column to 'electric' to create a 'Zero Carbon' kWh load demand for Puget Sound seasons, which shows *considerably* more winter load, than US average 30 kWh:

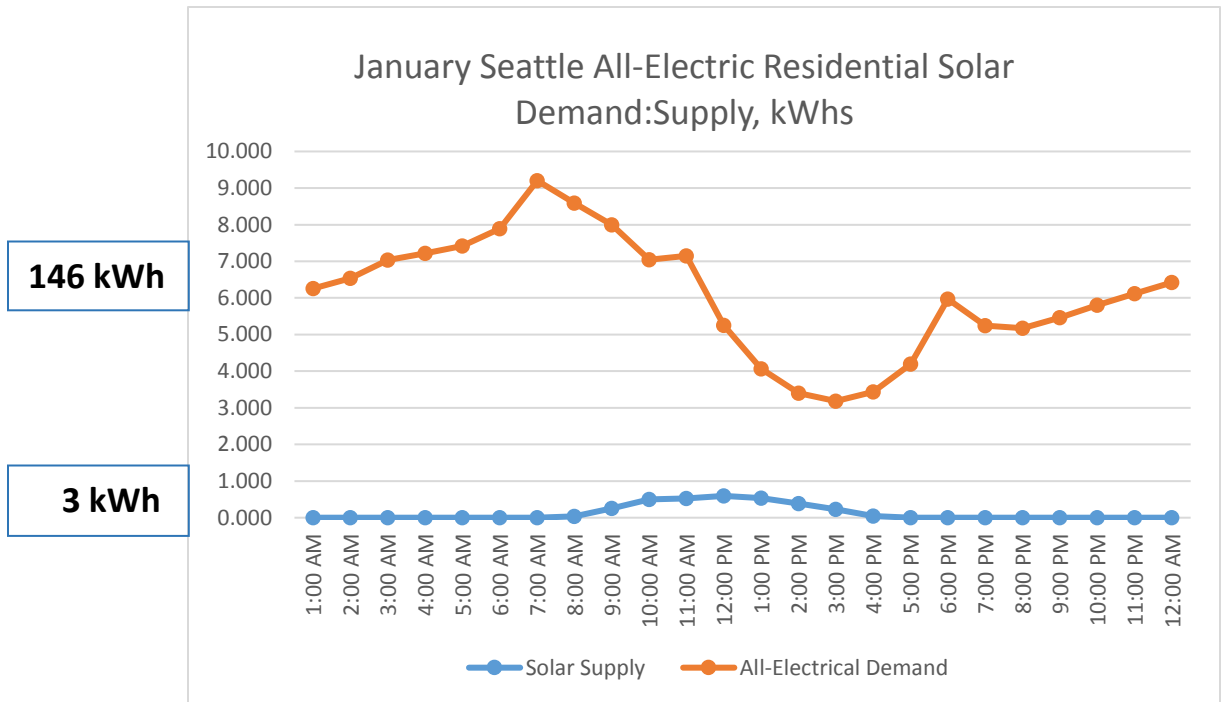


Figure 15 - January Power Supply:Demand Deficit for 18-Panel 1200SF Residence

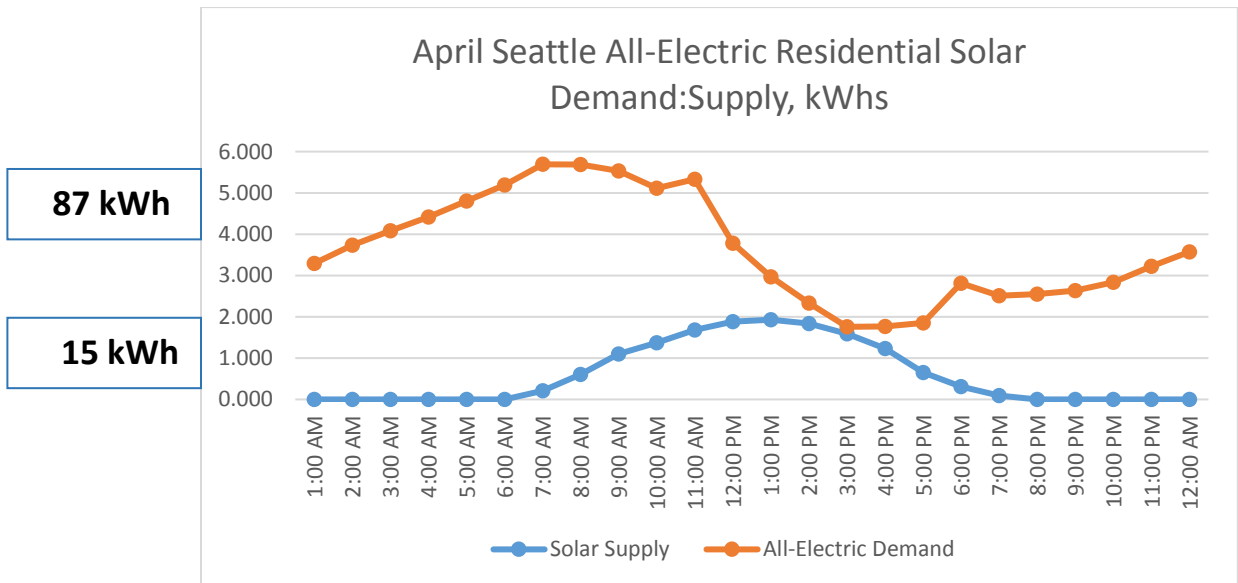


Figure 16 - April Power Supply:Demand Deficit for 18-Panel 1200SF Residence

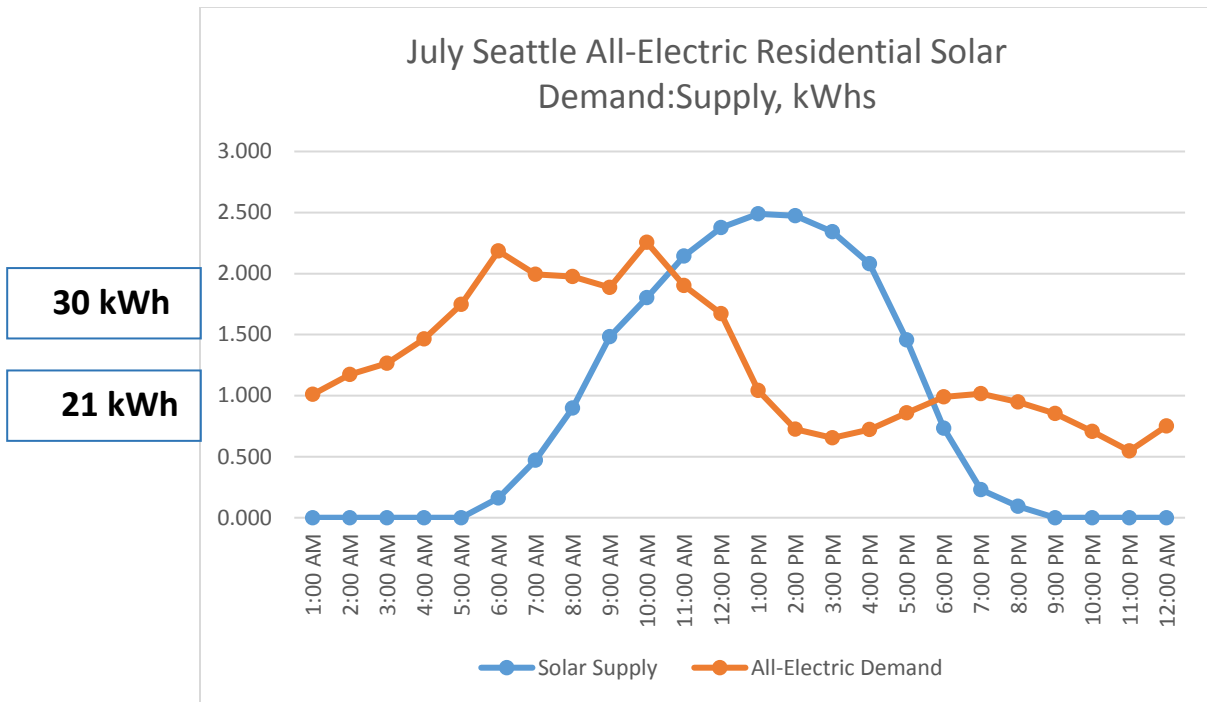


Figure 17- July Power Supply:Demand Deficit for 18-Panel 1200SF Residence

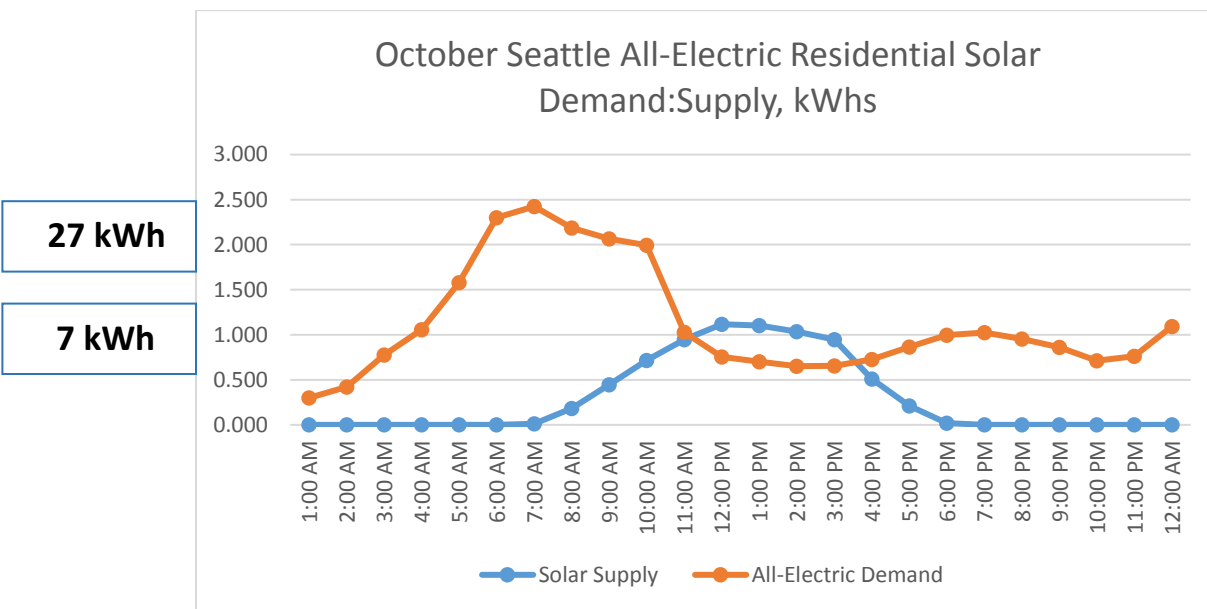


Figure 18- October Power Supply:Demand Deficit for 18-Panel 1200SF Residence

Note that these charts are modeled as ideal stand-alone systems, and that seasonal solar insolation *may be as much as -20% lower*. We also did not include 15 kWh load for EV commute vehicles. Unlike a central power grid, going out from the power plant to the substation to the subdivision transformers with a ‘hammer lock’ on voltage and frequency phase, a distributed power grid of individual residential and commercial solar installations, with no fossil base supply, means their individual DC-AC inverters and Powerwalls battery systems will be struggling to synchronize to a constantly fluctuating voltage and varying phase cycle. Likely nobody has ever modeled this:

The Tesla Powerwall 2 has a 13.5kWh capacity, with a **92.5%** solar ‘round-trip’ efficiency when charged or discharged by a 400–450 V system at 2 kW with a temperature of 77 °F (25 °C) when the product is brand new. Age of the PW2, charging temperatures above or below 77 °F (25 °C), and charge rates or discharge rates above 2 kW would lower this efficiency number, decreasing the system performance. [Wikipedia]

“In perfect conditions with no loads and 7.6kW of solar power, a Powerwall could charge in 2 hours. Each Powerwall holds 12.2 kWh of usable capacity and maintains a **10%** reserve so that when the power goes out, the battery has enough power to turn your solar on to get the battery recharged when the sun comes up the next day. The standard Tesla Powerwall warranty is 10 years at **70%** capacity.” [Southern Energy]

The long-range version of the Tesla Model 3 has a 75 kWh battery pack with a 310 mile range. It takes 12 hours to charge at 220V. 310 miles is barely enough to commute into Seattle for the week. We’ll assume that owners will plug their vehicle in during the week in the evening, when their Powerwall(s) are charged. This adds an additional daily 15 kWh’s charging to the power demand. *In any case, at no time and in no season will solar power provide even basic residential demand.*

V. SUMMARY

University of Washington environmental data records from 1999 to 2019 for solar insolation in the Seattle-Tacoma region have clearly established the available solar energy, and shown it to be insufficient for all four seasons, especially given the overall low efficiency of solar power systems to convert that available energy. The only reason that solar installs ‘work’ is because the existing hydro- and coal-powered base load grid hides those huge deficits. Seattle-Tacoma region is one of the worst locations in the continental US for solar installations, in terms of efficiency:capacity.

US Department of Energy daily-hourly residential ‘all-electric’ power demand data for Seattle-Tacoma is shown to vary from 146 kWh per day in winter to 30 kWh per day in summer, rather than the US average 30 kWh put out as a national average. In addition, for an ‘all-electric’ Puget Sound, 15 kWh more demand per day would be needed to partially-charge an EV vehicle for the commute, in order to achieve the new State Initiative ‘Zero Carbon Fossil Fuel Ban by 2035’.

Careful evaluation of a model solar panel installation for a standard Single Family residence shows that even with their roofs entirely covered with panels, there is a massive deficit in solar energy production and storage, especially in winter. Washington State’s hydropower resource are being diverted to supply large internet blade server warehouses along the Columbia River, and provide transfer power to neighboring States in the NorthWest grid, so that the notion of a ‘Zero Carbon Fossil Fuel Ban by 2035’, one that relies on intermittent and greatly insufficient wind and solar, one without coal or nuclear and with hydropower base load capacity seriously undercut by regional demand for internet data and local industries, *would be impossible to achieve*, by simple metrics.

We hope this report ‘informs’ policy makers to avoid continued tax-subsidies for non-viable PV, instead subsidize *all forms of energy* supply for a continued strong and productive Washington. Otherwise, the massive structural mal-investment will leave Puget Sound cold and dark in 2035.

From: [Lori Zoller](#)
To: [EFSEC mi Comments](#)
Subject: Carriger Solar Application
Date: Monday, August 14, 2023 3:27:10 PM

External Email

I am opposed to the Carriger Solar Application for Knight Road in Klickitat County due to the multiple land use ordinances, resolutions, and mortirums that are valid and existed prior to this application being submitted to EFSEC. Even within the our Energy Overlay there exists a settlement agreement, which the document was founded on, in which Klickitat County agreed that any solar applications would go through an EIS, site by site.

And, in light of our two recent fires in the area, one at 60K acres in east County every application for large scale solar should be put through rigorous planning for the safety of the public. The solar project, Lund Hill, missed being burnt to the ground by only inches. There were many many firefighters and local people who assisted who kept that disaster from happening. With the local winds and toxic smoke as far away as Tri Cities could have had to be evacuated. Once on fire, underprepared fire fighters will have to leave the area and the fire will proceed unattended. After seeing what we saw with this fire we must be responsible and ALL solar applications present and past need to have a new look and requirements for what will eventually happen.

Sincerely,

Lori Zoller
District #2 Klickitat County Commissioner

From: [Dave Barta](#)
To: [EFSEC mi Comments](#)
Subject: Carriger Land use comments
Date: Monday, August 14, 2023 11:29:51 PM
Attachments: [LandUseConsistencyfinding testimony.doc](#)
[Solar Moratorium Map April 2023PlanningDept.pdf](#)

External Email

I was discouraged to find that you had placed new controls of public comments for the Carriger Land use order. I absolutely scoured your site on August 7th and there was nothing listed on Carriger. No Order, no meeting, even though the chair had clearly stated in the July Regular meeting that the order was to be done on August 9. Even a call to EFSEC was basically answered with "Huh?" when asked about the August meeting. I do not believe the notice for comments was even posted on August 7 as your now updated site states. In light of the ever changing rules for comment by this public body, please accept my written comments for the Carriger Land Use Order. Thank you.

Dave Barta

Carriger Solar Consistency Order
Written Comments
Aug. 14, 2023

Today the EFSEC council is tasked with deciding whether the Carriger Industrial Solar complex is consistent with local zoning and local controls. It is not, and I urge the council to reject land use consistency for this project.

The Carriger Solar Project application was submitted on Feb. 10, 2023, about a month after the Klickitat County Board of Commissioners placed a land-use control on the affected area. According to the Board resolution, the moratorium was placed over a ten township area of central Klickitat County—a specific location on a map for a specific purpose (as stated in RCW 36.70.560). That RCW gives some examples of “...establishing standards and procedures to be employed in land development *including, but not limited to...* (followed by a list)” (emphasis added). Based on the land use consistency document drawn up by the attorney general representative, it is evident that he feels that a moratorium is not a land use restriction. In several places in RCW 36.70 and 80.50, that is shown not to be the case. According to RCW 36.70.020, “Official controls” means legislatively defined and enacted policies, standards, precise detailed maps and other criteria, all of which control the physical development of a county or any part thereof or any detail thereof, and are the means of translating into regulations and ordinances all or any part of the general objectives of the comprehensive plan. Such official controls may include, but are not limited to, ordinances establishing zoning, subdivision control, platting, and adoption of detailed maps.’ The moratorium put into effect on January 8, 2023 was placed over a specifically delineated area on the map with a specific restriction (see additional document-solar map) . All of this was done *before* any application had been submitted.

Klickitat BOCC resolution 00823 predicated its restriction on applications from industrial solar developers on many components, including the need for further review and planning. Not accepting applications for large scale solar is, in fact, a land use decision. One that was made well before any application was delivered to the EFSEC body. The moratorium did not restrict land subdivision, it did not restrict quarrying, house building, etc. The Klickitat BOCC simply “establish(ed) standards and procedures to be included in land development” as found in RCW 36.70.560. Following the passage of resolution 00823 over a specific, mapped area, the board held hearings, directed the county’s Planning Commission to investigate and make recommendations, and finally, accepted the Planning Commission’s 8-0 recommendation to maintain a moratorium. The Board followed that by placing interim zoning controls for the area through Resolution O061323.

The Order states that Klickitat County’s resolution to not accept applications was “not a land use decision.” In fact, when the resolution states that industrial solar applications will not be accepted, it clearly does restrict a land use. RCW 36.70.795 states “A moratorium, interim zoning map, interim zoning ordinance, or interim official control adopted under this section may be effective for not longer than six months, but may be effective for up to one year if a workplan is developed for related studies providing for such a longer period.” This RCW does not weight one over the other—there is simply a list of four controls listed under the title “Moratoria, interim zoning controls”. Further, RCW 36.70.640 specifically gives the board the right to refer possible interim controls to its planning commission for further development,

which is what the Board did. The Klickitat County moratorium is a land use tool, it was used exactly as it was when the moratorium was passed regarding marijuana production and sales locations in 2013, and it is, in fact, a land use decision. The Planning Commission decision of 8-0 to continue the moratorium is a statement in itself. That commission represents the breadth of Klickitat County--some commission members leasing land for renewable energy, some performing multi million dollar contracts on renewable projects. The Klickitat County moratorium was placed in effect prior to any applications being received for the affect zone and is law.

Respectfully,

Dave Barta
Goldendale

R 14 E

R 15 E

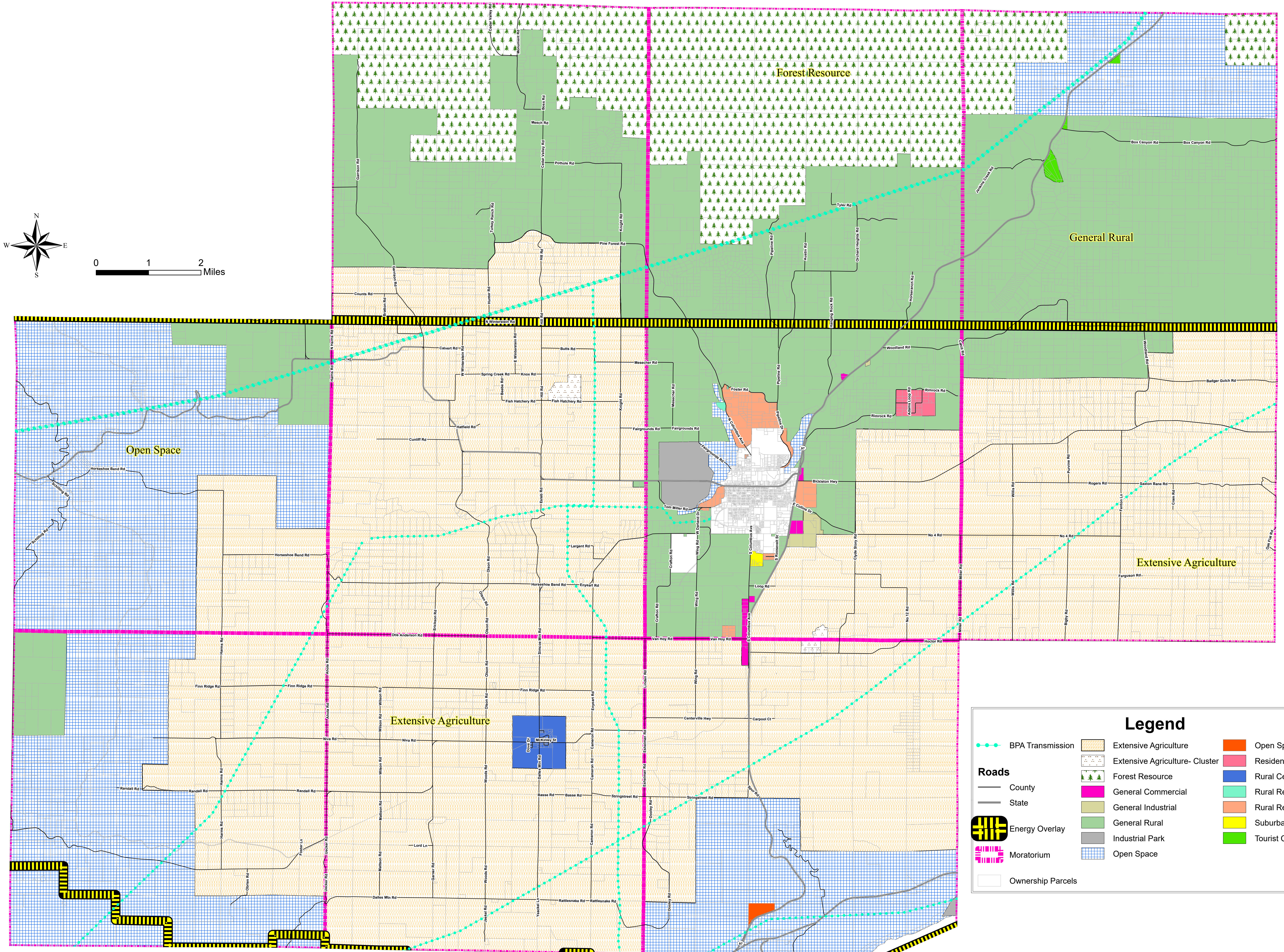
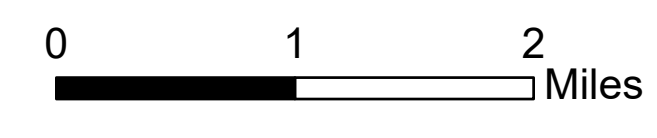
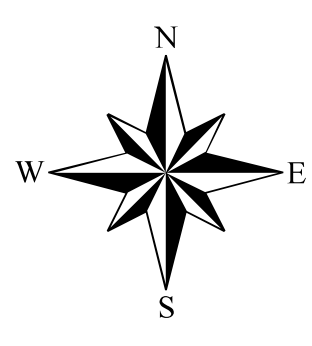
R 16 E

R 17 E

T 5 N

T 4 N

T 3 N



Legend

BPA Transmission	Extensive Agriculture	Open Space- Cluster
Roads	Extensive Agriculture- Cluster	Residential
County	Forest Resource	Rural Center
State	General Commercial	Rural Residential 1
Energy Overlay	General Industrial	Rural Residential 2
Moratorium	Industrial Park	Suburban Residential
Ownership Parcels	Open Space	Tourist Commercial

From: [Lori Zoller](#)
To: [EFSEC mi Comments](#); [Owens, Joan \(EFSEC\)](#); joanne.sharski@efsec.wa.gov; [Hafkemeyer, Ami \(EFSEC\)](#)
Subject: Request from Klickitat County Commissioners
Date: Tuesday, August 15, 2023 8:03:00 PM

External Email

Good afternoon.

It has come to our attention that even though our County has commented many times during the application process for the Carriger Solar Project Docket No. EF-230001, we have not communicated our proposed outcome from the EFSEC process.

Klickitat County is the leading County in the State of Washington for green energy projects. As such, we already have a qualified and robust process for applications and truly seek their success.

Carriger has worked for several years with our County in regards to this application. At the point of submission Carriger obviously felt they would be faced with a full EIS for the proposed project. Which environmentally would be the correct and proper choice for processing. So, at the last moment they chose to apply through the EFSEC process and exposed their intent to bypass the EIS requesting an expedited application.

With your decision today you can choose to ignore the decades of land use planning that Klickitat County has established. You can choose the expedited process or send the application on to the Governor. Or, you could choose to honor our processes and remind the Carriger Solar Project back to Klickitat County. A move by EFSEC that has not been done. But possible and it would certainly open the horizons of how green energy applications are processed and build partnerships for the future of Washington State.

The Klickitat County Commissioners would welcome the project application back at our County level and ensure that they would receive a fair and full application and siting process. Again, we have proven we are green energy friendly and understand what these projects can do for our County and the addition of green power for our State.

We sincerely appreciate your time and effort and look forward to hearing from you.

Lori Zoller
District #2 County Commissioner
Klickitat County

From: [Bumpus, Sonia \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: Fwd: Solar
Date: Wednesday, September 6, 2023 12:56:24 PM

Sonia E. Bumpus
Executive Director
Energy Facility Site Evaluation Council
Email: sonia.bumpus@efsec.wa.gov
Work mobile: (360) 972-5687

From: Virginia Fitzpatrick <virginiaf51@yahoo.com>
Sent: Wednesday, September 6, 2023 12:10:58 PM
To: Bumpus, Sonia (EFSEC) <sonia.bumpus@efsec.wa.gov>
Subject: Solar

External Email

Dear Ms Bumpus,

I am writing in regard to my opposition to to planned Solar farm near Goldendale Washington. The newspaper said it could have an adverse impact. I believe there were many of us that wrote the same thing.

Have you ever driven by those fields of solar panels? I understand the city folks are pretty much shielded from the ugliness of acres and acres of panels put up on good farmland.

Now the culture aspect is something that will hopefully stop it. The Native Americans have a lot of pull in this region.

So perhaps giving Carriger project an opportunity to withdraw saves our community.

Now as I've said before I'm all about green energy but has anyone at EFSEC bothered to find out the lifespan on these panels or learned they are not recyclable. How green is that? Wyoming quit taking used windmill blades to bury. Have you heard about Sweetwater TX and the 100's of uses blades being stored there?

Come on, you are all smart people but apparently can't see beyond the end of your noses. It's the old cart before the horse, which is ass backwards.

Sincerely,

Virginia Fitzpatrick
PO Box 380
Goldendale, WA 98620

Sent from my iPhone

From: [CEASE2020](#)
To: [GOVOutBound](#); [Office of Governor Inslee](#); [EFSEC \(EFSEC\)](#)
Subject: C.E.A.S.E. EV FIRE/DANGERS
Date: Wednesday, September 6, 2023 5:31:32 PM

External Email

External Email

Governor and EFSEC employees, this attached report illustrates the dangers of lithium-ion batteries in EVs and those dangers are amplified in BESS at wind/solar sites. The 7000 lithium-ion batteries in the EV are the size of an AA battery. Read the attached report on the dangers to the first responders, the nearby citizens, wildlife, environment due to the fires, explosions and release of toxic fumes and the cleanup cost. The 2-acres of lithium-ion batteries at the CCR Carriger solar site are much bigger and capable of storing 63 million watts of electrical energy. Does EFSEC require the applicant to pay for the first responder's equipment and training to fight the BESS lithium-ion battery fire at a solar or wind site? NO. What medium will be used to extinguish the fire? Water, foam, cement? If water is used is there an ample source of water in the remote area near the Carriger BESS? NO. Does EFSEC require the applicant to supply and equip the local first responders have a foam truck? NO. During the lithium-ion battery warehouse fire on June 29, 2021, Morris, IL. water and foam failed, and 28 tons of cement was used to extinguish the fire. Will EFSEC require CCR to have 28 tons of cement be stored next to the Carriger BESS? NO. Will EFSEC require the applicant to have equipment available at the Carriger site to cover the BESS with the cement. NO. Carriger solar BESS site will be an un-manned site. How will EFSEC mandate that CCR notify Klickitat County Rural 7 of a fire. NOTHING IS IN PLACE. Will EFSEC require that CCR install an early warning system to protect the nearby citizens from fires, battery explosions and the toxic fumes released? NO. Will EFSEC mandate that CCR put in place an emergency plan for notification and evacuation of the citizens? NO. BESS is a real danger. This reported EV battery fire/explosion is just one of thousands occurring all across the world and are in our future. But, if EFSEC allows large scale solar continues to development with BESS in Klickitat County or anywhere in the state that will create a great danger to the citizens. BUT EFSEC employees and the Governor need not worry as all the dangers will be on the eastside of the state near those expendable citizens far from your homes and family. Greg Wagner C.E.A.S.E.

[Deadly Tesla crash in Spokane County used as a test case to fight electric vehicle fires | The Spokesman-Review](#)

From: [CEASE2020](#)
To: [Drew, Kathleen \(EFSEC\)](#); [Hafkemeyer, Ami \(EFSEC\)](#); [Moon, Amy \(EFSEC\)](#); [Grantham, Andrea \(EFSEC\)](#); [Shiley, Alex \(EFSEC\)](#); [Bumpus, Sonia \(EFSEC\)](#); [EFSEC mi Comments](#); [EFSEC \(EFSEC\)](#); [Snarski, Joanne \(EFSEC\)](#); [Owens, Joan \(EFSEC\)](#); [Randolph, Sara \(EFSEC\)](#); [Masengale, Lisa \(EFSEC\)](#); patricia.betts@efsec.wa.gov; [Greene, Sean \(EFSEC\)](#); [GOVOutBound](#)
Subject: C.E.A.S.E. on CO2
Date: Thursday, October 5, 2023 7:37:10 AM

External Email

Hi, here's a site with the truth about CO2. It's not the cause of global warming. CO2 is a benefit to the environment but is being used as the basis for the phony climate crisis. Greg Wagner C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY
<https://co2coalition.org/facts/>

From: [CEASE2020](#)
To: [State of Washington](#); [Drew, Kathleen \(EFSEC\)](#); [Amanda McKinney](#); [Moon, Amy \(EFSEC\)](#); [Shiley, Alex \(EFSEC\)](#); [Grantham, Andrea \(EFSEC\)](#); [Bumpus, Sonia \(EFSEC\)](#); [patricia.betts@efsec.wa.gov](#); [EFSEC mi Comments](#); [Davis, Osta \(EFSEC\)](#); [EFSEC \(EFSEC\)](#); [Snarski, Joanne \(EFSEC\)](#); [Owens, Joan \(EFSEC\)](#); [Randolph, Sara \(EFSEC\)](#); [Greene, Sean \(EFSEC\)](#); [Masengale, Lisa \(EFSEC\)](#); [Office of Governor Inslee](#); [GOVOutBound](#)
Subject: C.E.A.S.E. Dr. Mike Heberling- Assessing The Environmental Downside of Electric Vehicles
Date: Friday, November 17, 2023 1:41:37 PM

External Email

You need to listen to this podcast on EVs and more. Learn how your stupid actions are destroying the future of every Washington citizen. Greg Wagner C.E.A.S.E.

<https://theklickitatvoice.buzzsprout.com/1804435/13979481>

From: [CEASE2020](#)
To: [Drew, Kathleen \(EFSEC\)](#); [Bumpus, Sonia \(EFSEC\)](#); [Hafkemeyer, Ami \(EFSEC\)](#); [Moon, Amy \(EFSEC\)](#); [Grantham, Andrea \(EFSEC\)](#); [Shiley, Alex \(EFSEC\)](#); [patricia.betts@efsec.wa.gov](#); [EFSEC mi Comments](#); [osta.davis@efsec.wa.gov](#); [Snarski, Joanne \(EFSEC\)](#); [EFSEC \(EFSEC\)](#); [Owens, Joan \(EFSEC\)](#); [Randolph, Sara \(EFSEC\)](#); [Masengale, Lisa \(EFSEC\)](#); [Greene, Sean \(EFSEC\)](#); [Office of Governor Insee](#); [GOVOutBound](#); [Corry, Chris \(LEG\)](#); [King, Curtis](#)
Subject: C.E.A.S.E.
Date: Tuesday, December 26, 2023 12:13:00 PM

External Email

- **PFAS are in some solar panels and could be in panels installed here in Klickitat County. and other counties. The solar corporations will never admit PFAS are in their panels. When we find out we have cancer caused from our contaminated wells these solar corporations will be long gone. We are just collateral damage. IF all the solar projects are built here totally millions of possibly toxic panels our wells be contaminated. PFAS regardless of the source is deadly. INSLEE, EFSEC and other state agencies have refused to address this potential citizen health problem. They just continue to approve these solar sites with little concern for the eastside citizens. Wait and see is not option but it theirs.**
- <https://yankeeinstitute.org/2020/12/03/department-of-public-health-concerned-about-pfas-in-solar-panels-near-drinking-water/>
- <https://www.americanchemistry.com/chemistry-in-america/chemistries/fluorotechnology-per-and-polyfluoroalkyl-substances-pfas/pfas-critical-to-renewable-energy>
- <https://pfasproject.com/2018/02/20/solar-panels-could-be-a-source-of-genx-and-other-perflourinated-contaminants/>
- [Vancouver outlines steps to manage PFAS in water system \(The Columbian\)](#)
- ['I've been drinking poison for 30 years': West Plains residents reckon with slow-moving PFAS cleanup \(The Spokesman-Review\)](#)

Greg Wagner C.E.A.S.E.

From: [bnickerson](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Carriger Industrial Solar Goldendale Wa
Date: Tuesday, March 21, 2023 4:53:47 AM

External Email

To whom it hopefully concerns I am asking you to please RECONSIDER the sitting of this HUGE ENVIRONMENTAL DISASTER WAITING TO HAPPEN. Not only is this toxic to the area but it is using much of the endangered species that are in this immediate area. These species have already been mowed over bulldozed down killed in the LundHill & bluebird project in Bickelton Wa plus there will be even more loss from the pump storage project. Please these are species that live in the ground and on top of the ground that are already listed on the state and federal species of endangered list...PLEASE PLEASE DO NOT DO THIS to our county. I have attached some visual for you

Thankyou for your time

Beverly Nickerson

Goldendale Wa resident

From: [bnickerson](#)
To: [EFSEC \(EFSEC\)](#)
Subject: Carriger solar goldendale
Date: Tuesday, March 21, 2023 5:14:57 AM

External Email

Tetra Tech was HIRED by Cypress Creek Renewables therefore it isn't hard to see that they would be intentionally mislead there findings so that there reports would be favorable to the company that has hired them for EVERY project they do.. Mochi does not hire a independent consultant firm to do there own studies which is negligence on her part putting our County, our Citizens, our Wildlife, Our Natural Resources like land water & air at even more risk. I ask you to please at least put all these real issues into your answer. Going green should not be toxic to the earth to the humans to the wildlife or water...

From: [James Pytel](#)
To: [EFSEC mi Comments](#)
Subject: Carriger Solar
Date: Tuesday, May 2, 2023 1:35:00 PM

External Email

WA EFSEC

Ladies and Gentlemen of the WA EFSEC,

I regretfully could not attend the recent Carriger Solar meeting however I wished to submit this letter for your consideration.

I am writing to express support for the proposed Carriger Solar development in Goldendale, WA. Renewable energy is the right path for our country. I served as a Captain in the United States Army and have witnessed the negative consequences of continuing reliance on foreign exports of oil. It is within the capacity of the United States to produce its own energy using resources within its own borders, among those resources being the ample solar and wind exposure in Klickitat County. The new energy economy is coming and Klickitat County stands uniquely poised to capitalize on this change and can become a regional leader in renewable energy production and research.

Additionally, in my capacity as the chair of Technology and Trades and lead instructor in the Electro-Mechanical Technology program at Columbia Gorge Community College, I urge this project be approved. Graduates of our program, many of whom come from Klickitat County, can find employment close to home and contribute to the economic development of this region. Renewable energy is projected to see explosive growth and it would be in Klickitat County's best interest to partake and contribute in this change with a locally sourced, technically competent workforce.

It is for this reason I respectfully urge the WA EFSEC to approve this solar development. Thank you for this consideration.

Sincerely,
Jim Pytel
Columbia Gorge Community College
Electro-Mechanical Technology Instructor
Chair Technology and Trades
NSF ATE Principal Investigator #2100047
jpytel@cgcc.edu

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From: [Snarski, Joanne \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. 5/16/2023 Land Use Consistency hearing testimony for the record
Date: Monday, May 15, 2023 11:41:18 AM

For the record.

Joanne Snarski
Energy Facility Site Specialist
360.485.1675
Joanne.Snarski@EFSEC.WA.gov

From: CEASE2020 <cease2020@aol.com>
Sent: Sunday, May 14, 2023 6:04 AM
To: CEASE2020 <cease2020@aol.com>
Subject: C.E.A.S.E. 5/16/2023 Land Use Consistency hearing testimony for the record

External Email

EFSEC, Klickitat County has a 150-year rich history of farming and ranching. This proposed project is inconsistent with this land use and is incompatible. In light of this new EFSEC Data Request dated 05/09/2023 the C.E.A.S.E. members request this virtual Land Use Consistency hearing cease and be rescheduled until a later date. If the applicant could provide answers prior to this Land Use Consistency hearing, EFSEC and its consultants would not have adequate time to review their answers to ensure they are accurate. C.E.A.S.E. members, the public and Klickitat County government would not be given adequate to review these answers. Many of these answers provided by Tetra Tech should not be accepted considering they are being investigated for fraudulent reporting. EFSEC's

questions should be forwarded to and reviewed by the appropriate agencies for accuracy. These are the reasons why this Land Use Consistency hearing should be cancelled and rescheduled. If this certification process is to be conducted in a fair and impartial manner and in compliance with RCW 42.36 adequate time needs to be given to all parties. C.E.A.S.E. members are requesting that the Land Use Consistency hearing be postponed until a later date.

Greg Wagner C.E.A.S.E. Citizens Educated About Solar Energy

[20230509_DataRequest1.xlsx \(live.com\)](#)

From: [Owens, Joan \(EFSEC\)](#)
To: [EFSEC \(EFSEC\)](#)
Subject: FW: C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY
Date: Monday, March 27, 2023 8:41:32 AM

Comment

Thanks,

~Joan Owens

NOTE: EFSEC email addresses have changed to @efsec.wa.gov! Please update your EFSEC contacts.

Energy Facility Site Evaluation Council

Executive Assistant

Email: joan.owens@efsec.wa.gov

Phone number: (360) 664-1920

EFSEC Email: efsec@efsec.wa.gov

EFSEC phone number: (360) 664-1345

Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172

Mailstop/P.O. Box: 43172

www.efsec.wa.gov

From: CEASE2020 <cease2020@aol.com>

Sent: Saturday, March 25, 2023 11:05 AM

To: CEASE2020 <cease2020@aol.com>

Subject: C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

External Email

Hi EFSEC, when you permit large scale solar sites you cause many of the problems in the reports below. Wake up and learn the truth. You are destroying Washington. Your poor decisions today will have long term horrific consequences. You are creating a toxic eco disaster of immense proportion which will harm the citizens and force future generations (your children) to cleanup. Why do you continue to go blinding down this so called green/clean energy dead end road? How can you live with yourself knowing the harm you are doing to Washington and its' citizens? Stop the scam. Greg Wagner C.E.A.S.E.

[How Virginia farmers claim Dominion is destroying their land: 'It's pretty catastrophic' - YouTube](#)

<https://youtube.com/shorts/xY0HVA00PWw?feature=share>

<https://youtu.be/iabE3cgvOwE>

<https://youtu.be/WDqX5vfXSLE>

<https://youtu.be/JqknT1jDnOs>

[The Dirty Secret Behind “Clean” Solar Energy - YouTube](#)

[The "Dirty Secrets" of California's Clean Energy | Jim Phelps - YouTube](#)

[Dr. Patrick Moore-- Carbon and Climate Catastrophe - YouTube](#)

[Essex County solar farm sediment runoff is "an enforcement case" - YouTube](#)

[Arizona Lithium Battery Storage Explodes -4 Firefighters Hospitalized \(4/2019\) - YouTube](#)

[Big Problem of Recycling Lithium-Ion Batteries - YouTube](#)

[Lithium battery investigated as cause of massive New York fire - YouTube](#)

[EEVblog 1411 - Tesla Victoria Big Battery FIRE! - YouTube](#)

[Electric bus bursts into flames, sets nearby vehicles on fire in China - YouTube](#)

[Reports say there was a massive explosion at a lithium battery warehouse in Grand-Couronne... - YouTube](#)

[Carbon Dioxide is Making The World Greener \(w/ Freeman Dyson, Institute for Advanced Studies\) - YouTube](#)

[The False Promise of Green Energy \(Prof. Andrew Morriss - Acton Institute\) - YouTube](#)

From: [Owens, Joan \(EFSEC\)](#)
To: [EFSEC \(EFSEC\)](#)
Subject: FW: C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY
Date: Monday, March 27, 2023 8:44:47 AM
Attachments: [Opposition to renewable energy is growing. Here's why - Columbia Insight.html](#)

Thanks,

~Joan Owens

NOTE: EFSEC email addresses have changed to @efsec.wa.gov! Please update your EFSEC contacts.

Energy Facility Site Evaluation Council

Executive Assistant

Email: joan.owens@efsec.wa.gov

Phone number: (360) 664-1920

EFSEC Email: efsec@efsec.wa.gov

EFSEC phone number: (360) 664-1345

Address: 621 Woodland Square Loop SE, Lacey WA 98503-3172

Mailstop/P.O. Box: 43172

www.efsec.wa.gov

From: CEASE2020 <cease2020@aol.com>

Sent: Saturday, March 25, 2023 9:12 AM

To: CEASE2020 <cease2020@aol.com>

Subject: C.E.A.S.E. CITIZENS EDUCATED ABOUT SOLAR ENERGY

External Email

Hi EFSEC, the eastside of our beautiful state is Inslee's dumping ground for his clean energy scam, and we don't want any more here. EFSEC is helping make his ridiculous clean energy dream come true at the expense of the citizens on the eastside. But why should Inslee or EFSEC care what happens here? You don't see the blight it causes, damage it does to the land/environment, the property damages it causes, or the family and friends lives that are destroyed, and the destruction of our state. Out sight out of mind. All your efforts for the sake of pleasing Inslee and ensuring you'll have a high paying job. You live on the westside and believe you won't be impacted by your decisions, but you are wrong. If and when Inslee's CETA dream comes true, his clean energy will not produce enough electricity and you will feel the impact. You

are not exempt. You will be without electricity just like us on the eastside. Continue pretending what you are doing is good for the state and your children will suffer for your actions. Shame on you. Greg Wagner C.E.A.S.E.

From: [Snarski, Joanne \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: C.E.A.S.E. EFSEC Has failed DUE NOTICE . Formal Complaint
Date: Monday, May 15, 2023 11:40:55 AM

For the record.

Joanne Snarski
Energy Facility Site Specialist
360.485.1675
Joanne.Snarski@EFSEC.WA.gov

From: CEASE2020 <cease2020@aol.com>
Sent: Saturday, May 13, 2023 12:49 PM
To: CEASE2020 <cease2020@aol.com>
Subject: C.E.A.S.E. EFSEC Has failed DUE NOTICE . Formal Complaint

External Email

Ms. Snarski, the first meeting did not comply with your 60-day requirement. Your process does not state that meeting the 60-day deadline is at the discretion of the applicant. The first EFSEC meeting (April 25,2023) the notice was sent to all citizens within 1 mile of the project by US mail. That notice was a land use consistency hearing. EFSEC also sent it by email to anyone registered to receive notice. Then posted the notice in the legal section of the Sentinel and Dalles papers. This notice was not posted at the local libraries. EFSEC then sent out another notice for the same date by email only, stating the meeting would be a SEPA threshold determination hearing. This notice was never posted at the local libraries, legal sections of the Sentinel or The Dalles papers or sent by US mail to anyone living within a 1 mile of the project as required. I called you prior to the April 25,2023 meeting and was told EFSEC made a mistake, and it was not a SEPA hearing just a get acquainted meeting. But EFSEC again failed to send out a

**notice by every required method on that change as required. The land use consistency hearing scheduled for May 16th has not been sent to me or anyone else by US mail living within a 1 mile of the project, or registered to receive email notification, it has not been posted in the Sentinel paper or The Dalles paper legal sections and not at local the libraries. EFSEC should be notifying all the concerned citizens by every required method and EFSEC has rules/procedures, WACs and RCWs requiring this which must be followed. EFSEC has failed in its responsibilities to give DUE NOTICE to the citizens of this hearing, and it should be postponed. This is a C.E.A.S.E. formal complaint and must be placed on the CCR Carriger record.
Greg Wagner**

[Legal Notices for May 10, 2023 | Legals | goldendalesentinel.com](https://www.goldendalesentinel.com)

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: Carriger Solar hearing
Date: Monday, May 15, 2023 11:29:59 AM

From: Dave Barta <dbarta@gorge.net>
Sent: Monday, May 15, 2023 11:29 AM
To: Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>
Cc: EFSEC (EFSEC) <efsec@efsec.wa.gov>; Drew, Kathleen (EFSEC) <kathleen.drew@efsec.wa.gov>
Subject: Carriger Solar hearing

External Email

Good Morning,

I have some concerns regarding the public hearing portion of the Carriger Solar application scheduled for May 16, 2023. In reviewing the open meetings act, it does not appear that this hearing meets the definition of a "regular" meeting, because it was specially announced, it was posted in papers, and the regular EFSEC meeting is on May 17 according to your May 17 agenda. As RCW 42.30.080 states, an agency may hold a meeting remotely if that agency held virtual regular meetings before March of 2020, and perhaps EFSEC did. But, this is not a regular meeting. Further, the gist of the RCW governing open meetings is to allow the public *in*, not to allow for the *convenience* of the agency members. By all appearances, this public hearing is being conducted virtually only to benefit the council members, and to inconvenience the public, especially those located near the proposed project.

I request that this hearing be postponed until a reasonable in person location may be acquired. Thank you.

Respectfully,

Dave Barta

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: Covid Emergency is over meeting in person public comments on EFSEC
Date: Thursday, April 13, 2023 10:22:38 AM

From: Susan1776@protonmail.com <Susan1776@protonmail.com>
Sent: Thursday, April 13, 2023 10:22:16 AM (UTC-08:00) Pacific Time (US & Canada)
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>
Subject: Covid Emergency is over meeting in person public comments on EFSEC

External Email

To whom it may concern,

Why are the meetings not being held in person for people to comment on the EFSEC? The "Covid emergency" is over and was declared over by Biden a couple of days ago. I have to say this overreach of government shows how little you really care about the citizens you claim to be representing for the best interest of us. Comments via email are not as impactful, but that is probably why you are continuing not meeting in person just for that reason.

I for one am tired of our government placating us by giving us forums to hear our input then plowing ahead with the agenda whether we like it or not. This is not going to end well for us and for you this tyrannical way of running our government. History shows us that. This whole Covid debacle was just a way to test out more control over everyone.

Susan

Sent with [Proton Mail](#) secure email.

From: [EFSEC \(EFSEC\)](#)
To: [EFSEC mi Comments](#)
Subject: FW: Request to testify - May 16 - EFSEC Docket No. EF-230001
Date: Monday, May 15, 2023 8:23:45 AM

From: Dana Peck <drpeck66@gmail.com>
Sent: Sunday, May 14, 2023 12:26 PM
To: EFSEC (EFSEC) <efsec@efsec.wa.gov>
Subject: Request to testify - May 16 - EFSEC Docket No. EF-230001

External Email

I would like to testify in support of the project, specifically that at the time of application the proposed facility was consistent and in compliance with land use plans and zoning ordinances of Klickitat County.

My remarks will specifically focus on the programmatic environmental impact statement (PEIS), which is the underpinning of the Klickitat County energy overlay zone and related comprehensive plan and zoning language.

That PEIS specifically evaluated, as an alternative, prohibiting energy project development outside the energy overlay zone, but selected the alternative that allowed for energy project development outside the energy overlay zone through the use of the conditional use process (Section 2.4, pages 2--16 through 2-19).

Specific language, which was incorporated into subsequent county actions through the acceptance of the Final PEIS (County Ordinance O031505) and additional language, is:

2.5 Preferred Alternative

The FEIS includes a preferred alternative combining Procedural Alternative 1 with the Limited Geographic Alternative. The preferred alternative would allow wind, gas-fired, biomass, and solar energy development to be permitted outright within the Overlay subject to site-specific SEPA review and mitigation, and compliance with relevant local, state, and federal laws and regulations. Energy proposals outside the Overlay would be subject to the existing County conditional use process. page 2-18)

Thanks you.

Dana Peck
509-250-0123 mobile

From: [Randy and Kelly Jo Hill](#)
To: [EFSEC mi Comments](#)
Subject: Letter in Support of Carriger Solar Project
Date: Wednesday, April 26, 2023 10:53:50 AM

External Email

State of Washington Energy Facility Site Evaluation Council,

My name is Randy Hill, one of the owners of Hillsvie Ranch, LLC. I attended last night's public meeting, but felt it best not to issue a response that was filled with emotion.

The land that Carriger Solar is proposing for the project may affect some of the naysayers that were at the meeting. However, most in attendance will only benefit from increased tax revenue, more school funding, increased job opportunities, and improvements to fire response, medical response and roads. Change is the only constant in this world that we live in. This change is good for all constituents and allows for a reset down the road if a need arises.

I love the natural beauty of Goldendale, and the project will benefit our family financially. Carriger has done a great job in mitigating water, animal and safety concerns. I am fully in support of this project and have faith that it will be done with utmost care and concern for this community.

It is my hope that this project is approved in its entirety.

Randy and Kelly Jo Hill
rlhill@olypen.com
841 Thornton Drive
Sequim, Washington 98382

From: [bnickerson](#)
To: [EFSEC \(EFSEC\)](#)
Date: Tuesday, March 14, 2023 11:20:27 PM

External Email

The carriger solar project has endangered species that use a lot of that land 3 miles W of Goldendale Wa that is going to be used for solar panels.. do you really think a out of area construction company that is building this, are going to stop & go around a rodent or dwarf rabbit? If they even see it there going to look the other way! There not going to stop there construction I guarantee that. There on a time schedule to get the job done get there bonus & will not stop for a endangered species or any bird, animal or bush!! This is insane to be doing this!!!!

From: [Joseph](#)
To: [EFSEC \(EFSEC\)](#)
Date: Tuesday, March 21, 2023 5:23:33 AM

External Email

To whom is listening and paying attention if you watch BoCC for Klickitat county on or around Feb 28 There's quite a few reputable people there stating some very straight forward facts about the devastating effects that is industrial solar has on the environment. There are so many other routs to take with solar on roof tops so many people have streams and rivers running through their property and they make these cool little hydro generators and why does everything have to be industrial every individual house dose not need full blown electricity a couple of small panels a little home made alternator generator powered by an old bicycle or what ever research it maybe a little more than apparently any of those people in charge are doing or are willing to do because your gdam industrial solar is killing the planet more than the way things are now. You're ruining a good idea like solar energy so it can be industrialized so a few people can get discustingly rich and the power companys like pud can keep robbing us. BS maybe you people should think about others like I don't know maybe the next generation o weight there won't be one. All's I'm asking is slow down and make sure you're doing the right thing cause standing back looking at industrial solar it ain't good for the planet since when ever has leveling thousands of acres ripping out every root blocking it off from wildlife and covering it in glass panels been good for the planet. At the very least call it what it is another way for humans to get lazier at the expense of our planet so at least the dying generation will know that it's coming just think about it. Joseph Essman

From: [Jason Franz](#)
To: [EFSEC mi Comments](#)
Subject: Re: Carriger Solar Project
Date: Saturday, April 29, 2023 5:42:13 PM

External Email

Hello,

I am writing to you in regards to the Carriger Solar Project. In reviewing the project and listening to the public comments from both citizens and commissioners of Klickitat County it is clear this should NOT be approved. I ask that you defer to the county commissioners. The county has an established land use agreement for the needs of both green energy and farmland that impacts the citizens of Klickitat county and the city of Goldendale. Do not ignore the voices of the voters that have agreed to and have supported those previous established land use agreements made by the county.

Jason Franz

Sent from my iPad