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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

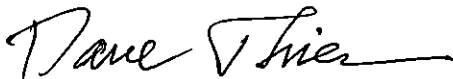
the other speakers were in opposition to the proposed project. Although the people turning out in the Grange Hall only represent a small portion of the general population of the county, we would be very happy to see the issue of renewable energy build-out voted on by county citizens. The proponents and 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