

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

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