



Respondent No: 1

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Responded At: Apr 08, 2025 14:58:13 pm

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Q1. Name	Gene Callan
Q2. Email	gene@v75vineyard.com
Q3. Are you part of an Agency or Organization?	No
Q4. Share any comment	Non-Participating and Adjacent Landowner. Please see attached Letter.
Q5. Upload your document (optional)	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/371eb2282bc71eefe16e34a898368496a7ddfabe/original/1744149483/b5aa3c8b6482f42f2ae09f7fd012c498_April%20%202025%20letter%20to%20EFSEC.pdf?1744149483
Q6. Upload a picture (optional)	not answered
Q7. Did you also share a video?	No
Q8. What is the title of your video?	not answered

April 8, 2025

STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL (EFSEC)
PO Box 43172
Olympia, Washington 98504-3172

Subject: **MITIGATED DETERMINATION OF NONSIGNIFICANCE (MDNS)**
 Carriger Solar Project, Klickitat County, Washington

Members of EFSEC,

The letter is to object to EFSEC's support of mitigation elements submitted by the Carriger Industrial Solar Project in the April 7, 2025, publication. We own land adjacent to the proposed Carriger Project, have testified against and written many letters over the last few years objecting to the project based on the severe negative impacts to our land and to our agricultural region. We have had our land appraised, and our domestic water tested, all in anticipation of the pending negative financial and environmental damage coming our way as a result of this project.

OVERVIEW

EFSEC has issued a Mitigated Determination of Non-Significance (MDNS) stating that the mitigating conditions by the applicant, along with required compliance with applicable county, state, and federal regulations and permit requirements, will mitigate any significant adverse impacts on the environment.

If it were not so tragic, the title of this report and statement above would be humorous. **An industrial project such as this that's placement will destroy thousands of acres of high value farmland and disrupt an entire region, there is absolutely nothing about this project that is non-significant, and no token responses are sufficient to mitigate the impact.** A wide majority of the citizens of our area are not in favor of this project as witnessed by years of testimonies, public hearings, written responses, and general conversations. To think that a few engineering consultants making blanket statements regarding our lands will mitigate the pending damage is offensive and wrong. The detail of the response was obviously composed by the applicant/developer and regurgitated by EFSEC. There are so many embedded terms like "*maybe*", "*anticipated*", and "*will consider*" included that it is clear that this a rubber-stamp approval aimed at simply moving the project forward ignoring all negative impacts.

The promise of employment and local financial gain is deceiving. A large majority of the short-term construction jobs will go to of area contractors and sub-contractors. The report says the project should "support four workers located in Klickitat County ". As a

side bar, it has been previously stated that the project will only need a .5 FTE with one "worker" dividing their time between this project and one other. Whatever employment metric you choose to use, step back and consider what is being said. In exchange for changing the agricultural foundation of our area and destroying non-participating land values and drinking water quality, there is a possible gain of .5 to 4 "workers" being added to our employment base. The loss of agricultural jobs alone in this area will exceed that loose projection.

SPCIFIC MDNS STATEMENTS WITH REBUTTAL

MDNS STATEMENT: *"Impervious surfaces would cover approximately 2.6% (35 acres) of the Project Area and are not anticipated to significantly alter stormwater infiltration patterns."*

REBUTTAL: This is a deceiving definition of impervious. The project will have 1,500-2,000 acres of impervious glass and metal panels creating considerable concentrated run-off. Obviously, the report is only using token parking lots or building pads to calculate this area, thus making it sound like a thousand acres of glass and metal panels are somehow made of natural bio-like materials allowing clean soil percolation. In fact, the sea of industrial panels will create new toxic drainage patterns funneled into existing channels and then into our smaller and larger waterways.

MDNS STATEMENT: *"The Applicant has committed to the preparation of an SPCC Plan to reduce the likelihood of an accidental release of a hazardous or regulated liquid and expedite the response to and remediation of the release should one occur. This Plan is to be completed and submitted to EFSEC for review prior to the start of construction."*

REBUTTAL: What statements can be included into a future spill or contamination report that will mitigate poisoning humans or livestock? Once the ground water is contaminated, there is no going back. Shouldn't an applicant be required to submit the complete plan at this time instead of right before construction? How can you state that there has been mitigation when this critical plan has not even been drafted and included in the submittal?

Our potable water well which supplies drinking water to our home and for our animals is within 400' of an adjacent stormwater drainage subject to future toxic runoff directly from the industrial solar panels. EFSEC and the County should require a potable water quality plan at this time coupled with robust financial penalties for violations.

MDNS STATEMENT: *"No residences will be displaced by the Project, with a minimum 500-foot setback provided from the closest non-participating residence. EFSEC incorporates the principles of environmental justice into its project reviews in an effort to ensure that*

there are no disproportionate environmental and health impacts to vulnerable and overburdened communities."

REBUTTAL: While no houses may be planned for demolition, the value of others are impacted, including ours. The 500' setback is inadequate to protect the multiple adverse impacts to a non-participating residence. The damaged development value of un-built land of non-participating landowners should be included in the program. If this project is even allowed to be permitted by Klickitat County, the setback from non-participating landowners should be increased from 500' to 2,000' from the adjacent property line.

MDNS STATEMENT: *"Residences are sparse in the area, though there are a few moderately trafficked roadways, most prominently SR 142 and Knight Road, which would be within the viewshed of the Project. The Applicant assessed the level of visual change from seven Key Observation Points using the Bureau of Land Management contrast ration system to evaluate visual and aesthetic impacts. This assessment indicated that the Project would introduce many new visual elements into the area, though these new elements would be largely consistent with other horizontal and vertical lines and geometric shapes associated with existing electric transmission lines, roads, and the built environment visible throughout the landscape. The Project would also not block views of the surrounding hills, agricultural lands, or landmarks. Visual impacts would primarily be experienced by drivers on Knight Road and SR 142. Three KOPs associated with these roads were determined likely to receive moderate contrast and visual impact ratings from the Project. Visual impacts were anticipated to be most pronounced along those portions of Knight Road where the Project would site panels on both sides of the road. To address these impacts, the Applicant increased the fence setback along SR 142 by 30 feet (minimum 100 feet) and the fence and panel setbacks along Knight Road by 25-40 feet (minimum 100 feet for fence, minimum 120 feet for panels). Updated visual simulations with these setbacks confirm that visual impacts to motorists on these roads would be less than significant. Avoid complete removal of vegetation beneath solar arrays during construction, where possible, to reduce contrast between the exposed soil and adjacent undisturbed areas during project operation. To the extent practicable, design BESS to blend with the adjacent agricultural character, including selecting materials and paint colors to reduce contrast with the existing setting. By mimicking design characteristics of agricultural structures in the area, the BESS facilities would appear consistent with the area's agricultural setting, including the overall visual scale of those existing structures. The existing visual setting surrounding the Project Lease Boundary is primarily rural agricultural with sparse, dispersed rural residences. The agricultural uses of the lands in the area are primarily crop cultivation, mostly dryland wheat, and grazing pastures. The flat-to-gently rolling terrain allows for a viewshed with many distant, unobstructed sightlines of several substantial natural features, including Mount Adams to the northeast, the Simcoe Mountains to the north/northeast, and the Columbia Hills to the south of the Project Lease Boundary. The visual character of the area is distinctly rural with no large-scale facilities of the nature of this Project. The Carriger*

Project has been sited and designed to ensure that no significant impacts result to visual aesthetics from this project alone, but when combined with other reasonably foreseeable developments, cumulative impacts to visual aesthetics could result in significant impacts to visuals in the area."

REBUTTAL: This alone might be the most appalling, negligent, and offensive series of paragraphs in the report. This section summarizes that the visual impact of changing a rural, green, agricultural valley mitigated by some bizarre language referring to horizontal lines, vertical lines, and the geometry of the electrical transmission towers. In addition, stating that the design vocabulary of a BESS complex will copy token agricultural barn or farm outbuilding designs while sitting inside a chain link and razor wire fence is a token response to the extreme visual impact to our area. Instead of insulting us "sparsely populated and dispersed" inhabitants with this rhetoric, why not say, 'yes, there will be a severe visual impact and you can't do anything about it'? The thousands of acres of fenced industrial glass and steel panels placed in the natural environment has no potential mitigation. In summary, we challenge each of you assessing this project to ask yourself how you would react if this project was to be built next to your home? How would you react to the visual aesthetics of your new neighbor-the industrial solar park?

MDNS STATEMENT: *"Glare analysis of potential glare hazards concluded that the Project would introduce a source of yellow glare (potential for after-image) at sections of SR 142, Knight Road, and the 2-mile final approach path for Runway 07 at Goldendale Municipal Airport. The yellow glare is predicted to impact Knight Road for less than two minutes a day at sunrise in June, SR 142 for less than 50 minutes a day at sunrise and just before sunset in May through August, and the final approach for Runway 07 for less than 100 minutes per day in the morning hours. The FAA's policy is that glare from solar panels is similar to the glare that pilots routinely experience from water bodies, glass windows, and parking lots and that glare is most impactful to airports when it affects the cabs of air traffic control towers."*

REBUTTAL: The applicant should be required to submit a written certification from the FAA declaring that the stated glare is approved. In addition, the applicant should be required to indemnify the City of Goldendale and Klickitat County of all liability stemming from glare related issues.

MDNS STATEMENT: *"The Project would be accessed primarily from SR 142, a two-lane paved route classified by WSDOT as a Rural Major Collector Road, and Knight Road, a two-lane paved county road classified by WSDOT as a Minor Collector."*

REBUTTAL: We live on Knight Road and have endured the noise, speed and disruption of construction traffic related to BPA's substation and transmission tower project a few years ago. No amount of training will cause the large trucks to slow down, or to stay off their exhaust brakes and respect the neighbors that they pass. It is going to happen, and the

applicant will give the issue lip service and the next day it will happen again, and again and again. Been there-done that. The applicant should be required to guarantee specific transportation hours and speed control coupled with severe financial penalties paid to non-residential landowners with each violation.

In addition to the local traffic concern, we own a 53-acre parcel on the southwestern part of the Project Site Control Boundary map which indicates that our non-participating land to be completely cut off from farming access.

MDNS STATEMENT: *"Some species, such as deer and elk, are very wary of fencing or movement restrictions and may need wildlife passages as wide as 1-2 miles in width, and potentially larger, in order to maintain effective movement. As additional projects which fence large areas are constructed, such as the reasonably foreseeable development that EFSEC is aware of, wildlife movement and connectivity could be more substantially affected. Maintaining effective wildlife corridors to allow the movement of large and small animal species will remain a focus of EFSEC environmental review of future projects. Additional wildlife corridors would be identified and protected as mitigation for future large, fenced projects in this rural area."*

REBUTTAL: Here is yet another example of a wildly conceptual thought aimed at blowing past a severe environmental impact. The applicant should submit specific, detailed solutions to this issue at this time and get written approval from the WDFW. Wildlife will not follow some conceptual man-made corridor but rather vacate the area moving to other areas non-impacted by fencing and industrial uses. If in fact some wildlife remain in the area, history tells us they will eventually become diseased and damaged due to their changing habitat and food sources. The local deer herd within the City of Goldendale is an example of this unfortunate wildlife dynamic.

MDNS STATEMENT: *"The Project is located in the service area of Klickitat County Fire Protection District 7. Given the coverage area of District 7, it can be assumed that most of their deployments are in response to single house fires and wildfires. As assessed by DNR in 2000, District 7 is at risk of wildfire due to the area fire history, type and density of vegetative fuels, extreme weather conditions, topography, and distance of structures from fuel sources (DNR 2002). The construction of a commercial/industrial project of the size and scope of the one considered here would present a unique form of fire risk on this community and may stress fire response expertise and resources. The Applicant has committed to developing a set of emergency plans, including an Emergency Management Plan and Fire Control Plan, formed in coordination with the Klickitat County Department of Emergency Management and District 7. The Applicant would provide recurring training to fire responders to familiarize them with the hazards and suppression and control techniques associated with photovoltaic and high voltage technologies such as those that would be installed at the Project. District 7 would also be provided an opportunity to review these emergency plans on an annual basis and recommend*

changes and updates that would be incorporated with EFSEC approval. While this Project is not anticipated to result in significant impacts to fire response services, EFSEC is aware of a reasonably foreseeable solar development that is planned for construction adjacent to this Project. This reasonably foreseeable development would also be located in the service area of District 7 and would present individual and cumulative fire risks that would require mitigation. The proximity of the two projects would increase the risk of additional photovoltaic and high voltage technologies serving to fuel a larger outbreak, either from a fire originating at either facility or from an external wildfire. The location of multiple large commercial/industrial facilities in the response area of an otherwise-rural fire response district increases the risk of overtaxing the district's resources. EFSEC will consider cumulative impacts to fire response services for future projects under review in this area and may impose mitigation such as the development of coordinated Fire Control Plans, financial contributions towards the training and equipping of District responders, or other relevant mitigation."

REBUTTAL: There have been recent industrial solar and battery fires across the nation. Promising a future holistic future fire training is not acceptable. Potential toxic chemical fires are the most ominous threat to life safety in this project. The mitigation responses provided are appallingly inadequate. Fires in this area are a distinct possibility every year. The location of the Carriger project coupled with our strong, prevailing west winds puts the town of Goldendale at risk. We had direct evidence of this in 2024 when fire broke out in the exact location of this project and burned many acres of brush and timber before . Thank goodness, no industrial solar farm or BESS existed at that time. In addition, a larger fire in eastern Klickitat County near Rock Creek and Bickleton endangered the existing industrial solar farms of that area. Our Rural 7 volunteer fire fighters are some of the best around, but do not have the training, specialized equipment or desire to fight these dangerous and extremely toxic fires. Any plan should be first presented and vetted by our local Rural 7 in addition and other municipalities before submittal to EFSEC to verify the desire and protocol for fighting these toxic fires.

MDNS STATEMENT: *"To retrieve as much of the natural resources used in construction and operation of the Project as possible, the Applicant would demolish and remove all Project-related equipment and facilities from the Lease Boundary upon Project decommissioning. The Applicant would recycle all components of the Project that have the potential to be used as raw materials in commercial or industrial applications. For any Project components that the Applicant deems non-recyclable, the rationale for that determination shall be presented to EFSEC for approval prior to the disposal of the components. If the Applicant intends to leave any portion of the facility, including concrete foundations, they must submit a request to EFSEC in an update to their decommissioning plan. Gravel Removal During Project decommissioning, all gravel and aggregate material will be removed from land intended to be returned to agricultural use."*

REBUTTAL: Believing that future decommissioning will return the land to its agricultural state is a fairy tale. Can the applicant provide an example somewhere in the USA where this has happened on a project of this scale? There is a reason the applicant leases land instead of purchasing land. They understand the impact and financial costs required to remove, clean, and restore the land. It simply will not happen. That said, if the project is even allowed to be permitted, the applicant should be required to deposit a multi-million dollar bonding amount into escrow with guarantees to fund a complete decommissioning.

SUMMARY

There are more items of concern not covered in this letter, such as Tribal issues, that we leave to more qualified entities to address. In addition, we encourage EFSEC to reconsider and reject the applicant's submittal while requiring a thorough and comprehensive Environmental Impact Statement (EIS). Even though EFSEC states that an EIS is not required, the scale and impact of this project screams for such an analysis. To push this project through without an EIS is wrong.

Finally, we encourage EFSEC to deem the impact as significant and the mitigation as non-sufficient.

Sincerely,



GENE CALLAN

38 Knight Road
Goldendale, Washington 98620