



Respondent No: 4

Login: Anonymous

Email: n/a

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Q1. Name	Rural 7 Fire & Rescue
Q2. Email	rural7@rural7.com
Q3. Are you part of an Agency or Organization?	Yes (please specify) Rural 7 Fire & Rescue
Q4. Share any comment	not answered
Q5. Upload your document (optional)	https://s3-us-west-1.amazonaws.com/ehq-production-us-california/bad9c59b99606eafa52e8b1bce97c96539017b21/original/1745011592/454ad6c7bf48d873f68b4c813b391349_MDNS%20response%20R7_.docx?1745011592
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

Joanne Snarski

Dear Ms. Snarski,

Thank you for the opportunity to comment on the mitigated determination of non-significance for the Carriger Solar project two miles northwest of Goldendale. As a rural all-volunteer fire district, we have concerns and needs that should be addressed. Klickitat County Fire Protection District 7 (Rural 7) has a full time chief, a part time assistant chief, a mechanic, and an office manager. Rural 7 is a fire district that is 601 square miles, stretching from the Simcoe Mountains in the north to the Columbia River to the south, and from the Klickitat River on the west end to Rock Creek in the east. Rural 7 covers almost one third of Klickitat County. Aside from the approximately ten thousand residents in the district, we cover a considerable amount of both pine forests and open grasslands. Although the MDNS says we have 140 volunteers, the number is closer to 100 and only 49 volunteers met the minimum training requirement this past year. At Rural 7, volunteer means volunteer—firefighters are paid nothing for their services unless they happen to be on a DNR fire and they have a DNR red card. Rural 7 pays its firefighters nothing for their hours of service in training and on incidents. Rural 7 has an annual budget of about \$725,000. We have a large amount of equipment but for fighting these types of fires, we have nine type 1 structure engines that are spread throughout our district and are not always readily available. Of those engines, all were bought used—well-used---and require significant maintenance and upgrades in order to continue as functional. We maintain one main hall and ten outlying halls so that we can provide the fastest service possible. With 49 volunteers, that means an average of less than five per hall (several have fewer), nearly all of whom have full time jobs and commitments that mean they can't necessarily respond to every incident. All of this is said so that EFSEC understands that should there be a fire in the proposed facility, Rural 7 cannot necessarily catch it before it becomes too big to stop. In the case of a lithium battery fire, there are much more serious concerns.

The proposed Carriger Project is sited on ground that is generally sloped upward south to north, and to the east it slopes upward as the ground enters timberlands. Prevailing winds are westerly about 60% of the time. In 2023 Rural 7 subdued a fire that started on the east side of Knight Road on DNR ground that is already lease optioned for solar. Thanks to aggressive firefighting, local fire volunteers stopped this fire before it started burning down residences. Had it gotten away, it likely would have destroyed dozens of homes and potentially caused fatalities—there was not time to implement a level 1 or 2 or 3 evacuation system. It was “get out now” and there weren't enough deputies to knock on all the doors fast enough. Had a solar installation been in place on this property at the time, it would have been nearly impossible for Rural 7 to stop the fire, because fighting fire in a fenced area with panel obstacles all over the place is difficult to impossible. EFSEC needs to require that the developer put all conductors underground regardless of how difficult that is. Spacing of panel rows needs to be determined based to some degree on how emergency apparatus can move inside the facility to stop fires or perform rescues. Rural 7 will need 24/7 access through a lock system since most of the time, no one will be at the facility to open gates. Since this project has several detached parcels, that means access to all of them.

The developer should be required to have a full site-specific all-hazards plan before development starts. The largest solar installation in the state, Lund Hill south of Bickleton, literally

copied and pasted its hazard plan in from a Prineville, Oregon project. The plan said injured workers (in Bickleton) would be evacuated to Prineville Hospital, etc. The Carriger all hazards plan should be developed in concert with Rural 7 and Klickitat County Emergency Management before the project breaks ground.

The proposed battery storage (BESS) brings an additional set of challenges. In the event of a battery fire, enormous amounts of water will be needed to suppress the toxic smoke as much as anything. Beginning about a half mile east of the proposed battery site, hundreds of residents live in a rural residential area. To reiterate, they live east of a BESS in a prevailing westerly wind environment. They are essentially immediately downwind. Using a pumper or pumpers that use a deluge gun with an output of 250 gallons of water per minute, each pumper carries enough water for 3 minutes of fire suppression. A three-thousand-gallon tender carries enough water to supply an engine for 12-20 minutes. So, in a perfect world, where a fire pumper gets to the scene of a BESS fire 20 minutes after the call (which is the fastest we can hope for), and a tender is right behind the fire engine, we have an average of 15 minutes of water. Then the tender detaches to go get water and hopefully another tender is there to hook up immediately. But Rural 7 only has one 3000-gallon tender and one 5000-gallon tender and one of them requires additional specialized training to drive. The turnaround to fill and get back is going to be a minimum of 30 minutes. That means even with two tenders running, the engine will only pump for 30 of 60 minutes each hour. The fire will just run and the smoke will continue to billow the rest of the time. With this in mind, Rural 7 requests that the developer be required to provide Rural 7 with an additional fire tender built to Rural 7 specification, funding to replace it when it meets the end of its usable lifespan and funding to help hire another full-time Officer for the department. Our duty is to keep residents safe. If a BESS facility is permitted, an additional tender is the only way we can hope to suppress enough smoke and cool the fire down so that adjacent residents can safely evacuate.

Additionally, Rural 7 requests that all bunker gear damaged or deemed toxic after a lithium battery fire be replaced at the expense of the developer or owner at that time. Carriger Solar hopes to build a solar facility that generates income, but Klickitat County taxpayers cannot be expected to pay costs incurred solely by this profit-making venture. Again, thank you for the opportunity to comment, and we look forward to EFSEC supporting KCFPD 7 needs during the permitting process.

Sincerely,

Anthony Browning
Chief