



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

August 11, 2023

Dear Ms. Altick,

As you know, we have been reviewing the Carriger Solar Application for Site Certification (ASC) in pursuit of making a SEPA threshold determination as required by Washington Administrative Code (WAC) 197-11-330 and 463-47.

At this point in our review, we believe the Project may have significant impacts to the environment and we are considering the issuance of a determination of significance. For the purposes of SEPA, significance is defined as “a reasonable likelihood of more than a moderate adverse impact on environmental quality,” with the additional understanding that an impact “may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred” (WAC 197-11-794). In accordance with Revised Code of Washington 80.50.090, EFSEC is notifying you of this anticipated determination and providing the Applicant “the option of withdrawing and revising its application and the associated environmental checklist to clarify or make changes to features of the proposal that are designed to mitigate the impacts” that are the basis of our anticipated determination.

The primary resources for which significant impacts are anticipated are:

- Cultural Resources
- Visual Aesthetics

As previously discussed, the Yakama Nation staff have stated that, in their opinion, the Project as proposed is likely to have significant impacts to Traditional Cultural Properties (TCPs) in the area. The Yakama Nation have informed EFSEC that they are aware of TCPs in the vicinity of the Project Lease Boundary that they anticipate will be adversely impacted by the construction and operation of the Project. The Yakama Nation staff have indicated that additional analysis for the Project area and surrounding environment will be necessary to fully identify, assess, and classify these impacts. The Yakama Nation has also expressed that they view any impacts to TCPs as significant due to the historic degradation and scarcity due to loss of these properties through the last several hundred years of colonization and development of non-native populations and that effective mitigation for further impacts to TCPs may not be available.

This analysis is necessary to identify where avoidance or other mitigation may be possible. In nature, these impacts may be direct, indirect, or, when considered collectively with impacts from other past, present, or reasonably foreseeable future projects, cumulative. EFSEC is currently moving forward with discussions with the Yakama Nation on scoping, timing, and format decisions relevant for this additional analysis.

Lauren Altick
Cypress Creek Renewables
August 11, 2023

The Visual Impact Assessment (VIA) provided as an addendum to the ASC used the U.S. Bureau of Land Management (BLM) contrast rating system to qualitatively measure potential changes to the visual environment. The BLM contrast rating system defines a strong rating as the point where the Project “demands attention, will not be overlooked, and is dominant in the landscape.” The existing visual character of the area, as described in the VIA, could be described as typical of agricultural lands with “flat to rolling terrain,” “grasses, shrubs, and trees” that are organically irregular in shape and brown and green in color, and linear, horizontal structural features including “fencing, road, utility poles and lines, and agricultural structures.” The Project would introduce many new visual elements to the area that would contrast with the existing visual character, most prominently solar arrays that are tan, gray, white, and brown in color and linear in structure. The VIA identified three Key Observation Points (KOPs), numbers 1, 3, and 5, associated with SR 142 and Knight Road from which the Project would have a strong degree of contrast and would “dominate” or “co-dominate” the landscape. The Knight Road KOPs, numbers 3 and 5 in particular, are described in the VIA as viewpoints from which “the Project would demand attention, would not be overlooked by the casual observer and would dominate the landscape.”

The reasonable likelihood that the Project would result in a more than moderate adverse impact on visual aesthetics is further compounded when considered cumulatively with reasonably foreseeable developments, including a planned adjacent solar project that EFSEC is aware of. While the Carriger Project would only be responsible for its contributions to cumulative visual impacts, it is likely that the cumulative impacts would result in an increased degree of severity for the Project’s visual impacts. While potential mitigation for these impacts can be identified, such as color-treating Project components, revegetation beneath and around Project components, or increasing setbacks from sensitive viewpoints, it is unlikely that these measures would be sufficient to reduce impacts to a level of non-significance. Given the environment that the Project would be located in, the likelihood of cumulative impacts in concert with reasonably foreseeable future developments, and the scarcity of effective, available mitigation options for visual impacts, it is likely that there would be significant impacts to visual aesthetics.

We appreciate the time and effort you have put forth into providing the application and supplemental information to this point. If you have questions or concerns about any of the above, please contact Joanne Snarski at joanne.snarski@efsec.wa.gov, or 360-485-1675.

Sincerely,



Sonia E. Bumpus
EFSEC Director

Cc: Amí Hafkemeyer, EFSEC
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