

From: [Snarski, Joanne \(EFSEC\)](#)
To: [Snarski, Joanne \(EFSEC\)](#)
Subject: FW: Carriger Solar Project - Klickitat County
Date: Monday, August 7, 2023 10:57:43 AM

From: McLain, Kelly (AGR) <KAardal@agr.wa.gov>
Sent: Thursday, August 3, 2023 10:37 PM
To: Snarski, Joanne (EFSEC) <joanne.snarski@efsec.wa.gov>
Subject: RE: Carriger Solar Project - Klickitat County

Hi Joanne,

I apologize so much for the delay on these comments. Here they are:

1. Every effort should be made to avoid placement of solar or wind equipment on high value soils (like those listed here), and avoidance of irrigated ground as much as possible. When avoidance is not possible, every effort should be made to limit the amount of gravel and hard medium added to the site.
2. Information about the total acres of the project is helpful, but would be more helpful if placed in context. This land is being removed from agricultural production. It is unlikely that the ground will produce yields after the project is decommissioned that equal the production values right now. In order to better understand the long-term impacts of solar siting on agricultural lands, the applicant should provide information about the total agricultural land in the county, how much is being removed, how much has already been removed for other clean energy projects, etc. One of the things that makes agriculture so viable in Washington is that the land base supports ancillary agricultural businesses (financers, equipment repairs and sales, chemical and fertilizer dealers, etc.). If too much land is converted, these ancillary businesses also move away to more profitable areas, making it more difficult for the farmers that remain.
3. 93.7 percent of the MPE (maximum project extent) are soils classified as prime farmland or farmland of statewide importance. There are also 70 acres of irrigated farmland in the MPE. There are no suggested mitigation measures to ensure soil quality remains throughout the life of the installation. WSDA would like to suggest soil sampling in years 1, 2, 5, 10, 15, 20, and 25 of the project to better inform the state and the applicant of the long-term impact clean energy siting has on soil health.
4. The softness of the soil has been acknowledged by the applicant and there are plans to add additional hardscaping products (gravel) to the site to allow for vehicles, equipment installation, and maintenance access. In the original application, these are acknowledged as permanent site impacts. WSDA would like to see the proposed decommissioning information and requests that every effort is made to remove any material brought in for the purpose of energy production. The site should be re-vegetated by the applicant with the intention of returning the site to productive agricultural land use if possible.
5. For any irrigated land, the water for that purpose should be banked for future agricultural use if possible.