



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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May 8, 2023

Joanne Snarski  
Washington Energy Facility Site Evaluation Council  
621 Woodland Square Loop SE  
PO Box 43172  
Olympia, WA 98504-3172

Subject: Carriger Solar Project

Dear Joanne,

First and foremost, we want to emphasize the importance of renewable energy as part of a modernized energy portfolio consistent with state policy. The Washington Department of Fish and Wildlife (WDFW) fully supports Governor Inslee's goals for decarbonization in Washington State. Realizing this vision requires considerable planning and technical work to ensure renewable energy sources are sited in a manner that avoids, minimizes, and compensates for unavoidable impacts on our State's fish and wildlife resources.

We have reviewed the Carriger Solar Project Biological Studies and Mitigation Discussion Presentation and Attachments F (Botanical Survey Report), C (Habitat and General Wildlife Survey Report), D (Raptor Nest Survey Report). These are our initial comments on the Carriger Solar Project (Project), and we will continue to provide comments as we further discuss the project both internally and externally with the developer, their consultant, and EFSEC.

We appreciate the Project providing site plan revisions to avoid sensitive plants, Western Gray Squirrel, and wetlands while also minimizing impacts to dwarf shrubsteppe and providing wider wildlife corridors by designing a layout that includes fenced-in arrays.

We recommend the maximum distance setback from wetlands, especially potential fish-bearing waters, to prevent concentrated runoff from panels causing erosion of sediments from the site into these adjacent waters. Not only might these waters provide fish habitat, but the range of the Western toad, a WDFW Candidate Species, is located within approximately 0.5 miles of the project and impacts to on-site wetland could also potentially impact this species. Stream buffers should be based on the WA Department of Natural Resources *Water Type Classifications* that considers the seasonality and persistence of water as well as actual and potential fish use. It appears that these buffers are based on this system and we would like to learn more about when (time of year) and by what methods fish use

was determined.

Mitigation at the Project should be consistent with EFSEC's determination regarding increasing the mitigation ratio for altered impacts at the Wautoma solar project. Based on this we recommend that the mitigation ratio for altered impacts to WDFW priority habitats at the Project be increased from 1:1 to 2:1.

Thank you for the opportunity to provide these comments. Please contact me at 564-669-4433 or at [Michelle.Huppert@dfw.wa.gov](mailto:Michelle.Huppert@dfw.wa.gov) with any questions.

Sincerely,

A handwritten signature in black ink that reads "Michelle Huppert". The signature is written in a cursive style with a large initial "M" and "H".

Michelle Huppert  
Solar and Wind Energy Biologist