



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

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Memorandum

To: Sonia Bumpus, SEPA Responsible Official, Energy Facility Site Evaluation Council (EFSEC) Director, (360) 664-1363

From: Amí Hafkemeyer, EFSEC Director of Siting and Compliance, (360) 664-1305

Date: June 13, 2025

RE: Supplemental Memorandum Post SEPA Comment Period - Environmental Review and Staff Recommendation for State Environmental Policy Act (SEPA) Review and SEPA Determination for *Carriger Solar*

PROPOSAL: The Carriger Solar, LLC Project (Project) is a 160 megawatt (MW) solar photovoltaic (PV) electric generating facility, including a 63 MW battery energy storage system (BESS) in Klickitat County. The project is proposed by Cypress Creek Renewables, LLC (CCR), (Applicant). The Project Lease Boundary spans 2,108 acres of privately owned land. Within the Project Lease Boundary, the Project Area would occur on 1,326 acres and would represent the maximum Project footprint proposed within the ASC. The Project Area includes a 30-foot corridor associated with the project collector line in the Knight Road right of way (ROW), the 30-foot corridor associated with the project access road and collector line within the Bonneville Power Administration (BPA) ROW and the areas within the solar array fence lines minus exclusion areas where sensitive resources such as wetlands and streams are being avoided. Project components include:

- PV modules
- Single-axis tracking systems
- Ground mount posts
- Underground and above ground cabling
- Inverters and transformers
- Overhead collector lines
- Meteorological station
- BESS capable of storing 63 MW
- Project substation
- 500 foot-long overhead 500-kilovolt (kV0) generation-tie transmission line

- Operations and maintenance (O&M) building
- Access and service roads
- Fences
- Gates and security lighting
- Microwave or other telecommunications towers

The Carriger Solar Project would interconnect with the Bonneville Power Administration (BPA) transmission system at the BPA Knight Substation, which is located adjacent to and west of the Project Lease Boundary. A 500-foot-long overhead 500 kV generation-tie transmission line would extend from the Project substation to the BPA Knight substation.

CASE NUMBER: EFSEC Docket No. EF-230001

APPLICANT: Cypress Creek Renewables, LLC

LOCATION: The Project would be located approximately 2 miles west/northwest of the City of Goldendale in unincorporated Klickitat County, WA.

On April 7, 2025, EFSEC issued a Mitigated Determination of Non-Significance (MDNS) for the Carriger Project for public comment. The public comment period ended on April 20, 2022, during which EFSEC received 7 public comment letters. All of these comments were reviewed, and several issues were raised for consideration that are best addressed by a revision to the MDNS. Additionally, the Applicant indicated a concern that one of the mitigation measures recommended in the MDNS could not feasibly be accomplished in its current format due to site conditions. EFSEC is making the following edits to address environmental impact concerns raised in public comments and mitigation feasibility concerns produced by the Applicant:

7. ENVIRONMENTAL HEALTH

- A concern was raised that the battery chemistry used for the Battery Energy Storage System (BESS) included within the project proposal would result in an adverse environmental and public health impact in the event of a fire. A recommendation was proposed that EFSEC require a change in battery chemistry to one that would result in reduced impacts resulting from a fire. EFSEC staff considered other commercially available battery chemistries and determined that the lithium-ion phosphate chemistry initially proposed by the Applicant is the best combination of commercial availability, safety margin, and longevity. However, staff crafted a new mitigation measure that allows for the possibility that a new, safer battery chemistry may be available in the future when the BESS is due for replacement.

New Mitigation: When the BESS is due for replacement, the Applicant would assess all battery chemistries that are widely commercially available for BESSs at the time of replacement. A comparative report of such chemistries shall be submitted to EFSEC along with the Applicant's recommendation for chemistry selection for EFSEC's approval.

10. NOISE AND VIBRATION

- A mitigation measure requiring that laydown yards and equipment storage/parking areas be located at least 2,500 feet from noise sensitive receptor (NSR) sites presented feasibility issues for the Applicant. All of the Applicant's planned laydown yards and most of the lands within Project Lease Boundary are within 2,500 feet of NSR sites, specifically non-participating residences, and the Applicant indicated that the lack of available locations for laydown yards challenged the feasibility of constructing the Project.
- WAC 197-11-660(1)(c) states that, when using SEPA substantive authority to impose mitigation, "mitigation measures shall be reasonable and capable of being accomplished." EFSEC has previously used a 1,200-foot buffer between NSR sites and laydown yards for projects similar in scope and scale to the Carriger Project. EFSEC staff understand that the 2,500-foot buffer is a measure that is not capable of being accomplished by the Applicant nor is it reasonable for the reasons here:
 - In contrast to other projects that EFSEC has reviewed where one or two large laydown yards were proposed that would be in operation throughout the entire construction phase, the Carriger Project proposes a single "primary" laydown yard and several smaller "ancillary" laydown yards that will each contain a small portion (less than 20%) of construction materials and only be in use for a portion of the Project's construction phase. This would result in substantial reductions in the volume and duration of construction noise from ancillary laydown yards. Staff have determined that the reduced duration and magnitude of activity at ancillary laydown yards provide some mitigative effect on noise impacts, resulting in a lower level of impact overall from these types of laydown yards.
 - Staff have determined that a 1,200-foot buffer for the Carriger Project's primary laydown yard and an 800-foot buffer for the ancillary laydown yards would be sufficient to address noise impacts to NSR sites considering noise related to laydown yards will be temporary, intermittent, and typically limited to daytime, weekday hours during Project construction. Primary laydown and storage areas would have more noise sources for longer periods of time than other areas; therefore, setting these locations further from non-participating NSR locations would limit the sound level and the duration that such equipment can impact a non-participating NSR

Revised Mitigation: Avoid primary laydown and equipment storage/parking areas, defined as those containing 20% or more of Project equipment and materials, closer than 1,200 feet from the nearest non-participating NSR location. Avoid ancillary laydown and equipment storage/parking areas, meaning those with less than 20% of Project equipment and materials, closer than 800 feet from the nearest non-participating NSR location.

11. VISUAL AND AESTHETICS

- A concern was raised that the impacts to visual aesthetics from the Project when viewed from the northern boundary of the parcel owned and managed by the Department of Natural Resources (DNR) in the middle of the Project Lease Boundary remain high, even accounting for the additional Project setbacks that were adopted prior to the publication of the MDNS. To further mitigate these visual impacts, a new mitigation measure has

been developed that would require the use of natural screening along the border between the DNR parcel and the project along the northern boundary of the DNR parcel.

New Mitigation: To reduce visual impacts from the Project to the adjacent DNR parcel, a combination of natural screening tools, which may include earthen berms, rock piles, native vegetation, or other natural methods, would be installed along the border of the Project and the northern boundary of the DNR parcel. The final design of this natural screening shall be submitted to EFSEC for approval prior to the start of construction and would be maintained throughout Project operation.

14. HISTORIC AND CULTURAL RESOURCES


- Following the publication of the MDNS, EFSEC staff noted that for one mitigation measure related to continuing ongoing engagement between the Applicant and affected Tribes, some draft language had been inadvertently left in the final language. This draft language was deemed to be unenforceable and impractical and has been removed in the revised version of this mitigation measure here.

Revised Mitigation: Maintain ongoing engagement with affected Tribes to facilitate identification, location, quantification, and mitigation of potential impacts to TCPs when practical. Tribal review of site/engineering plans would provide input to guide design and avoidance without confidential disclosure of sensitive locations.

16. PUBLIC SERVICES

- A comment was received indicating that due to equipment, staffing, and training limitations and the isolated location of the project, the local fire response agency, Klickitat County Fire Protection District 7, would only be able to pump water for 30 minutes out of every 60 in the event of a site fire within the Project Area. While the vegetation management associated with Project operation makes the lands within the Lease Boundary more fire-resistant than surrounding, unmanaged lands, staff is aware that local rural fire response agencies are concerned about fire management for an industrial facility. A new mitigation measure has been developed to require the placement of a water cistern onsite that can be used by local fire response agencies to assist in fire and/or smoke suppression within the Project Area.

New Mitigation: The Applicant would install a 10,000-gallon, opaque, enclosed water cistern to store water for potential fire suppression needs. The location and access for the cistern would be developed in coordination with Klickitat County Fire Protection District 7. It would be kept in good working order throughout the Project's lifespan, including performing maintenance such as sediment removal or tank integrity testing as appropriate.


Ami Hafkemeyer
EFSEC Director of Siting and Compliance

06/13/2025

Date