



August 22, 2025

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Re: Klickitat County's Draft BESS and Solar Ordinance

Renewable Northwest (RNW) is a 501(c)3 nonprofit organization that advocates for clean energy across Washington, Oregon, Idaho, and Montana. We are a membership-based organization with over 90 members that include clean energy developers, manufacturers, consultants, law firms, and other nonprofit organizations.

RNW is grateful to have been invited to provide feedback on Klickitat County's draft BESS and Solar Ordinance. Clearly, much research and discussion has gone into this comprehensive document. As requested, RNW has reviewed the draft ordinance internally and sought feedback from our members, with the original goal of providing redline commentary. However, the feedback we have received from our members is that this draft ordinance would greatly benefit from conversation with industry representatives, before turning to line editing to ensure the ordinance accomplishes county goals.

It is our understanding that Klickitat County wants to encourage developers to use the county permitting process and/or the expedited option of the state's Energy Facility Site Evaluation Council (EFSEC) process, *without pre-empting county rules*. Solar and BESS developers share this goal: everyone benefits when a county government is supportive of a large project.

Unfortunately, this ordinance as drafted encourages the opposite; we believe no developer will choose the county process, and that the EFSEC option – including county pre-emption – will be viewed as less expensive, less complicated, and less time consuming. RNW understands that members of the Project Advisory Committee believe otherwise. Unfortunately, this conclusion was reached without any outreach or discussion with the companies who might use this ordinance to develop projects.

RNW would appreciate the opportunity to engage and contribute to a fully collaborative drafting process. There is great opportunity to craft an ordinance that builds on innovations like the Energy Overlay Zone, allowing the county to truly encourage solar development on land most suited for it. We are confident there are options to ensure Klickitat County achieves all its goals, including encouraging development that works within reasonable county rules.

The following sections are not a comprehensive list of concerning provisions, but they are the ones that rose to the top as the most unworkable for developers:

- **B.7.i.15 Setback requirements**

- BESS setbacks will be "5280 ft from the view of any residential property unless otherwise agreed with residential property owners"
- Solar setbacks "not be in view of any residential property unless otherwise agreed to with property owners"

Comment: Distances are unreasonable and far outside norms and the language "not in view" will lead to confusion and ignores the possibility of appropriate screening.

- **B.7.i.20 - noise exceedance requirements**

- 1 hour average and associated equip shall not exceed 40 dBA, as measured at the project property line

Comment: This is stricter than the state level noise requirements and is less than the average decibel level of conversation in a room.

- **B.7.j - Agrivoltaics**

- Language in this section essentially *requires* Agrivoltaics/dual use for projects by putting strict 20% land coverage requirements on projects not using agrivoltaics.

Comment: Not all sites are appropriate for agrivoltaics and requiring this defeats the purpose of finding the most appropriate use for land under consideration. This is particularly true in arid locations with few opportunities for dual use sites. In all cases, this requirement will raise project costs significantly.

- **Extensive surveys and reports** - All of the required permits, surveys and reports, particularly those listed below, could cost more than \$1M to produce and these costs would be borne *even before an application is filed*. At the permit application stage, projects are rarely mature enough to support these costs or have enough design certainty to complete these studies.

- B.7.h - ALTA survey
- B.7.i.19 - Lighting Plan
- B.7.i.16 - Vegetative screening plan and visual impacts assessment
- B7.i.23 - Safety Feasibility Assessment Report required
- B.7.i.24 - Draft and submit Agricultural Land Mitigation Report
- C.2, C.3
 - Commissioning plan required for BESS and Solar projects
 - Hazard Identification and Assessment plan
 - Risk Mitigation plan
 - EOP

Comment: RNW understands and appreciates that the County wants to address residents' concerns. But as drafted, these requirements appear to serve the purpose of discouraging attempted development, rather than steering development in a desirable way.

Klickitat County has historically been one of the most attractive places in Washington State to develop clean energy projects. Between 2011 and 2024, nine clean energy projects, mostly in eastern Klickitat County, have generated \$111,000,000 in local tax revenue. RNW is aware of how property tax assessments for these projects have resulted in rapidly declining property tax revenue, and we're actively working in the state legislature to fix this problem going forward. Nevertheless, property tax revenue from renewable energy projects have been substantial, and new projects will yield millions of dollars in county taxes, benefiting residents in a myriad of tangible ways.

We hope to work with you to continue this history of success by crafting a BESS and solar ordinance that works for community members and the development community.

Sincerely,
/s/ Adam Capage
Adam Capage
Outreach and Communications Director
Renewable Northwest