Montague Wind Power Facility

Crane Path Modification

March 14, 2019, Revised April 25, 2019

Montague Wind Power Facility (Montague) plans to use a temporary crane path outside the site boundary to move cranes from the southern to northern portions of the project area (from I-String to F-String). Montague would use the alternative crane path for a single pass by two cranes. This route is 5.1 miles long, and 4.4 miles are outside the site boundary (Figure 1). As approved, there are no feasible routes within the site boundary to move cranes between the north and south project areas without using public roads. The portions of the site boundary connecting the north and south project areas are too steep to walk cranes.

The alternative crane path would parallel Baseline Road heading west outside the site boundary and the head north along Ion Road, following the survey corridor within the proposed expanded site boundary areas for Phase 2, as described in Request for Amendment 4. The land crossed by the alternative crane path is owned by Weedman Farms LLC, and Montague has an agreement with the landowner for this one-time crossing. Each crane would take one day to move and the cranes would be moved about 10 days apart. No grading along the alternative route is planned.

The alternative crane path would allow for more efficient construction sequencing and require less overall truck trips and heavy equipment moving on public roads. Use of the alternative crane path would allow Montague to move cranes across the project site without using public roads. A disassembled crane requires about 20 semi-tractor trailers loads to transport on public roads, so use of the alternative crane path would save about 80 semi-truck loads (2 cranes x 20 loads per crane x 2 round trip = 80 trips) from traveling on Old Tree Lane, Hwy 19, Ion Road and Baseline Road. The boom portion of the crane will be transported by truck.

The alternative crane path crosses one jurisdictional stream outside the site boundary. This stream was mapped by Montague and concurred by DSL in JD 2010-0084. The alternative crane path also crosses areas surveyed for wetlands by Baseline Wind and reported in JD 2011-00364. The crane crossing would span the ordinary high water boundary of the stream (about 4 feet wide) using steel plates and timber crane mats to avoid impacts on the stream bed or banks (Figure 2). At this location, stream channel has been modified for agricultural use and has the uniform shape of an excavated channel. No fill would be added the stream. The location of the stream crossing is N 45°29.4331', W120°7.4192'.

Montague concludes that the alternative route does do not trigger the three "coulds" under OAR 345-027-0050(4) for a site certificate amendment because:

- Land and habitat types crossed by the proposed crane path are the same as within the site boundary (dry land wheat)
- Use is temporary and limited to single passes by two cranes.
- No excavation or grading is planned.
- The alternative crane path will reduce truck traffic on public roads.
- There are no sensitive resources or unique features that could be impacted in crane path area.
- The proposed modifications will not impair Montague's ability to comply with previously approved Site Certificate conditions.

 The proposed modifications will not require new conditions, or changes to the text of the previously approved Site Certificate conditions.

The alternative crane path is shown on figure 1. Table 1 demonstrates that the proposed temporary crane path does not trigger an amendment under OAR 345-027-0050(4)(a) because it does not result in new impacts to protected resources that have not previously been evaluated and addressed by the Council. In addition, Table 1 provides confirmation that the proposed crane path does not impair Montague's ability to comply with previously approved Site Certificate conditions and no new conditions or changes to existing conditions are required as a result of the proposed crane path. Therefore, the proposed crane path does not trigger an amendment under OAR 345-027-0050(4)(b) or (c).

Figure 1. Alternative crane path from turbine I-6 to F-3 outside the site boundary (orange dashed line)



Figure 2. Stream crossing location (left) and typical crane mats (right)



Figure 3. Temporary bridge

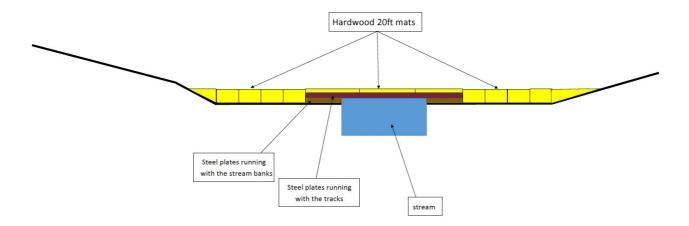


 Table 1. Assessment of Crane Path Compliance with Applicable Standards

Oregon Administrative Rule	Standard	Assessment of Compliance with Standard	Assessment of the Three "Coulds" under OAR 345-027-0050(4)
OAR 345-022- 0010	Organizational Expertise	This standard is not applicable to the crane path modification.	Not applicable
OAR 345-022- 0020	Structural Standard	This standard is not applicable to the crane path modification. There is no change to any of the facilities structures.	Not applicable
OAR 345-022- 0022	Soil Protection	The Council previously found that the Facility complies with the Soil Protection Standard. The proposed modifications do not alter the basis for the Council's earlier findings. Soil types crossed by the crane path include Ritzville silt loam, 2-7 percent slopes (32B), Ritzville silt loam, 7-12 percent slopes (32C), Willis silt loam, 5 to 12 percent slopes (56C), and Mikkalo silt loam, 7 to 12 percent slopes (17C). Potential impacts from erosion will be minimal and are addressed by the Facility's Erosion and Sediment Control Plan. No new road will be built. The path will be decompacted and reseeded in accordance with the landowner agreement so that the area will remain viable for agricultural purposes.	The crane path modification will not result in significant adverse impact, will not impair ability to comply with conditions of the Site Certificate, will not require new condition or change to existing condition of the Site Certificate.
OAR 345-022- 0030	Land Use	This standard is not applicable to the crane path modification. There is no change in land use as a result of the modification.	Not applicable
OAR 345-022- 0040	Protected Areas	This standard is not applicable to the crane path modification as action is temporary (two days) and does not affect a protect area.	Not applicable
OAR 345-022- 0050	Retirement and Financial Assurance	This standard is not applicable to the crane path modification. There are no proposed changes to the bond amount resulting from the crane path modification.	Not applicable

Oregon Administrative Rule	Standard	Assessment of Compliance with Standard	Assessment of the Three "Coulds" under OAR 345-027-0050(4)
OAR 345-022- 0060	Fish and Wildlife Habitat	The majority of the crane path would cross dryland wheat farmland (Category 6 habitat) A portion of the crane path would cross two ephemeral drainages that will crossed using crane mats.	The crane path modification will not result in significant adverse impact, will not impair ability to comply with conditions of the Site Certificate, will not require new condition or change to existing condition of the Site Certificate.
OAR 345-022- 0070	Threatened and Endangered Species	The site boundary, including the majority of the crane path, was surveyed for rare plants and Washington ground squirrel, which are the only threatened or endangered species suspected within the vicinity of the facility. No rare plants or Washington ground squirrel burrows were observed within the area of the crane path that was surveyed. The area that was not surveyed is cultivated wheat and is not suitable for threatened or endangered species	The crane path modification will not result in significant adverse impact, will not impair ability to comply with conditions of the Site Certificate, will not require new condition or change to existing condition of the Site Certificate.
OAR 345-022- 0080	Scenic Resources	This standard is not applicable to the crane path modification. The crane movement would not result in a change to scenic resources, all impacts would be temporary.	Not applicable
OAR 345-022- 0090	Historic, Cultural and Archaeological Resources	A pedestrian cultural resources field investigation was conducted for Phase 2, including the majority of the crane path and no known resources were found. Potential impacts to portions of the path that have not been surveyed are highly unlikely as no excavations will be made, and ground disturbance will be similar to plowing used for wheat farming.	The crane path modification will not result in significant adverse impact, will not impair ability to comply with conditions of the Site Certificate, will not require new condition or change to existing condition of the Site Certificate.
OAR 345-022- 0100	Recreation	This standard is not applicable to the crane path modification. The crane path is on private farmland without any public recreational resources.	Not applicable
OAR 345-022- 0110	Public Services	This standard is not applicable to the crane path modification. The crane path would not impact any public facilities.	Not applicable
OAR 345-022- 0120	Waste Minimization	This standard is not applicable to the crane path modification. The crane path would not change the facility's waste management.	Not applicable
OAR 345-024- 0010	Public Health and Safety Standards for Wind Energy Facilities	This standard is not applicable to the crane path modification. The crane path would not result in new above or belowground facilities and all impacts would be temporary.	Not applicable

Oregon Administrative Rule	Standard	Assessment of Compliance with Standard	Assessment of the Three "Coulds" under OAR 345-027-0050(4)
OAR 345-024- 0015	Cumulative Effects Standard for Wind Energy Facilities	The crane path will lessen Montague's use of public roads. Installation of underground transmission lines, or additional substations are not needed. The crane path would not impact raptors and other wildlife, and there will be no change to the visual impact analysis previously conducted. No additional lighting would be needed for the crane path.	Not applicable
OAR 345-024- 0090	Siting Standards for Transmission Lines	This standard is not applicable to the crane path modification. The crane path does not include new transmission lines.	Not applicable