

May 16, 2016

Katie Clifford
Energy Facility Siting Analyst
Oregon Department of Energy
625 Marion Street, NE
Salem, OR 97301-3742

Re: Proposed Change to Biglow Canyon Wind Farm: Request for
Department of Energy Determination Pursuant to OAR 345-027-0050(5)

Dear Ms. Clifford:

As you know, Portland General Electric Company (PGE) is the holder of the Third Amended Site Certificate for the Biglow Canyon Wind Farm (the "Site Certificate"). PGE is proposing to modify the approved facility as shown on the attached site plan in order to provide an additional storage facility at the approved five-acre O&M site.

PGE is proposing to construct a new single-story building, approximately 60 feet by 60 feet, on the south side of the O&M site. The building will be steel construction (including roof), similar in appearance to the existing buildings at the site and with the same color scheme. As shown on the attached site plan, the building will be located along the south side of the O&M site, west of the sanitary drain field.

The building will be used only for storage. It will be insulated and will have electricity, heat and ceiling fans. The building will not have water, will not be connected to the septic system for the O&M site, and will not have any office space.

The primary purpose of the new building is to provide room for PGE to store parts. Biglow Canyon utilizes wind turbines from two different manufacturers: Vestas (Phase I) and Siemens (Phases II and III). Each turbine supplier has proprietary information and technology that they require be protected from the other. PGE is obligated by contract to provide storage for both Vestas and Siemens. PGE currently shares warehouse space with Siemens. Under that arrangement, Siemens does not have adequate room to store the parts required by its contract with PGE.

Original equipment manufacturers (OEMs) in the wind industry generally have difficulty sourcing parts and experience delays due to parts being manufactured and stored overseas. As part of its contract, PGE has been recycling failed electrical, electronic and mechanical parts for repair and finding alternate sourcing on parts with better operating life, pricing and delivery. These parts are used to minimize down time and extend MTBF (Mean Time Between Failures). The repaired parts are advantageous to PGE when Siemens has a long lead time to get a replacement component; they are also used when PGE performs the turbine repairs.

Pursuant to OAR 345-027-0050(5), PGE therefore requests a determination by the Oregon Department of Energy that the change outlined above does not require an amendment to the Site Certificate. PGE notes that this request is very similar to a prior change request submitted by PGE by letter dated July 8, 2008, seeking a determination under OAR 345-027-0050(5) for an additional warehouse and office at the O&M site of the Biglow Canyon Wind Farm. The request was subsequently approved by the Department.

OAR 345-027-0050(5) provides:

A certificate holder may submit a change request in writing to the Department for a determination whether a proposed change requires a site certificate amendment. In the change request, the certificate holder must describe the proposed change, explain the basis for the certificate holder's conclusion that an amendment is not required under section (1), and provide the written evaluation described in section (3). The Department shall respond in writing as promptly as possible. The Department may refer its determination to the Council for concurrence, modification or rejection. At the request of the certificate holder or a Council member, the Department must refer its determination to the Council for concurrence, modification or rejection.

1. Analysis under OAR 345-027-0050(1)

PGE requests a determination that the proposed change does not meet the threshold requirements for an amendment to the Site Certificate under OAR 345-027-0050(1). OAR 345-027-0050(2) is not directly relevant to PGE's request. OAR 345-027-0050(1) provides:

Except as allowed under sections (2) and (6), the certificate holder must submit a request to amend the site certificate to design, construct or operate a facility in a manner different from the description in the site certificate if the proposed change:

- (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource protected by Council standards;
- (b) Could impair the certificate holder's ability to comply with a site certificate condition; or
- (c) Could require a new condition or a change to a condition in the site certificate.

A. The proposed change would not result in a significant adverse impact that the Council has not addressed in an earlier order.

The certificate holder has evaluated the potential impacts of the change shown on the attached site plan to determine whether the additional warehouse building at the approved O&M site would adversely impact any resources protected by Council rules. Although the combined O&M facilities would exceed the approximate 17,500 square-foot area indicated in Section III.A.2.d of the Site Certificate, there are no additional adverse impacts associated with the proposed addition on a new warehouse building. The additional warehouse structure would be located entirely within the approximately 5-acre O&M site south of Herin Lane, which was one of three potential O&M sites evaluated and approved by the Council in the Final Order for Biglow Canyon Wind Farm, June 30, 2006. In other words, the proposed site has already been evaluated in the ASC and ASC Supplement, reviewed by the Council, and approved.

Moreover, as shown in Table 6 of the Final Order of June 30, 2006 (p. 59), the O&M building site was assumed for purposes of the land use analysis to be 5 acres, not just the area occupied by an O&M building. The entire 5-acre site was also considered part of the approximately 177-acre permanent habitat impact of the Biglow Canyon Wind Farm. The area south of Herin Lane, where the O&M facility is located, is identified on Figure P-6 of the ASC as Agricultural, and therefore Category 6 habitat. Because the Certificate Holder was only required to provide mitigation for impacts to Category 3 and Category 4 habitat, the permanent impact to the O&M site was not germane to the Certificate Holder's habitat mitigation obligations set forth in Attachment C to the Final Order.

B. The proposed change would not impair the certificate holder's ability to comply with any site certificate condition.

As discussed above, the proposed change does not result in permanent disturbance of a type or extent not previously evaluated. Moreover, as described above, the change does not create any impacts to habitat categories not already evaluated and does not create any adverse impact to other resources protected by Council rules. The Site Certificate already contains adequate conditions to address the potential impacts of the temporary disturbance associated with construction activities (for example, Soil Protection conditions 26-35, Condition 56 requiring preconstruction surveys for raptor nesting sites, and Historic, Cultural and Archaeological conditions 69-73). Construction of additional O&M facilities at the approved 5-acre O&M site would not impair PGE's ability to comply with those conditions.

Condition 9 requires that the certificate holder provide a bond or letter of credit as financial assurance for site restoration, based on the costs shown on Table 1 of the Final Order on Amendment #3 (October 31, 2008). Table 1 includes a cost of \$11,320 to "dismantle and dispose of 5,200-sq ft O&M building." That is 0.07 percent of the total estimated site restoration cost for the Biglow Canyon Wind Farm of \$14.624 million and less than one percent of the "Future Developments Contingency" of \$1,218,647 already incorporated into the site restoration cost and financial assurance. The cost to dismantle and dispose of the proposed new warehouse structure of approximately 3,600 square feet would be even less. Given the minimal cost

compared to the contingency already included in the financial assurance, construction of the new warehouse building does not interfere with PGE's ability to comply with Condition 9.

Condition 20 requires that aboveground structures not be located within 30 feet of any property line or within 50 feet from the right-of-way of any arterial or major collector road or street. The new building would not be located near any "arterial or major collector road or street," and would be located more than 30 feet from the boundary of PGE's property as shown on the attached site plan.

Condition 75 requires that prior to beginning facility operation, the certificate holder must have a well (not exceeding 5,000 gallons per day) suitable for delivering water for domestic use at the O&M building. The Site Certificate, Section III.A.2.d indicates that domestic water use at the O&M building is not anticipated to exceed 1,000 gallons per day. The certificate holder has developed a well to serve water needs at the O&M facility; the new warehouse building will not be served by water and will be used for storage; therefore, it will not increase water use.

Condition 50 requires that the certificate holder "apply a low-reflectivity finish to the exterior of the O&M building and substation equipment to control their visual integration into the surrounding background. Condition 51 requires that the certificate holder "design and construct the O&M building to be generally consistent with the character of similar buildings used by commercial farmers or ranchers in the area and shall paint the building in a neutral color to blend with the surrounding background." The certificate holder can and will comply with Conditions 50 and 51 in the construction of the new warehouse building.

Condition 83 requires that sanitary waste generated at the O&M facility be discharged to "a licensed on-site septic system in compliance with county permit requirements. The certificate holder shall design the septic system with a capacity that is less than 2,500 gallons per day." The certificate holder has constructed a county-permitted septic system on the O&M site. The system has a 2,000 gallon tank, and a drainfield. The additional O&M building would not have any water or septic service and would not require enlargement or alteration of the septic system at the O&M site.

Conditions 82 and 84-86 address waste management practices during construction activities. Construction of a new warehouse building would not involve construction activities materially different from those already employed in constructing the other O&M facilities; therefore, new construction will not affect the certificate holder's ability to comply with requirements for waste management during construction.

C. The proposed change would not require a new condition or a change to a condition of the site certificate.

As described above, the Site Certificate already contains adequate conditions to address any impacts (soil impacts, restoration of temporary disturbance areas, and impacts to previously undiscovered archaeological resources) that might arise from the facility changes addressed in this request.

2. Evaluation required by OAR 345-027-0050(3)

OAR 345-027-0050(3) requires that if the certificate holder concludes that a change does not require a site certificate amendment, “the certificate holder shall, nevertheless, complete an investigation sufficient to demonstrate that the proposed change in the design, construction and operation of the facility would comply with applicable Council standards.”

For the reasons described above, the entire 5-acre O&M site has already been evaluated by the Council, and the certificate holder’s proposal to construct a new warehouse building of approximately 3,600 square feet on that site does not alter the Council’s prior findings that the Biglow Canyon Wind Project will comply with Council standards for Soil Protection (OAR 345-022-0022), Threatened and Endangered Species (OAR 345-022-0070), Fish and Wildlife Habitat (OAR 345-022-0060), and Historic, Cultural and Archaeological Resources (OAR 345-0220-0090). The proposed facility changes would not involve the construction of additional turbines, transmission facilities, or access roads, and would not increase the area of permanent disturbance associated with the Biglow Canyon Wind Farm.

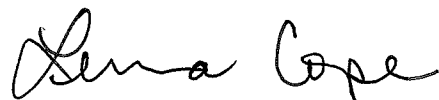
Several conditions of the Site Certificate were required by the Council to ensure that development at the O&M site would comply with Council standards. For the reasons set forth above, the certificate holder has concluded that the proposed construction of an additional building at the O&M site can be accomplished in full compliance with those conditions.

Therefore, the changes do not alter the Council’s prior findings of compliance with standards regarding Organizational Expertise (OAR 345-022-0010), Retirement and Financial Assurance (OAR 345-022-0050), Land Use (OAR 345-022-0030), Protected Areas (OAR 345-022-0040), Scenic and Aesthetic Values (OAR 345-022-0080), Recreation (OAR 345-022-0100), Public Health and Safety for Wind Energy Facilities (OAR 345-024-0010), Siting Standards for Wind Energy Facilities (OAR 345-024-0015), Siting Standards for Transmission Lines (OAR 345-024-0090), Structural Standard (OAR 345-022-0020), Public Services (OAR 345-022-0110), Waste Minimization (OAR 345-022-0120), and Noise Control (OAR 340-035-0035).

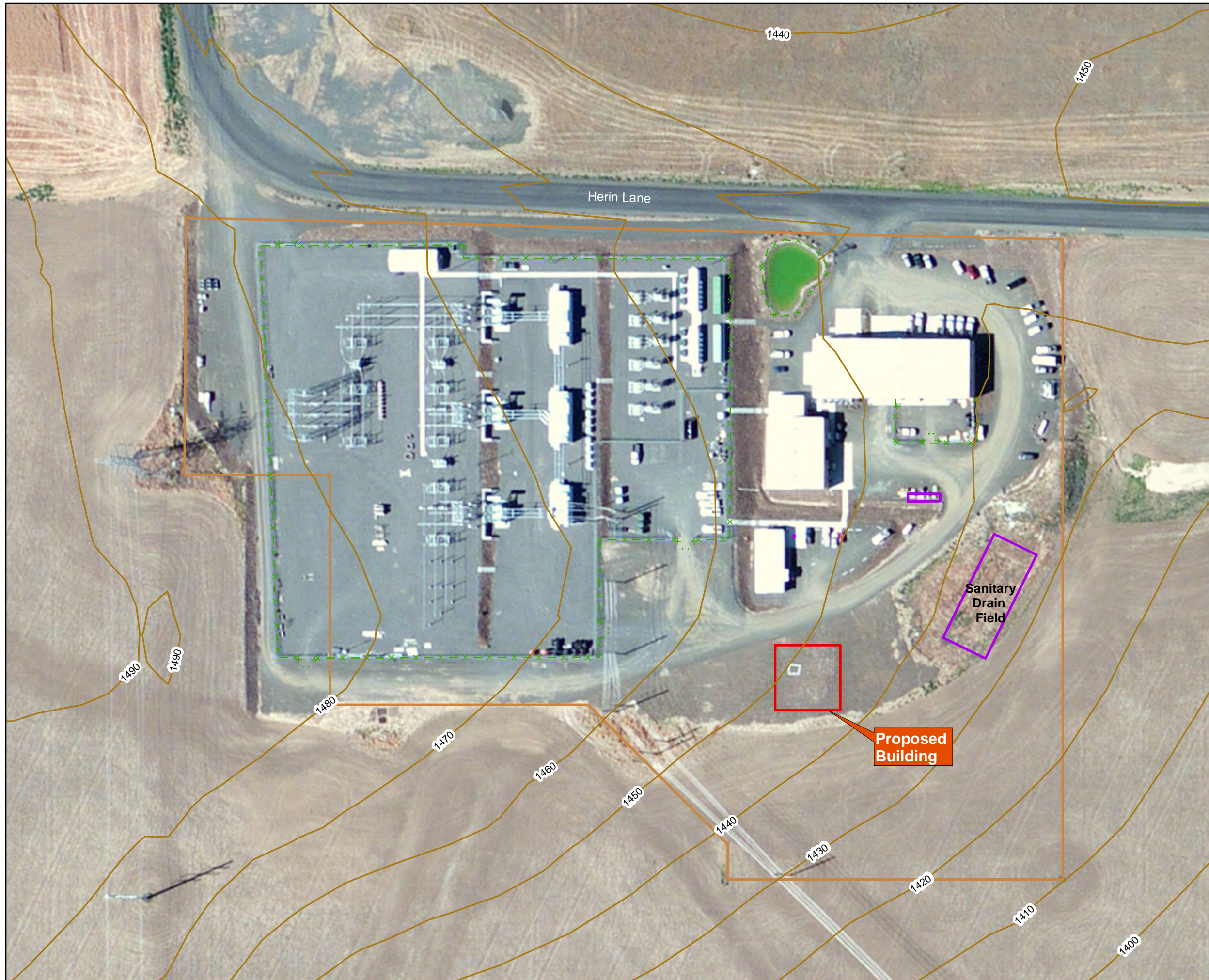
For the reasons set forth in this letter, we request the Department’s determination that the proposed construction of an additional storage structure of approximately 3,600 square feet as part of the approved O&M site does not require an amendment to the Site Certificate.

Ms. Clifford
May 16, 2016
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Very truly yours,

A handwritten signature in black ink that reads "Lenna Cope". The signature is written in a cursive style with a large initial 'L' and a distinct 'C'.

Lenna Cope
Portland General Electric Company



- Map Features**
- Proposed Building
 - PGE Property Boundary
 - x - x - x Fence
 - Sanitary Drain Field
 - 10 Foot Contour



Portland General Electric
Portland, Oregon

Site Plan
Change Request for
Additional O&M Building
Biglow Canyon Wind Farm

| | |
|--|--------------------|
| Date: 5/16/2016 | Drawn By: J.B. Hoy |
| Drawing File: J:\Biglow_Canyon\Maps\BC_Building_New_051616.mxd | Rev.: |



Oregon

Kate Brown, Governor



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January 12, 2017

Thomas J. Nilan
Manager, Environmental Compliance & Licensing
Portland General Electric
121 SW Salmon Street
Portland, Oregon 97204

Sent via email: Tom.Nilan@pgn.com

RE: Request for Determination Pursuant to OAR 345-027-0050(5) for Proposed Change to Biglow Canyon Wind Farm

Dear Mr. Nilan:

The Oregon Department of Energy (Department) received Portland General Electric's (PGE) request, dated May 16, 2016, for a determination under OAR 345-027-0050(5) whether the construction of an additional warehouse structure at the O&M site requires an amendment to the site certificate for the Biglow Canyon Wind Farm (BCWF) [Attachment 1]. On May 24, 2016 the Department requested additional information via email. PGE provided additional information requested by the Department on November 21, 2016 [Attachment 2].

Background and Description of Proposed Change

On June 30, 2006, the Energy Facility Siting Council (EFSC or Council) issued a site certificate to Orion Sherman County Wind Farm LLC (Orion) for the BCWF, a wind energy facility with a peak generating capacity of up to 450 megawatts in Sherman County, Oregon that began operating in 2010. On November 3, 2006, the Council approved a transfer of the site certificate from Orion to PGE as set forth in the Final Order on Amendment #1. The Council subsequently approved a second and third site certificate amendment in 2007 and 2008, respectively. PGE has previously submitted five change requests related to the site certificate, and in each case the Department notified PGE of its determination that a site certificate amendment would not be necessary to authorize the requested changes. PGE's fourth change request, submitted on July 8, 2008, requested the Department to determine whether a site certificate amendment was necessary to authorize PGE to construct two new O&M buildings (a new warehouse and a new office building) within the site boundary. On July 21, 2008, the Department notified PGE of its determination that a site certificate would not be necessary to authorize construction of the two new structures.

PGE points out that its current request for a determination that the construction of an additional warehouse structure (hereafter, "new building") at the O&M site does not require an amendment to the

BCWF site certificate is similar to its fourth change request. Like the warehouse described in the fourth change request, PGE indicates that the purpose of the new building under this sixth change request is to provide room for PGE to store wind turbine parts. The need for the new building arises from PGE's decision to use a different turbine supplier for Phase I (Vestas) and Phases II and III (Siemens). PGE states that it is obligated by contract to provide separate storage space for both Siemens and Vestas, and that Siemens does not currently have adequate room to store the parts required by its contract with PGE. This sixth change request describes the new building as follows:

PGE is proposing to construct a new single-story building, approximately 60 feet by 60 feet, on the south side of the O&M site. The building will be steel construction (including roof), similar in appearance to the existing buildings at the site and with the same color scheme...[T]he building will be located along the south side of the O&M site, west of the sanitary drain field.

The building will be used only for storage. It will be insulated and will have electricity, heat and ceiling fans. The building will not have water, will not be connected to the septic system for the O&M site, and will not have any office space.

Evaluation under OAR 345-027-0050

Under OAR 345-027-0050(5), a certificate holder may ask the Department to determine whether a proposed change requires a site certificate amendment by submitting a change request describing the proposed change, explaining the basis for the certificate holder's conclusion that an amendment is not required under OAR 345-027-0050(1), and providing the written evaluation described in OAR 345-027-0050(3). The Department considers PGE to have met their obligations under the requirements of OAR 345-027-0050(5) by providing the information contained in their May 16, 2016 change request and November 21, 2016 additional information submittal.

OAR 345-027-0050(1)

OAR 345-027-0050(1) requires that, except as allowed under sections (2) and (6), the certificate holder submit a request to amend the site certificate to design, construct, or operate a facility in a manner different from the description in the site certificate if the proposed change meets one or more criteria described in (a) through (c). Taken together, OAR 345-027-0050(1) and OAR 345-027-0050(5) provide the Department authority to authorize (subject to Council review at the request of the certificate holder or a Council member) a change in design, construction, or operation of a facility in a manner different from the description in the site certificate without requiring an amendment to the site certificate if the proposed change does not meet one or more criteria in OAR 345-027-0050(1)(a)-(c).

The third amended site certificate describes the O&M buildings as follows:

The site of the operations and maintenance buildings will comprise about 5 acres adjacent to the substation on Herin Lane. The O&M buildings will occupy about 17,500 square feet and will include office and workshop areas, control room, kitchen, bathroom, shower, utility sink, and other typical facilities. Water for the bathroom, shower and kitchen will be obtained from an onsite well constructed by a licensed contractor in accordance with local and state requirements. Water use will not be expected to exceed 1,000 gallons per day. Domestic wastewater generated

at the O&M facility will drain into an onsite septic system. A graveled parking area for employees, visitors and equipment will be located adjacent to the O&M facility. [Third amended site certificate at 3].

The new building could potentially be construed to be consistent with the “other typical facilities” authorized in the third amended site certificate for the O&M buildings, particularly given the similarity of the new building to the warehouse authorized in response to PGE’s fourth change request and later incorporated into the third amended site certificate [Final Order on Amendment #3 at 5 and 6]. However, because the approximately 3,600 square-foot new building would be an addition to the O&M buildings footprint (approximately 17,500 square-feet) described in Section III.A.2.d of the third amended site certificate, the evaluation under OAR 345-027-0050(1) is required.

OAR 345-027-0050(1)(a): *(1) Except as allowed under sections (2) and (6), the certificate holder must submit a request to amend the site certificate to design, construct or operate a facility in a manner different from the description in the site certificate if the proposed change: (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource protected by Council standards...*

PGE states that the new building would be entirely located within the 5-acre O&M site adjacent to the substation on Herin Lane described in the third amended site certificate. The new building would not have any water or septic service [Attachment 2]. PGE evaluated the potential impacts and given that the new building would be located on an unvegetated, developed gravel area previously evaluated as a permanent impact of project facilities and adjacent to existing O&M buildings, they concluded it would not result in a significant adverse impact that the Council has not addressed in an earlier order to a resource protected by Council standards. The Department agreed with PGE’s analysis and conclusions but based on the type of development, determined it prudent to further evaluate impacts to soil, cultural resources, farmland, and natural resources.

Conditions related to soil protection during construction (Section IV.D of the third amended site certificate) would continue to apply and are expected to be sufficient to ensure no significant adverse impact to soils from construction of the new building. Because the entirety of the 5-acre O&M site was previously considered by Council as part of the permanent impacts to fish and wildlife habitat (in this case, Category 6 habitat) [application for site certificate at Figure P-6] and part of the 170.73 acres of permanent impact to land zoned EFU (exclusive farm use) [original final order at 59], further development within the 5-acre site would not result in a significant adverse impact to fish and wildlife habitat or high-value farmland beyond what the Council addressed in an earlier order nor would it require additional mitigation for impacts to habitat.

PGE states that previously-conducted cultural resource surveys included the area where the new building would be located, and in Attachment 2 re-affirms its commitment to comply with the conditions relevant to ensuring that construction activities would not result in significant adverse impacts to historic, cultural, and archaeological resources (see, e.g., Conditions 70, 71, and 72 of the third amended site certificate). Therefore, further development within the 5-acre site would not result in a significant adverse impact to historic, cultural, and archaeological resources beyond what the Council addressed in an earlier order.

Based upon these considerations, the Department concludes that the proposed change would not result in a significant adverse impact that the Council has not addressed in an earlier order to a resource protected by Council standards.

OAR 345-027-0050(1)(b): *(1) Except as allowed under sections (2) and (6), the certificate holder must submit a request to amend the site certificate to design, construct or operate a facility in a manner different from the description in the site certificate if the proposed change:... (b) Could impair the certificate holder's ability to comply with a site certificate condition; or...*

The second factor under OAR 345-027-0050(1) would require a site certificate amendment if the proposed change "could impair the certificate holder's ability to comply with a site certificate condition."

In Attachments 1 and 2, PGE affirms that design of the new building would meet the requirements of Conditions 20, 50, 52, 67, 68, and 112, including but not limited to requirements to reduce the visual impact of facility and to design, engineer, and construct the facility to avoid dangers to human safety presented by seismic and non-seismic hazards. In addition, PGE acknowledges that its obligations under Conditions 2, 3, 46, 52, 70-72, 82, 84-86, 93 and 94 would apply to the new building. These conditions describe PGE's obligations related to waste management practices; use, clean up, and disposal of hazardous materials; minimizing lighting during nighttime construction; developing and implementing a site health and safety plan; minimizing fire risk; protecting cultural resources during construction; and ensuring compliance with applicable laws and regulations and the terms and conditions of the site certificate. PGE stated that it would ensure compliance with Condition 71 "by having a qualified archaeologist to monitor ground-disturbing activities" (Attachment 2). The Department reminds PGE that Condition 71 requires the certificate holder to ensure that a qualified archaeologist is present on site during any ground-disturbing activities; otherwise, the certificate holder shall implement an alternate monitoring procedure, including a testing strategy, as agreed to in consultation with the Department, the Oregon State Historic Preservation Office, and the tribes.

PGE acknowledges its obligations under Condition 89 to reduce noise impacts and states that it will re-establish a noise complaint response system at the operational administrative offices (Attachment 2). Condition 74 requires that the certificate holder obtain water for construction activities from off-site sources previously permitted for such uses. PGE states that it intends to obtain the minimal amount of water required for construction of the new building from the well located onsite, and that if the cumulative water requirements for ongoing operations and construction of the new building would exceed the daily limit of 5,000 gallons per day, PGE would obtain any additional water from an offsite source.

Condition 9 of the third amended site certificate required PGE to submit a bond or letter of credit in an amount approved by the Department and based on the costs shown in Table 1 of the Final Order on Amendment #3. Those costs included \$11,320 (third quarter 2008 dollars) to "dismantle and dispose of 5,200-sq ft O&M building," which is one of the structures (the warehouse) included in PGE's fourth change request. Given the similarity between the previously approved larger warehouse and the warehouse under the current change request, PGE points to this cost as the upper-bound of the cost to dismantle and dispose of the approximately 3,600 square foot new building, and notes that this cost

would be less than one percent of the “Future Developments Contingency” of \$1,218,647 (third quarter 2008 dollars) that PGE provided in its financial assurance instrument. The Department notes that Table 1 also included costs to restore the 5-acre O&M site. The Department agrees with PGE that, based on this information, construction of the new building would not interfere with PGE’s ability to comply with Condition 9.

PGE provided information on how the proposed change would comply with the applicable site certificate conditions pertaining to the Threatened and Endangered Species standard (OAR 345-022-0070) and the Fish and Wildlife Habitat standard (OAR 345-022-0060). PGE explains that construction of the new building would comply with Condition 57 (which requires the certificate holder to implement measures to mitigate impacts to sensitive wildlife habitat during construction) because the proposed change would be located entirely within Category 6 habitat, which is defined by OAR 635-415-0025 as habitat that has low potential to become essential or important habitat, and for which no compensatory mitigation is required. In 2006 and 2012, raptor nest surveys were performed to comply in part with the requirements of Conditions 56, 60, and the Wildlife Monitoring and Mitigation Plan (Condition 61). These surveys identified no bald eagle or peregrine falcon nests within 2 miles of the proposed change (findings that are reportedly supported by PGE’s 2016 eagle nest surveys) and no sensitive raptor nests within one-half mile of the proposed change. Condition 60, which requires that during construction the certificate holder protect the area within a 1,300-foot buffer around any active nests of the species specified in that condition during the sensitive periods listed therein, would apply during construction of the new building. PGE states that if construction of the new building occurs “during nesting season for the sensitive species outlined in Condition 60, a review of the area will be completed for suitable nesting habitat and nests. If an active nest is found, PGE will comply with the outlined parameters in Condition 60” [Attachment 2]. PGE does not elaborate upon what a “review of the area” would entail. The Department reminds PGE that per Condition 60 such a review must follow a protocol approved by the Oregon Department of Fish and Wildlife to determine whether there are any active nests of these species within a half-mile of any area that would be disturbed during construction.

The Department notes that Condition 103 of the third amended site certificate requires the certificate holder to design, construct, operate, and retire the facility substantially as described in the site certificate, consistent with OAR 345-027-0020(3). The Department concludes that the requested change is consistent with Condition 103 because it would not result in a significant adverse impact that the Council has not addressed in an earlier order to a resource protected by Council standards, will not impair the certificate holder’s ability to comply with any other site certificate condition, and does not require any new condition or change to a condition of the site certificate. In addition, the Department concludes that the contemplated change (a modest increase in the O&M buildings footprint as a result of an additional building of a kind contemplated by the site certificate) does not involve design, construction, operation, or retirement of the facility in a manner that is substantially different from the site certificate in either kind or scope.

Based upon the information provided in Attachments 1 and 2, and the considerations and analysis above, the Department agrees with PGE’s assessment that the proposed change would not impair the certificate holder’s ability to comply with a site certificate condition.

OAR 345-027-0050(1)(c): (1) Except as allowed under sections (2) and (6), the certificate holder must submit a request to amend the site certificate to design, construct or operate a facility in a manner different from the description in the site certificate if the proposed change:...(c) Could require a new condition or a change to a condition in the site certificate.

The final factor under OAR 345-027-0050(1) would require a site certificate amendment if the proposed change "could require a new condition or a change to a condition in the site certificate." The Department agrees with PGE's analysis that the proposed change (addition of the new building) would not require any new or changed conditions, because the site certificate already contains conditions adequate to address the impacts that might arise from the proposed change.

Determination

The Department agrees with PGE's evaluation under OAR 345-027-0050(3) that the proposed change would comply with applicable Council standards because the change would not alter the basis for the Council's previous findings of compliance with the standards. The proposed change does not significantly change the facts and circumstances addressed by the Council in making previous findings of compliance with each of the applicable Council standards.

For the reasons discussed above, we have determined that a site certificate amendment is unnecessary to accommodate the proposed change described in the May 16, 2016 change request and November 21, 2016 additional information submittal. In accordance with the requirements of OAR 345-027-0050(4), please include a description of this change request and our determination in the next annual report required under OAR 345-026-0080. In the annual report, please describe any unanticipated impacts that result from this change and describe how PGE addressed those impacts.

Please note that OAR 345-027-0050(5) allows that at the request of a member of the Council, the Department's determination must be referred to the Council for concurrence, modification, or rejection. In compliance with this rule the Department will share its determination with EFSC, informing Council members of their rights under the rule. Should a Council member request that Council review the determination, this would likely go before EFSC at the February Council meeting.

Sincerely,



Katie Clifford
Energy Facility Siting Analyst
Katie.clifford@oregon.gov
(503) 302-0267

cc via e-mail distribution:

Barry Beyeler, Chair, Energy Facility Siting Council
Todd Cornett, Oregon Department of Energy
Duane Kilsdonk, Oregon Department of Energy
Max Woods, Oregon Department of Energy

May 16, 2016

Katie Clifford
Energy Facility Siting Analyst
Oregon Department of Energy
625 Marion Street, NE
Salem, OR 97301-3742

Re: Proposed Change to Biglow Canyon Wind Farm: Request for
Department of Energy Determination Pursuant to OAR 345-027-0050(5)

Dear Ms. Clifford:

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PGE is proposing to construct a new single-story building, approximately 60 feet by 60 feet, on the south side of the O&M site. The building will be steel construction (including roof), similar in appearance to the existing buildings at the site and with the same color scheme. As shown on the attached site plan, the building will be located along the south side of the O&M site, west of the sanitary drain field.

The building will be used only for storage. It will be insulated and will have electricity, heat and ceiling fans. The building will not have water, will not be connected to the septic system for the O&M site, and will not have any office space.

The primary purpose of the new building is to provide room for PGE to store parts. Biglow Canyon utilizes wind turbines from two different manufacturers: Vestas (Phase I) and Siemens (Phases II and III). Each turbine supplier has proprietary information and technology that they require be protected from the other. PGE is obligated by contract to provide storage for both Vestas and Siemens. PGE currently shares warehouse space with Siemens. Under that arrangement, Siemens does not have adequate room to store the parts required by its contract with PGE.

Original equipment manufacturers (OEMs) in the wind industry generally have difficulty sourcing parts and experience delays due to parts being manufactured and stored overseas. As part of its contract, PGE has been recycling failed electrical, electronic and mechanical parts for repair and finding alternate sourcing on parts with better operating life, pricing and delivery. These parts are used to minimize down time and extend MTBF (Mean Time Between Failures). The repaired parts are advantageous to PGE when Siemens has a long lead time to get a replacement component; they are also used when PGE performs the turbine repairs.

Pursuant to OAR 345-027-0050(5), PGE therefore requests a determination by the Oregon Department of Energy that the change outlined above does not require an amendment to the Site Certificate. PGE notes that this request is very similar to a prior change request submitted by PGE by letter dated July 8, 2008, seeking a determination under OAR 345-027-0050(5) for an additional warehouse and office at the O&M site of the Biglow Canyon Wind Farm. The request was subsequently approved by the Department.

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A certificate holder may submit a change request in writing to the Department for a determination whether a proposed change requires a site certificate amendment. In the change request, the certificate holder must describe the proposed change, explain the basis for the certificate holder's conclusion that an amendment is not required under section (1), and provide the written evaluation described in section (3). The Department shall respond in writing as promptly as possible. The Department may refer its determination to the Council for concurrence, modification or rejection. At the request of the certificate holder or a Council member, the Department must refer its determination to the Council for concurrence, modification or rejection.

1. Analysis under OAR 345-027-0050(1)

PGE requests a determination that the proposed change does not meet the threshold requirements for an amendment to the Site Certificate under OAR 345-027-0050(1). OAR 345-027-0050(2) is not directly relevant to PGE's request. OAR 345-027-0050(1) provides:

Except as allowed under sections (2) and (6), the certificate holder must submit a request to amend the site certificate to design, construct or operate a facility in a manner different from the description in the site certificate if the proposed change:

- (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource protected by Council standards;
- (b) Could impair the certificate holder's ability to comply with a site certificate condition; or
- (c) Could require a new condition or a change to a condition in the site certificate.

A. The proposed change would not result in a significant adverse impact that the Council has not addressed in an earlier order.

The certificate holder has evaluated the potential impacts of the change shown on the attached site plan to determine whether the additional warehouse building at the approved O&M site would adversely impact any resources protected by Council rules. Although the combined O&M facilities would exceed the approximate 17,500 square-foot area indicated in Section III.A.2.d of the Site Certificate, there are no additional adverse impacts associated with the proposed addition on a new warehouse building. The additional warehouse structure would be located entirely within the approximately 5-acre O&M site south of Herin Lane, which was one of three potential O&M sites evaluated and approved by the Council in the Final Order for Biglow Canyon Wind Farm, June 30, 2006. In other words, the proposed site has already been evaluated in the ASC and ASC Supplement, reviewed by the Council, and approved.

Moreover, as shown in Table 6 of the Final Order of June 30, 2006 (p. 59), the O&M building site was assumed for purposes of the land use analysis to be 5 acres, not just the area occupied by an O&M building. The entire 5-acre site was also considered part of the approximately 177-acre permanent habitat impact of the Biglow Canyon Wind Farm. The area south of Herin Lane, where the O&M facility is located, is identified on Figure P-6 of the ASC as Agricultural, and therefore Category 6 habitat. Because the Certificate Holder was only required to provide mitigation for impacts to Category 3 and Category 4 habitat, the permanent impact to the O&M site was not germane to the Certificate Holder's habitat mitigation obligations set forth in Attachment C to the Final Order.

B. The proposed change would not impair the certificate holder's ability to comply with any site certificate condition.

As discussed above, the proposed change does not result in permanent disturbance of a type or extent not previously evaluated. Moreover, as described above, the change does not create any impacts to habitat categories not already evaluated and does not create any adverse impact to other resources protected by Council rules. The Site Certificate already contains adequate conditions to address the potential impacts of the temporary disturbance associated with construction activities (for example, Soil Protection conditions 26-35, Condition 56 requiring preconstruction surveys for raptor nesting sites, and Historic, Cultural and Archaeological conditions 69-73). Construction of additional O&M facilities at the approved 5-acre O&M site would not impair PGE's ability to comply with those conditions.

Condition 9 requires that the certificate holder provide a bond or letter of credit as financial assurance for site restoration, based on the costs shown on Table 1 of the Final Order on Amendment #3 (October 31, 2008). Table 1 includes a cost of \$11,320 to "dismantle and dispose of 5,200-sq ft O&M building." That is 0.07 percent of the total estimated site restoration cost for the Biglow Canyon Wind Farm of \$14.624 million and less than one percent of the "Future Developments Contingency" of \$1,218,647 already incorporated into the site restoration cost and financial assurance. The cost to dismantle and dispose of the proposed new warehouse structure of approximately 3,600 square feet would be even less. Given the minimal cost

compared to the contingency already included in the financial assurance, construction of the new warehouse building does not interfere with PGE's ability to comply with Condition 9.

Condition 20 requires that aboveground structures not be located within 30 feet of any property line or within 50 feet from the right-of-way of any arterial or major collector road or street. The new building would not be located near any "arterial or major collector road or street," and would be located more than 30 feet from the boundary of PGE's property as shown on the attached site plan.

Condition 75 requires that prior to beginning facility operation, the certificate holder must have a well (not exceeding 5,000 gallons per day) suitable for delivering water for domestic use at the O&M building. The Site Certificate, Section III.A.2.d indicates that domestic water use at the O&M building is not anticipated to exceed 1,000 gallons per day. The certificate holder has developed a well to serve water needs at the O&M facility; the new warehouse building will not be served by water and will be used for storage; therefore, it will not increase water use.

Condition 50 requires that the certificate holder "apply a low-reflectivity finish to the exterior of the O&M building and substation equipment to control their visual integration into the surrounding background. Condition 51 requires that the certificate holder "design and construct the O&M building to be generally consistent with the character of similar buildings used by commercial farmers or ranchers in the area and shall paint the building in a neutral color to blend with the surrounding background." The certificate holder can and will comply with Conditions 50 and 51 in the construction of the new warehouse building.

Condition 83 requires that sanitary waste generated at the O&M facility be discharged to "a licensed on-site septic system in compliance with county permit requirements. The certificate holder shall design the septic system with a capacity that is less than 2,500 gallons per day." The certificate holder has constructed a county-permitted septic system on the O&M site. The system has a 2,000 gallon tank, and a drainfield. The additional O&M building would not have any water or septic service and would not require enlargement or alteration of the septic system at the O&M site.

Conditions 82 and 84-86 address waste management practices during construction activities. Construction of a new warehouse building would not involve construction activities materially different from those already employed in constructing the other O&M facilities; therefore, new construction will not affect the certificate holder's ability to comply with requirements for waste management during construction.

C. The proposed change would not require a new condition or a change to a condition of the site certificate.

As described above, the Site Certificate already contains adequate conditions to address any impacts (soil impacts, restoration of temporary disturbance areas, and impacts to previously undiscovered archaeological resources) that might arise from the facility changes addressed in this request.

2. Evaluation required by OAR 345-027-0050(3)

OAR 345-027-0050(3) requires that if the certificate holder concludes that a change does not require a site certificate amendment, “the certificate holder shall, nevertheless, complete an investigation sufficient to demonstrate that the proposed change in the design, construction and operation of the facility would comply with applicable Council standards.”

For the reasons described above, the entire 5-acre O&M site has already been evaluated by the Council, and the certificate holder’s proposal to construct a new warehouse building of approximately 3,600 square feet on that site does not alter the Council’s prior findings that the Biglow Canyon Wind Project will comply with Council standards for Soil Protection (OAR 345-022-0022), Threatened and Endangered Species (OAR 345-022-0070), Fish and Wildlife Habitat (OAR 345-022-0060), and Historic, Cultural and Archaeological Resources (OAR 345-0220-0090). The proposed facility changes would not involve the construction of additional turbines, transmission facilities, or access roads, and would not increase the area of permanent disturbance associated with the Biglow Canyon Wind Farm.

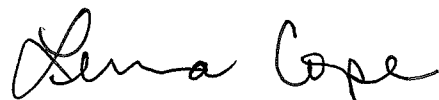
Several conditions of the Site Certificate were required by the Council to ensure that development at the O&M site would comply with Council standards. For the reasons set forth above, the certificate holder has concluded that the proposed construction of an additional building at the O&M site can be accomplished in full compliance with those conditions.

Therefore, the changes do not alter the Council’s prior findings of compliance with standards regarding Organizational Expertise (OAR 345-022-0010), Retirement and Financial Assurance (OAR 345-022-0050), Land Use (OAR 345-022-0030), Protected Areas (OAR 345-022-0040), Scenic and Aesthetic Values (OAR 345-022-0080), Recreation (OAR 345-022-0100), Public Health and Safety for Wind Energy Facilities (OAR 345-024-0010), Siting Standards for Wind Energy Facilities (OAR 345-024-0015), Siting Standards for Transmission Lines (OAR 345-024-0090), Structural Standard (OAR 345-022-0020), Public Services (OAR 345-022-0110), Waste Minimization (OAR 345-022-0120), and Noise Control (OAR 340-035-0035).

For the reasons set forth in this letter, we request the Department’s determination that the proposed construction of an additional storage structure of approximately 3,600 square feet as part of the approved O&M site does not require an amendment to the Site Certificate.

Ms. Clifford
May 16, 2016
Page 6

Very truly yours,

A handwritten signature in black ink that reads "Lenna Cope". The signature is written in a cursive style with a large initial "L" and a distinct "C" for "Cope".

Lenna Cope
Portland General Electric Company



- Map Features**
- Proposed Building
 - PGE Property Boundary
 - x - x - x Fence
 - Sanitary Drain Field
 - 10 Foot Contour



Portland General Electric
Portland, Oregon

Site Plan
Change Request for
Additional O&M Building
Biglow Canyon Wind Farm

| | |
|--|--------------------|
| Date: 5/16/2016 | Drawn By: J.B. Hoy |
| Drawing File: J:\Biglow_Canyon\Maps\BC_Building_New_051616.mxd | |



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

November 21, 2016
Biglow
ES-293-2016

Katie Clifford
Energy Facility Siting Analyst
Oregon Department of Energy
625 Marion Street NE
Salem, OR 97301

Subject: Biglow Canyon Wind Farm Change Request

Dear Ms. Clifford:

In May of 2016 Portland General Electric Company (PGE) submitted the Biglow Canyon Request for Department of Energy Determination pursuant to OAR 345-027-0050(5); at that time the Department responded with a request for PGE to provide additional information to assist in the Department's review of the Change Request. Please see below for the additional information requested.

Request 1:

A figure showing where the warehouse would be located in relationship to the approved site boundary (as previously amended) and the boundary of the 5-acre Operation & Maintenance (O&M) site.

Response:

Please see the attached figure (Attachment 1); PGE has modified the figure attached to the Change Request to show the additional requested information. The site certificate boundary is shown in the upper right-hand corner inset. The figure also shows the PGE property boundaries where the switchyard and O&M facilities are located; and the location of the proposed new O&M building in relationship to the property boundary.

The first time a specific acreage for the O&M facilities is referenced is in the Second Amended Site Certificate. Figure 1a of the Request for a Second Amended Site Certificate showed an approximate box at the location of the O&M facility, but did not specify acreage. In the Second Amended Site Certificate the facility is described as "...about 5 acres adjacent to the substation on Herin Lane." In the attached figure, PGE has designated the area considered by PGE to be the approximately 5-acre O&M site.

Request 2:

Information about what field surveys have been done that include the site where the warehouse would be located, and PGE's understanding of what additional field surveys, if any, would be required.

Response:

General wildlife, avian, bat, and habitat surveys were conducted with varying buffers for the Biglow project area. The approximately 5-acre area designated for the O&M facility was designated as Category 6 habitat under ODFW's Habitat Categorization criteria (agriculture/developed lands) and this categorization has not changed. Category 6 habitat does not provide habitat for sensitive species nor do impacts to it require mitigation. This area was calculated into the projects permanent impacts and no additional surveys are therefore required. As discussed in the response below for Condition 60, if construction of the proposed facility occurs during nesting season for the sensitive species outlined in Condition 60, a review of the area will be completed for suitable nesting habitat and nests. If an active nest is found, PGE will comply with the outlined parameters in Condition 60.

Cultural resource surveys have already been conducted in the area where the additional warehouse would be located. The area has already been disturbed during initial development of the O&M facilities; also attached are photos of the existing ground conditions at the proposed location (Attachment 2). As discussed in response to Conditions 70, 71, and 72 below PGE would comply with the construction related Historical, Cultural, and Archaeological Resources requirements contained within those conditions. No additional cultural resources surveys are necessary as a result of this Change Request.

Request 3:

A brief discussion on whether or not the proposed change would comply with each of the following site certificate conditions from the third amended site certificate:

Response:

The proposed change would comply with each of the site certificate conditions listed in the Departments request. The following provides a brief discussion for each condition.

A. Organizational Expertise, OAR 345-022-0010 – Conditions 2 and 3

Condition 2: PGE would continue to comply with Condition 2 by contractually requiring all construction contractors and subcontractors involved with the construction of the additional O&M building to comply with all applicable laws and regulations and with the terms and conditions of the site certificate applicable to the construction of the additional O&M building.

Condition 3: PGE would comply with Condition 3 by continuing to utilize the project manager providing compliance for this Condition during operations. It is PGE's understanding that the requirement to have an on-site assistance construction manager during construction of the facility was applicable during major construction of each phase when operational personnel were not yet staffed and available to oversee

construction. Since this additional O&M building would require minimal construction the project manager role can be handled by existing permanent onsite staff.

B. Retirement and Financial Assurance, OAR 345-022-0050 – Condition 13

Condition 13: Condition 13 requires PGE to construct a facility substantially as described in the site certificate. The addition of an additional approximately 3,600 square feet of warehouse space in an area already disturbed where similar facilities are already constructed would not impact PGE’s ability to comply with this Condition. Other than the slight increase in square footage of O&M buildings no other aspects of Section III.A.1 or III.A.2 of the site certificate would be impacted by this Change Request.

H. Public Health and Safety Standards for Wind Energy Facilities, OAR 345-024-0010 – Condition 46

Condition 46: PGE would comply with Condition 46 by requiring any new on-site construction contractors to develop and implement a site health and safety plan that contains the information required the Condition. Existing site health and safety plans would continue to apply to PGE’s current operations and contractors.

I. Siting Standards for Wind Energy Facilities, OAR 345-024-0015 – Conditions 49 and 52

Condition 49: PGE would continue to comply with Condition 49 by implementing the relevant measures contained in the Vegetation Management Plan developed in consultation with the Sherman County Weed District. In addition to measures that will be implemented during construction, PGE has an ongoing agreement with Sherman County to provide noxious weed treatment throughout the entire facility during operations. A copy of the plan is provided as Attachment 3.

Condition 52: PGE would continue to comply with Condition 52 regarding exterior nighttime lighting. Any permanent lighting installed in relation to the additional building would meet the requirements of subsection (b) of the condition. PGE does not anticipate needing to conduct construction activities at night; however, should it become necessary the requirements of subsection (d) would be complied with. Subsections (a) and (c) are not applicable to this Change Request.

K. Threatened and Endangered Species, OAR 345-022-0070 – Conditions 56 and 57

Condition 56: There is no suitable nesting habitat for bald eagles or peregrine falcons within 2 miles of the proposed change. Raptor nest surveys done at the project site over the years have never identified an eagle or peregrine nest within 2-miles of the

proposed change. Eagle nest surveys completed in 2016 by PGE biologists verify that no nests are located within this 2-mile radius.

Condition 57: The proposed change is within the area reviewed and approved for permanent disturbance under the original facility review. The 5-acre area designated for the O&M facility was designated Category 6 habitat under ODFW's Habitat Categorization criteria (agriculture/developed lands) and this categorization has not changed. Category 6 habitat does not provide habitat for sensitive species nor do impacts to it require mitigation. The proposed change complies with this condition.

L. Fish and Wildlife Habitat, OAR 345-022-0060 – Conditions 60, 61, and 62

Condition 60: Based on previous mapping and aerial images, the habitat within ½ mile of the proposed change is either developed or agriculture. Sensitive raptor nests have not been found within this ½ mile area during all previous site surveys, likely due to lack of suitable nesting habitat. If construction of the proposed facility occurs during nesting season for the sensitive species outlined in Condition 60, a review of the area will be completed for suitable nesting habitat and nests. If an active nest is found, PGE will comply with the outlined parameters in Condition 60.

Condition 61: The Wildlife Monitoring and Mitigation Plan lays out the required wildlife studies, mitigation, and reporting for Biglow Canyon. Requirements of this plan have been met and will continue to be met, the proposed change does not affect implementation or compliance with this Plan.

Condition 62: The proposed change is within developed gravel area previously evaluated as a permanent impact of project facilities; therefore, revegetation is not required. The proposed change does not affect compliance with the Revegetation Plan.

M. Structural Standard, OAR 345-022-0020 – Conditions 67 and 68

Condition 67: PGE will comply with Condition 67 by designing and constructing the new O&M building in accordance with requirements set forth by the State of Oregon's Building Code Division and any other applicable codes and design procedures.

Condition 68: PGE will comply with Condition 68 by having the additional O&M building designed, engineered, and constructed to avoid dangers to human safety presented by non-seismic hazards. The area where the additional O&M building would be constructed is in the same vicinity of other O&M facilities and therefore has already been evaluated for non-seismic hazards.

N. Historical, Cultural, and Archaeological Resources, OAR 345-022-0090 – Conditions 70, 71, and 72

Condition 70: PGE will comply with Condition 70 by instructing construction personnel in the identification of cultural resources prior to any ground disturbing activities. Additionally, PGE's construction staff on this project will have undergone a comprehensive cultural resources awareness training in advance of this project.

Condition 71: PGE will comply with Condition 71 by having a qualified archaeologist to monitor ground-disturbing activities. If the monitor identifies any cultural resources during construction, PGE will engage with ODOE, SHPO and area Tribes.

Condition 72: PGE will comply with Condition 72 through training of construction staff and PGE employees, by providing a qualified archaeologist during ground-disturbing activities and by having a qualified archaeologist available to evaluate any inadvertent discovery. PGE's staff archaeologist will coordinate any consultation that may become necessary with SHPO and other appropriate parties, including the Department, should an inadvertent discovery be made.

O. Public Services, OAR 345-022-0110 – Condition 74

Condition 74: Since the facility has been substantially complete and in full operation PGE intends to obtain the minimal amount of water required for construction activities associated with the new O&M building from the well located onsite. This well has a daily limit of 5,000 gallons per day; therefore if more than 5,000 gallons per day is needed then PGE would obtain any additional water from an offsite source.

P. Waste Minimization, OAR 345-022-0120 – Conditions 80 and 81

Condition 80: PGE would continue to comply with Condition 80 by requiring any new contractors or sub-contractors to use hazardous materials in compliance with this Condition. Construction of the additional steel building is not expected to require any significant amounts of hazardous material to be brought, used, or stored at the site.

Condition 81: PGE will continue to comply with the spill and cleanup requirements of Condition 81; construction of the additional building would not inhibit PGE's ability to comply with this condition.

Q. Noise Control Regulations, OAR 345-035-0035 – Condition 89

Condition 89: PGE will comply with the noise requirements in Condition 89. Construction of the additional building is not expected to require the type of heavy equipment needed for construction of each phase; however, PGE intends to primarily construct the additional building during day light hours. PGE will require contractors to install and maintain exhaust mufflers on all combustion engine-powered equipment and will re-establish a noise complaint response system at the operational administrative offices.

T. Public Health and Safety – Conditions 93 and 94

Condition 93: PGE will continue to implement the existing operational fire management plan during construction of the additional O&M building. The proposed location of the additional building is in an already disturbed and rocked area; therefore the fire risk is low compared to if construction or maintenance activities were taking place in open fields.

Condition 94: PGE will continue to comply with Condition 94, each on-site company vehicle contains a fire extinguisher, water spray can, shovel, and access to emergency response procedures (either hard copy or via tablet). If additional company vehicles are brought onsite to accommodate construction of the additional building the additional vehicles will contain the items required by this Condition.

V. Conditions Required by Council Rules – Conditions 107, 111, and 112

Condition 107: PGE will continue to comply with this Condition.

Condition 111: Disturbance associated with construction of the proposed additional building would not occur in vegetated areas; therefore there will be no need to revegetate following construction. If temporary structures are installed they will be removed and properly disposed of following construction.

Condition 112: The location of the proposed additional building is adjacent to other buildings which have met the requirements of this Condition. PGE will design, engineer and construct the additional building to avoid dangers to human safety presented by seismic hazards affecting the site as identified in previous studies.

If there are any questions please do not hesitate to contact me at 503-464-8738.

Sincerely,

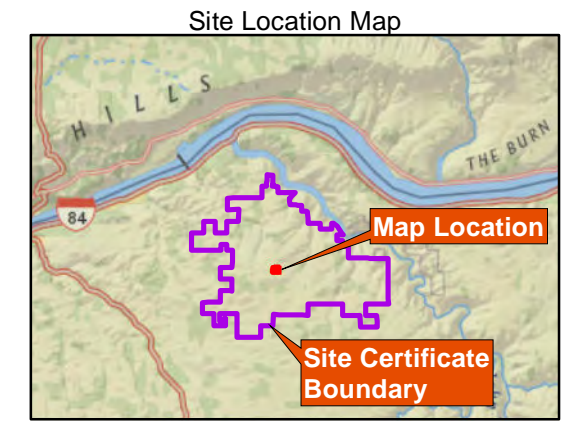
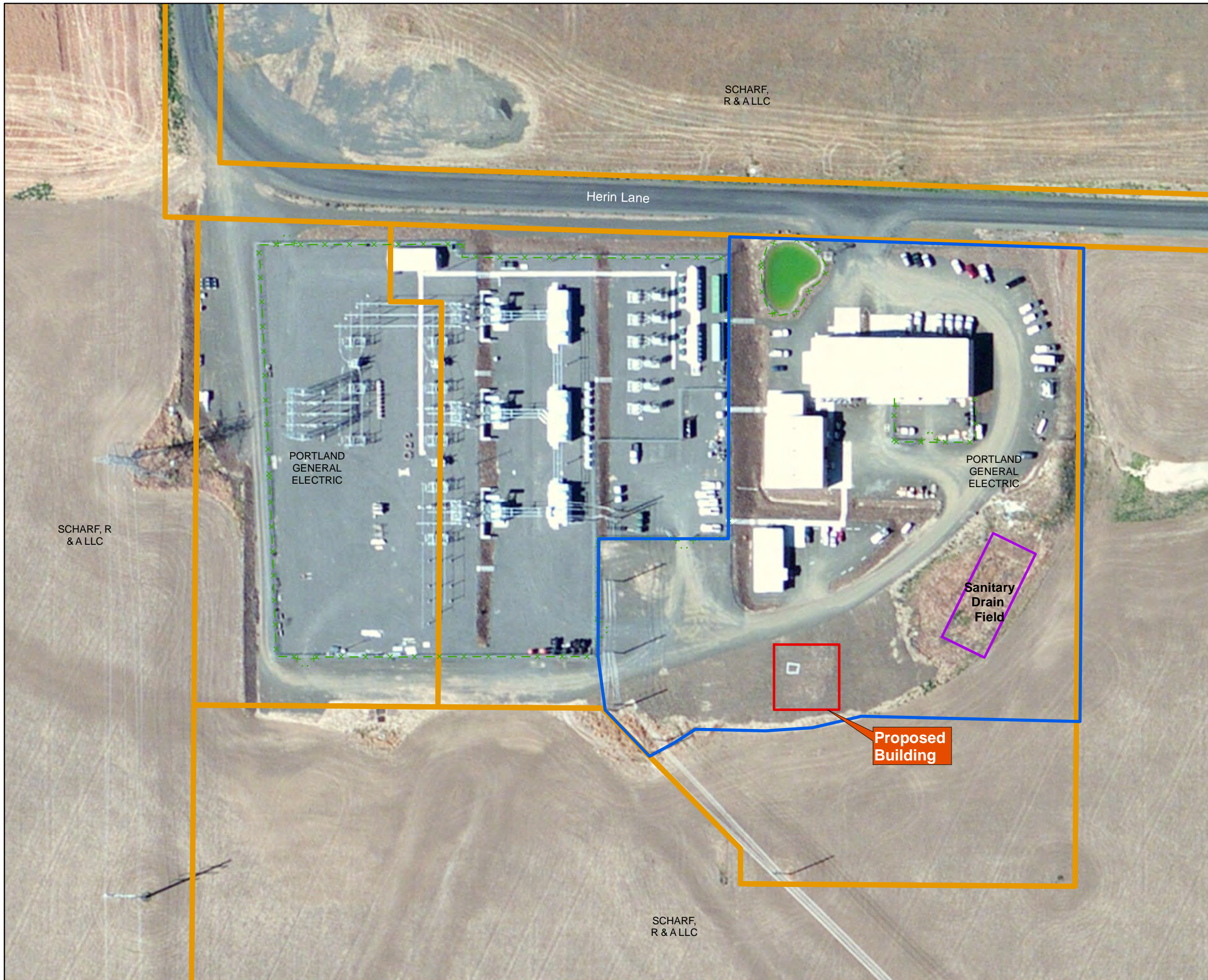


Thomas J. Nilan
Manager, Environmental Compliance & Licensing

C: Scott Elliott, PGE
Matthew Brookins, PGE
Lenna Cope, PGE

Attachment 1

Site Plan, Change Request for Additional O&M Building



- Map Features**
- Approx. 5 Acre O&M Facility
 - Proposed Building
 - Fence
 - Sanitary Drain Field
 - Taxlot Boundary



Portland General Electric
Portland, Oregon

Site Plan
Change Request for
Additional O&M Building
Biglow Canyon Wind Farm

| | |
|--|--------------------|
| Date: 11/7/2016 | Drawn By: J.B. Hoy |
| Drawing File: J:\Biglow_Canyon\Maps\BC_OM_5_Acres_110316.mxd | |

Attachment 2

O&M Building Location Existing Ground Conditions Photos





Attachment 3

Vegetation Management Plan

Sherman County Weed District
PO Box 384, 409 Hood Street
Moro, Oregon 97039
(541) 565-3655

PGE
Joe Mihelich

Subject: Vegetation Management Plan

This plan is a recommendation for vegetation management at the proposed Biglow Canyon wind farm in Sherman County and has been prepared by the Sherman County Weed District Supervisor. Points addressed will be current conditions, preventative measures, monitoring and control measures.

Current conditions

The site should be surveyed for noxious and nuisance weeds prior to disturbance by someone experienced in weed identification. This would provide a baseline for future use in control efforts.

Preventative measures

Prevention may be the most important part of vegetation management. This focuses on not letting noxious weeds to become established.

The first issue is not allowing new weed invaders to be brought into the area. Weed seed can travel on the under-carriage of vehicles and equipment and therefore vehicles and equipment should be cleaned before entering the site. Either high-pressure water or air can accomplish this. This pertains to equipment that is used off-road as opposed to over-road, transport only vehicles which are less likely to have encountered any weed seed.

The second issue deals with disturbed ground. Any earth moving or digging activities should be followed up with re-vegetation. Noxious weeds are very aggressive and are often the first vegetation to appear after the ground has been disturbed. A good stand of mixed perennial grasses can out-compete noxious weeds.

The third issue is a preventative and control measure and deals with the proposed gravel roads, which will be built to provide access to the area. An annual program of treating the road surface with residual herbicides will prevent any vegetation from growing on the road surface. Roads are often the first sites in which weeds appear that may be carried by vehicles or wind blown. A bare road also allows for easy notice of new weeds.

Monitoring

Monitoring, which is simply the process of looking for weeds, should be done on a regular basis throughout the year by someone familiar with the weeds and the concerns of the local area. Different weeds grow at different times of the year so monitoring should be done at least once each in the spring, summer and fall.

Control measures

Chemical control measures should be allowed for on an as-needed basis. Weeds found during the monitoring period should be controlled when detected or as the growing conditions warrant.

A weed management plan that focuses on prevention is a valuable investment that will reduce future threats of noxious weed invasion. The Weed District is available for future assistance in any weed control matters.

Respectfully submitted,

Rod Asher, Supervisor