

Request for Amendment No. 3 to the Site Certificate for the Golden Hills Wind Project

Prepared for

Oregon Energy Facility Siting Council

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Submitted by

Golden Hills Wind Farm LLC

Contents

Section	Page
1 Introduction	1-1
1.1 Amendment History.....	1-1
1.2 Purpose of This Amendment Request	1-1
1.3 Summary of Modifications.....	1-2
1.3.1 Extension of Construction Deadline	1-2
1.3.2 Change in Turbine Height/Rotor Diameter and Reduction in Number of Turbines	1-2
1.3.3 Changes to Related and Supporting Facilities	1-2
1.3.4 Change in Site Boundary.....	1-3
1.3.5 Updated Temporary and Permanent Disturbance Calculations.....	1-3
1.4 Regulatory Framework	1-3
2 Information Required Pursuant to OAR 345-027-0030 for Extension of Construction Start and Completion Deadlines	2-1
3 Information Required Pursuant to OAR 345-027-0050(1) for Site Certificate Changes.....	3-1
4 Information Required Pursuant to OAR 345-027-0060 and OAR 345-027-0070(10) for Site Certificate Amendments	4-1
4.1 Information Required Pursuant to OAR 345-027-0060	4-1
4.1.1 OAR 345-027-0060(1)(a) Name and Mailing Address.....	4-1
4.1.2 OAR 345-027-0060(1)(b) Description of Facility.....	4-1
4.1.3 OAR 345-027-0060(1)(c) Proposed Changes to Permitted Facility.....	4-2
4.1.4 OAR 345-027-0060(1)(d) Proposed Changes to Site Certificate	4-2
4.1.5 OAR 345-027-0060(1)(e) Relevant Council Standards.....	4-2
4.1.6 OAR 345-027-0060(1)(f) Applicable Laws and Council Rules	4-2
4.1.7 OAR 345-027-0060(1)(g) Landowners Within or Adjacent to the Facility	4-3
4.1.8 OAR 345-027-0060(2) Incorporation by Reference	4-3
4.1.9 OAR 345-027-0060(3) and (4) Consultation with the Department	4-3
4.2 Information Required Pursuant to OAR 345-027-0070(10) Review of a Request for Amendment	4-4
5 Information Required Pursuant to OAR 345-027-0060(1)(e) for Compliance with Applicable Council Standards, Laws, and Council Rules	5-1
5.1 Division 22 Standards.....	5-1
5.1.1 OAR 345-022-0000 General Standard of Review.....	5-1
5.1.2 OAR 345-022-0010 Organizational Expertise	5-2
5.1.3 OAR 345-022-0020 Structural Standard	5-3
5.1.4 OAR 345-022-0022 Soil Protection	5-4
5.1.5 OAR 345-022-0030 Land Use	5-4
5.1.6 OAR 345-022-0040 Protected Areas.....	5-6
5.1.7 OAR 345-022-0050 Retirement and Financial Assurance	5-10
5.1.8 OAR 345-022-0060, Fish and Wildlife Habitat	5-11
5.1.9 OAR 345-022-0070, Threatened and Endangered Species.....	5-12
5.1.10 OAR 345-022-0080 Scenic Resources	5-12
5.1.11 OAR 345-022-0090 Historic, Cultural and Archaeological Resources.....	5-19
5.1.12 OAR 345-022-0100 Recreation	5-19

5.1.13	OAR 345-022-0110 Public Services	5-22
5.1.14	OAR 345-022-0120 Waste Minimization	5-24
5.2	Division 24 Standards.....	5-24
5.2.1	OAR 345-024-0010, Public Health and Safety Standards for Wind Energy Facilities	5-25
5.2.2	OAR 345-024-0015 Cumulative Effects Standard for Wind Energy Facilities ...	5-25
5.2.3	OAR 345-024-0090 Siting Standards for Transmission Lines.....	5-26
6	OAR 345-027-0060(1)(f) for Compliance with Other Applicable Requirements	6-1
6.1	DEQ Noise Control Regulations—OAR 340-035-0035	6-1
6.2	Department of State Lands (DSL) Removal/Fill Regulations—ORS 196.795 to .990, OAR 141-085-0500 to -0785, and Section 404 of the Clean Water Act.....	6-1
6.3	Groundwater Act of 1955—ORS 537.505 to .796, and OAR Chapter 690.....	6-2
6.4	State Highway Access and Crossings —OAR Chapter 734, Divisions 51 and 55.....	6-2
6.5	Public Health and Safety—ORS 469.310.....	6-2
7	References.....	7-1

Attachments

- 1 Figures Cited in Text
- 2 Sherman County Property Owners within 500 feet of Proposed Site Boundary

Tables

- 5-1 Applicable Local Land Use, Tribal Land Management, and Federal Land Management Plans ..
- 5-2 Significant or Important Scenic Resources Within the Analysis Area.....

Figures (located in Attachment 1)

- 1 Facility Turbine Layout
- 2 Proposed Change in Site Boundary
- 3 Protected Areas
- 4 Scenic and Aesthetic Values

Introduction

Golden Hills Wind Project (Facility or project) is a permitted wind energy generation facility under development in Sherman County, Oregon, with electrical generating capacity of up to 400 megawatts (MW). On June 18, 2009, the Oregon Energy Facility Siting Council (EFSC or Council) issued a site certificate approving the Facility. The Facility will be located within permitted micrositing corridors on approximately 30,000 acres of privately owned, Exclusive Farm Use (EFU) land both east and west of Highway 97, between the cities of Wasco and Moro (Figure 1 in Attachment 1).

1.1 Amendment History

Golden Hills Wind Farm LLC (Certificate Holder) holds the *Second Amended Site Certificate for the Golden Hills Wind Project*, dated February 11, 2015 (Second Amended Site Certificate).

This *Request for Amendment No. 3* (amendment request) incorporates by reference the following documents:

- *Application for Site Certificate for the Golden Hills Wind Project* (Application for Site Certificate [ASC]) (Golden Hills Wind Farm LLC; May 2007 with May 2008 addendum)
- *Final Order on the Application for Site Certificate* (Final Order on the Application) (EFSC; issued May 15, 2009) and *Site Certificate for the Golden Hills Wind Project* (Site Certificate) (EFSC; fully executed on May 15, 2009)
- *Final Order on Amendment No. 1 for the Golden Hills Wind Project* (Final Order on Amendment No. 1) (EFSC; issued May 11, 2012) and *First Amended Site Certificate for the Golden Hills Wind Project* (EFSC, fully executed on May 18, 2012)
- *Final Order on Amendment No. 2 for the Golden Hills Wind Project* (Final Order on Amendment No. 2) (EFSC; issued January 30, 2015) and *Second Amended Site Certificate* (EFSC, fully executed on February 11, 2015)

1.2 Purpose of This Amendment Request

Certificate Holder requests an amendment to the Second Amended Site Certificate to (1) extend the construction start and completion deadlines for an additional 2 years, (2) change the allowed turbine height and rotor diameter in response to improvements in turbine technology, (3) modify the related and supporting facilities including eliminating the previously approved western substation and 500-kilovolt (kV) transmission line, and (4) amend the site boundary to remove approximately 2,800 acres of land that is no longer needed for the Facility design and add approximately 200 acres of land to potentially accommodate construction-related activities and related and supporting facilities. In short, this request is driven by technology updates and additional information about the project based on a refined Facility design and clarification of specific Facility requirements. These requested modifications to the Facility respond to recent changes in the wind energy market and enhance the feasibility of the proposed project, using equipment that is currently available in the market.

Certificate Holder submits this amendment request pursuant to Oregon Administrative Rule (OAR) 345-027-0050(1) and OAR 345-027-0060(1). Sections 2 through 6 address the applicable EFSC standards for amendments to the site certificate, and are supported by the following attachments:

- Attachment 1 contains four figures showing the proposed turbine layout, the change in the site boundary, protected areas, and scenic and aesthetic areas, respectively.

- Attachment 2 contains the updated property owner list required by OAR 345-027-0060(1)(g) and a set of maps showing the location of each property owner (by tax lot ID number) within 500 feet of the proposed site boundary.

1.3 Summary of Modifications

1.3.1 Extension of Construction Deadline

This is the third request to extend construction deadlines for the Facility. The First Amended Site Certificate extended the construction start deadline from June 18, 2012, to June 18, 2014, and the completion deadline from June 18, 2015, to June 18, 2017. The Second Amended Site Certificate, in connection with a change in Facility ownership, extended the construction start deadline from June 18, 2014, to June 18, 2016, and the completion deadline from June 18, 2017, to June 18, 2019. In this amendment request, Certificate Holder seeks to extend the construction start deadline from June 18, 2016, to June 18, 2018, and the completion deadline from June 18, 2019, to June 18, 2021, to allow necessary refinements to Facility components. This third amendment is driven by the need to complete the review process with the Federal Aviation Administration, and to update and refine the Facility design in order to respond to recent changes in the wind energy market and enhance the feasibility of the proposed project, using equipment that is currently available in the market.

1.3.2 Change in Turbine Height/Rotor Diameter and Reduction in Number of Turbines

EFSC previously authorized construction of up to 267 General Electric sle 1.5-MW turbines or any combination of turbines subject to specific restrictions. The maximum turbine tower height was restricted to 80 meters (263 feet) at the rotor hub, and the diameter of the rotor-swept area was restricted to 96 meters (315 feet). Certificate Holder seeks to increase the maximum turbine tower height to 95 meters (312 feet), and the diameter of the maximum rotor-swept area to 126 meters (413 feet). The change in turbine tower height and rotor diameter will result in a net reduction in the total number of turbines, to a maximum of 125 turbines. Depending on the availability of turbine components and the results of resource analyses conducted during detailed design, turbine towers less than 95 meters tall could be used. Accordingly, Certificate Holder requests a minimum ground clearance of 19.8 meters (65 feet) instead of the previously approved minimum ground clearance of 32 meters (105 feet).

The purpose of the change in turbine height and rotor diameter is to take advantage of improvements in turbine technology that allow fewer turbines to attain the previously approved maximum peak electric generating capacity of 400 MW. As previously approved, the total rotor swept area for the Facility would have been approximately 1.93 million square meters. As currently proposed, the total rotor swept area will decrease by approximately 19 percent to approximately 1.56 million square meters.

The modified 125-turbine layout results in corresponding modifications to the location of access roads, collector lines, and other project facilities, as well as construction areas such as crane paths and laydown areas. Specific locations of each of the foregoing may be modified further during detailed design within the approved site boundary.

1.3.3 Changes to Related and Supporting Facilities

Certificate Holder seeks to eliminate the previously approved 500-kV transmission line to the Bonneville Power Administration's (BPA) John Day substation and the associated construction of one of the two approved substations. These related and supporting facilities are no longer needed based on a revised and updated Facility design. The previously approved eastern substation will be relocated to the center of the site boundary and will serve as the single substation for the Facility. The location of the previously

approved 230-kV transmission line will be modified to run from the proposed centrally located substation to the Hay Canyon 230-kV transmission line located near the southeastern corner of the Facility's site boundary. From there, electricity will be transmitted using the existing Hay Canyon 230-kV line to its northernmost transmission pole structure near the Klondike Substation. From this location, Certificate Holder will construct up to approximately 700 feet of new 230-kV transmission line and associated structures and equipment to interconnect the Facility to BPA's transmission structure located approximately 300 feet north of the Klondike substation. The Council previously approved approximately 11 miles of 500-kV transmission line to the John Day Substation, and 0.7 mile of 230-kV transmission line to the Klondike Substation, for a total of approximately 11.7 miles; as modified, Certificate Holder proposes less than 8 total miles of 230-kV line. Of the 8 total miles of transmission line, approximately 3 miles are already fully constructed on the Hay Canyon transmission line and do not require any new construction. In total, only 5 miles of new 230-kV transmission line will need to be constructed for the Facility, as currently proposed.

1.3.4 Change in Site Boundary

The site boundary will be amended to remove approximately 2,800 acres of land that are no longer required for the Facility design and add approximately 200 acres of land to account for possible changes in the Facility construction methods, e.g., the relocation of related construction areas such as temporary laydown areas and crane paths, access roads, and collector lines for the proposed turbines. The amended site boundary encompasses land needed to accommodate the 230-kV transmission line and its interconnection with the Hay Canyon 230-kV transmission line and BPA network. Figure 2 shows proposed changes in the site boundary overlaid on the approved site boundary.

No changes to the approved micro-siting corridors are proposed. All proposed turbines will be located within these approved corridors.

1.3.5 Updated Temporary and Permanent Disturbance Calculations

The proposed amendment will result in a net reduction in the approved temporary and permanent impacts.¹ Additional information on the net reduction in impacts will be provided as part of a supplemental information package (Supplement) to be submitted to the Oregon Department of Energy (ODOE) in January 2016.

1.4 Regulatory Framework

This amendment request is organized in accordance with OAR 345-027-0030, OAR 345-027-0050, OAR 345-027-0060, and OAR 345-027-0070, which set forth the required contents of a request to amend a site certificate as well as additional considerations for EFSC in deciding whether to grant an amended site certificate.

¹ Final Order on the Application, p. 117-118 (May 15, 2009).

Information Required Pursuant to OAR 345-027-0030 for Extension of Construction Start and Completion Deadlines

(1) The certificate holder may request an amendment to extend the deadlines for beginning or completing construction of the facility that the Council has specified in a site certificate or an amended site certificate. The certificate holder shall submit a request that includes an explanation of the need for an extension and that conforms to the requirements of 345-027-0060 no later than six months before the date of the applicable deadline, or, if the certificate holder demonstrates good cause for the delay in submitting the request, no later than the applicable deadline.

Response: This amendment request to extend construction start and completion deadlines is timely under OAR 345-027-0030(1) because it is filed no later than six months before the current construction start date deadline of June 18, 2016. Conformance to the requirements of 345-027-0060 is described in Section 2 of this amendment request. Therefore, OAR 345-027-0030(1) is satisfied.

(2) A request within the time allowed in section (1) to extend the deadlines for beginning or completing construction suspends those deadlines until the Council acts on the request.

Response: This amendment request is timely under OAR 345-027-0030(1) and therefore the applicable construction deadlines in the Second Amended Site Certificate are suspended until EFSC acts on this amendment request.

(3) The Council shall review the request for an amendment as described in OAR 345-027-0070.

Response: Certificate Holder requests that EFSC review this amendment request without subjecting it to extended review. The proposed changes should not warrant extended review under OAR 345-027-0070(2).

(4) If the Council grants an amendment under this rule, the Council shall specify new deadlines for beginning or completing construction that are not more than two years from the deadlines in effect before the Council grants the amendment.

Response: Certificate Holder requests a two-year extension of the construction deadlines, to June 18, 2018, for beginning construction and June 18, 2021, for completing construction.

(5) To grant an amendment extending the deadline for beginning or completing construction of an energy facility subject to OAR 345-024-0550, OAR 345-024-0590, or OAR 345-024-0620, the Council must find that the facility complies with the carbon dioxide standard in effect at the time of the Council's order on the amendment.

Response: This rule is not applicable to the Facility.

Information Required Pursuant to OAR 345-027-0050(1) for Site Certificate Changes

(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;

Response: Certificate Holder maintains that the proposed amendment will not result in significant adverse impacts that the Council has not previously addressed. This request includes additional analysis to demonstrate that the proposed changes do not result in significant changes to the impacts previously reviewed.

(b) Could impair the certificate holder's ability to comply with a site certificate condition; or

Response: The proposed changes to the Facility could impair Certificate Holder's ability to comply with existing site certificate conditions and thus Certificate Holder submits this third amendment request. Please refer to Section 4.1.4 (Proposed Changes to the Site Certificate).

(c) Could require a new condition or change to a condition in the site certificate.

Response: The proposed amendments include changes to existing site certificate conditions. Please refer to Section 4.1.4 (Proposed Changes to Site Certificate).

Information Required Pursuant to OAR 345-027-0060 and OAR 345-027-0070(10) for Site Certificate Amendments

4.1 Information Required Pursuant to OAR 345-027-0060

4.1.1 OAR 345-027-0060(1)(a) Name and Mailing Address

(1) To request an amendment of a site certificate, the certificate holder shall submit a written request to the Department of Energy that includes the information described in section (2) and the following:

(a) The name and mailing address of the certificate holder and the name, mailing address and phone number of the individual responsible for submitting the request.

Name and Address of Certificate Holder:

Golden Hills Wind Farm LLC
Reid Buckley, Vice President
Orion Renewable Energy Group LLC
155 Grand Avenue, Suite 706
Oakland, CA 94612
(510) 267-8921
rbuckley@orionrenewables.com

Name, Mailing Address, and Phone Number of Individual Responsible for Submitting the Request:

Linnea Eng
CH2M HILL Engineers, Inc.
3015 126th Ave NE
Seattle, WA 98005
(425) 895-0879
linnea.eng@ch2m.com

Name, Mailing Address, and Phone Number of Orion Contact Person:

Ryan McGraw, Head of Asset Management
Orion Renewable Energy Group LLC
155 Grand Avenue, Suite 706
Oakland, CA 94612
(510) 267-9322
rmcgraw@orionrenewables.com

4.1.2 OAR 345-027-0060(1)(b) Description of Facility

(b) A description of the facility including its location and other information relevant to the proposed change.

Response: Exhibits B and C of the ASC and Section III of the Final Order on the Application described the Facility. As previously approved, the Facility would contain up to 267 wind turbine locations, each consisting of a turbine tower and foundation, turbine pad area, nacelle, rotor and blade assembly, and step-up transformer. The Facility would have a maximum peak electric generating capacity of 400 MW and an average electric generating capacity of about 133 MW.

As proposed in this request, the Facility will contain up to 125 wind turbine locations, each consisting of a turbine tower and foundation, turbine pad area, nacelle, rotor and blade assembly, and step-up transformer. The Facility will have a maximum peak electric generating capacity of 400 MW and an average electric generating capacity of about 133 MW.

The proposed wind turbines in the Facility could have a larger rotor diameter than previously approved, adjustments to the maximum tower height, changes to the related and supporting facilities, and adjustments to the site boundary to accommodate changes to the related and supporting facilities. As stated in the introduction to this amendment request, the Facility will be located on privately owned EFU land both east and west of Highway 97, between the cities of Wasco and Moro in Sherman County, Oregon.

As a part of this amendment, Certificate Holder seeks to clarify that it may conduct a phased construction and interconnection schedule based on market factors as long as the phasing has been previously reviewed by Department staff.

4.1.3 OAR 345-027-0060(1)(c) Proposed Changes to Permitted Facility

(c) A detailed description of the proposed change and the certificate holder's analysis of the proposed change under the criteria of OAR 345-027-0050(1).

Response: Please refer to Section 4.1.2 (Description of Facility) for a description of the proposed changes.

4.1.4 OAR 345-027-0060(1)(d) Proposed Changes to Site Certificate

(d) The specific language of the site certificate, including affected conditions, that the certificate holder proposes to change, add or delete by an amendment.

Response: Certificate Holder proposes to change the language of Conditions III.D.1 and III.D.2 concerning construction start and completion deadlines, and the language of conditions pertaining to other modifications proposed herein, in a redlined draft of the existing Second Amended Site Certificate to be provided as part of the January 2016 Supplement.

4.1.5 OAR 345-027-0060(1)(e) Relevant Council Standards

(e) A list of the Council standards relevant to the proposed change.

Response: The relevant Council standards to the proposed change are Division 22 (General Standards for Siting Facilities) and Division 24 (Specific Standards for Siting Facilities). Section 5 identifies and addresses the standards. The Facility is an electric generating facility using wind turbine technology and therefore Division 23, which applies to nongenerating facilities, does not apply. Similarly, inapplicable provisions of Division 24 (e.g., standards applicable to gas plants, gas storage, nongenerating facilities) are not discussed.

4.1.6 OAR 345-027-0060(1)(f) Applicable Laws and Council Rules

(f) An analysis of whether the facility, with the proposed change, would comply with the requirements of ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances if the Council amends the site certificate as requested. For the purpose of this rule, a law, rule or ordinance

is “applicable” if the Council would apply or consider the law, rule or ordinance under OAR 345-027-0070(10).

Response: Sections 5.1.1 (OAR 345-022-0000 General Standard of Review) and 6.5 (Public Health and Safety—ORS 469.310) of this amendment request contain analysis concluding that the proposed amended Facility will comply with the requirements of ORS Chapter 469, applicable EFSC rules, and applicable state and local laws, rules and ordinances if the EFSC approves this third amendment request.

4.1.7 OAR 345-027-0060(1)(g) Landowners Within or Adjacent to the Facility

(g) An updated list of the owners of property located within or adjacent to the site of the facility, as described in OAR 345-021-0010(1)(f).

Response: An updated list of property owners located within 500 feet of the proposed site boundary (i.e., the site boundary with the additions/subtractions discussed above) is provided in Attachment 2. The list includes all property owners within 500 feet of the site boundary as required by OAR 345-021-0010(1)(f)(C) for a site located within a farm or forest zone. Attachment 2 also contains a corresponding set of figures showing the location of each tax lot. The property information was obtained from Sherman County on December 4, 2015.

4.1.8 OAR 345-027-0060(2) Incorporation by Reference

(2) In a request to amend a site certificate, the certificate holder shall provide the information described in applicable subsections of OAR 345-021-0000 and OAR 345-021-0010. The certificate holder may incorporate by reference relevant information that the certificate holder has previously submitted to the Department or that is otherwise included in the Department’s administrative record on the facility.

Response: To satisfy OAR 345-027-0060(2), Certificate Holder provides the information set forth in this amendment request and incorporates by reference the information contained in the ASC and the information forming the basis for the Final Order on Amendment No. 1 and the Final Order on Amendment No. 2. In addition, the Second Amended Site Certificate is incorporated by reference.

4.1.9 OAR 345-027-0060(3) and (4) Consultation with the Department

(3) Before submitting a request to amend a site certificate, the certificate holder may prepare a draft request and may confer with the Department about the content of the request. Although the Council does not require the certificate holder to prepare a draft request and confer with the Department, the Council recommends that the certificate holder follow this procedure.

Response: Certificate Holder met with ODOE to discuss the proposed changes and necessary analysis before submitting this amendment request.

(4) The certificate holder shall submit an original and two printed copies of the amendment request to the Department. Upon a request by the Department, the certificate holder must submit printed copies of the amendment request for members of the Council. In addition to the printed copies, the certificate holder shall submit the full amendment request in a non-copy-protected electronic format acceptable to the Department. The certificate holder shall provide additional copies of the amendment request to the Department upon request and copies or access to copies to any person requesting copies. If requested by the Department, the certificate holder shall send copies of the request to persons on a mailing list provided by the Department.

Response: Certificate Holder submits an original and two printed copies of this Amendment request and will provide additional copies upon request. In addition to the printed copies, Certificate Holder submits the full amendment request in a non-copy-protected electronic format acceptable to the Department.

4.2 Information Required Pursuant to OAR 345-027-0070(10) Review of a Request for Amendment

(10) In making a decision to grant or deny issuance of an amended site certificate, the Council shall apply the applicable substantive criteria, as described in OAR 345-022-0030, in effect on the date the certificate holder submitted the request for amendment and all other state statutes, administrative rules, and local government ordinances in effect on the date the Council makes its decision. The Council shall consider the following:

(a) For an amendment that would change the site boundary or the legal description of the site, the Council shall consider, for the area added to the site by the amendment, whether the facility complies with all Council standards;

Response: As discussed in Section 1.3.4 (Change in Site Boundary), Certificate Holder seeks to amend the site boundary to remove approximately 2,800 acres of land that are no longer required for the Facility design and add approximately 200 acres of land to account for possible changes in the Facility construction methods, e.g., the relocation of related construction areas such as temporary laydown areas and crane paths, access roads, and collector lines for the proposed turbines. The amended site boundary encompasses land needed to accommodate the 230-kV transmission line, including its interconnection with the Hay Canyon 230-kV transmission line and BPA network.

No changes to the approved micro-siting corridors are proposed. All proposed turbines will be located within these approved corridors. The proposed amendment will result in a net reduction in the previously approved temporary and permanent impacts.

The legal description of the modified site boundary will change. The proposed site will occupy portions of the following parcels in the Willamette Meridian of Sherman County:

- Sections 1-17, Township 1 South, Range 17 East
- Sections 6-7, Township 1 South, Range 18 East
- Sections 29-31, Township 1 North, Range 18 East
- Sections 5-9, 14-23, and 25-36, Township 1 North, Range 17 East
- Sections 1-3, 12-14, 23-26, and 35-36, Township 1 North, Range 16 East
- Sections 29-33, Township 2 North, Range 17 East
- Sections 25-27 and 34-36, Township 2 North, Range 16 East

(b) For an amendment that extends the deadlines for beginning or completing construction, the Council shall consider:

(A) Whether the Council has previously granted an extension of the deadline;

Response: EFSC previously granted extensions of the construction deadlines when it approved the First Amended Site Certificate in May 2012, and the Second Amended Site Certificate in February 2015. A third extension to the construction deadlines is warranted because Certificate Holder has experienced unforeseen delays in the development and commencement of construction of the Facility, including federal aviation issues raised by federal agencies, which Certificate Holder believes will be addressed in the near to medium term. The site is a strong and well-documented renewable energy resource, and Certificate Holder has signed a Large Generator Interconnection Agreement with BPA. To best implement the proposed changes and prepare for construction, additional time is needed.

(B) Whether there has been any change of circumstances that affects a previous Council finding that was required for issuance of a site certificate or amended site certificate; and

Response: Since the Council approved the Facility in 2009, considerable advances in turbine technology have occurred. The newer technology allows for a more efficient and economical Facility, which in turn will help to attract buyers of electricity generated by the Facility. These changes in circumstances drive the proposed changes contained in this amendment request.

(C) Whether the facility complies with all Council standards, except that the Council may choose not to apply a standard if the Council finds that:

(i) The certificate holder has spent more than 50 percent of the budgeted costs on construction of the facility;

(ii) The inability of the certificate holder to complete the construction of the facility by the deadline in effect before the amendment is the result of unforeseen circumstances that are outside the control of the certificate holder;

(iii) The standard, if applied, would result in an unreasonable financial burden on the certificate holder; and

(iv) The Council does not need to apply the standard to avoid a significant threat to the public health, safety or the environment;

Response: The Facility complies with all EFSC standards as set forth herein.

(c) For any amendment not described above, the Council shall consider whether the amendment would affect any finding made by the Council in an earlier order.

Response: The amendment is captured under the response to OAR 345-027-0070(10)(b) and therefore subsection (c) does not apply.

(d) For all amendments, the Council shall consider whether the amount of the bond or letter of credit required under OAR 345-022-0050 is adequate.

Response: Section 5.1.7 (OAR 345-022-0050 Retirement and Financial Assurance) of this amendment request discusses the bond or letter of credit and Certificate Holder's conservative approach to determining the amount required.

Information Required Pursuant to OAR 345-027-0060(1)(e) for Compliance with Applicable Council Standards, Laws, and Council Rules

This section analyzes the relevant council standards listed under OAR 345-027-0060(1)(e). The standards are organized under Division 22 (General Standards for Siting Facilities) and Division 24 (Specific Standards for Siting Facilities)

(e) A list of the Council standards relevant to the proposed change.

Response: The relevant EFSC standards to the proposed amendment include Division 22 (General Standards for Siting Facilities) and Division 24 (Specific Standards for Siting Facilities). The Facility is a wind power generating facility. Accordingly, Division 23, which applies to nongenerating facilities, does not apply. Similarly, inapplicable provisions of Division 24 (e.g., standards applicable to gas plants, gas storage, nongenerating facilities) are not discussed.

5.1 Division 22 Standards

The following Division 22 standards are addressed:

- OAR 345-022-0000 General Standard of Review
- OAR 345-022-0010 Organizational Expertise
- OAR 345-022-0020 Structural Standard
- OAR 345-022-0022 Soil Protection
- OAR 345-022-0030 Land Use
- OAR 345-022-0040 Protected Areas
- OAR 345-022-0050 Retirement and Financial Assurance
- OAR 345-022-0060 Fish and Wildlife Habitat
- OAR 345-022-0070 Threatened and Endangered Species
- OAR 345-022-0080 Scenic Resources
- OAR 345-022-0090 Historic, Cultural and Archaeological Resources
- OAR 345-022-0100 Recreation
- OAR 345-022-0110 Public Services
- OAR 345-022-0120 Waste Minimization

The requirements of each applicable EFSC standard are outlined below, along with Certificate Holder's responses.

5.1.1 OAR 345-022-0000 General Standard of Review

(1) To issue a site certificate for a proposed facility or to amend a site certificate, the Council shall determine that the preponderance of evidence on the record supports the following conclusions:

(a) The facility complies with the requirements of the Oregon Energy Facility Siting statutes, ORS 469.300 to ORS 469.570 and 469.590 to 469.619, and the standards adopted by the Council pursuant to ORS

469.501 or the overall public benefits of the facility outweigh the damage to the resources protected by the standards the facility does not meet as described in section (2).

(b) Except as provided in OAR 345-022-0030 for land use compliance and except for those statutes and rules for which the decision on compliance has been delegated by the federal government to a state agency other than the Council, the facility complies with all other Oregon statutes and administrative rules identified in the project order, as amended, as applicable to the issuance of a site certificate for the proposed facility. If the Council finds that applicable Oregon statutes and rules, other than those involving federally delegated programs, would impose conflicting requirements, the Council shall resolve the conflict consistent with the public interest. In resolving the conflict, the Council cannot waive any applicable state statute.

Response: EFSC previously found that the Facility complies with the requirements of its statutes.² There is sufficient evidence in this amendment request upon which to base a finding that the Facility, as proposed, continues to comply with the requirements of its statutes. Thus, EFSC may rely on its previous findings and the information provided in this amendment request to determine that the Facility, as amended, satisfies OAR 345-022-0000(1).

5.1.2 OAR 345-022-0010 Organizational Expertise

(1) To issue a site certificate, the Council must find that the applicant has the organizational expertise to construct, operate and retire the proposed facility in compliance with Council standards and conditions of the site certificate. To conclude that the applicant has this expertise, the Council must find that the applicant has demonstrated the ability to design, construct and operate the proposed facility in compliance with site certificate conditions and in a manner that protects public health and safety and has demonstrated the ability to restore the site to a useful, non-hazardous condition. The Council may consider the applicant’s experience, the applicant’s access to technical expertise and the applicant’s past performance in constructing, operating and retiring other facilities, including, but not limited to, the number and severity of regulatory citations issued to the applicant.

(2) The Council may base its findings under section (1) on a rebuttable presumption that an applicant has organizational, managerial and technical expertise, if the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program.

(3) If the applicant does not itself obtain a state or local government permit or approval for which the Council would ordinarily determine compliance but instead relies on a permit or approval issued to a third party, the Council, to issue a site certificate, must find that the third party has, or has a reasonable likelihood of obtaining, the necessary permit or approval, and that the applicant has, or has a reasonable likelihood of entering into, a contractual or other arrangement with the third party for access to the resource or service secured by that permit or approval.

(4) If the applicant relies on a permit or approval issued to a third party and the third party does not have the necessary permit or approval at the time the Council issues the site certificate, the Council may issue the site certificate subject to the condition that the certificate holder shall not commence construction or operation as appropriate until the third party has obtained the necessary permit or approval and the applicant has a contract or other arrangement for access to the resource or service secured by that permit or approval.

Response:

A. Certificate Holder’s Expertise

² Final Order on Amendment No. 2, p. 16 (January 30, 2015).

EFSC previously found that the Facility, as amended, “satisfies the Organizational Expertise standard.”³ No circumstances have changed that warrant reconsideration of this prior finding. Thus, EFSC may rely on its previous findings and determine that the Facility, as amended, satisfies OAR 345-022-0010.

B. Third-Party Permits

EFSC has previously found that third parties either have any necessary permits or have a reasonable likelihood of obtaining any necessary permits.⁴ The proposed amendment does not affect this previous finding.

5.1.3 OAR 345-022-0020 Structural Standard

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that:

(a) The applicant, through appropriate site-specific study, has adequately characterized the site as to Maximum Considered Earthquake Ground Motion identified for the site in the 2009 International Building Code and maximum probable ground motion, taking into account ground failure and amplification for the site specific soil profile under the maximum credible and maximum probable seismic events; and

(b) The applicant can design, engineer, and construct the facility to avoid dangers to human safety presented by seismic hazards affecting the site that are expected to result from maximum probable ground motion events. As used in this rule “seismic hazard” includes ground shaking, ground failure, landslide, liquefaction, lateral spreading, tsunami inundation, fault displacement, and subsidence;

(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility; and

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety presented by the hazards identified in subsection (c).

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

Response: OAR 345-022-0020 authorizes EFSC to issue a site certificate without making findings with respect to the Structural Standard,⁵ but the rules also authorize EFSC to impose site certificate conditions based on the requirements of OAR 345-022-0020. EFSC addressed the Structural Standard in Section V.A of the Final Order on Amendment No. 2 and imposed five conditions in Section V.A of the Second Amended Site Certificate to ensure compliance with the Structural Standard.⁶ Certificate Holder proposes to amend the site boundary to include approximately 200 acres of new land. Although not previously included in the site boundary, this land is adjacent to and in the vicinity of the existing site boundary. At the same time, Certificate Holder is removing approximately 2,800 acres of land from the site boundary. In total, the proposed amendments will reduce the size of the site boundary by approximately 2,600 acres. The original seismic analysis covers site-specific faults and regional seismicity. The additional areas will not cross any active faults and therefore will not increase the

³ Final Order on Amendment No. 2, p. 17 (January 30, 2015).

⁴ Final Order on Amendment No. 2, p. 11 (January 30, 2015).

⁵ ORS 469.501(4).

⁶ Final Order on Amendment No. 2, p. 20 (January 30, 2015).

potential for fault rupture or overall seismic hazard. No liquefiable soils are present in the additional parcels. The soil site class, underlying bedrock, and maximum credible earthquake and maximum probable earthquake within the additional parcels are consistent with those on the site and the regional and site-specific seismicity, and as such will not be subject to seismic hazards. In addition, no turbines will be constructed on the additional parcels; they are intended for possible use as construction-related laydown areas and crane paths, access roads, and collector lines.

Further, Certificate Holder is obligated to submit a preconstruction site-specific geotechnical investigation report to the Oregon Department of Geology and Mineral Industries, which will include a slope stability analysis, soil classifications, depth to rock, and recommendations for foundations, excavations, slopes, and road sections. The findings of the geotechnical analyses will be used for final micrositing of turbines, safe foundation design, and appropriate structural design to resist earthquake damage to facilities. See Conditions V.A.1 and V.A.2. For these reasons, EFSC may conclude that the proposed amendment does not affect EFSC’s ability to find that the construction and operation of the Facility will be consistent with the Structural Standard. OAR 345-022-0020 is met and no new or revised conditions of approval are necessary.

(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

Response: This rule is not applicable.

5.1.4 OAR 345-022-0022 Soil Protection

To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to soils including, but not limited to, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills.

Response: EFSC previously found that the Facility would comply with the Soil Protection Standard.⁷ The proposed amendment will amend the site boundary to include land. The soil types and slopes in the additional parcels are consistent with soils and slopes analyzed for other areas within the site boundary. The soil in the new parcels consists primarily of Walla Walla silt loam, with slopes less than 15 percent. These soils are used for dryland wheat/alfalfa/pasture but are only considered “Prime Farmland” if irrigated. These are considered “not highly erodible.” Certificate Holder’s sediment and erosion control plan applies to soils with similar properties across the site, and will cover all soil disturbance. In addition, Certificate Holder is obligated to satisfy Conditions IV.E.1 through IV.E.6 which further assures that the Facility, during construction and operation, will not result in significant adverse impacts to soils. For these reasons, EFSC may conclude that the proposed amendment does not affect EFSC’s ability to find that the construction and operation of the Facility will be consistent with the Soil Standard. OAR 345-022-0022 is met and no new or revised conditions of approval are necessary.

5.1.5 OAR 345-022-0030 Land Use

(1) To issue a site certificate, the Council must find that the proposed facility complies with the statewide planning goals adopted by the Land Conservation and Development Commission.

(2) The Council shall find that a proposed facility complies with section (1) if:

⁷ Final Order on Amendment No. 2, p. 20 (January 30, 2015).

(a) The applicant elects to obtain local land use approvals under ORS 469.504(1)(a) and the Council finds that the facility has received local land use approval under the acknowledged comprehensive plan and land use regulations of the affected local government; or

(b) The applicant elects to obtain a Council determination under ORS 469.504(1)(b) and the Council determines that:

(A) The proposed facility complies with applicable substantive criteria as described in section (3) and the facility complies with any Land Conservation and Development Commission administrative rules and goals and any land use statutes directly applicable to the facility under ORS 197.646(3);

(B) For a proposed facility that does not comply with one or more of the applicable substantive criteria as described in section (3), the facility otherwise complies with the statewide planning goals or an exception to any applicable statewide planning goal is justified under section (4); or

(C) For a proposed facility that the Council decides, under sections (3) or (6), to evaluate against the statewide planning goals, the proposed facility complies with the applicable statewide planning goals or that an exception to any applicable statewide planning goal is justified under section (4).

(3) As used in this rule, the “applicable substantive criteria” are criteria from the affected local government’s acknowledged comprehensive plan and land use ordinances that are required by the statewide planning goals and that are in effect on the date the applicant submits the application. If the special advisory group recommends applicable substantive criteria, as described under OAR 345-021-0050, the Council shall apply them. If the special advisory group does not recommend applicable substantive criteria, the Council shall decide either to make its own determination of the applicable substantive criteria and apply them or to evaluate the proposed facility against the statewide planning goals.

(4) The Council may find goal compliance for a proposed facility that does not otherwise comply with one or more statewide planning goals by taking an exception to the applicable goal. Notwithstanding the requirements of ORS 197.732, the statewide planning goal pertaining to the exception process or any rules of the Land Conservation and Development Commission pertaining to the exception process, the Council may take an exception to a goal if the Council finds:

(a) The land subject to the exception is physically developed to the extent that the land is no longer available for uses allowed by the applicable goal;

(b) The land subject to the exception is irrevocably committed as described by the rules of the Land Conservation and Development Commission to uses not allowed by the applicable goal because existing adjacent uses and other relevant factors make uses allowed by the applicable goal impracticable; or

(c) The following standards are met:

(A) Reasons justify why the state policy embodied in the applicable goal should not apply;

(B) The significant environmental, economic, social and energy consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with rules of the Council applicable to the siting of the proposed facility; and

(C) The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.

(5) If the Council finds that applicable substantive local criteria and applicable statutes and state administrative rules would impose conflicting requirements, the Council shall resolve the conflict consistent with the public interest. In resolving the conflict, the Council cannot waive any applicable state statute.

(6) If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(10)(a)(C) to (E) or for a related or supporting facility that does not pass

through more than one local government jurisdiction or more than three zones in any one jurisdiction, the Council shall apply the criteria recommended by the special advisory group. If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(10)(a)(C) to (E) or a related or supporting facility that passes through more than one jurisdiction or more than three zones in any one jurisdiction, the Council shall review the recommended criteria and decide whether to evaluate the proposed facility against the applicable substantive criteria recommended by the special advisory group, against the statewide planning goals or against a combination of the applicable substantive criteria and statewide planning goals. In making the decision, the Council shall consult with the special advisory group, and shall consider:

(a) The number of jurisdictions and zones in question;

(b) The degree to which the applicable substantive criteria reflect local government consideration of energy facilities in the planning process; and

(c) The level of consistence of the applicable substantive criteria from the various zones and jurisdictions.

Response: EFSC previously concluded that the Facility complied with the Land Use Standard.⁸ No changes in the local zoning ordinance or comprehensive plan have occurred since the last amendment. This amendment request proposes changes to the Facility design and site boundary. Even with these changes, the Facility can satisfy the Land Use Standard. The proposed changes in turbine height and rotor diameter do not affect EFSC’s previous findings of compliance with the Land Use Standard because the turbines will be constructed within the previously permitted micrositing corridors and the Facility, as proposed, must still satisfy Conditions IV.D.1 through IV.D.22. Likewise, the proposed adjustments to the site boundary by removing 2,800 acres of land and adding 200 acres of land do not affect EFSC’s previous findings because all new land is zoned EFU and is largely cultivated farmland as topography allows, similar to the land within the previously approved site boundary. The proposed activities on the additional 200 acres of land are the same as those approved on EFU land. The area to be added in the southeast portion of the site boundary, as shown in Figure 2, is also in the Natural Hazards (NH) Combining Zone. The additional area does not cross any active faults that would increase the fault rupture or overall seismic hazard. No liquefiable soils are present. No turbines will be constructed on the portion in the NH zone. The aboveground 230-kV transmission line will cross the NH zone in this area, but siting transmission lines in the NH zone is consistent with the Final Order.⁹ Certificate Holder will submit a site-specific geotechnical investigation report prior to construction to comply with the requirements of the NH Combining Zone in accordance with Condition V.A.1 of the Final Order.

The January 2016 supplement will include additional analysis of specific acreage of disturbance to EFU land to support an EFSC finding that the Facility, as proposed, can comply with the Land Use Standard.

5.1.6 OAR 345-022-0040 Protected Areas

(1) Except as provided in sections (2) and (3), the Council shall not issue a site certificate for a proposed facility located in the areas listed below. To issue a site certificate for a proposed facility located outside the areas listed below, the Council must find that, taking into account mitigation, the design, construction and operation of the facility are not likely to result in significant adverse impact to the areas listed below. References in this rule to protected areas designated under federal or state statutes or regulations are to the designations in effect as of May 11, 2007:

⁸ Final Order on Amendment No. 2, p. 32 (January 30, 2015).

⁹ Final Order on the Application, pp. 43-44 (May 15, 2009).

- (a) National parks, including but not limited to Crater Lake National Park and Fort Clatsop National Memorial;*
 - (b) National monuments, including but not limited to John Day Fossil Bed National Monument, Newberry National Volcanic Monument and Oregon Caves National Monument;*
 - (c) Wilderness areas established pursuant to The Wilderness Act, 16 U.S.C. 1131 et seq. and areas recommended for designation as wilderness areas pursuant to 43 U.S.C. 1782;*
 - (d) National and state wildlife refuges, including but not limited to Ankeny, Bandon Marsh, Baskett Slough, Bear Valley, Cape Meares, Cold Springs, Deer Flat, Hart Mountain, Julia Butler Hansen, Klamath Forest, Lewis and Clark, Lower Klamath, Malheur, McKay Creek, Oregon Islands, Sheldon, Three Arch Rocks, Umatilla, Upper Klamath, and William L. Finley;*
 - (e) National coordination areas, including but not limited to Government Island, Ochoco and Summer Lake;*
 - (f) National and state fish hatcheries, including but not limited to Eagle Creek and Warm Springs;*
 - (g) National recreation and scenic areas, including but not limited to Oregon Dunes National Recreation Area, Hell's Canyon National Recreation Area, and the Oregon Cascades Recreation Area, and Columbia River Gorge National Scenic Area;*
 - (h) State parks and waysides as listed by the Oregon Department of Parks and Recreation and the Willamette River Greenway;*
 - (i) State natural heritage areas listed in the Oregon Register of Natural Heritage Areas pursuant to ORS 273.581;*
 - (j) State estuarine sanctuaries, including but not limited to South Slough Estuarine Sanctuary, OAR chapter 142;*
 - (k) Scenic waterways designated pursuant to ORS 390.826, wild or scenic rivers designated pursuant to 16 U.S.C. 1271 et seq., and those waterways and rivers listed as potentials for designation;*
 - (l) Experimental areas established by the Rangeland Resources Program, College of Agriculture, Oregon State University: the Prineville site, the Burns (Squaw Butte) site, the Starkey site and the Union site;*
 - (m) Agricultural experimental stations established by the College of Agriculture, Oregon State University...*
 - (n) Research forests established by the College of Forestry, Oregon State University, including but not limited to McDonald Forest, Paul M. Dunn Forest, the Blodgett Tract in Columbia County, the Spaulding Tract in the Mary's Peak area and the Marchel Tract;*
 - (o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas and research natural areas;*
 - (p) State wildlife areas and management areas identified in OAR chapter 635, division 8.*
- (2) Notwithstanding section (1), the Council may issue a site certificate for a transmission line or a natural gas pipeline or for a facility located outside a protected area that includes a transmission line or natural gas or water pipeline as a related or supporting facility located in a protected area identified in section (1), if other alternative routes or sites have been studied and determined by the Council to have greater impacts. Notwithstanding section (1), the Council may issue a site certificate for surface facilities related to an underground gas storage reservoir that have pipelines and injection, withdrawal or monitoring wells and individual wellhead equipment and pumps located in a protected area, if other alternative routes or sites have been studied and determined by the Council to be unsuitable.*

(3) The provisions of section (1) do not apply to transmission lines or natural gas pipelines routed within 500 feet of an existing utility right-of-way containing at least one transmission line with a voltage rating of 115 kilovolts or higher or containing at least one natural gas pipeline of 8 inches or greater diameter that is operated at a pressure of 125 psig.

Response: EFSC previously found that the Facility met the Protected Areas Standard.¹⁰ EFSC concluded that the Facility would not be located in any protected areas listed in OAR 345-022-0040, and that the design, construction, and operation of the Facility, taking mitigation into account, would likely not result in significant adverse impacts to any protected area.¹¹ This amendment request proposes changes to the Facility design but as discussed below, the proposed amendment makes no changes that would alter the basis upon which EFSC may find that OAR 345-022-0040 is met. Compared to the approved Facility, the proposed amended Facility will include 142 fewer wind turbines, require approximately 2,600 fewer acres, and reduce the total amount of overhead transmission line by approximately 48 percent.

(i) Noise resulting from facility construction or operation;

Response: EFSC previously found that noise associated with the Facility would be inaudible from all protected areas listed in OAR 345-022-0040, except the Columbia Basin Agricultural Research Center. The maximum noise level at the Center would have been approximately 34 dBA, which would be audible at times at a very low level, mostly late at night. EFSC found that noise resulting from Facility construction or operation would not adversely impact the Center. In conjunction with this amendment request, Certificate Holder will submit for EFSC approval prior to construction, a complete new noise analysis for the Facility as designed. The analysis will provide a table listing each noise-sensitive property, as defined in OAR 340-035-0015(38), including the Center and the predicted maximum hourly L₅₀ noise level at each noise-sensitive property.

(ii) Increased traffic resulting from facility construction or operation would not adversely impact Protected Areas.

Response: EFSC previously found that local Facility-related road use during construction and operation would not result in a significant adverse impact to any protected area. The proposed Facility will contain up to 142 fewer turbines than the approved Facility. Because the turbines may be larger than previously approved, construction of individual turbines may require a small increase in truck traffic over construction of individual smaller turbines. Larger turbines will require a larger foundation, which will result in more concrete and steel truckloads per turbine. With added height, the larger turbines could also require more trucks per tower section. The tower section of each turbine may require one or two additional large trucks compared to the original smaller turbines, but the blades (although longer as well) will likely require the same number of trucks per turbine as the smaller turbines (three trucks per turbine). Up to approximately 95 trucks could be required for the foundation and components of each smaller turbine, while up to approximately 140 trucks could be required for each larger turbine. Even with this estimated increase in trucks per turbine, a significantly smaller number of turbines will be constructed, and the total number of estimated trucks generated during construction will be approximately 30 percent lower with the changes proposed in this amendment request.

As was found in the Final Order on the Application, Facility-related road use during construction and operation will not result in a significant adverse impact to any protected area.

(iii) Water Use and Wastewater Disposal.

¹⁰ Final Order on Amendment No. 1, p. 19 (May 11, 2012) and Final Order on Amendment No. 2, p. 35 (January 30, 2015).

¹¹ Final Order on Amendment No. 1, p. 19 (May 11, 2012) and Final Order on Amendment No. 2, p. 34 (January 30, 2015).

Response: The smaller number of turbines will result in a net decrease in truck traffic and use of roads during construction. As a result, water use for dust suppression will be similar to or less than what would have been required for the approved Facility. Although concrete requirements for individual turbine foundations will be greater, owing to the smaller number turbines, the total amount of concrete for foundations will be less. The overall water use and wastewater disposal requirements for the proposed amended Facility will be similar to or less than the amount previously estimated for the approved Facility.

(iv) Visual Impacts.

Response: In the Final Order on the Application (May 15, 2009), EFSC found that turbines would be potentially seen from the following protected areas located within the analysis area:¹²

- John Day Federal Wild and Scenic River
- John Day State Scenic Waterway
- John Day Wildlife Refuge
- Deschutes Federal Wild and Scenic River
- Deschutes State Scenic Waterway
- Lower Deschutes Wildlife Area
- Columbia Hills Natural Area Preserve
- Columbia Basin Agriculture Research Center
- Columbia River Gorge National Scenic Area (CRGNSA) (including Columbia Hills State Park and much of the Columbia Hills Natural Area Preserve)
- Columbia Hills State Park (the Final Order on the Application stated that turbines would not be seen in the Horsethief Lake portion of the park; turbines would have been seen in the upland portions of the park near State Route 14 [SR-14])

The proposed amended Facility will have 142 fewer wind turbines than the approved Facility and will use taller turbines. This amendment request includes an updated visibility analysis of the proposed amended Facility to reflect the smaller number of taller turbines (see Figure 3). As shown in Figure 3, the turbines of the proposed amended Facility will not be seen from the John Day or Deschutes Rivers or their adjacent shorelines.

Under the proposed amendment, the taller turbines will be seen from slightly more high areas on the river's canyon rims and low areas on some canyon walls than the approved smaller turbines. However, the turbines still will not be visible from the water or the interior canyon areas of either river. Therefore, the proposed Facility will not result in significant adverse visual impact on these protected areas.

The Columbia Hills Natural Area Preserve and the Columbia Basin Agriculture Research Center are not managed for scenic quality. Therefore, the visual impact of the proposed Facility will not adversely affect these protected areas. Columbia Hills State Park does not have a management document (or master plan) that contains a visual resource section of relevance to the proposed Facility. The visual impact of the proposed Facility will not adversely affect this protected area.

EFSC previously found that public views of the approved Facility located beyond the CRGNSA from within the CRGNSA would be generally limited to locations along SR-14 in the State of Washington.¹³

¹² Final Order on the Application, p. 84-85 (May 15, 2009).

The proposed Facility will be seen from hillsides above and below SR-14, but these steep areas are not easily accessible to the general public. EFSC previously found that intervening features between the approved Facility and SR-14 (located both within and outside of the CRGNSA) that would be seen from the highway included multiple transmission lines (composed of steel lattice towers and distribution lines), radio towers, rail lines, Interstate 84, Highway 30, and rural development, all of which would have decreased the visual impact of the approved Facility from views originating from the portion of SR-14 in the CRGNSA. The proposed amended Facility will have fewer, but taller, turbines potentially seen from within the CRGNSA. As with the approved turbines, the proposed amended turbines will be seen from most of the sections of SR-14 located within the portion of the CRGNSA contained within the analysis area. They will also be seen somewhat higher on the hillsides above SR-14 and on steep hillsides located below SR-14 and above the Columbia River than the approved turbines. Intervening features between SR-14 and the proposed Facility, such as multiple transmission lines, radio towers, rail lines, I-84, Highway 30, and rural development, will decrease the visual impact of the Facility on views from SR-14. Therefore, as with the approved Facility, the proposed amended Facility will not result in significant adverse impacts on this protected area.

The taller proposed turbines will be visible from one additional protected area that was not previously identified and analyzed. This additional protected area is the Goldendale Fish Hatchery. The Goldendale Fish Hatchery does not have a management document (or master plan) that contains a visual resource section and is not managed for scenic quality. The proposed Facility will not result in significant adverse visual impacts to this protected area.

Impacts to protected areas from the Facility, as proposed, will be substantially similar to those described for the approved Facility. Therefore, for the reasons outlined herein, the proposed amendment makes no changes that would alter the basis for EFSC's earlier findings that OAR 345-022-0040 is met, and no new conditions of approval are warranted.

5.1.7 OAR 345-022-0050 Retirement and Financial Assurance

To issue a site certificate, the Council must find that:

- (1) The site, taking into account mitigation, can be restored adequately to a useful, non-hazardous condition following permanent cessation of construction or operation of the facility.*
- (2) The applicant has a reasonable likelihood of obtaining a bond or letter of credit in a form and amount satisfactory to the Council to restore the site to a useful, non-hazardous condition.*

Response: EFSC previously found that Certificate Holder would meet EFSC's Retirement and Financial Assurance Standard.¹⁴ This amendment request proposes to increase the turbine height, decrease the number of turbines from 267 to 125 and removes from the approved related and supporting facilities the 500-kV transmission line and one of the two substations. With the reduction in turbine count from 267 to 125 and the elimination of the 500-kV transmission line and associated substation, the amount of the bond will change from \$16,491,000 (in 2008 dollars). A revised estimate of the retirement cost will be provided in the January 2016 Supplement. Certificate Holder will also submit financial assurance that a bond or letter of credit can be obtained before construction.

(. . . CONTINUED)

¹³ Final Order on Amendment No. 2, p. 85 (January 30, 2015).

¹⁴ Final Order on Amendment No. 2, p. 36 (January 30, 2015).

5.1.8 OAR 345-022-0060, Fish and Wildlife Habitat

To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are consistent with the fish and wildlife habitat mitigation goals and standards of OAR 635-415-0025 in effect as of September 1, 2000.

OAR 635-415-0025 Requirements (Implementation of Department Habitat Mitigation Recommendations):¹⁵

(1) “Habitat Category 1” is irreplaceable, essential habitat for a fish or wildlife species, population, or a unique assemblage of species and is limited on either a physiographic province or site-specific basis, depending on the individual species, population or unique assemblage.

*(a) The mitigation goal for Category 1 habitat is no loss of either habitat quantity or quality. ****

(2) “Habitat Category 2” is essential habitat for a fish or wildlife species, population, or unique assemblage of species and is limited either on a physiographic province or site-specific basis depending on the individual species, population or unique assemblage.

*(a) The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality. ****

(3) “Habitat Category 3” is essential habitat for fish and wildlife, or important habitat for fish and wildlife that is limited either on a physiographic province or site-specific basis, depending on the individual species or population.

*(a) The mitigation goal is no net loss of either habitat quantity or quality. ****

(4) “Habitat Category 4” is important habitat for fish and wildlife species.

*(a) The mitigation goal is no net loss in either existing habitat quantity or quality. ****

(5) “Habitat Category 5” is habitat for fish and wildlife having high potential to become either essential or important habitat.

*(a) The mitigation goal, if impacts are unavoidable, is to provide a net benefit in habitat quantity or quality. ****

(6) “Habitat Category 6” is habitat that has low potential to become essential or important habitat for fish and wildlife.

*(a) The mitigation goal is to minimize impacts. ****

Response: EFSC previously found that the Facility complies with OAR 345-022-0060, Fish and Wildlife Habitat Standard.¹⁶ Acreage impacts to each habitat category and type were depicted in Table P-10 of the ASC.

In an email dated November 18, 2015¹⁷, Jeremy Thompson, District Wildlife Biologist for the Oregon Department of Fish and Wildlife (ODFW), noted that the Golden Hills Wind Farm habitat classifications submitted in the original ASC are still valid. Updated habitat impact calculations will be provided in the January 2016 Supplement to account for the change in Facility design and the new land included in the site boundary. The adequacy of the mitigation site as approved will be evaluated.

¹⁵ The provisions cited under OAR 635-415-0025 are included only in part, rather than in their entirety, for purposes of brevity.

¹⁶ Final Order on Amendment No. 2, p. 24 (January 30, 2015).

¹⁷ Email correspondence between Joel Thompson, Wildlife Biologist and Project Manager/WEST, and Jeremy Thompson, District Wildlife Biologist/ODFW (November 18, 2015).

5.1.9 OAR 345-022-0070, Threatened and Endangered Species

To issue a site certificate, the Council, after consultation with appropriate state agencies, must find that:

(1) For plant species that the Oregon Department of Agriculture has listed as threatened or endangered under ORS 564.105(2), the design, construction and operation of the proposed facility, taking into account mitigation:

(a) Are consistent with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3); or

(b) If the Oregon Department of Agriculture has not adopted a protection and conservation program, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and

(2) For wildlife species that the Oregon Fish and Wildlife Commission has listed as threatened or endangered under ORS 496.172(2), the design, construction and operation of the proposed facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

Response: EFSC previously determined that the Facility complies with the Threatened and Endangered Species Standard.¹⁸

Certificate Holder reviewed current data on federal and state listed endangered, threatened, proposed, or candidate plant and wildlife species that have potential for occurrence in the analysis area. U.S. Fish and Wildlife Service (USFWS) and Oregon Department of Agriculture (ODA) data on listed species occurring in the state of Oregon were reviewed (USFWS, 2014; ODA, 2015) to assess potential changes to the status, occurrence, or impacts of the species listed in revised Table Q-1 of Attachment 5 to Certificate Holder's responses to the 2014 *Request for Additional Information* (RAI) on the second amendment (Golden Hills Wind Farm LLC, 2014). All species have maintained the same status reported in the revised Table Q-1 and no additional listed species were identified that have a potential to occur within the project area.

In 2013, WEST, Inc., reviewed a database of Rare, Threatened, and Endangered Species of Oregon (ORBIC, 2013) to assess potential changes to the status, occurrence, or impacts of the species listed in Table Q-1 of the ASC. WEST addressed changes in Attachment 5 of the 2014 RAI of the second amendment.

Based on a review of Exhibit Q of the ASC, Attachment 5 of the 2014 RAI of the second amendment, and current and applicable lists of Endangered, Threatened, Proposed, or Candidate plant and wildlife species (ODA, ORBIC, and USFWS), there is no reason to anticipate any previously unevaluated impacts on threatened and endangered species. Therefore, OAR 345-022-00070 is met.

5.1.10 OAR 345-022-0080 Scenic Resources

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans, tribal land management plans and federal land management plans for any lands located within the analysis area described in the project order.

(2) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

¹⁸ Final Order on Amendment No. 2, p. 23 (January 30, 2015).

Response: EFSC previously found that Certificate Holder would meet the Scenic Resources Standard.¹⁹ This response analyzes how the proposed reduction in the number of turbines and the increased size of the turbines may change visibility of the Facility within the 10-mile analysis area and concludes that notwithstanding such changes, EFSC may find that the Facility still complies with OAR 354-022-0080.

5.1.10.1 Methodology

Two steps were taken to determine where the tallest turbines will be potentially seen from significant or important scenic resources within the 10-mile analysis area. The first step was to determine if any of the local land use, tribal land management, or federal land plans had been updated since the Final Order on the Application (May 15, 2009) (referenced in this discussion as “Final Order”) was issued. The second step was to conduct a new Zone of Visual Influence (ZVI) analysis within the 10-mile analysis area of the tallest turbines proposed in this request. Based on the ZVI, Certificate Holder analyzed the potential impacts from the proposed turbines and compared those impacts against impacts EFSC previously evaluated when it considered whether the previously approved turbines complied with OAR 354-022-0080 in the Final Order.

5.1.10.2 Analysis

This section describes the two steps performed for the scenic resources analysis.

Step 1: Verify New or Updated Local Land Use Plans, Tribal Land Management Plans, and Federal Land Management Plans. Plans that were identified in the Final Order were reviewed to see if they had been subject to updates that would be of relevance to this amendment request. Table 5-1 identifies the current plans relevant to this amendment request.

TABLE 5-1. Applicable Local Land Use, Tribal Land Management, and Federal Land Management Plans

Plans	Did Plan Identify Significant or Important Scenic Resources of Relevance to this Amendment Request?	What are the Scenic Resources?	Would Components of this Amendment Request Be Visible From the Scenic Resource and Require Impact Analysis?
Management Plan for the Columbia River Gorge National Scenic Area, September, 1992, revised May 10, 2004	Yes	Lands within the Columbia River Gorge National Scenic Area	Yes
Management and Use Plan Update Final Environmental Impact Statement Oregon National Historic Trail and Mormon Pioneer National Historic Trail, August 1999 (Record of Decision issued November 1999).	Yes	Deschutes River Crossing. Biggs Junction John Day River Crossing – McDonald Ferry	No
Lewis and Clark National Historic Trail Comprehensive Plan and Management and Use, January 1982,	No	NA	NA
Lower Deschutes River Management Plan and Final Environmental Impact Statement,	Yes	Lower Deschutes River and corridor	Yes

¹⁹ Final Order on Amendment No. 2, p. 34 (January 30, 2015).

TABLE 5-1. Applicable Local Land Use, Tribal Land Management, and Federal Land Management Plans

Plans	Did Plan Identify Significant or Important Scenic Resources of Relevance to this Amendment Request?	What are the Scenic Resources?	Would Components of this Amendment Request Be Visible From the Scenic Resource and Require Impact Analysis?
January 1993 (Record of Decision issued February 1993).			
Proposed Two Rivers Resource Management Plan Final Environmental Impact Statement, September 1985 (Record of Decision issued June 1986).	Yes (Lower part of Deschutes River in BLM administered land)	Lower Deschutes River and corridor	Yes
Proposed Spokane Resource Management Plan Amendment Final Environmental Impact Statement, June 22, 1992.	No	NA	NA
Journey Through Time Scenic Byway Management Plan, April 1996 (State Scenic Byway Management Plan referenced in Sherman County Comprehensive Plan).	Yes	Portion of SR 97 passing through analysis area that is the byway	Yes
Comprehensive Plan for Wasco County [Oregon], August 25, 1983.	No	NA	NA
Gilliam County [Oregon] Comprehensive Land Use Plan, October 25.	No	NA	NA
Klickitat County [Washington] Comprehensive Plan, August, 1977	No	NA	NA
Sherman County [Oregon]— Comprehensive Land Use Plan 1994, updated June 2007.	Yes	Rock outcroppings, trees, the John Day River Canyon, the Deschutes River Canyon, and the rural nature of the Sherman County landscape	Yes
Bureau of Land Management— John Day Basin Record of Decisions and Resource Management Plan, April 2015	Yes (John Day River in BLM administered land)	John Day River and corridor	Yes

NA = not applicable

The last two plans described in Table 5-1 were the only plans to have been updated and identify new significant or important resources that must be included in the scenic resource analysis.

Sherman County Comprehensive Land Use Plan, Updated June 2007

This plan contains two new items related to scenic resources that were not previously considered in the Final Order:

- New Goal VI encourages the preservation of the rural nature of the Sherman County landscape.
- Finding X1 identifies more items as important features. It classifies rock outcroppings, trees, the John Day River Canyon, and the Deschutes River Canyon as all-important features of the Sherman County landscape.

Bureau of Land Management—John Day Basin Record of Decisions and Resource Management Plan, April 2015

This finalized resource management plan (RMP) contains several items related to scenic resources that are of particular relevance to lands managed by the BLM for the John Day River and Canyon, a portion of which is within the southeastern part of the 10-mile analysis area. Although the directives contained in the RMP do not apply to private land within, or beyond, the boundary of lands administered by the BLM, they do illustrate how important scenic resources along the John Day River are managed. The relevant management objective (Objective VR1) for scenic resources for BLM lands near much of the John Day River in the analysis area directs the BLM to manage the land to “preserve the existing character of VRM Class I landscape (for Wildernesses and Wilderness Study Areas)...”. Management Action 2 of Objective VR1 instructs the BLM to not permit activities that would result in significant, long-term, adverse effects on the visual resources of the John Day River Canyon in areas normally seen from this river.

Step 2: Conduct New ZVI Analysis. The ZVI model that was developed for the tallest, 158-meter (518-foot) turbines depicts the “worst-case” potential visibility of proposed turbines within a 10-mile radius of the site boundary (see Figure 4). Table 5-2 identifies the significant or important scenic resources within the analysis area and identifies the distance to the closest Facility turbine.

TABLE 5-2. Significant or Important Scenic Resources Within the Analysis Area

Scenic Resource	Distance to Closest Turbine(s) (miles)
Lands within the Columbia River Gorge National Scenic Area	5 miles
State Route 14 within the Columbia River Gorge National Scenic Area	7.5 miles
Lower Deschutes River and corridor	5.5 miles
John Day River and corridor	9 miles
Journey Through Time Scenic Byway	0.3 mile
Rock outcroppings, trees, the John Day River Canyon, the Deschutes River Canyon, and the rural nature of the Sherman County landscape	Rock outcroppings, trees, and the Sherman County landscape adjacent to John Day River Canyon and Deschutes River Canyon – 5 to 5.5 miles

Columbia River Gorge National Scenic Area

As was the case with the approved turbines, the proposed amended turbines will be visible from portions of the CRGNSA. As proposed, the closest turbines will be approximately 5 miles away from the CRGNSA and the most distant will be approximately 17 miles. The increased height of the proposed turbines will not make them significantly more noticeable from within the CRGNSA than the approved turbines, nor will they be seen over a much greater area. Further, the reduction in the number of turbines (from 267 to 125) means that fewer turbines will be seen from within the CRGNSA compared to

the number that EFSC previously found complied with the Scenic Resources Standard (OAR 354-022-0080).

Like with the approved turbines, the proposed amended turbines will be visible from most of the portion of SR-14 that passes through this part of the CRGNSA and serves as a primary viewpoint of the CRGNSA for many people (see Figure 4), as well as from some of the fairly remote, steep, undeveloped hillsides above and below SR-14. The proposed turbines will also be visible from areas farther above and below portions of the hillsides adjacent to SR-14. Unlike the approved turbines, the proposed turbines will be seen from the northern side of the Columbia River and nearby shoreline and from uplands starting in the area adjacent to the community of Wishram and continuing upriver to an area north of Miller Island. The Final Order, pointed out that human-made objects such as transmission lines, wind turbines, railroad tracks, and highways are clearly visible from SR 14 when looking toward the Facility site. The Final Order demonstrated that because of the existence of these human-made objects, the presence of the approved turbines would have less than significant impacts to significant or important scenic resources associated with the CRGNSA. The proposed turbines will likewise be visible from SR 14, as will the human-made objects previously described. Therefore, the proposed turbines will also have less than significant impacts to significant or important scenic resources associated with the CRGNSA.

Oregon National Historic Trail High Potential Sites (the John Day River Crossing [McDonald Ferry], Biggs Junction, and the Deschutes River Crossing)

As a result of topographic screening, the proposed turbines will not be seen from McDonald Ferry, Biggs Junction, or the Deschutes River Crossing.

Lower Deschutes River Canyon

As with the approved turbines, some of the proposed amended turbines will be seen from isolated rims of the Deschutes River Canyon. At the closest portion of the canyon rim from which turbines will be visible, the nearest turbines will be approximately 5.5 miles away. In addition, the proposed turbines will likely be seen from additional remote upper canyon walls from which the approved turbines would not be seen. The proposed turbines, however, will not be visible from the river, shoreline, or interior canyon areas. The Final Order found that the Federal Wild and Scenic Rivers and state scenic rivers and waterways are managed for outstanding scenic quality, but that the management plans for these types of rivers focus on views from the rivers, not from canyon rims.²⁰ Gordon Ridge follows the east side of the Lower Deschutes River Canyon west of the Facility, and in many locations this ridge will block views of turbines (see Photo 1). Consistent with the findings in the Final Order, the Facility, as proposed, will not result in significant impacts to significant or important scenic resources and values of the Lower Deschutes River Canyon.

²⁰ Final Order on the Application, p. 88 (May 15, 2009).



Photo 1. Gordon Ridge looking northwest from near Gordon Ridge Road. The edge of the Lower Deschutes River Canyon can be seen on the left side of the photo. The ridge slopes down on the right side to the area where the Golden Hills Wind Farm will be located and the ridge will block views of the wind farm from much of the canyon.

John Day River Canyon

The proposed turbines will be located farther from the John Day River than the Deschutes River, and will be separated from the John Day River by a number of intervening wind projects and transmission lines (see Photo 2). Turbines will be potentially visible in very remote portions of upper rims of the John Day River Canyon. No turbines will be seen from the river, its shoreline, or lower canyon areas. Consistent with the findings in the Final Order, the Facility, as proposed, will not result in significant impacts to significant or important scenic resources associated with the John Day River Canyon.



Photo 2. Northeast view from Starvation Lane of the area between the west edge (the “hill” on which the electrical transmission line towers are located) of the John Day River Canyon and the Facility project area (which is approximately 9 miles to the west) that contains wind farms and electrical transmission lines.

Journey Through Time Scenic Byway

As with the approved turbines, the proposed amended turbines will be visible in the foreground and middleground of the byway (US 97) for approximately 12 miles between south of Moro and north of Biggs. As discussed in the Final Order (page 88), the Facility will be compatible with the master plan for the Journey Through Time Scenic Byway, which does not identify any significant or important scenic values in the analysis area. Further, the amendment request supports Sherman County’s marketing efforts that promote the existing wind farms in Sherman County. These efforts include two tourist brochures titled “Get Up and Close With Oregon’s Wind Farms: Self-Guided Wind Farm Driving Tour” and “Windmills and Wheat Fields Scenic Cycling Tour through Sherman County” (Sherman County, no date). For these reasons, EFSC may conclude that the Facility, as proposed, will not result in significant impacts to the byway.

Sherman County Comprehensive Plan

The *Sherman County Comprehensive Plan* (Sherman County, June 2007 revision) identified resources such as trees, rock outcroppings, the John Day and Deschutes River canyons, and the rural nature of the Sherman County landscape. Like the approved turbines, the proposed amended turbines will not impact tree or rock outcroppings, and as described above, will not significantly impact the John Day and Deschutes River canyons. The proposed Facility will add large-scale wind generation elements to the landscape of Sherman County, but will not remove significant amounts of wheat fields, farms, or other elements that contribute the rural character of Sherman County. The proposed turbines will be similar in appearance and character to turbines featured in Sherman County tourism brochures such as *Windmills & Wheatfields: Scenic Cycling Tour Through Sherman County* (Sherman County, 2015a) and *Windmills and Wheatfields: Oregon Wind Farm Driving Tour* (Sherman County, 2015b) that celebrate the rural

character of Sherman County along with the County’s unique position as “Oregon’s #1 wind farm region.” Therefore, the Facility will be consistent with the intent of preserving the resources identified in the comprehensive plan.

5.1.10.3 Conclusions

In accordance with the Final Order and the discussion above, the construction and operation of the Facility, as proposed, will not result in significant adverse impacts to scenic resources and values identified as significant or important in local land use, tribal land management, and federal land management plans for any lands within the Facility’s analysis area. The amendment request makes no changes that would alter the basis for EFSC’s earlier findings and EFSC may conclude that OAR 345-022-0080 is met.

5.1.11 OAR 345-022-0090 Historic, Cultural and Archaeological Resources

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to:

(a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;

(b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and

(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

Response: EFSC previously found that the Facility satisfied the Historic, Cultural, and Archaeological Resources Standard.²¹ Prior to construction, Certificate Holder must consult with SHPO (Condition V.B.3) and provide the Department with a map showing the final design locations of the Facility in relation to areas previously surveyed (Condition V.B.4). If there are additional areas of ground-disturbing activities, Certificate Holder must consult with SHPO and determine whether there will be additional impacts to cultural resources, which could require surveying these new areas. The proposed Facility must comply with these and all other historic, cultural, and archaeological resource conditions of approval. Accordingly, the Council may find that the construction and operation of the Facility, as amended, will not result in significant adverse impacts to historical, cultural or archeological resources and OAR 345-022-0090 is satisfied.

5.1.12 OAR 345-022-0100 Recreation

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:

(a) Any special designation or management of the location;

(b) The degree of demand;

²¹ Final Order on Amendment No. 2, p. 85 (January 30, 2015).

(c) Outstanding or unusual qualities;

(d) Availability or rareness;

(e) Irreplaceability or irretrievability of the opportunity.

Response:

EFSC previously found that the Facility satisfied the Recreation Standard.²² This section discusses how, and if, the proposed changes to the Facility would change the basis for EFSC’s finding of compliance with OAR 345-022-0100. The analysis area for impacts on recreational opportunities encompasses the area within the site boundary and five miles beyond the site boundary.

The analysis area is modified slightly from that analyzed in the ASC and described in the Final Order²³. Generally, the analysis area is smaller, because parcels have been removed from the site boundary along the north and southeast edges. The addition of parcels in the interior of the site boundary and along the east and west edges does not have a significant impact on the analysis area. Modifications to the analysis area do not change the recreational opportunities from those identified in the ASC and Final Order.

5.1.12.1 Noise Resulting from Facility Construction or Operation

The noise analysis conducted for the Final Order on the Application indicated that the approved Facility will be inaudible from all recreational opportunities in the analysis area except the Oregon National Historic Trail, the Journey Through Time Scenic Byway, and DeMoss Springs Memorial Park.²⁴ The modifications proposed in this amendment request will still comply with noise conditions described in the site certificate. Noise from the proposed Facility will still be audible at these three recreational opportunities. However, for the same reasons previously cited by EFSC, audible noise will not adversely affect recreation in these areas.

Oregon National Historic Trail. At the Oregon National Historic Trail, EFSC previously found that there are no intact trail segments or developed facilities associated with the Trail in the analysis area, so there will be no noise impacts to recreational use of the Trail from the Facility. The proposed modifications to the Facility do not change this finding.

Journey Through Time Scenic Byway. Similarly, EFSC previously determined that because activities associated with the Journey Through Time Scenic Byway primarily involve auto touring, noise resulting from the approved Facility would not be heard from inside a moving or closed vehicle, or would be drowned out by highway noise, so no adverse noise impacts to this recreational opportunity would occur.²⁵ The proposed changes do not affect the basis for this finding.

DeMoss Springs Memorial Park. EFSC previously found that the maximum noise level at DeMoss Springs Memorial Park would be approximately 48 dBA²⁶. EFSC determined that this noise level would be audible, but would be below the Oregon Department of Environmental Quality (ODEQ) limit of 50 dBA. EFSC concluded that noise resulting from the approved Facility construction or operation would not adversely affect recreation opportunities. Because the proposed Facility will comply with noise requirements, including the 50-dBA noise limit, EFSC may rely on its previous finding that no significant

²² Final Order on Amendment No. 2, p. 42 (January 30, 2015).

²³ Final Order on the Application, p. 89 (May 15, 2009).

²⁴ Final Order on the Application, p. 89-94 (May 15, 2009).

²⁵ Final Order on the Application, p. 89 (May 15, 2009).

²⁶ Final Order on the Application, p. 94 (May 15, 2009).

adverse effect to this recreational opportunity would occur. As required under Condition VI.A.1.2, Certificate Holder will submit, for ODOE approval before construction, a complete new noise analysis for the Facility as designed. This analysis will demonstrate compliance with the relevant noise requirements and confirm that audible noise at the DeMoss Springs Memorial Park will be below ODEQ limits. Therefore, the EFSC may rely on its previous finding that noise at the DeMoss Springs Memorial Park will not adversely affect recreational opportunities.

5.1.12.2 Traffic Resulting from Facility Construction or Operation

The Final Order on the Application²⁷ concluded that temporary traffic impacts would occur to the Journey Through Time Scenic Byway during construction. These impacts could include short-term traffic delays on US 97 and local roads. However, the existence of several passing lanes on US 97 would alleviate potential impacts along the travel corridor. Traffic impacts on other recreational facilities were determined to be negligible. Although the individual turbines proposed under this amendment request will be larger and require more concrete than previously analyzed, the smaller number of turbines will result in a net decrease in truck traffic during construction of approximately 30 percent below the previous estimate, as described in Section 5.1.6 (Protected Areas). Therefore, the proposed modifications will result in lower temporary construction impacts to recreational opportunities and EFSC can rely on its previous findings that there would be no significant traffic impact to recreational facilities resulting from construction or operation of the Facility.

5.1.12.3 Visual Impacts of Facility Structures

As described in the Final Order on the Application²⁸, turbines would be visible from six of the identified recreational opportunities in the analysis area (CRGNSA, Journey Through Time Scenic Byway, Lewis and Clark National Historic Trail interpretive site at the Maryhill Museum of Art, Maryhill Museum of Art, Maryhill's Stonehenge, and DeMoss Springs Memorial Park). Visibility of the proposed turbines and the changes resulting from the modifications described in this amendment request are detailed in Section 5.1.10, Scenic Resources. Turbines described in this amendment request will still be seen from the same six recreational areas, although fewer turbines will be visible because fewer turbines will be built. The modified turbines proposed in this request will be visible from additional portions of two of the identified recreational areas: CRGNSA and the Deschutes River Corridor.

Columbia River Gorge National Scenic Area. Turbines described in this amendment request will be seen from certain areas of the CRGNSA from which the approved turbines would not have been visible. The additional areas within the CRGNSA from which turbines will now be visible include a portion of the waters, shoreline, and uplands along the north side of the Columbia River, between the community of Wishram and an area north of Miller Island. In addition, the turbines will be seen from more of the hillsides above and below SR-14. However, these steep hillsides areas are not easily accessible to the general public. EFSC previously found that existing features, including steel lattice towers, transmission lines, grain elevators, rail lines, the community of Biggs, and interstate highway and rail development affect views toward the approved Facility from viewing locations within the CRGNSA. The proposed modifications will not change this finding and EFSC may rely on its previous conclusion that the visual impacts of the proposed Facility on the CRGNSA would be negligible.²⁹

Deschutes River Corridor. As described in Section 5.1.6, Protected Areas, and Section 5.1.10, Scenic Resources, the turbines described in this amendment will be seen from the upper portions of some

²⁷ Final Order on the Application, pgs. 88-94 (May 15, 2009).

²⁸ Final Order on the Application, pgs. 88-94 (May 15, 2009).

²⁹ Final Order on the Application, p. 89 (May 15, 2009).

remote canyon rims and lower portions of some canyon walls from which the approved turbines would not be seen. However, like the approved turbines, the proposed amended turbines will not be visible from the river portion of this protected river corridor. Because turbines described in this amendment request will not be seen from the Deschutes River or the Deschutes River State Recreation Area, their presence will have negligible impacts on this important recreational opportunity.

Conclusion. For the same reasons stated in the Final Order on the Application, EFSC may rely on its previous findings to conclude that design, construction, and operation of the proposed modified Facility, taking into account mitigation and subject to the conditions previously approved, are not likely to result in significant adverse impact to important recreational opportunities in the analysis area. Therefore, OAR 345-022-0100 is met.

5.1.13 OAR 345-022-0110 Public Services

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

Response: The proposed amendment makes no changes that would alter the basis for EFSC's earlier findings that OAR 345-022-0110 is met. An updated public service provider list was provided in Request for Amendment No. 2 and confirmed that the needed public services and public service providers were still available to serve the Facility without causing a significant adverse impact on the ability of the public and private providers. As described in this amendment request, the proposed changes will reduce the number of turbines and overall disturbance to the project area. The proposed changes will generally maintain or reduce the number of employees required for construction and operation of the Facility, and will not increase the number of people requiring housing or public services. For these reasons and based on the information provided below, the Council may find that the Facility, as proposed, satisfies the Public Services Standard, subject to Conditions V.C.1 through V.C.13.

5.1.13.1 Sewers and Sewage Treatment

No significant change to impacts on sewers or sewage treatment during construction or operations will occur based on the changes described in this amendment request. Consistent with EFSC's previous finding, no significant adverse impacts to sewers and sewage treatment are anticipated.

5.1.13.2 Water

No significant change to water use during construction or operations will occur based on the changes described in this amendment request. Although individual turbine foundations will be larger for the taller turbines, the total number of turbines will be less than half of the approved number and the total volume of concrete will be smaller than previously approved. Because construction traffic will be reduced as described in Section 5.1.13.6, water requirements for dust suppression will be similar to or less than requirements for the larger number of turbines. Therefore, overall water usage during construction will be the same or less than the amount previously approved. Water use during operations will also be similar to or less than the amount previously approved. Consistent with EFSC's previous finding, no adverse impacts to the local water supply are anticipated.

5.1.13.3 Stormwater Drainage

Construction-related stormwater drainage impacts could occur during construction of the proposed Facility, likely from road, turbine foundation, and staging area construction. The disturbance area for proposed project construction will be smaller than the previously approved disturbance area due to the decrease in turbines and modified layout, and therefore stormwater drainage impacts during construction and operations will be less than the amount previously approved. This conclusion will be confirmed in the January 2016 Supplement with the updated disturbance area calculations. However, all phases of construction of the project are subject to Condition IV.E.I of the Site Certificate, which requires Certificate Holder to conduct all construction work in compliance with an Erosion and Sediment Control Plan satisfactory to DEQ and as required under the National Pollutant Discharge Elimination System 1200-C permit.

5.1.13.4 Solid Waste Management

The quantity of solid waste generated during construction and operation of the proposed modified Facility will be similar to or less than the quantity presented in the Final Order on the Application. Although individual turbines will be larger, the reduction in number of turbines means that the total quantity of material for the project is reduced. This estimate will be confirmed in the January 2016 Supplement that will contain the updated retirement cost estimate and waste quantity calculations. At the time of the Final Order, the nearest landfill, the Columbia Ridge Recycling and Landfill, had not projected to reach capacity for at least 56 years. There has been no significant change to landfill availability or capacity since the previous finding. Therefore, no significant adverse impact on landfill operations that provide solid waste management services in the area is anticipated.

5.1.13.5 Housing

No adverse impacts to housing in the analysis area are anticipated as a result of the proposed project. The amount of temporary and permanent employees is anticipated to be similar to those presented in the Final Order.

5.1.13.6 Traffic Safety

The individual turbines proposed under this amendment request will be larger than the approved turbines. As a result, individual turbine foundations will require more concrete (and therefore, a greater number of concrete truck trips) than previously analyzed. However, the smaller number of turbines will result in a net decrease in total concrete needs, and the individual turbines will require a similar number of trucks to those previously estimated. Therefore, there will be a net decrease in construction truck traffic of approximately 30 percent below the previous estimate, as described in Section 5.1.6 (Protected Areas). The proposed modifications will result in lower temporary construction impacts on traffic safety and EFSC can rely on its previous findings that no significant traffic impacts will result from construction or operation of the Facility. All required permits for traffic impacts will be coordinated with and obtained from Sherman County and the Oregon Department of Transportation (ODOT).

5.1.13.7 Police and Fire Protection

Because there will be no significant change to construction or operations employment levels, the proposed changes to the Facility are not anticipated to result in additional adverse impacts to fire protection and emergency services, nor will the changes affect Certificate Holder's ability to comply with the conditions and requirements provided in the Final Order on Amendment No. 2.

5.1.13.8 Health Care

Because there will be no significant change to construction or operations employment levels, the proposed changes to the Facility will not result in additional impacts to medical services in the analysis

area nor affect Certificate Holder’s ability to comply with the conditions and requirements provided in the Final Order on Amendment No. 2.

5.1.13.9 Schools

Because there will be no significant change to construction or operations employment levels, the proposed changes to the Facility will not result in additional impacts to schools in the analysis area nor affect Certificate Holder’s ability to comply with the Site Certificate and fulfill the conditions and requirements as provided in the Final Order on Amendment No. 2.

5.1.14 OAR 345-022-0120 Waste Minimization

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that, to the extent reasonably practicable:

(a) The applicant’s solid waste and wastewater plans are likely to minimize generation of solid waste and wastewater in the construction and operation of the facility, and when solid waste or wastewater is generated, to result in recycling and reuse of such wastes;

(b) The applicant’s plans to manage the accumulation, storage, disposal and transportation of waste generated by the construction and operation of the facility are likely to result in minimal adverse impact on surrounding and adjacent areas.

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

Response: Waste generated during operation of the proposed Facility will be similar to or less than the quantity analyzed previously because of the reduction in number of turbines requiring maintenance. Nonhazardous solid waste generated during construction will consist of the same elements previously analyzed: concrete and wood waste from turbine pad construction; scrap steel from turbine construction; and miscellaneous materials such as packing materials for turbine parts and electrical equipment, and erosion control materials. Although the larger individual turbines will generate more construction waste than previously estimated, the reduction in number of turbines results in a net reduction in quantity of waste materials generated. As previously described in Exhibit V of the ASC³⁰, the Certificate Holder plans to minimize construction waste through detailed estimating of materials needs and through efficient construction practices that will recycle as much as is practicable. Wastewater from vehicle washdown will be similar to or less than previously estimated because of the net reduction in total concrete needs. Wastewater from portable toilets will be similar to or less than previously estimated because the construction workforce will be similar to that previously estimated for the approved Facility. The proposed amendment makes no changes that would alter the basis for EFSC’s earlier findings nor change the Certificate Holder’s ability to comply with any requirements and conditions issued by the EFSC. Therefore, OAR 345-022-0120 is met.

5.2 Division 24 Standards

The following Division 24 standards are addressed:

³⁰ Golden Hills Wind Farm LLC. 2008. *Application for Site Certificate—Exhibit V, Waste Minimization.*

- OAR 345-024-0010 Public Health and Safety Standards for Wind Energy Facilities
- OAR 345-024-0015 Cumulative Effects Standards for Wind Energy Facilities
- OAR 345-024-0090 Transmission Lines

5.2.1 OAR 345-024-0010, Public Health and Safety Standards for Wind Energy Facilities

To issue a site certificate for a proposed wind energy facility, the Council must find that the applicant:

(1) Can design, construct and operate the facility to exclude members of the public from close proximity to the turbine blades and electrical equipment.

(2) Can design, construct and operate the facility to preclude structural failure of the tower or blades that could endanger the public safety and to have adequate safety devices and testing procedures designed to warn of impending failure and to minimize the consequences of such failure.

Response:

EFSC previously found that the Facility complies with the Public Health and Safety Standards for Wind Energy Facilities.³¹ Although the proposed towers and blades may be taller and longer, as described in the Final Order on the Application,³² tower and blade design will be by a major wind turbine manufacturer, and the structures will be installed per manufacturer requirements. The turbines have automated cutoff devices to shut the equipment down when the wind is very strong and the turbine reaches the cutout speed. Periodic inspections of all turbine equipment will be conducted per the manufacturer's specifications.

Each turbine will be equipped with vibration sensing equipment that will shut the turbine down if abnormal levels of vibration are detected. In the unlikely event of a blade defect, the preceding vibration caused by aerodynamic or structural flaws will trigger a shut down in order to prevent the type of failure that might create a personnel hazard. During operations, all electrical components, such as the substations and turbines, will be locked and accessible only by authorized personnel. Additionally, the project changes eliminate the need for one of the two approved transmission lines, which, as described in the Final Order, can have adverse health impacts. Therefore, the changes described in the proposed amendment will not alter the basis for EFSC's earlier findings nor change the applicants ability to comply with any requirements and conditions issued by EFSC and therefore EFSC may find that OAR 345-024-0010 is satisfied.

5.2.2 OAR 345-024-0015 Cumulative Effects Standard for Wind Energy Facilities

To issue a site certificate for a proposed wind energy facility, the Council must find that the applicant can design and construct the facility to reduce cumulative adverse environmental effects in the vicinity by practicable measures including, but not limited to, the following:

(1) Using existing roads to provide access to the facility site, or if new roads are needed, minimizing the amount of land used for new roads and locating them to reduce adverse environmental impacts.

(2) Using underground transmission lines and combining transmission routes.

(3) Connecting the facility to existing substations, or if new substations are needed, minimizing the number of new substations.

³¹ Final Order on Amendment No. 2, p. 47 (January 30, 2015).

³² Final Order on the Application, p. 95 (May 15, 2009).

(4) Designing the facility to reduce the risk of injury to raptors or other vulnerable wildlife in areas near turbines or electrical equipment.

(5) Designing the components of the facility to minimize adverse visual features.

(6) Using the minimum lighting necessary for safety and security purposes and using techniques to prevent casting glare from the site, except as otherwise required by the Federal Aviation Administration or the Oregon Department of Aviation.

Response: EFSC previously found that the Facility complies with the Siting Standards for Wind Energy Facilities.³³ The proposed changes will not change the Facility's reliance on existing roads where possible. The proposed changes in Facility layout result in a net reduction in the total length of transmission lines required for the project, and do not change the approach of using underground transmission lines where possible. The proposed amended Facility layout will combine transmission routes by use of the existing Hay Canyon 230-kV transmission line for the majority of the transmission route.

As described in Section 5.1.10 (Scenic Resources) above, although the proposed turbines will have an increased height, the changes to visual impact on protected areas or public viewing areas will not be significant. Proposed changes will not significantly affect wetlands or other waters of the state because the Facility construction will avoid impacts to wetlands through boring or rerouting facilities around these features. The proposed changes will result in a net reduction of impact to fish and wildlife habitat because there will be a net reduction in disturbance area for the project, and other construction methodologies and commitments will be met as approved. The proposed amendment makes no changes that would alter the basis for EFSC's earlier findings that OAR 345-024-0015 is met.

5.2.3 OAR 345-024-0090 Siting Standards for Transmission Lines

To issue a site certificate for a facility that includes any transmission line under Council jurisdiction, the Council must find that the applicant:

(1) Can design, construct and operate the proposed transmission line so that alternating current electric fields do not exceed 9 kV per meter at one meter above the ground surface in areas accessible to the public;

(2) Can design, construct and operate the proposed transmission line so that induced currents resulting from the transmission line and related or supporting facilities will be as low as reasonably achievable.

Response: EFSC previously found that the Facility complies with this standard.³⁴ The proposed amendment modifies the previously approved collector line route, removes the 500-kV transmission line, and extends the 230-kV transmission line. The analysis presented in the ASC did not rely on the length or exact location of the lines, and therefore the changes proposed in this amendment request do not change the conclusions of that analysis.

As stated in Section 1.3.3 (Changes to Related and Supporting Facilities) above, EFSC previously approved approximately 11 miles of 500-kV transmission line to the John Day Substation, and 0.7 mile of 230-kV transmission line to the Klondike Substation, for a total of approximately 11.7 miles of high-voltage transmission. Certificate Holder proposes to eliminate the 500-kV transmission line and construct less than 5 total miles of 230-kV line. Further, the closest distance between the 230-kV transmission centerline route and the nearest residence is 1,600 feet, a distance that is substantially greater than the 200 feet stated in the original analysis provided in Exhibit AA of the ASC and required

³³ Final Order on Amendment No. 2, p. 20 (January 30, 2015).

³⁴ Final Order on the Application, p. 106 (May 15, 2009).

under Condition VI.A.4.1 in the Final Order. Although the collector line route has been adjusted to meet the needs of the modified turbine layout, the total length of collector line will be similar to or less than that previously authorized. Because the previous analysis did not rely on the length of transmission or collector line, and because other aspects of these lines will be the same as previously analyzed, the conclusions of the original analysis are still valid and the criteria presented in OAR 345-024-0090 will not be exceeded.

For the same reasons stated in the Final Order, EFSC may rely on its previous findings to conclude that Certificate Holder can design, construct, and operate the proposed transmission lines so that alternating current electric fields do not exceed 9 kV per meter at one meter above the ground surface in areas accessible to the public, and induced currents will be as low as reasonably achievable. Therefore, OAR 345-024-0090 is met.

OAR 345-027-0060(1)(f) for Compliance with Other Applicable Requirements

This section analyzes the relevant council standards listed under OAR 345-027-0060(1)(f).

(f) An analysis of whether the facility, with the proposed change, would comply with the requirements of ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances if the Council amends the site certificate as requested. For the purpose of this rule, a law, rule or ordinance is “applicable” if the Council would apply or consider the law, rule or ordinance under OAR 345-027-0070(10).

Response: Certificate Holder demonstrates that the Facility, as amended, will comply with the applicable requirements outlined in OAR 345-027-0060(1)(f).

6.1 DEQ Noise Control Regulations—OAR 340-035-0035

The Oregon Department of Environmental Quality (DEQ) noise regulations for industrial and commercial noise sources are established under OAR 340-035-0035. More specifically, OAR 340-035-0035(1)(b)(B)(iii) establishes the noise standards for noise levels generated by a wind energy facility. In Section III.B.4.a of the Final Order on Amendment No. 2 (January 30, 2015, at p. 51-52), the Council found that the Facility would meet applicable DEQ noise standards, subject to four conditions of approval (Conditions VI.A.I.1 through VI.A.I.4). As noted in the Final Order on Amendment No. 2, Condition VI.A.I.2 requires a new noise analysis be submitted to the department prior to construction that demonstrates the Facility, as proposed, will comply with all relevant noise related requirements. Consistent with the record in this proceeding and in Final Orders previously issued, Certificate Holder has multiple means to demonstrate compliance, including (1) eliminating or moving turbine locations within the approved corridors, (2) altering the turbine selection, (3) documenting that the hourly L₅₀ noise levels caused by the Facility at any noise-sensitive property will not cause the hourly L₅₀ to increase by more than 10 dBA, and 4) obtaining a legally-effective easement or real covenant. Nothing in this amendment request alters the Facility’s ability to comply with OAR 340-035-0035 or the four noise-related conditions of approval (Conditions VI.A.I.1 through VI.A.I.4). Therefore, OAR 340-035-0035 is met.

6.2 Department of State Lands (DSL) Removal/Fill Regulations—ORS 196.795 to .990, OAR 141-085-0500 to -0785, and Section 404 of the Clean Water Act

The Oregon Removal-Fill Law (ORS 196.795 to .990) and regulations (OAR 141-085-0500 to -0785) adopted by DSL require a Removal/Fill Permit if 50 cubic yards or more of material is removed, filled, or altered within any “waters of the state” at the proposed site. The Council must determine whether a permit is needed. In addition to the DSL regulations, the USACE administers Section 404 of the Clean Water Act, which regulates the discharge of fill into waters of the United States (including wetlands). Under Section 404, a federal Nationwide or Individual fill permit may be required if waters of the United States are affected by project construction or operation.

The Facility can be constructed and operated without triggering the need for a Removal/Fill Permit from DSL or a Section 404 permit from the USACE because wetlands, waters of the state, and waters of the

United States will be avoided. A wetland delineation report was prepared for the Golden Hills Wind Farm in June 2007 as part of the ASC. EFSC previously found that the Facility could avoid impacts to identified wetlands by boring under identified wetland and creek crossings. These will be directionally drilled, with the bore starting 50 feet from the edge of the wetland area. Restoration will be to backfill the borehole after the cable is installed and then reseed disturbed areas as required by the Revegetation Plan. Nothing in this amendment request changes Certificate Holder’s commitment to avoid impacts to jurisdictional waters. Further, prior to construction, Certificate Holder will conduct an updated wetland delineation to confirm that the final Facility design will not have any impacts to jurisdictional waters.

Consistent with the Final Order on the Application,³⁵ EFSC may conclude that the conditions of ORS 196.795 to .990, OAR 141-085-0500 to -0785, and Section 404 of the Clean Water Act are met.

6.3 Groundwater Act of 1955—ORS 537.505 to .796, and OAR Chapter 690

Through the provisions of the Groundwater Act (GWA) of 1955, ORS 537.505 to .796, and OAR Chapter 690, the Oregon Water Resources Commission administers the rights of appropriation and use of the groundwater resources of the state. Under OAR 345-022- 0000(1), the Council must determine whether the Facility complies with these statutes and administrative rules. Section V.1(c) of the Final Order finds that Certificate Holder’s proposed use of groundwater would be consistent with (1) the GWA and Oregon Water Resources Department statutes, (2) administration regarding rights of appropriation, and (3) the uses of state groundwater resources. As described in the response to OAR 345-022- 0110 (Public Services), the amendment request does not increase the quantity of water used during construction or operation. The request does not significantly change the quantity of water used and wastewater generated during operations from what was originally authorized in the Site Certificate. As previously approved, water for operations will come from a new well at the O&M facility. The new well will provide less than 5,000 gallons per day, and because of its limited output, is not required to obtain a state water withdrawal permit. The modifications proposed in this amendment request do not affect Certificate Holder’s ability to comply with the Site Certificate, and therefore, EFSC may conclude that the conditions of OAR Chapter 690 are met.

6.4 State Highway Access and Crossings —OAR Chapter 734, Divisions 51 and 55

Under OAR Chapter 734, Division 51, ODOT regulates highway approaches and access control. In particular, pursuant to OAR 734-051-0070, an Approach Permit is required for a new approach (permanent or temporary) to a state highway. As described in the Final Order, Certificate Holder is coordinating with ODOT about one proposed new access point and improvements to two existing access points along Highway 206. As described in the Final Order, Certificate Holder is also coordinating with ODOT about one new access point and improvements to one existing access point along Highway 97. Therefore, EFSC may conclude that the conditions of OAR Chapter 734, Divisions 51 and 55 are met.

6.5 Public Health and Safety—ORS 469.310

Under ORS 469.310, the Council must ensure that the “siting, construction and operation of energy facilities shall be accomplished in a manner consistent with protection of the public health and safety....”

³⁵ Final Order on the Application, p. 75 (May 15, 2009).

The state siting statute also provides that “the site certificate shall contain conditions for the protection of the public health and safety...” In Section VI.A.4.1-3 of the Final Order, the Council imposed conditions of approval to address public health and safety issues including and coordination with the Public Utilities Commission on design and specifications for transmission lines and with respect to fire protection. Specific public health and safety requirements for wind facilities are addressed in the response to OAR 345-024- 0010. This amendment request does not change the information presented in the Final Order or Certificate Holder’s ability to comply with the Site Certificate. Therefore, EFSC may conclude that the conditions of ORS 469.310 are met.

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Oregon Department of Energy Energy Facility Siting Council. 2015. *Final Order on Amendment No. 2 for the Golden Hills Wind Project* (issued January 30, 2015) and *Second Amended Site Certificate* (fully executed on February 11, 2015).

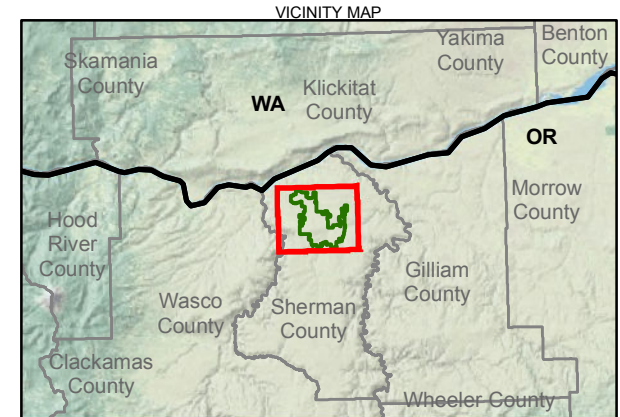
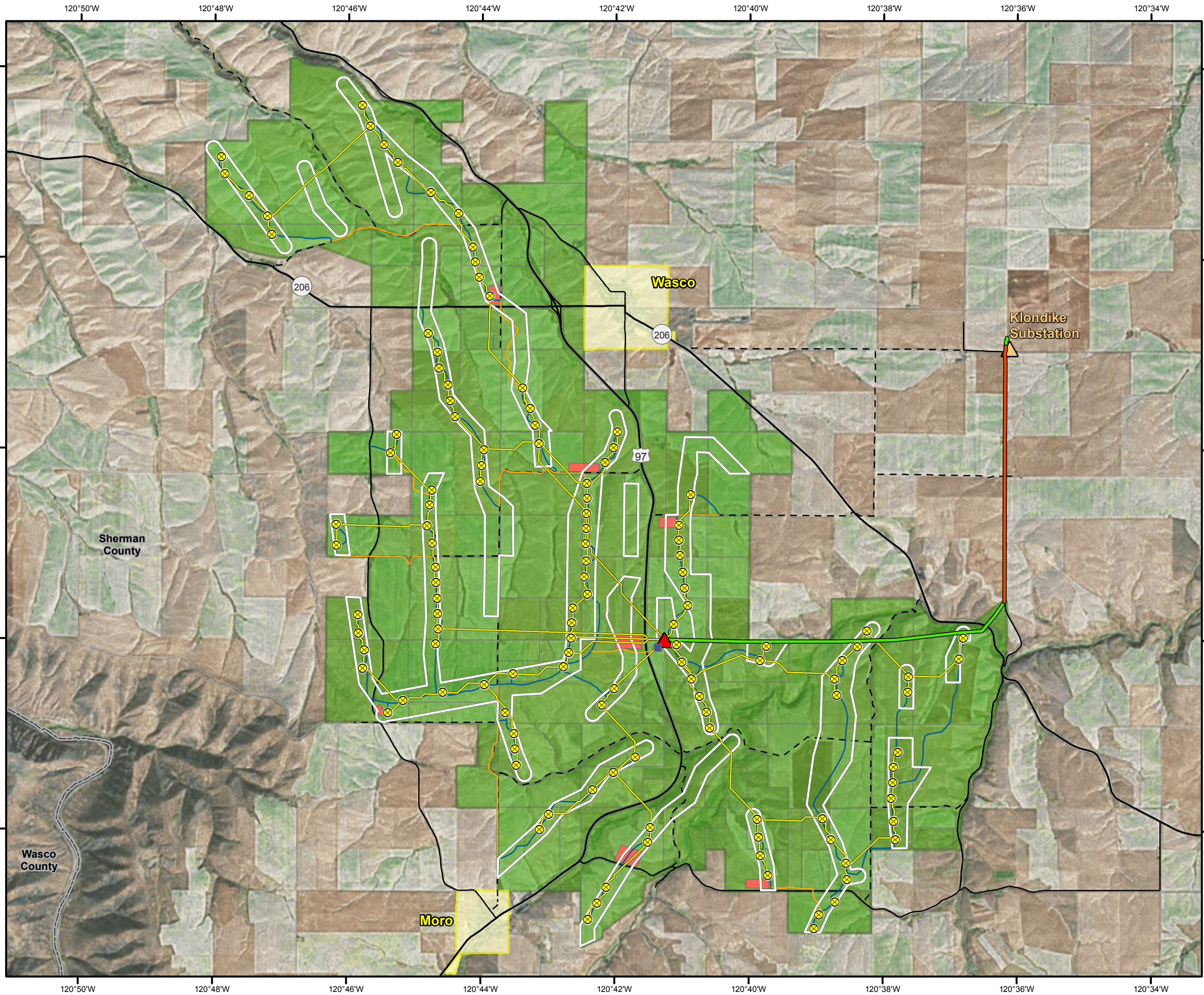
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http://www.dfw.state.or.us/wildlife/diversity/species/threatened_endangered_candidate_list.asp.

Attachment 1
Figures Cited in Text



- Facility Site Boundary
- Wind Turbine
- Approved Micrositing Corridor
- Land Parcel Boundary
- O & M Facility
- Proposed Substation
- Existing Substation
- Proposed 230-kV Transmission Line
- Existing Hay Canyon 230-kV Transmission Line
- Low-voltage Collector System
- Crane Path
- Access Road
- Public Road (Paved)
- Public Road (Gravel)
- Temporary Laydown Area
- City Boundary
- County Boundary

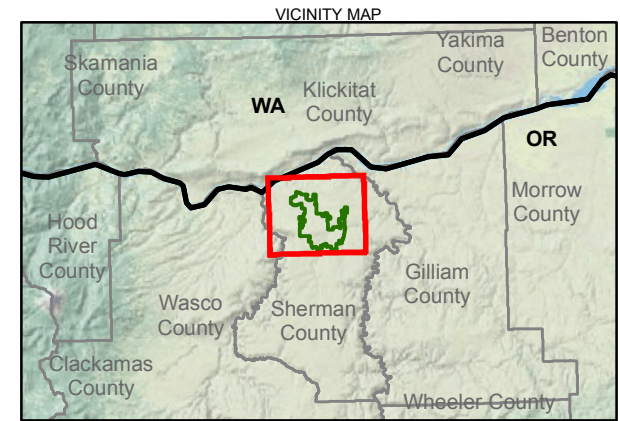
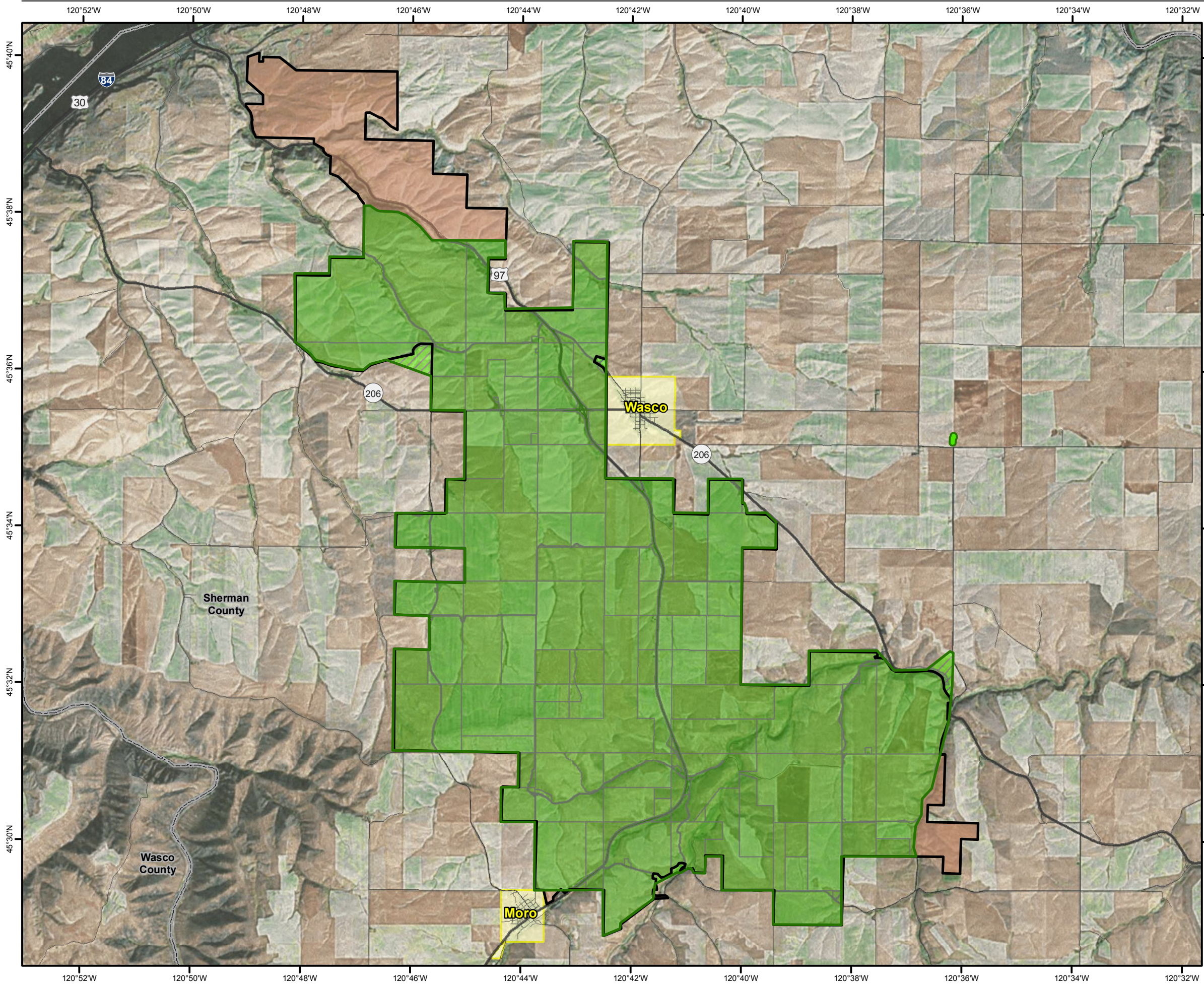
Coordinate System: NAD 1983 StatePlane Oregon North
 FIPS 3601 Feet Intl

Data Sources: Orion Renewable Energy Group LLC,
 2015; BLM (2015); WSDOT; ODOT; US Census Bureau;
 USDA; ESRI

0 0.75 1.5 3
 Miles

1 inch equals 1.18 miles

FIGURE 1
Facility Turbine Layout
 Golden Hills Wind Project Request for Amendment No. 3



-  Proposed New Site Boundary
-  Previously Approved Site Boundary
-  Proposed Site Boundary - Transmission Line
-  Area to be Retained
-  Area to be Added
-  Area to be Removed
-  Land Parcel Boundary
-  Road
-  Interstate or Highway
-  City Boundary
-  County Boundary

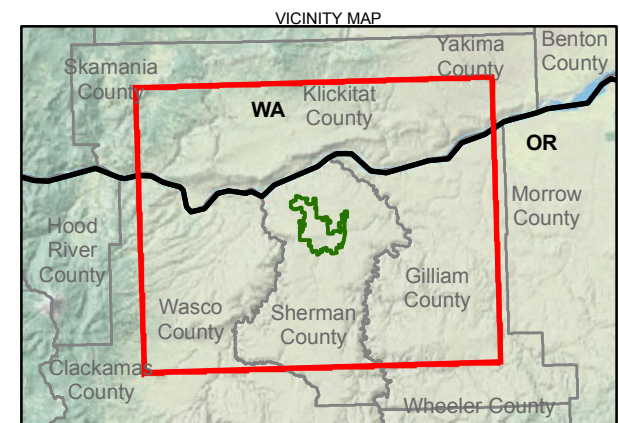
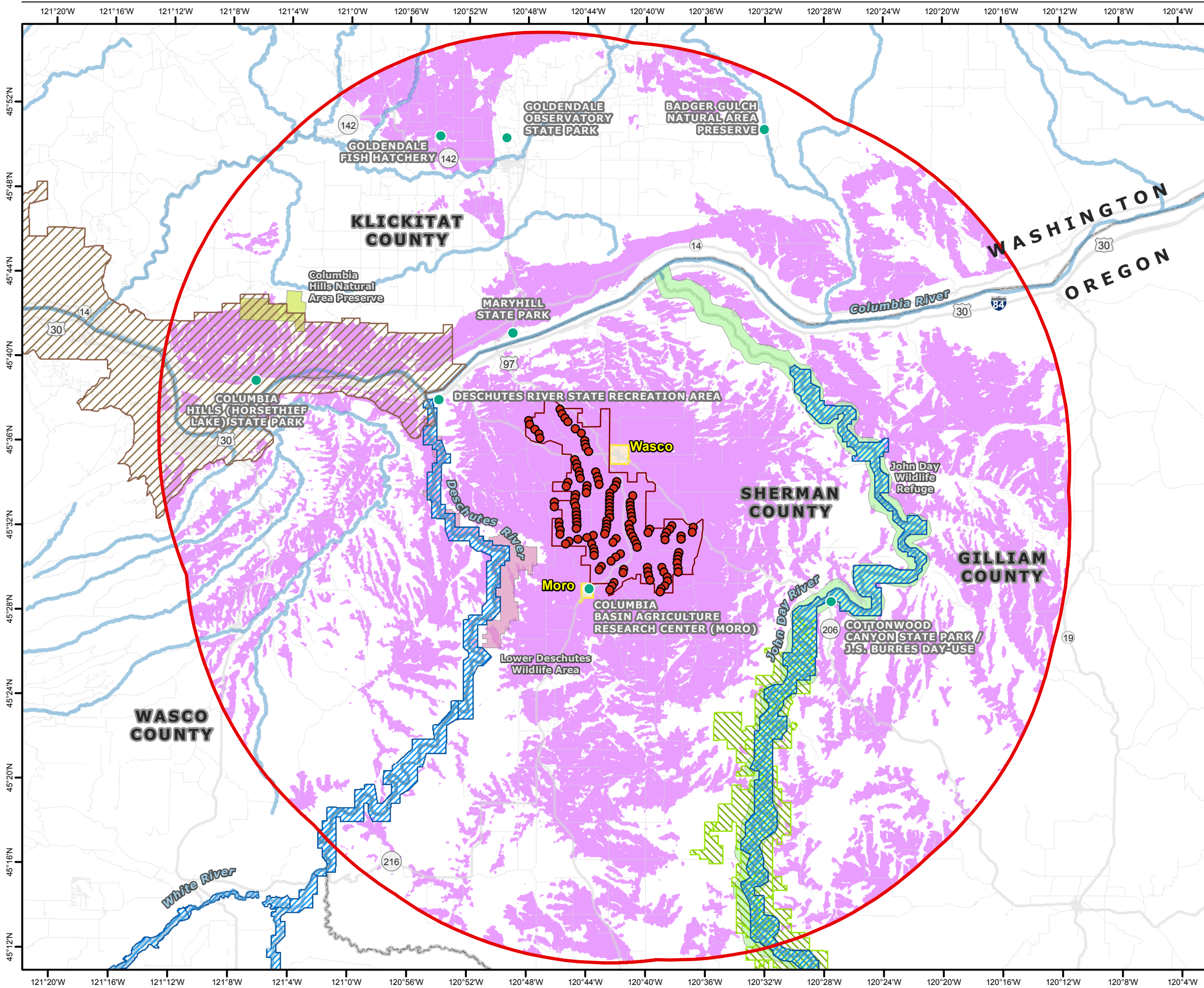
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 FIPS 3601 Feet Intl

Data Sources: Orion Renewable Energy Group LLC,
 2015; BLM (2015); WSDOT; ODOT; US Census Bureau;
 USDA; ESRI

0 0.75 1.5 3
 Miles

1 inch equals 1.42 miles

FIGURE 2
Proposed Change in Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3



- Wind Turbine Location
 - Protected Area
 - Area of Turbine Visibility
 - Analysis Area (20 Miles)
 - Facility Site Boundary
 - Interstate or Highway
 - Major Road
 - Major River or Stream
 - Wild / Scenic River Corridor
 - Wilderness Study Area
 - Columbia River Gorge National Scenic Area
 - Columbia Hills Natural Area Preserve
 - John Day Wildlife Refuge
 - Lower Deschutes Wildlife Area
 - City Boundary
 - County Boundary
- Turbine Hub Height: 95 meters (312 feet)
 Turbine Rotor Diameter: 126 meters (413 feet)
 Worst-case Total Turbine Height: 158 meters (518)
 Total Number Assessed: 125 turbines

Analysis Area: 20 miles from Site Boundary
 Assumed Viewer Height: 6-foot-tall person

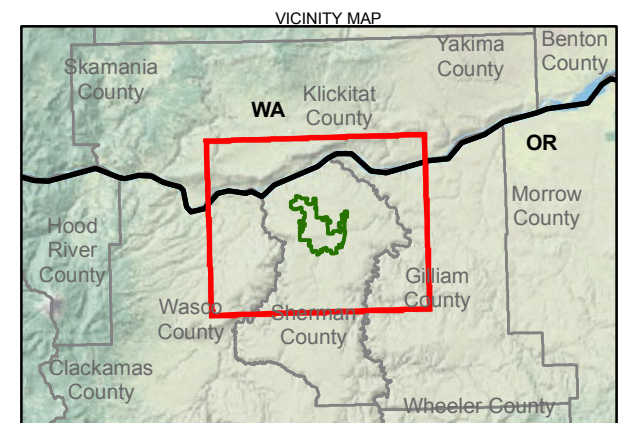
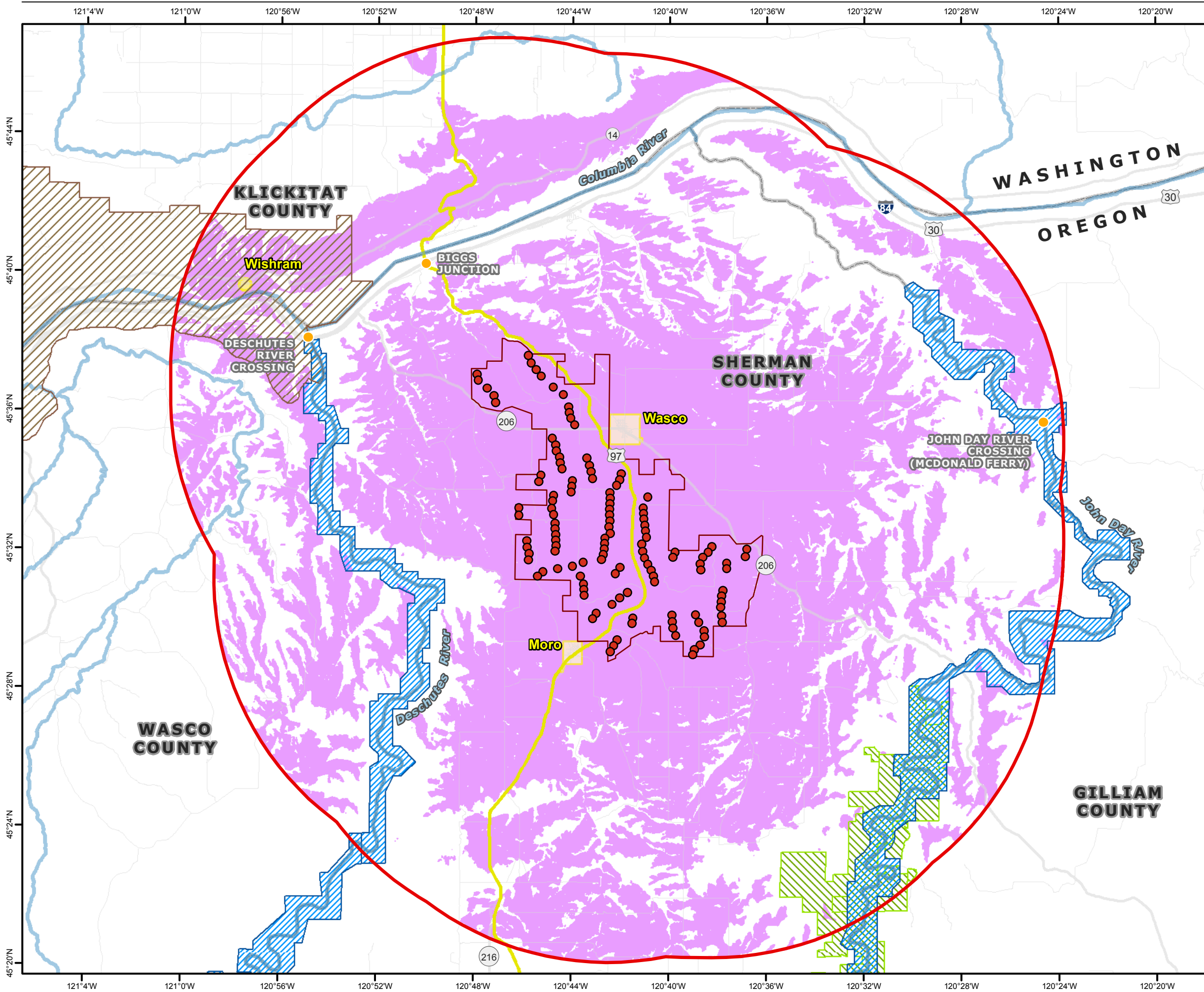
Coordinate System: NAD 1983 StatePlane Oregon North
 FIPS 3601 Feet Intl

Data Sources: Orion Renewable Energy Group LLC,
 2015; BLM (2015); WSDOT; ODOT; US Census Bureau;
 USDA; ESRI

0 2.5 5 10
 Miles

1 inch equals 5.29 miles

FIGURE 3
Protected Areas
 Golden Hills Wind Project Request for Amendment No. 3



- Wind Turbine Location
- Scenic Resource
- Area of Turbine Visibility
- Analysis Area (10 Miles)
- Facility Site Boundary
- Journey Through Time Scenic Byway (US 97)
- Interstate or Highway
- Major Road
- Major River or Stream
- Wild / Scenic River Corridor
- Wilderness Study Area
- Columbia River Gorge National Scenic Area
- City Boundary / Community
- County Boundary

Turbine Hub Height: 95 meters (312 feet)
 Turbine Rotor Diameter: 126 meters (413 feet)
 Worst-case Total Turbine Height: 158 meters (518 feet)
 Total Number Assessed: 125 turbines

Analysis Area: 10 miles from Site Boundary
 Assumed Viewer Height: 6-foot-tall person

Coordinate System: NAD 1983 StatePlane Oregon North
 FIPS 3601 Feet Intl

Data Sources: Orion Renewable Energy Group LLC, 2015; BLM (2015); WSDOT; ODOT; US Census Bureau; USDA; ESRI



1 inch equals 3.24 miles

FIGURE 4
Scenic and Aesthetic Values
 Golden Hills Wind Project Request for Amendment No. 3

Attachment 2
Sherman County Property Owners
within 500 feet of Proposed Site
Boundary

ATTACHMENT 2

Sherman County Property Owners within 500 feet of Proposed Site Boundary

Property information obtained from Sherman County on December 4, 2015.

TAX LOT ID	NAME	AGENT	ADDRESS 1	ADDRESS 2	CITY, STATE, ZIP
01N16E00003500	ALT, BETTY SUZANNE LE ETAL		107 FERNWOOD		WILLIAMSBURG, VA 23185
01N17E00007100	AMIDON, KARL F ETAL		202 KNIGHT ROAD		GOLDENDALE, WA 98620
01S17E00001700	AMIDON, KARL F ETAL		202 KNIGHT ROAD		GOLDENDALE, WA 98620
01S17E00001900	AMIDON, KARL F ETAL		202 KNIGHT ROAD		GOLDENDALE, WA 98620
01N17E00004800	ANDERSON, DARLENE ETAL		3445 DOGWOOD DRIVE		SALEM, OR 97302-4035
01N16E0000200	ANDREWS FAMILY TRUST	ANDREWS, BRUCE TRUSTEE	8563 SE 257TH		GRESHAM, OR 97080
01N17E00001400	ANDREWS FAMILY TRUST	ANDREWS, BRUCE TRUSTEE	8563 SE 257TH		GRESHAM, OR 97080
01N17E0000800	BARNETT ESTATE PARTNERSHIP	HILDERBRAND, JOSH	PO BOX 2		WASCO, OR 97065
02N17E00007400	BARNETT ESTATE PARTNERSHIP	HILDERBRAND, JOSH	PO BOX 2		WASCO, OR 97065
01N17E00004900	BARNUM, MAY TRUST	US BANK	FARM, RANCH & TIMBER ASSET MGT	PO BOX 3588, PD-WA-T7TR	SPOKANE, WA 99220-3588
01N17E00006800	BARNUM, MAY TRUST	US BANK	FARM, RANCH & TIMBER ASSET MGT	PO BOX 3588, PD-WA-T7TR	SPOKANE, WA 99220-3588
01S16E0000100	BARZEE, NORMA M		14404 SE WEBSTER RD #116		MILWAUKIE, OR 97267
01S16E0000400	BARZEE, NORMA M		14404 SE WEBSTER RD #116		MILWAUKIE, OR 97267
01S17E00001800	BARZEE, NORMA M		14404 SE WEBSTER RD #116		MILWAUKIE, OR 97267
01S18E00001000	BELSHE, JAMES R & JERRINE A		PO BOX 327		WASCO, OR 97065
01S18E0000900	BELSHE, JAMES R & JERRINE A TR		PO BOX 327		WASCO, OR 97065
01N18E00004900	BELSHE, JAMES R & JERRINE CO-T		500 SANDON STREET		WASCO, OR 97065
01N17E00001000	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
01N17E00001100	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
02N17E00004200	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
02N17E00006300	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
02N17E00006800	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
02N17E00006900	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
02N17E00007300	BISH, DOUGLAS R		PO BOX 13		WASCO, OR 97065
01N16E0000500	BLAU, SCOTT ETAL		314 2ND STREET		LAKE OSWEGO, OR 97034-3115
02N16E00003700	BLAU, SCOTT ETAL		314 2ND STREET		LAKE OSWEGO, OR 97034-3115
01S17E00002600	BLAYLOCK, ORVILLE ETAL		68808 HIGHWAY 97		MORO, OR 97039
01N16E00003600	BLAYLOCK, SHIRLEY E		68808 HIGHWAY 97		MORO, OR 97039
01N17E00006900	BLAYLOCK, SHIRLEY E		68808 HIGHWAY 97		MORO, OR 97039
01S17E00001600	BLAYLOCK, SHIRLEY E		68808 HIGHWAY 97		MORO, OR 97039
01S17E00001602	BLAYLOCK, SHIRLEY E		68808 HIGHWAY 97		MORO, OR 97039
01S17E00002400	BLAYLOCK, SHIRLEY E		68808 HIGHWAY 97		MORO, OR 97039
01S17E00002900	BURNET, PATRICIA PERSONAL REP	MCKINNEY, KIMBERLY TRUSTEE	70544 MCKINNEY ROAD		WASCO, OR 97065
01S17E00003200	BURNET, PATRICIA PERSONAL REP	MCKINNEY, KIMBERLY TRUSTEE	70544 MCKINNEY ROAD		WASCO, OR 97065
01S17E00003600	BURNET, PATRICIA PERSONAL REP	MCKINNEY, KIMBERLY TRUSTEE	70544 MCKINNEY ROAD		WASCO, OR 97065
01S17E00002100	BURNET, STEVEN F ETAL	MCKINNEY, KIMBERLY TRUSTEE	70544 MCKINNEY ROAD		WASCO, OR 97065
01S17E00002101	BURNET, STEVEN F LE ETAL	KIM MC KINNEY	70544 MC KINNEY ROAD		WASCO, OR 97065
01S17E00003000	BURNET, STEVEN F LE ETAL	KIM MC KINNEY	70544 MC KINNEY ROAD		WASCO, OR 97065
01S17E00003003	BURNET, STEVEN F LE ETAL	KIM MC KINNEY	70544 MC KINNEY ROAD		WASCO, OR 97065
01S17E00003004	BURNET, STEVEN F LE ETAL	KIM MC KINNEY	70544 MC KINNEY ROAD		WASCO, OR 97065
01S17E00001500	CHRISTIANSO, BON & CORA MAY		10505 N SAGE HOLLOW WAY		BOISE, ID 83714-9575
01N17E00004500	CLARK FARMS I LP	CLARK, LAWRENCE	PO BOX 145		SELAH, WA 98942
01N17E00004501	CLARK FARMS I LP	CLARK, LAWRENCE	PO BOX 145		SELAH, WA 98942
01N17E00005000	CLARK FARMS I LP	CLARK, LAWRENCE	PO BOX 145		SELAH, WA 98942
01N17E00005001	CLARK FARMS I LP	CLARK, LAWRENCE	PO BOX 145		SELAH, WA 98942
01S16E0000500	COATS, REATHA S REVOCABLE TRUS	COATS, J THOMAS TRUSTEE	112 W. 4TH STREET		THE DALLES, OR 97058
01S17E00004100	COCKBURN, GLORIA F LE ETAL		10776 SE IDLEMAN ROAD		PORTLAND, OR 97086
01S17E00004200	COCKBURN, GLORIA F LE ETAL		10776 SE IDLEMAN ROAD		PORTLAND, OR 97086
01N17E00001701	CORNIE, LINDA KAY	LAWRENCE, TRAVIS & MELISA	94144 HWY 206		WASCO, OR 97065

ATTACHMENT 2

Sherman County Property Owners within 500 feet of Proposed Site Boundary

Property information obtained from Sherman County on December 4, 2015.

TAX LOT ID	NAME	AGENT	ADDRESS 1	ADDRESS 2	CITY, STATE, ZIP
01N17E00007800	DEMOSS SPRINGS RANCH LLC		PO BOX 2265		BOTHELL, WA 98041-2265
01S17E00001100	DEMOSS SPRINGS RANCH LLC		PO BOX 2265		BOTHELL, WA 98041-2265
01S17E00001400	DEMOSS SPRINGS RANCH LLC		PO BOX 2265		BOTHELL, WA 98041-2265
01S17E00001401	DEMOSS, CAROLYN J TRUSTEE		PO BOX 2265		BOTHELL, WA 98041-2265
01N17E00001800	DUNN, DAVID E		21811 SHELTERING SPRUCE		CHUGIAK, AK 99567
01S17E00001101	FEDERAL GOVERNMENT		EXEMPT		0
02N16E00003402	FIELDS, JOHN & NANCY		PO BOX 48		WASCO, OR 97065
02N16E00003400	FIELDS, JOHN M	FIELDS, NANCY	PO BOX 48		WASCO, OR 97065
02N17E00006500	FIELDS, JOHN M	FIELDS, NANCY	PO BOX 48		WASCO, OR 97065
01N16E00003700	FOSS, MICHAEL R		23826 SE 47TH PLACE		ISSAQUAH, WA 98029
01S17E00001601	FOSS, MICHAEL R		23826 SE 47TH PLACE		ISSAQUAH, WA 98029
01N16E00002600	FULTON, JAMES TRUST	US BANK	FARM, RANCH & TIMBER ASSET MGT	PO BOX 3588, PD-WA-T7TR	SPOKANE, WA 99220-3588
01N17E00005600	HART, DARRYL R		63461 FRASER ROAD		MORO, OR 97039
01N17E00007900	HART, DARRYL R		63461 FRASER ROAD		MORO, OR 97039
01S17E00003300	HART, DARRYL R		63461 FRASER ROAD		MORO, OR 97039
01S17E00003300	HART, DEBBIE L ALAN R & DARRYL	PERNA, MARC & NANCY	3688 AUGUSTA NAT'L DR SOUTH		SALEM, OR 97302
01N18E00001700	HILDERBRAND, GORDON W	HILDERBRAND, RANDY G	PO BOX 326		WASCO, OR 97065
01N18E00001799	HILDERBRAND, GORDON W	HILDERBRAND, RANDY G	PO BOX 326		WASCO, OR 97065
02N16E00005700	JUSTESEN RANCHES	JUSTESEN, FRED	59720 TWIN LAKES ROAD		GRASS VALLEY, OR 97029
01N16E00002100	KASEBERG, J KENNETH GST TRUST&	RIPER, BARBARA J TRUSTEE	1670 EDGEWOOD DRIVE		PALO ALTO, CA 94303
01N16E00004000	KASEBERG, LEE & KAREN		70031 VAN GILDER RD		WASCO, OR 97065
01N16E00003300	KASEBERG, LEE C		70031 VANGILDER ROAD		WASCO, OR 97065
01N16E00008000	KASEBERG, LEE C		70031 VAN GILDER RD		WASCO, OR 97065
01N16E0000802	KASEBERG, STEVEN D		92883 LOCUST GROVE LANE		WASCO, OR 97065
01N16E0000801	KASEBERG, TERRY D & DIANE		93431 HWY 206		WASCO, OR 97065
01N17E00004300	KOCK, STEPHEN	KOCK, ANITA	PO BOX 86		WASCO, OR 97065
01N18E0700100	LAUGHLIN, VIRGINIA TRUSTEE		63011 MARSH ORCHID ROAD		BEND, OR 97701
01N16E0000804	LOHREY, BRAD A & DONNA C	WASHINGTON MUTUAL BANK	C/O ACS IMAGE SOLUTIONS	12691 PALA DRIVE - MS156DPCA	GARDEN GROVE, CA 92841
01N16E00004200	MACNAB, PETER J LE		608 YATES		WASCO, OR 97065
01N16E00006100	MACNAB, PETER J LE		608 YATES STREET		WASCO, OR 97065
01N16E00004000	MACNAB, PETER J TRUSTEE		608 YATES		WASCO, OR 97065
01S17E00003800	MACNAB, TOM & GEORGIA		66330 HENRICHS ROAD		MORO, OR 97039
02N16E00004100	MARTIN BROTHERS LAND		PO BOX 201		RUFUS, OR 97050
01S17E00003700	MARTIN, ROBERT L TRUSTEE		65886 HENRICHS ROAD		MORO, OR 97039
01N16E00003701	MCARTHUR, MIKE & JEANNEY		93350 FOSS LANE		WASCO, OR 97065
01N17E00004101	MCCLENNAN, LYNDON P		PO BOX 215		WASCO, OR 97065
01N17E00004200	MCCLENNAN, LYNDON P		PO BOX 215		WASCO, OR 97065
01N17E00004400	MCCLENNAN, LYNDON P		PO BOX 215		WASCO, OR 97065-0215
01N16E00003800	MCCOY LAND	MCCOY, THOMAS	93340 HWY 206		WASCO, OR 97065
01N16E00006200	MCCOY LAND	MCCOY, THOMAS	93340 HWY 206		WASCO, OR 97065
01N17E00007000	MCCOY LAND	MCCOY, THOMAS	93340 HWY 206		WASCO, OR 97065
01N17E00005200	MCDERMID CENTURY FARM LLC		27640 POWERLINE ROAD		HALSEY, OR 97348
01N17E00006000	MCDERMID CENTURY FARM LLC		27640 POWERLINE ROAD		HALSEY, OR 97348
01N17E00006300	MCDERMID CENTURY FARM LLC		27640 POWERLINE ROAD		HALSEY, OR 97348
01N17E00006400	MCDERMID CENTURY FARM LLC		27640 POWERLINE ROAD		HALSEY, OR 97348
01N17E00003200	MCGREGOR, RICHARD D & JEAN H		10242 SE WALNUT DRIVE		PORTLAND, OR 97086
01S17E18AA200	MCKINNEY, KIMBERLY B		70544 MCKINNEY LANE		WASCO, OR 97065
01S17E18AA100	MELZER, MYRNA L TRUSTEE		PO BOX 342		MORO, OR 97039
01S17E18AA1600	MELZER, MYRNA L TRUST		PO BOX 342		MORO, OR 97039

ATTACHMENT 2

Sherman County Property Owners within 500 feet of Proposed Site Boundary

Property information obtained from Sherman County on December 4, 2015.

TAX LOT ID	NAME	AGENT	ADDRESS 1	ADDRESS 2	CITY, STATE, ZIP
01S17E18AA1700	MELZER, MYRNA L TRUST		PO BOX 342		MORO, OR 97039
01N18E00005800	MID COLUMBIA PRODUCERS INC		PO BOX 344		MORO, OR 97039
01N18E00005900	MID COLUMBIA PRODUCERS INC		PO BOX 344		MORO, OR 97039
01S17E0000900	MID COLUMBIA PRODUCERS INC		PO BOX 344		MORO, OR 97039
02N16E00003800	MORGAN, ALETHA CHRISTINE	WELK, PATRICIA MAE FULTON	19855 SW TOUCHMARK WAY #421		BEND, OR 97702
01S17E00002401	MORO, CITY		PO BOX 231		MORO, OR 97039
01N17E0000901	MORROW COUNTY GRAIN GROWERS	WASCO BRANCH	PO BOX 367		LEXINGTON, OR 97839
01N17E0400400	O'MEARA, WILLIAM P ETAL		5080 GREEN ROAD		HOOD RIVER, OR 97031
01N17E00003100	O'MEARA, WILLIAM P ETAL		5080 GREEN ROAD		HOOD RIVER, OR 97031
01N18E00005200	O'MEARA, WILLIAM P ETAL		5080 GREEN ROAD		HOOD RIVER, OR 97031
01N18E00005500	O'MEARA, WILLIAM P ETAL		5080 GREEN ROAD		HOOD RIVER, OR 97031
01N18E00005700	O'MEARA, WILLIAM P ETAL		5080 GREEN ROAD		HOOD RIVER, OR 97031
01S17E00002402	OREGON DEPT OF TRANSPORTATION	RIGHT OF WAY SECTION	4040 FAIRVIEW INDUSTRIAL DR SE MS#2		SALEM, OR 97302-1142
01S17E00001102	PACIFIC POWER & LIGHT CO		PUBLIC UTILITY		CENTRALLY ASSESSED 00000
01N18E00001701	PACIFIC WIND DEVELOPMENT		1125 NW COUCH ST STE 600		PORTLAND, OR 97209
01N17E00001900	PETERS, BRYAN F	PETERS, FOREST A	P O BOX 63		WASCO, OREGON 97065
01N17E00001601	PETERS, FOREST		69420 N SAWTOOTH ROAD		WASCO, OR 97065
01N17E00001602	PETERS, FOREST		69420 N SAWTOOTH ROAD		WASCO, OR 97065
01N17E0900900	PETERS, FOREST A	ORCHARD VIEW	69420 N SAWTOOTH ROAD		WASCO, OR 97065
01N17E00001600	PETERS, FRANCIS W TRUST	PETERS, FOREST A	69420 N SAWTOOTH ROAD		WASCO, OR 97065
01N17E00006600	PINKERTON BROTHERS		PO BOX 312		MORO, OR 97039
01N17E00006700	PINKERTON BROTHERS		PO BOX 312		MORO, OR 97039
01N17E00007600	PINKERTON BROTHERS	PINKERTON, BRUCE R	PO BOX 312		MORO, OR 97039
01N17E00006500	PINKERTON RANCH	PINKERTON, T DEAN	PO BOX 343		MORO, OR 97039
01N17E00007300	PINKERTON RANCH	PINKERTON, JANET PERSONAL REP	PO BOX 343		MORO, OR 97039
01N17E00007400	PINKERTON RANCH	PINKERTON, T DEAN	PO BOX 343		MORO, OR 97039
01N17E00007500	PINKERTON RANCH		PO BOX 343		MORO, OR 97039
01S17E00001300	PINKERTON RANCH	PINKERTON, T DEAN	PO BOX 343		MORO, OR 97039
01N17E00007301	PINKERTON, BARBARA L		1704 SW 3RD ST		PENDLETON, OR 97801
02N17E00006100	POSTON PROPERTIES LLC	POSTON, DIANA E	301 SOUTH ELM STREET SUITE 206		GREENSBORO, NC 27401
01N17E00004000	POWELL, PATRICK A TRUSTEE		PO BOX 440		WASCO, OR 97065
01N17E00004100	POWELL, PATRICK A TRUSTEE		PO BOX 440		WASCO, OR 97065
01N17E00004201	POWELL, PATRICK A TRUSTEE		PO BOX 440		WASCO, OR 97065
01N17E00005400	PROBSTFIELD-CLARK LLC	PROBSTFIELD, JUDITH	13315 WEST PROSPECT DRIVE		SUN CITY WEST, AZ 85375
01N17E00005500	PROBSTFIELD-CLARK LLC	PROBSTFIELD, JUDITH	13315 WEST PROSPECT DRIVE		SUN CITY WEST, AZ 85375
01N16E00003601	RHINEHART, DOUGLAS		72484 SCOTT CANYON ROAD	PO BOX 67	WASCO, OR 97065
02N17E00007500	RICE KEITH, CHRISTINE TRUST	US BANK	FARM, RANCH & TIMBER ASSET MGT	PO BOX 3588, PD-WA-T7TR	SPOKANE, WA 99220-3588
01N17E00001300	RICHELDERFER BROTHERS	RICHELDERFER, MARTIN	PO BOX 93		WASCO, OR 97065
01N17E00001302	RICHELDERFER, E MARTIN		PO BOX 113		WASCO, OR 97065
01N17E00001200	RICHELDERFER, MARTIN	ZACHARIASEN, MARY	PO BOX 93		WASCO, OR 97065
01N17E00005800	ROGERS, SYLVIA IRENE ETAL		2010 SW NANCY DRIVE		GRESHAM, OR 97080
01N17E00007700	ROGERS, SYLVIA IRENE ETAL		2010 SW NANCY DRIVE		GRESHAM, OR 97080
01S17E00002000	ROGERS, SYLVIA IRENE ETAL		2010 SW NANCY DRIVE		GRESHAM, OR 97080
01S17E00003500	ROLFE, SHARON A LE ETAL		6015 COLE CREEK DRIVE		GRAND FORKS, ND 58201
02N16E00003600	SANDERSON, TERRY	SANDERSON, HAROLD C	91608 BIGGS-RUFUS HWY		WASCO, OR 97065
01S17E18AA101	SHELTON, R GARY ETUX		PO BOX 311		MORO, OR 97039
01N17E00001500	SHERMAN COUNTY		EXEMPT		0
01S17E00002800	SHERMAN COUNTY		EXEMPT		0
01S17E0000800	SHERMAN COUNTY		EXEMPT		0

ATTACHMENT 2

Sherman County Property Owners within 500 feet of Proposed Site Boundary

Property information obtained from Sherman County on December 4, 2015.

TAX LOT ID	NAME	AGENT	ADDRESS 1	ADDRESS 2	CITY, STATE, ZIP
01S17E0000901	SHERMAN COUNTY		EXEMPT		0
01S17E00004400	SHERMAN COUNTY EXPERIMENT	OREGON STATE UNIVERSITY	EXEMPT		
01N16E00003900	SHERWOOD, DAWN M	VAN GILDER, GARY L	68192 PETES RD		WASCO, OR 97065
01S17E00002700	SHIPLEY FARMSTEAD LLC	ERRAND, CAROL	PO BOX 1107		BAKER CITY, OR 97814
01S17E00002701	SHIPLEY FARMSTEAD LLC	ERRAND, CAROL	PO BOX 1107		BAKER CITY, OR 97814
01N18E00006100	SHULL, EDITH L & GEREMY E		61909 LONEROCK ROAD		GRASS VALLEY, OR 97029
01N18E00005701	SHULL, GEREMY E		61909 LONEROCK ROAD		GRASS VALLEY, OR 97029
01S17E00003100	SIGLOO RANCH LLC		3302 ROYAL CREST DRIVE		THE DALLES, OR 97058
01S17E00003400	SIGLOO RANCH LLC		3302 ROYAL CREST DRIVE		THE DALLES, OR 97058
01S18E00001300	SIGLOO RANCH LLC		3302 ROYAL CREST DRIVE		THE DALLES, OR 97058
01S17E00004501	SIMPSON, GRANT		PO BOX 370		MORO, OR 97039
01N16E0000901	SKILES, PATRICIA A		504 VETERANS DRIVE		THE DALLES, OR 97058
01N16E0000900	SKILES, PATRICIA ANN LE ETAL	KASEBERG, LARRY EDWARD LE ETAL	69384 WHEATACRES RD		WASCO, OR 97065
01N16E00002702	SKILES, PATRICIA ANN LE ETAL	KASEBERG, LARRY EDWARD ETAL	69384 WHEATACRES ROAD		WASCO, OR 97065
01N17E0900700	SMITH, RAY		PO BOX 293		WASCO, OR 97065
01N17E0900800	SMITH, RAY D		PO BOX 293		WASCO, OR 97065
01N18E00005300	STATE OF OREGON		EXEMPT		0
01N18E00005400	STATE OF OREGON		EXEMPT		0
01N18E00006000	STATE OF OREGON		EXEMPT		0
01N18E00003700	STEVENS FAMILY FARMS		400 MARYLHURST DRIVE		WEST LINN, OR 97068
01N18E00005100	THOMAS, JOSEPH M		4480 HILLCREST AVENUE		JUNEAU, AK 99801
01N17E00005700	THOMPSON PEAKE, CAROLE TRUST		PO BOX 353		MORO, OR 97039
01N17E00005701	THOMPSON PEAKE, CAROLE TRUST		PO BOX 353		MORO, OR 97039
01S17E00001100	THOMPSON PEAKE, CAROLE TRUST		PO BOX 353		MORO, OR 97039
01S17E0000200	THOMPSON PEAKE, CAROLE TRUST		PO BOX 353		MORO, OR 97039
01S18E00001100	THOMPSON, DONALD DEAN TRUST	UMEMOTO, KAREN TRUSTEE	10511 NE 97TH CIRCLE		VANCOUVER, WA 98662
01S18E00001200	THOMPSON, DONALD DEAN TRUST	UMEMOTO, KAREN TRUSTEE	10511 NE 97TH CIRCLE		VANCOUVER, WA 98662
01S18E00001400	THOMPSON, DONALD DEAN TRUST	UMEMOTO, KAREN TRUSTEE	10511 NE 97TH CIRCLE		VANCOUVER, WA 98662
01S17E00002703	THOMPSON, GARY D	THOMPSON, LINDA K	66974 FAIRVIEW ROAD		MORO, OR 97039
01S18E00001401	THOMPSON, RONALD D		66351 HAY CANYON ROAD		MORO, OR 97039
01S18E00001500	THOMPSON, RONALD D		66351 HAY CANYON ROAD		MORO, OR 97039
01N18E00005600	THOMPSONS GOLDEN WINDS LLC		PO BOX 353		MORO, OR 97039
01S18E00001101	THOMPSONS GOLDEN WINDS LLC		PO BOX 353		MORO, OR 97039
01S17E00002500	UNION PACIFIC RAILROAD CO	PROPERTY TAX	1400 DOUGLAS STOP 1640		OMAHA, NE 68179-1640
01S17E0000700	UNION PACIFIC RAILROAD CO	PROPERTY TAX	1400 DOUGLAS, STOP 1640		OMAHA, NE 68179-1640
01N16E00000100	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
01N17E00001301	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
01N17E00000900	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
01N17E04CB600	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
01N17E04CB700	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
01N17E04CC400	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
02N17E00006200	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
02N17E00006600	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
02N17E00007000	VAN GILDER ENTERPRISES LLC	VAN GILDER, ARTHUR A	PO BOX 275		WASCO, OR 97065
01N16E00002200	VAN GILDER HERITAGE LLC		PO BOX 96		WASCO, OR 97065
01N16E00002300	VAN GILDER HERITAGE LLC		PO BOX 96		WASCO, OR 97065
01N16E00002400	VAN GILDER HERITAGE LLC		PO BOX 96		WASCO, OR 97065
01N17E000001700	VAN GILDER HERITAGE LLC		PO BOX 96		WASCO, OR 97065
01N17E00004600	VAN GILDER HERITAGE LLC		PO BOX 96		WASCO, OR 97065

ATTACHMENT 2

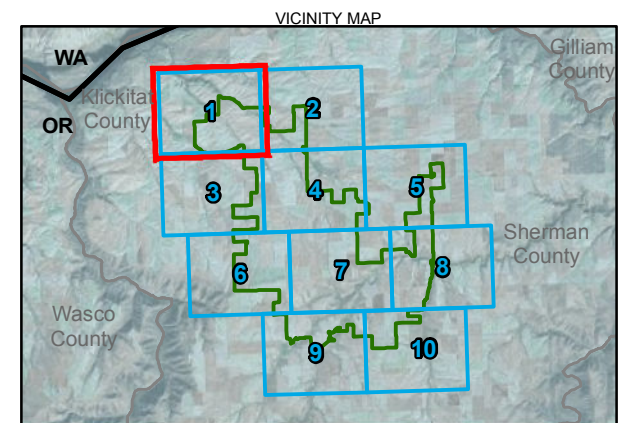
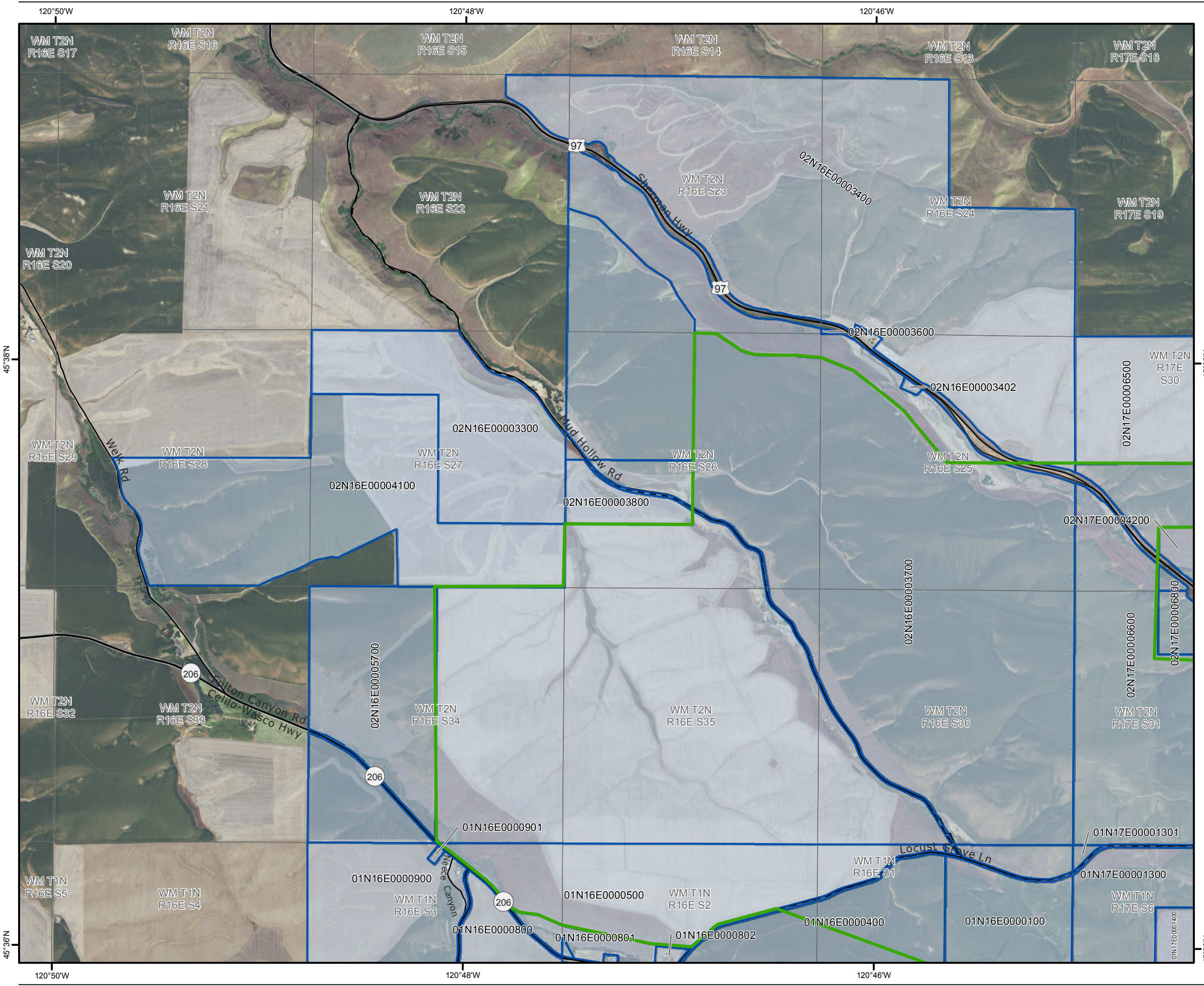
Sherman County Property Owners within 500 feet of Proposed Site Boundary








Property information obtained from Sherman County on December 4, 2015.

TAX LOT ID	NAME	AGENT	ADDRESS 1	ADDRESS 2	CITY, STATE, ZIP
01N16E00002500	WALKER, JAMES MURRAY		15819 NE 43RD ST		VANCOUVER, WA 98682
01N17E00004700	WALKER, JAMES MURRAY		15819 NE 43RD ST		VANCOUVER, WA 98682
02N17E00007100	WASCO CEMETERY ASSOCIATION		EXEMPT		0
01N17E0000801	WASCO, CITY		PO BOX 26		WASCO, OR 97065
01N17E0000902	WASCO, CITY		PO BOX 26		WASCO, OR 97065
01N17E04CB500	WASCO, CITY		PO BOX 26		WASCO, OR 97065
01N18E0700102	WEEDMAN RANCHES INC		PO BOX 386		WASCO, OR 97065
02N16E00003300	WELK, PATRICIA MAE		19855 SW TOUCHMARK WAY #421		BEND, OR 97702
01N17E00005300	YAMAUCHI, ALISON		4900 CRESTWOOD DRIVE		LITTLE ROCK, AR 72207
01N17E00005900	YAMAUCHI, ALISON		4900 CRESTWOOD DRIVE		LITTLE ROCK, AR 72207
01N17E00006100	YAMAUCHI, ALISON		4900 CRESTWOOD DRIVE		LITTLE ROCK, AR 72207
01N17E00006200	YAMAUCHI, ALISON		4900 CRESTWOOD DRIVE		LITTLE ROCK, AR 72207
01N17E00007200	YAMAUCHI, ALISON		4900 CRESTWOOD DRIVE		LITTLE ROCK, AR 72207

NOTES:

1. Exact duplicates have been removed from this list, meaning owners with identical tax lot IDs, names, agent, addresses, and city/state zip. All other entries are maintained "as is" from the County data.
2. "Exempt" owners are maintained "as is" from the County data.

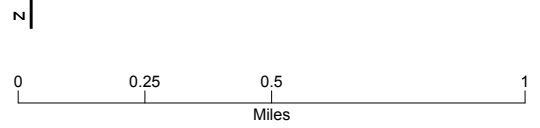


-  Sherman County Tax Lot within 500 feet
-  Facility Site Boundary
-  Interstate or Highway
-  Public Road (Paved)
-  Public Road (Gravel)
-  County Boundary
-  Public Lands Survey Section

Notes:
 1. Sherman County property owner data obtained on December 4, 2015.
 2. Property owner names, addresses, and tax lot IDs can be found in Attachment 2.

Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

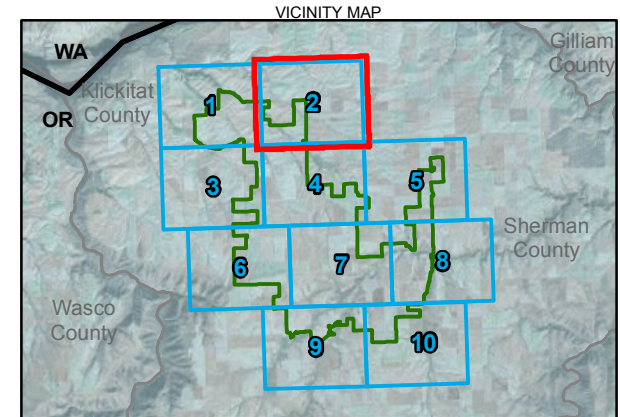
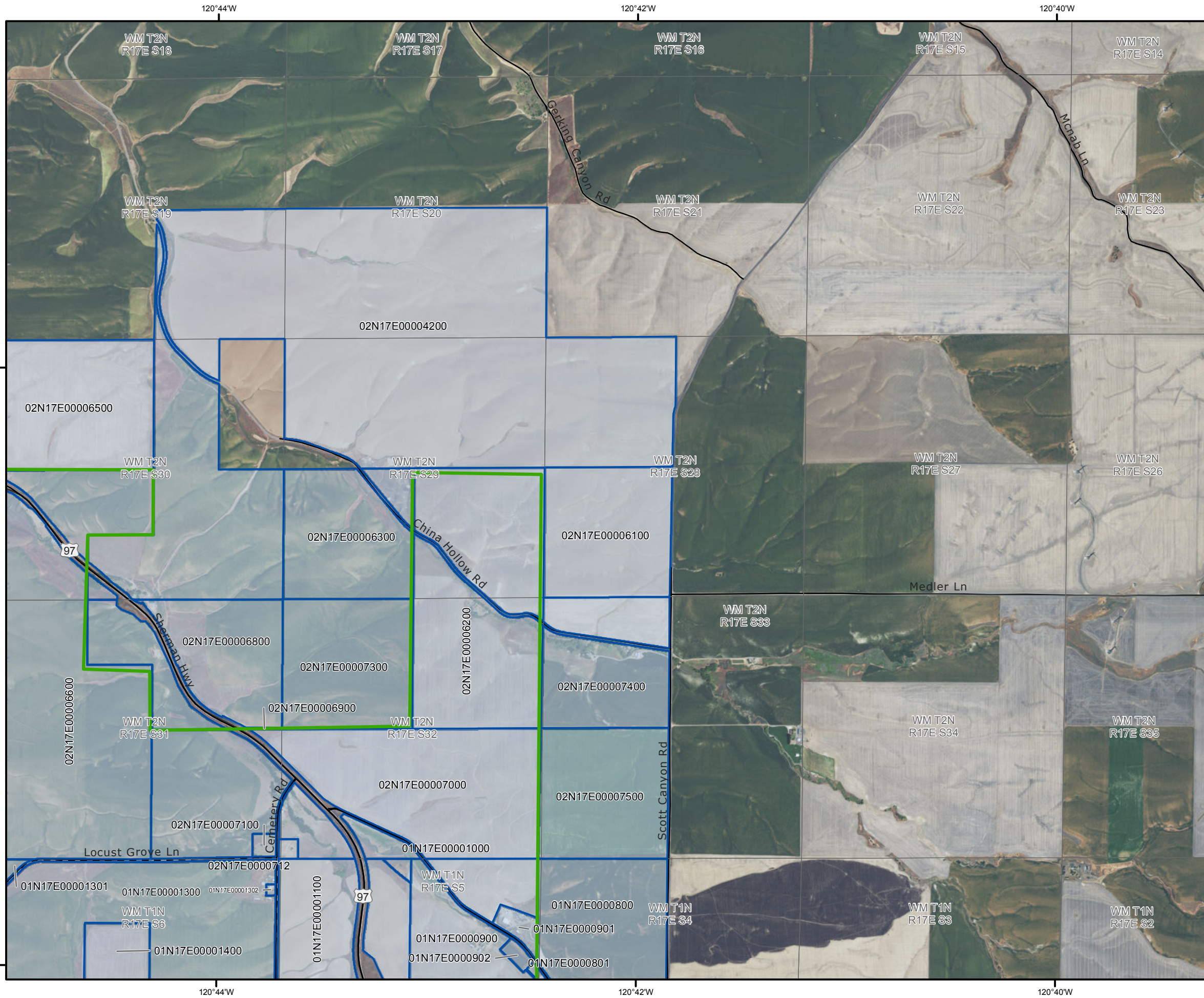
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








1 inch equals 0.38 miles

ATTACHMENT 2 - Page 1 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3



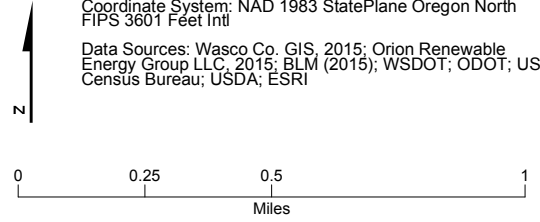


-  Sherman County Tax Lot within 500 feet
-  Facility Site Boundary
-  Interstate or Highway
-  Public Road (Paved)
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Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

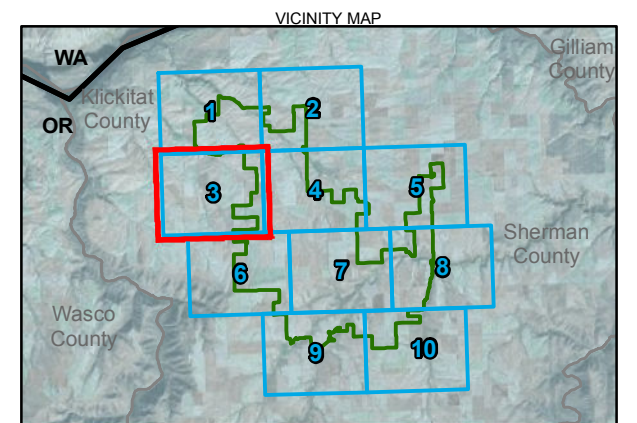
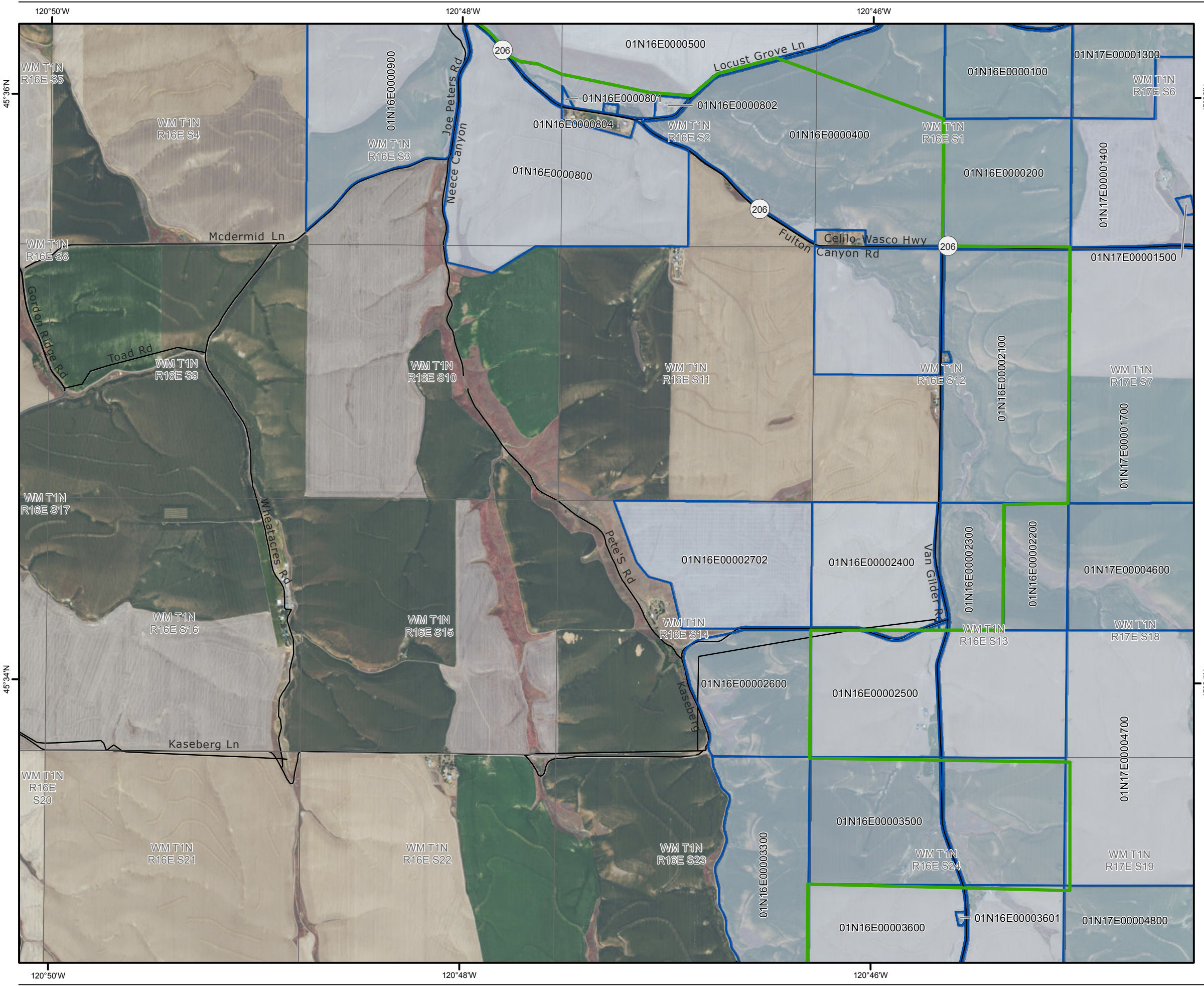
Data Sources: Wasco Co. GIS, 2015; Orion Renewable Energy Group LLC, 2015; BLM (2015); WSDOT; ODOT; US Census Bureau; USDA; ESRI



1 inch equals 0.38 miles

ATTACHMENT 2 - Page 2 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3



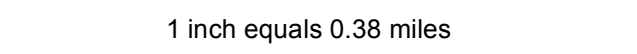


- Sherman County Tax Lot within 500 feet
- Facility Site Boundary
- Interstate or Highway
- Public Road (Paved)
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Notes:
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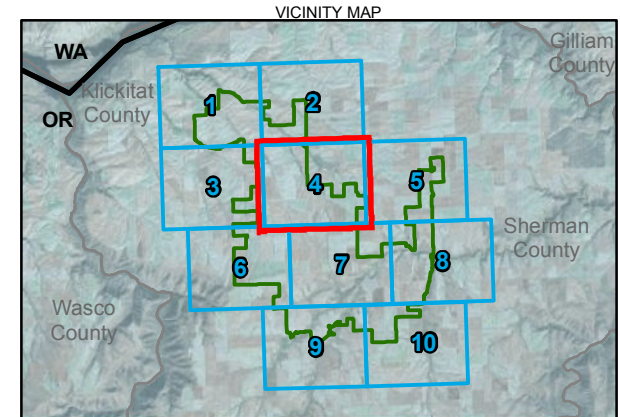
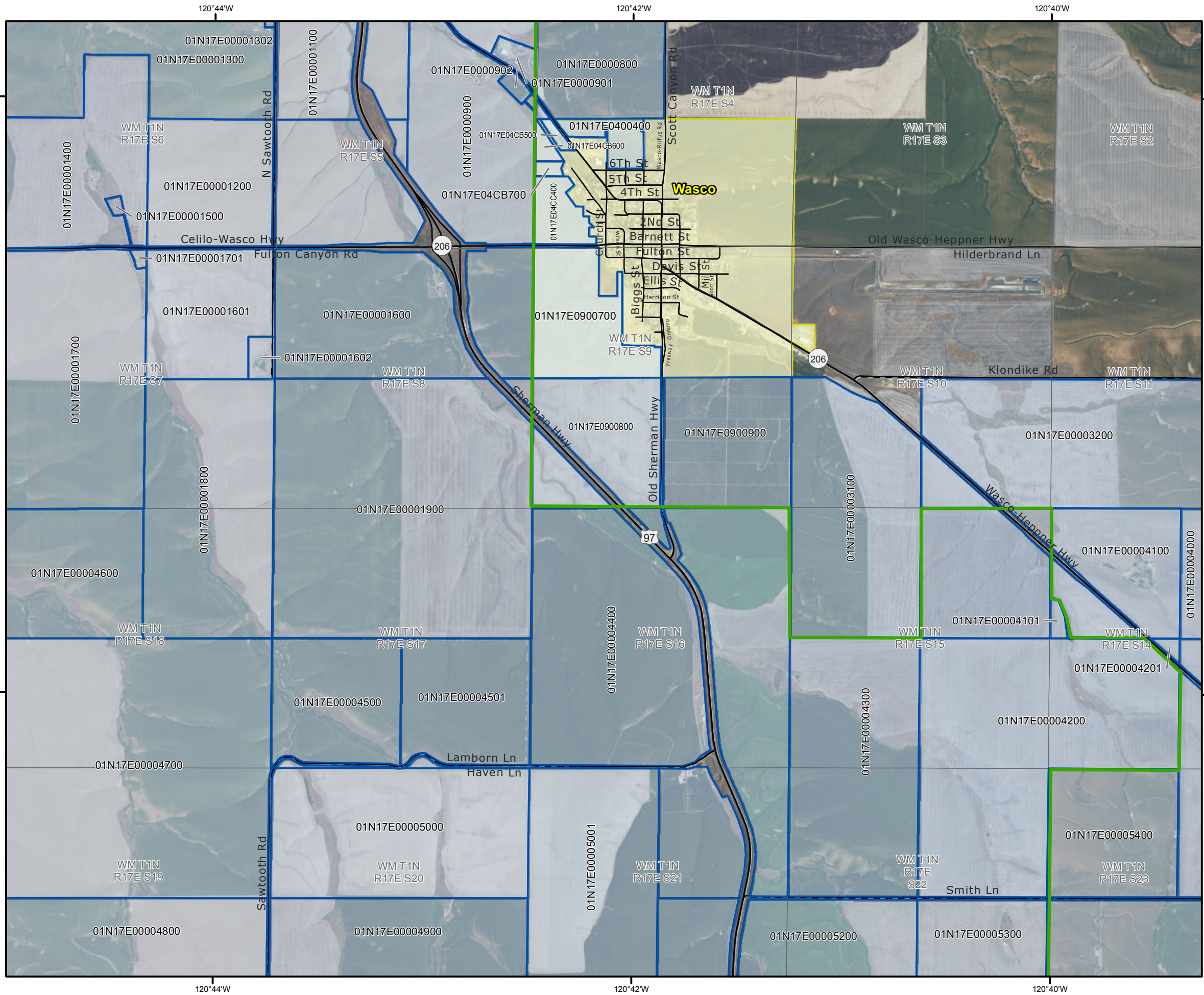
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



Data Sources: Wasco Co. GIS, 2015; Orion Renewable Energy Group LLC, 2015; BLM (2015); WSDOT; ODOT; US Census Bureau; USDA; ESRI



ATTACHMENT 2 - Page 3 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3





-  Sherman County Tax Lot within 500 feet
-  Facility Site Boundary
-  Interstate or Highway
-  Public Road (Paved)
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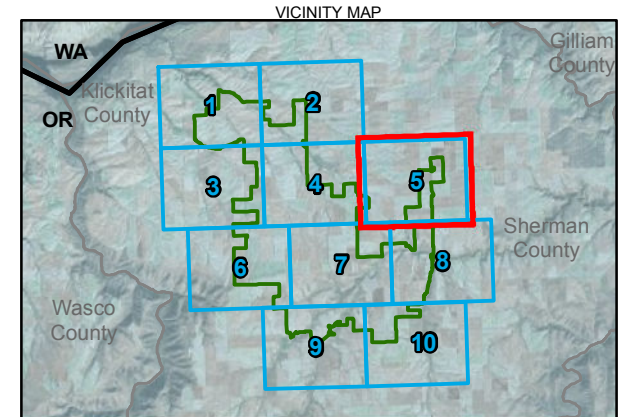
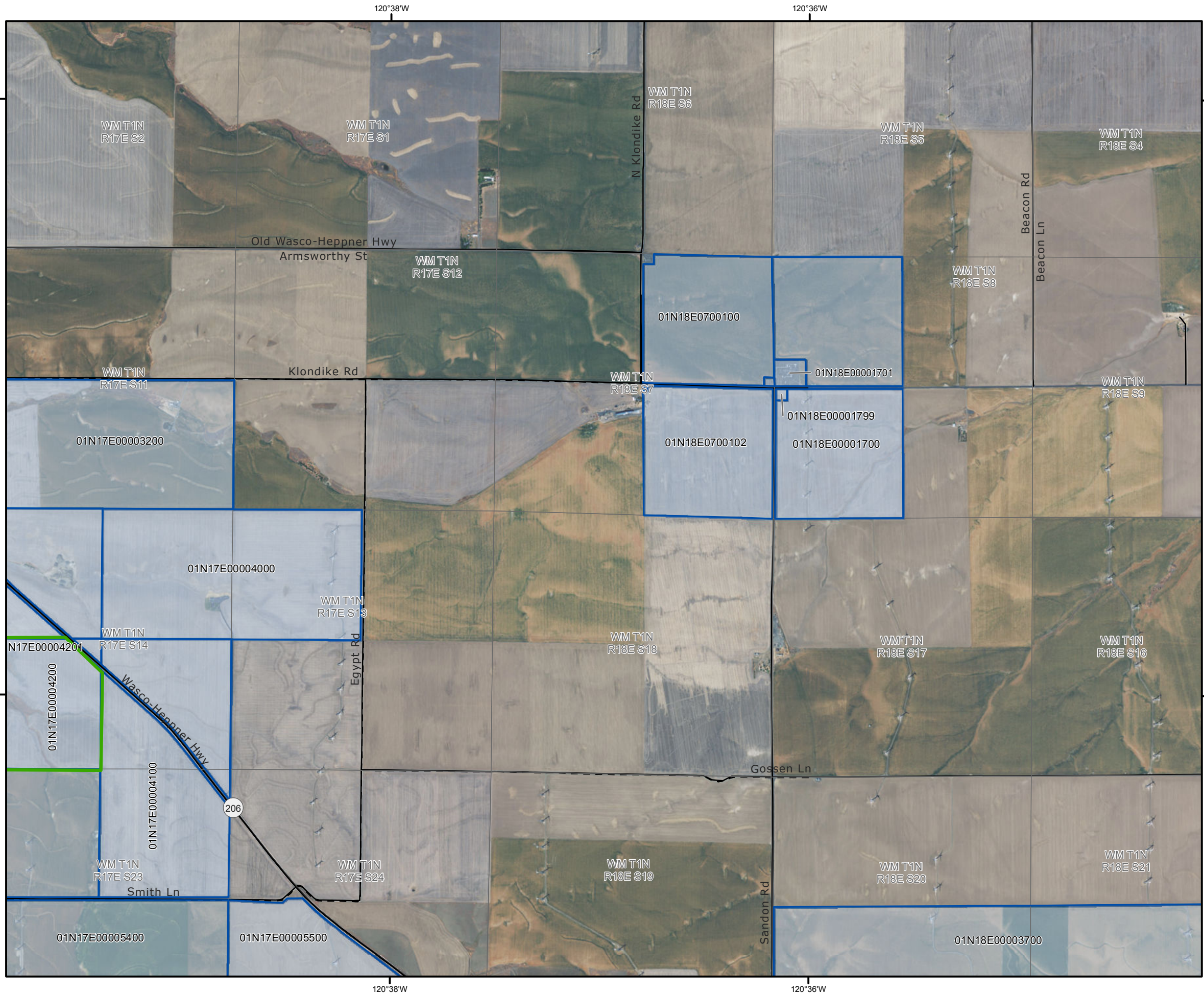
Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl








Data Sources: Wasco Co. GIS, 2015; Orion Renewable Energy Group LLC, 2015; BLM (2015); WSDOT; ODOT; US Census Bureau; USDA; ESRI

0 0.25 0.5 1
Miles

1 inch equals 0.38 miles





-  Sherman County Tax Lot within 500 feet
-  Facility Site Boundary
-  Interstate or Highway
-  Public Road (Paved)
-  Public Road (Gravel)
-  County Boundary
-  Public Lands Survey Section

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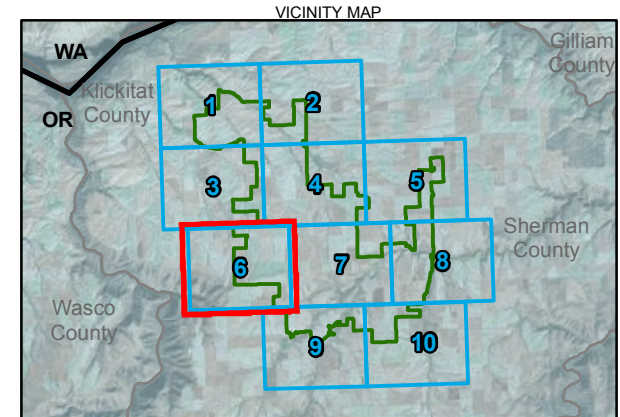
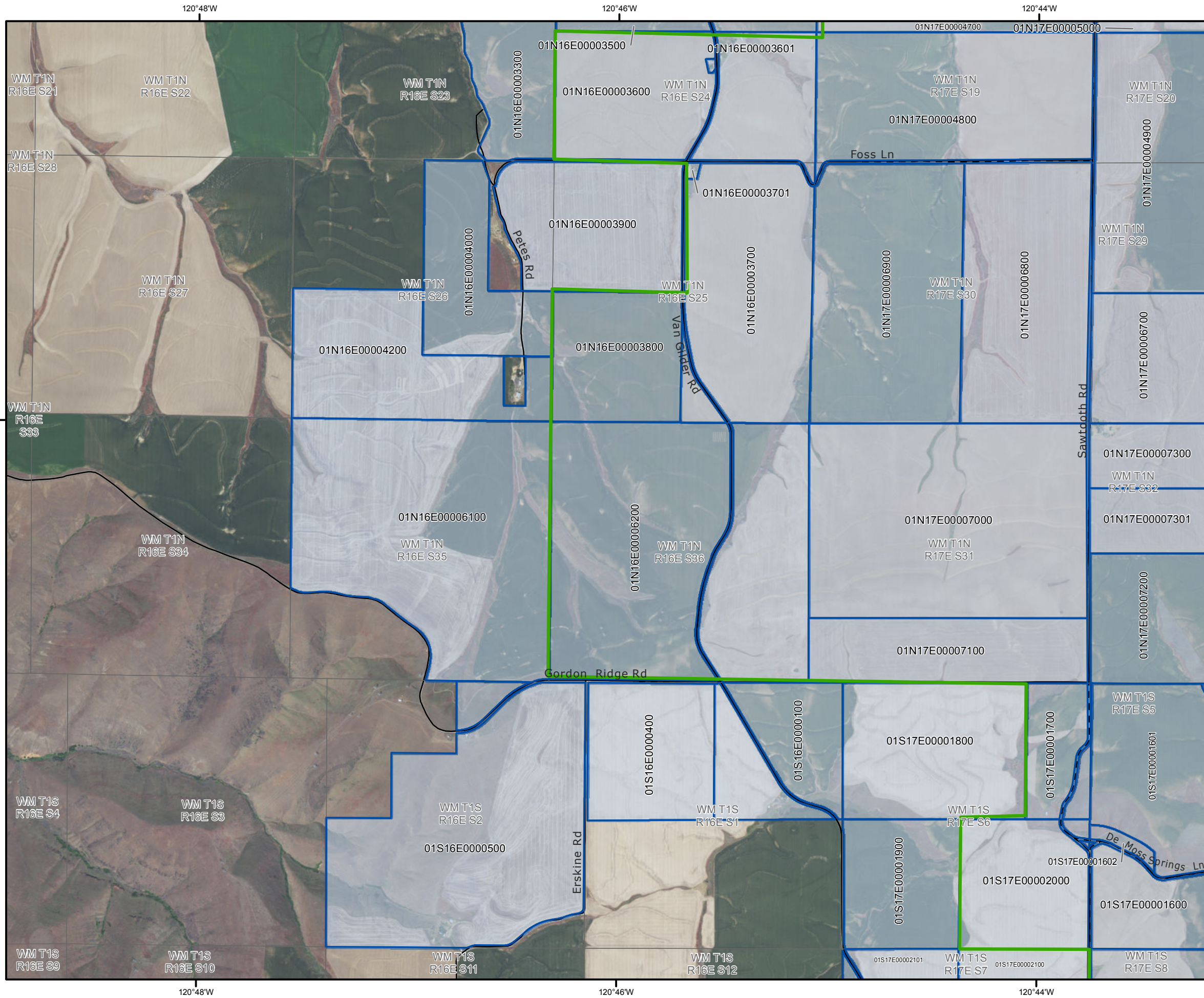
Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl







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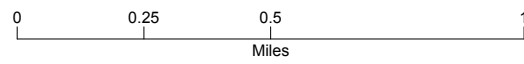
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-  Facility Site Boundary
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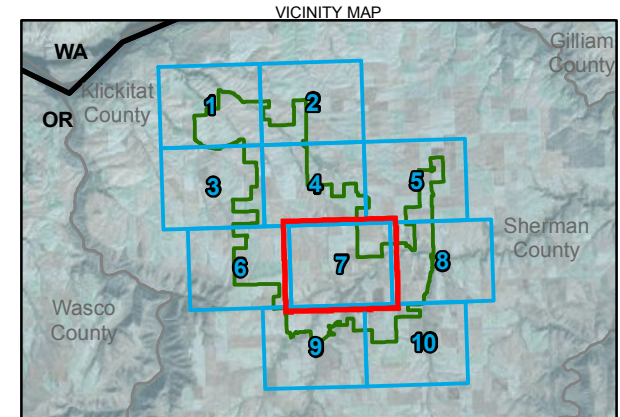
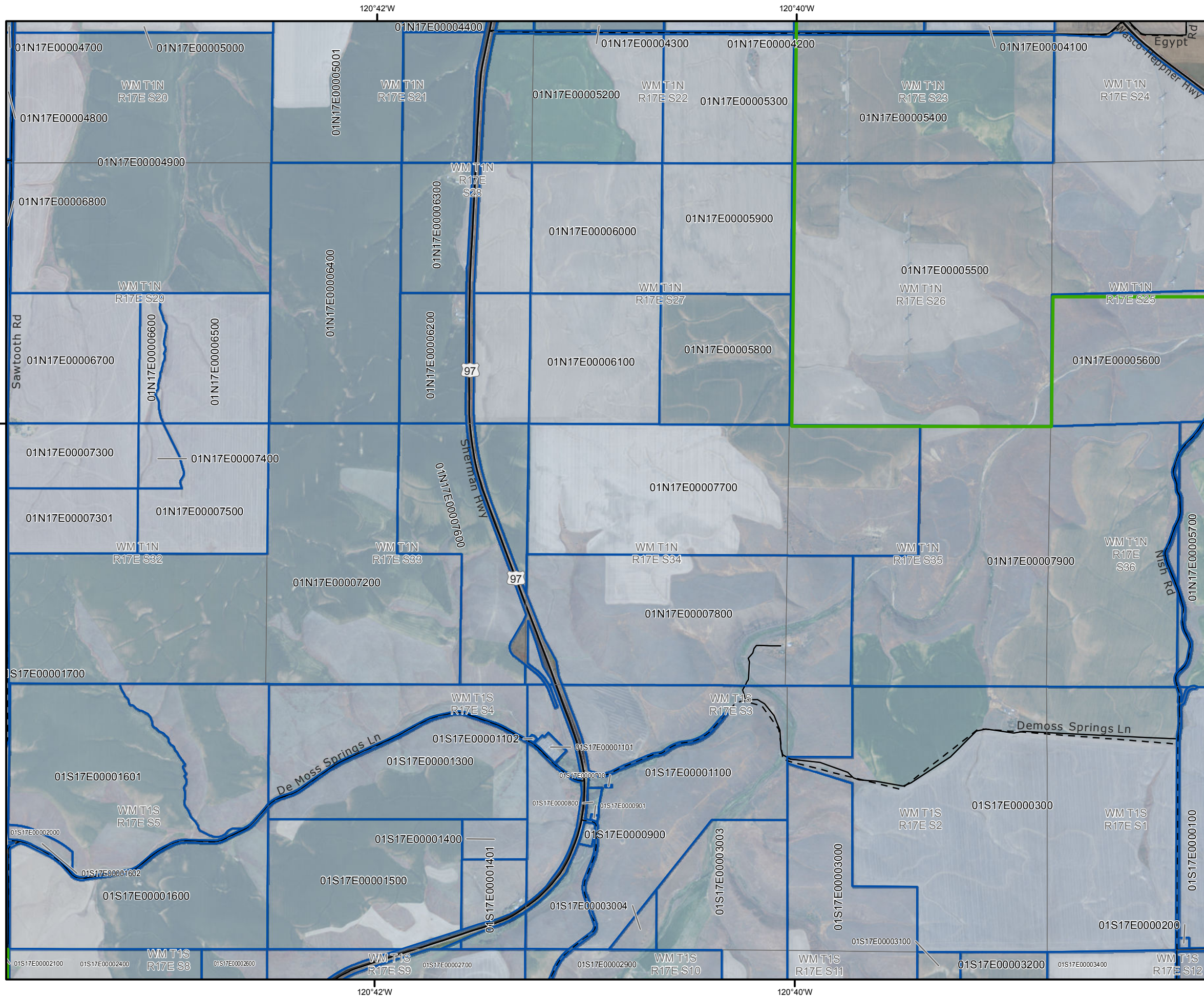
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
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1 inch equals 0.38 miles





-  Sherman County Tax Lot within 500 feet
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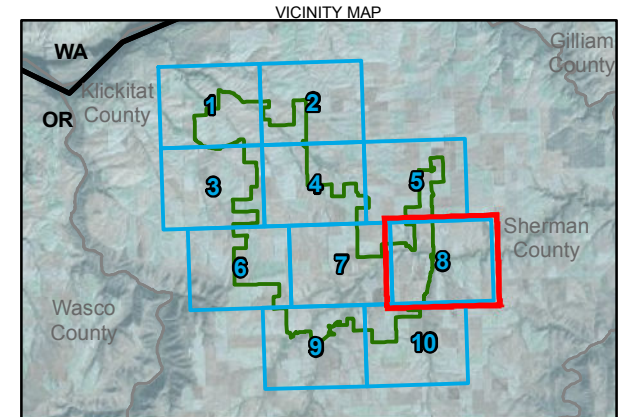
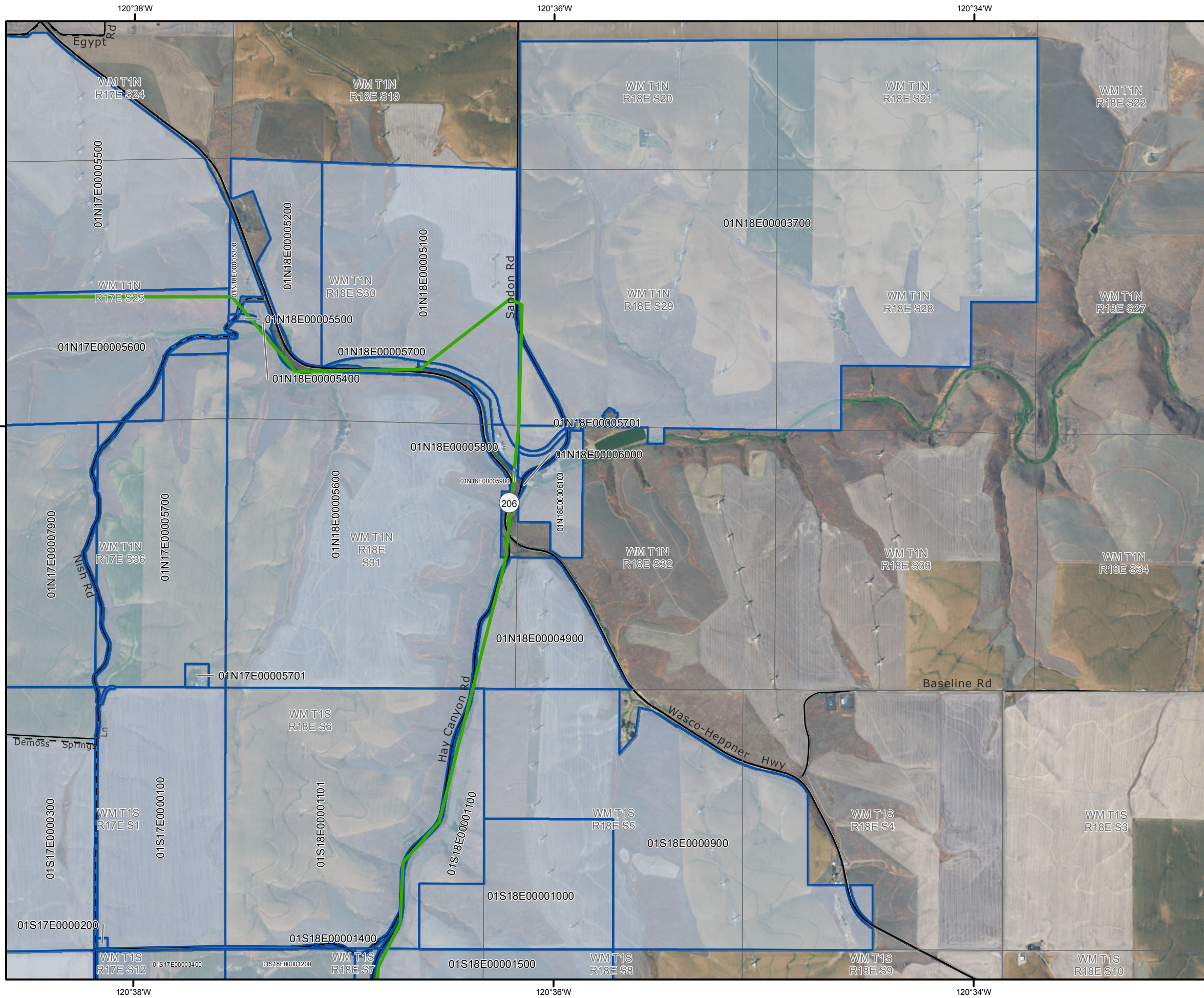
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
0 0.25 0.5 1
Miles

1 inch equals 0.38 miles

ATTACHMENT 2 - Page 7 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3



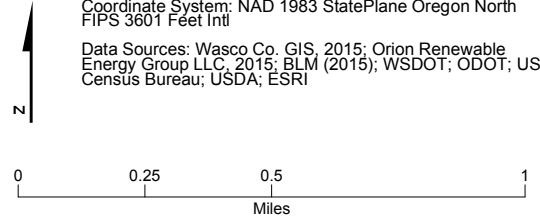


-  Sherman County Tax Lot within 500 feet
-  Facility Site Boundary
-  Interstate or Highway
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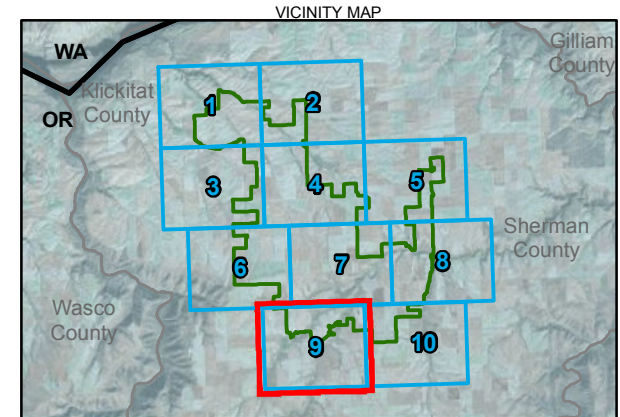
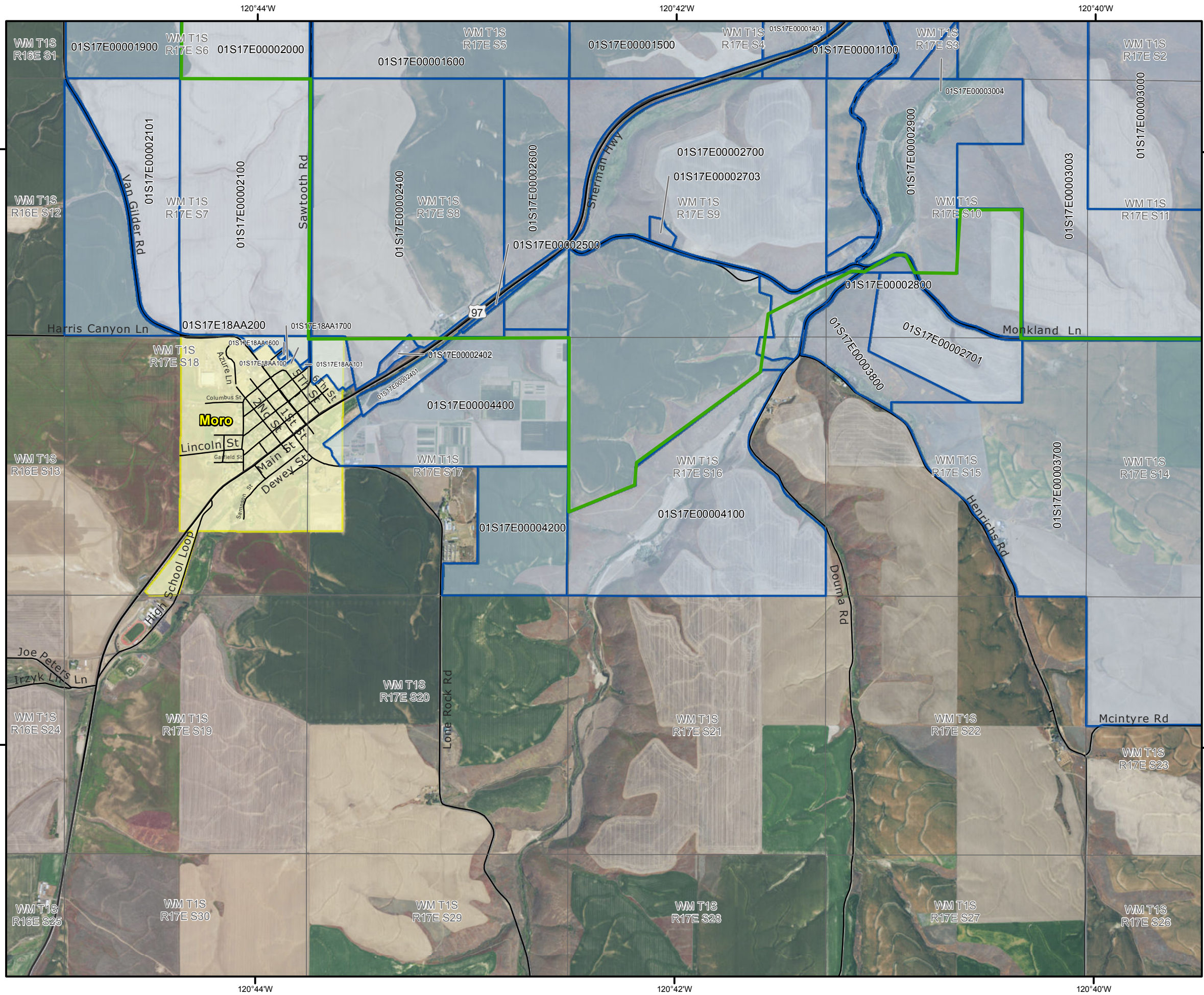
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




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ATTACHMENT 2 - Page 8 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3



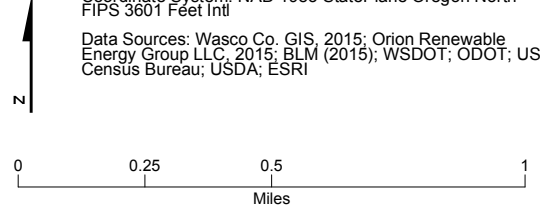


-  Sherman County Tax Lot within 500 feet
-  Facility Site Boundary
-  Interstate or Highway
-  Public Road (Paved)
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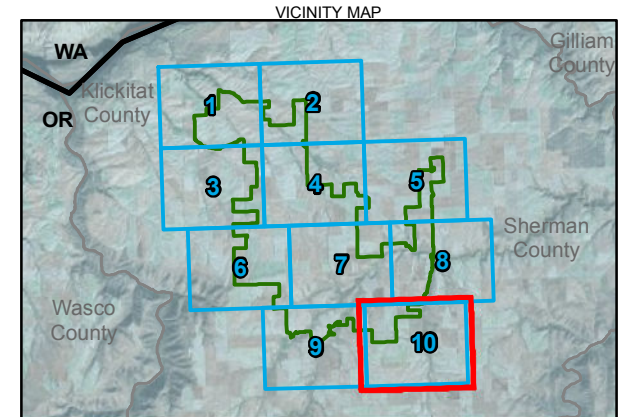
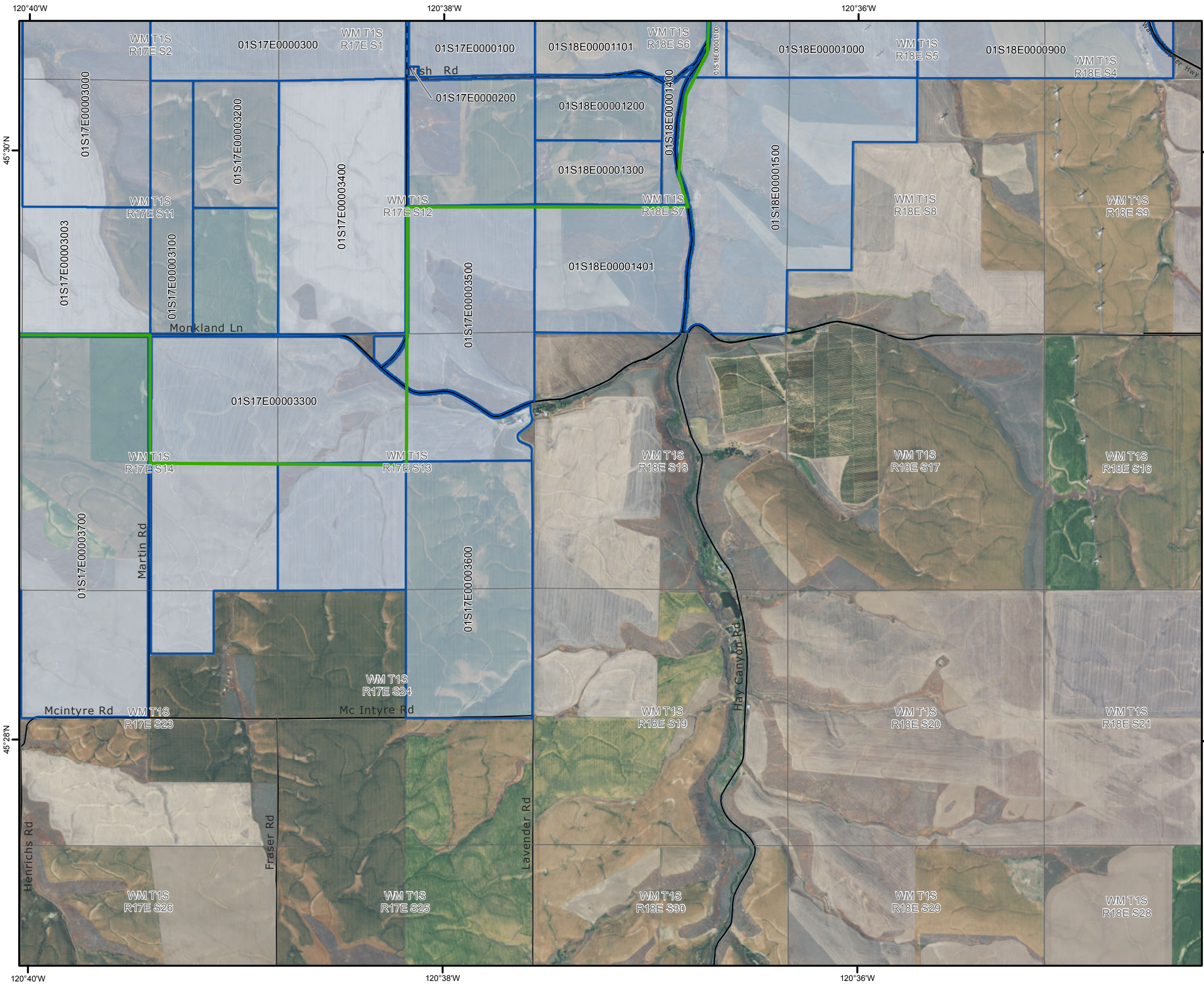
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








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ATTACHMENT 2 - Page 9 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3



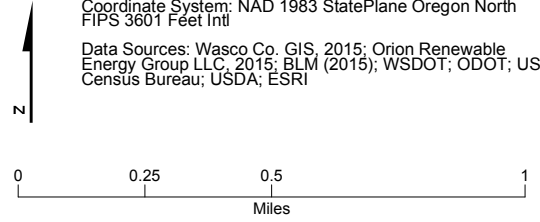


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ATTACHMENT 2 - Page 10 of 10
Sherman County Property Owners
within 500 feet of Proposed Site Boundary
 Golden Hills Wind Project Request for Amendment No. 3

