



Oregon

Kate Brown, Governor



550 Capitol St. NE
Salem, OR 97301
Phone: 503-378-4040
Toll Free: 1-800-221-8035
FAX: 503-373-7806
www.oregon.gov/energy

To: Energy Facility Siting Council

From: Sarah Esterson, Senior Siting Analyst

Date: October 9, 2020

Subject: Agenda Item C (Action Item):
Staff Report on Request to Amend the Wildlife Monitoring and Mitigation Plans for Wheatridge Renewable Energy Facility I and Wheatridge Renewable Energy Facility II for the October 22-23, 2020 EFSC Meeting

Attachments: Attachment 1: Draft Amended Wildlife Monitoring and Mitigation Plan (WREFI)
Attachment 2: Draft Amended Wildlife Monitoring and Mitigation Plan (WREFII)

STAFF RECOMMENDATION

The Oregon Department of Energy (Department) recommends the Energy Facility Siting Council (Council) approve the request by Portland General Electric Company (PGE) and Wheatridge Wind Energy II, LLC (certificate holders) to amend the Wildlife Monitoring and Mitigation Plan (WMMP) of the Wheatridge Renewable Energy Facility I (WREFI) and Wheatridge Renewable Energy Facility II (WREFII) site certificates.

BACKGROUND

The Department received a request to amend the WMMP for WREFII in June 2020. WREFII is an approved 550 megawatt (MW) wind and solar energy generation facility with 80 wind turbines (200 MW) currently under construction in Morrow County. Commercial operation of the wind facility components is anticipated in October 2020; the construction commencement deadline for solar facility components is November 22, 2022.

The facility originally received approval from the Council in April 2017 for a site certificate for a 500 MW wind energy facility referred to as the Wheatridge Wind Energy Facility. Subsequent to the April 2017 site certificate issuance, the certificate holder received Council approval of four site certificate amendments, where the Council's Final Order on Amendment 5 authorized allocation of previously approved facility components into two original site certificates for facilities referred to as WREFII and Wheatridge Renewable Energy Facility I (WREFI, 100 MW wind facility currently under construction; commercial operation is anticipated in October 2020). The Council's Final Order on Amendment 5 resulted in largely the same conditions and mitigation plans mirrored across two site certificates, for WREFI and WREFII.

Specifically, the WMMP for WREFI and WREFII are identical. Because WREFI and WREFII are adjacent facilities and remain interconnected, both operationally and via shared facility components and the WMMPs are identical, PGE subsequently requested to amend the WREFI WMMP to align with the WREFII WMMP amendment.

Council reviewed the request to amend the WREFII WMMP at the July 22, 2020 Council meeting but continued their review and decision until staff at Oregon Department of Fish and Wildlife (ODFW) completed their review of supplemental materials provided by the WREFII certificate holder, as further described below. The request to amend the WREFI WMMP and WREFII WMMP are identical and therefore this staff report applies to both requests, although Council will be tasked with separate actions for the WREFI WMMP and WREFII WMMP amendments.

PROPOSED MITIGATION PLAN AMENDMENTS

Under the Fish and Wildlife Habitat Standard (OAR 345-022-0060), Council imposed Fish and Wildlife Habitat Condition 4 (PRE-FW-02) requiring that, during facility operation, the certificate holder implement a Wildlife Monitoring and Mitigation Plan (WMMP). One of the WMMP components is a Post-Construction Fatality Monitoring Program (PCFM), where the objective is to determine whether wind turbine operation results in significant fatality of bird and bat species. The WMMP PCFM establishes protocol for removal trials, searcher efficiency trials, fatality searches, and the statistical analysis of an ODFW-approved model (“Shoenfeld Estimator”). The protocols and statistical analysis represent current standard practice for EFSC-wind facilities.

The certificate holder requests approval to amend the WMMP PCFM protocols and statistical analysis to reflect updates in industry standards and practices. In summary, the changes to the PCFM would result in the following:

- Updated terminology to reflect current industry standard descriptions of post construction monitoring methods;
- More detail on the standardized carcass search methods, such as defining the two target size classes and the search plots, search intervals, and search strategy proposed for each of those target size classes;
- Updating searcher efficiency trial language to reflect the two target size classes being studied and update number of carcasses placed for each size class;
- Updating incidental finds language to clarify how those finds would be incorporated into fatality rates; and
- Updating the fatality estimator from Shoenfeld to the United States Geological Survey’s Generalized Mortality Estimator (GenEst) tool.

The Department, in consultation with ODFW Regional Biologist Steve Cherry and Energy Coordinator Sarah Reif, thoroughly reviewed the proposed changes, and received additional supporting documentation and explanation of the requested change in methods. In particular, ODFW and the Department reviewed proposed changes in PCFM search interval, search plot size and location, and the fatality correction factor that would be applied to search results.

Based on the Department's review, in consultation with ODFW, the Department recommends Council approve the WMMP amendment for WREFI and WREFII and determine that the proposed amendments represent improvements in data collection and analytical evaluation of potential fatality impacts from wind turbine operation to bird and bat species.