

January 15, 2026 EFSC Meeting

Agenda Item E Attachment 3

ODFW review and concurrence on habitat assessment for temporary disturbance, resulting in removal of habitat restoration requirements associated with the Revegetation Plan

(see Attachment 1)

ESTERSON Sarah * ODOE

From: Sarah.Esterson@Oregon.gov
Subject: Oregon Trail Solar - Revised habitat survey and map/table.

From: SOMERS Lindsay N * ODFW <Lindsay.N.SOMERS@odfw.oregon.gov>
Sent: Monday, December 22, 2025 2:54 PM
To: Casler, Jennifer <JCasler@haleyaldrich.com>
Cc: ESTERSON Sarah * ODOE <Sarah.Esterson@Oregon.gov>; THOMPSON Jeremy L * ODFW <Jeremy.L.THOMPSON@odfw.oregon.gov>
Subject: Re: Oregon Trail Solar - Revised habitat survey and map/table.

Hi Jennifer,

Please see the below response regarding the TetraTech Memo detailing the change in habitat categorization for a portion of the Oregon Trail Solar Project.

- ODFW concurs with the change in habitat classification (to category 6 or highly disturbed) for this parcel of the Oregon Trail Solar Project. The current vegetation on the site is dominated by non-native species (as shown in memo photos 2 & 3), the area is also located between an active solar farm and cultivated agriculture, and as recent as 2020 this area was actively cultivated. Given the location and disturbance level of this site it is reasonable to change habitat categorization to 'highly disturbed'. Although the potential for this area to become essential or important habitat is low, this area does not meet a strict non-habitat definition and ODFW recommends that impacts to this area remain temporary in nature (e.g. the area not be fenced, graveled, or paved) and that the vegetation be returned to pre-project condition (e.g. not bare soil).

Although potential for this site to serve as essential or important habitat is low, areas with degraded vegetation condition can provide marginal habitat for wildlife. Hawks and owls may forage for rodents in these areas and even burrowing owls and Washington ground squirrels can be found in areas dominated by exotic annual grasses or low vegetation. Based on the results of wildlife surveys for this site, sensitive species have not been documented in the project area and are not a concern at this time.

Lindsay

Lindsay Somers

Habitat Biologist-John Day Watershed

Oregon Department of Fish and Wildlife

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From: Casler, Jennifer <JCasler@haleyaldrich.com>
Sent: Friday, December 19, 2025 2:24 PM
To: SOMERS Lindsay N * ODFW <Lindsay.N.SOMERS@odfw.oregon.gov>
Cc: ESTERSON Sarah * ODOE <Sarah.Esterson@Oregon.gov>
Subject: RE: Oregon Trail Solar - Revised habitat survey and map/table.

Thanks Lindsay, good find on the aerial views. That could also be another rationale for re-categorization.

Thank you for the status update!

Jennifer A. Casler, RG, PG

Senior Client Leader

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From: SOMERS Lindsay N * ODFW <Lindsay.N.SOMERS@odfw.oregon.gov>
Sent: Friday, December 19, 2025 2:23 PM
To: Casler, Jennifer <JCasler@haleyaldrich.com>
Cc: ESTERSON Sarah * ODOE <Sarah.Esterson@Oregon.gov>
Subject: Re: Oregon Trail Solar - Revised habitat survey and map/table.

External Sender: Use extra caution with links and actions.

Thanks for forwarding those Jenn. I've got to confirm language with Jeremy and then I will send back a concurrence email.

Looking back at google earth imagery this area was farmed as recently as 2020, so that could another reason for the poor quality of existing vegetation along this corridor.

Lindsay

From: Casler, Jennifer <JCasler@haleyaldrich.com>
Sent: Friday, December 19, 2025 3:18 AM
To: SOMERS Lindsay N * ODFW <lindsay.n.somers@odfw.oregon.gov>
Cc: ESTERSON Sarah * ODOE <Sarah.Esterson@Oregon.gov>
Subject: Oregon Trail Solar - Revised habitat survey and map/table.

Good morning, Lindsay!

We received Tetra Tech's revised Habitat Survey Memo for the Oregon Trail Solar facility. As you recall from our December 9 discussion with Avangrid's team and ODOE – we agreed that the habitat subtype "Eastside Grassland" should be reclassified from a Category 4 to Category 6, given the degraded nature of this area (less than 15% non-native plant species and its location between two actively managed commercial agricultural and solar farm areas). We have reviewed the revised map and memo (specifically Section 4, paragraph 6) and believe that the category change rationale is complete enough to demonstrate why the category change was made.

Could you review Section 4, paragraph 6 to determine if you agree with the explanation?

Best,

Jennifer
Jennifer A. Casler, RG, PG
Senior Client Leader

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