



Notice of Intent to Apply for a Site Certificate

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Ørsted North America Inc.

Klamath Falls Energy Center in Klamath County, Oregon
December 2025





Notice of Intent to Apply for a Site Certificate

Client name:	Ørsted North America Inc.		
Project name:	Klamath Falls Energy Center in Klamath County, Oregon		
Document no:	250707114854_b411949d	Project manager:	Emilio Candanoza/Jacobs
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Acronyms and Abbreviations

ACDP	Air Contaminant Discharge Permit
Applicant	Klamath Falls Energy Center, LLC, care of Ørsted North America Inc.
ASC	Application for Site Certificate
BESS	battery energy storage system
CFR	<i>Code of Federal Regulations</i>
DEQ	Oregon Department of Environmental Quality
EFSC	Energy Facility Siting Council
ESCP	erosion and sediment control plan
F	Klamath County Forestry zoning district
Facility	Klamath Falls Energy Center
FAA	Federal Aviation Administration
Jacobs	Jacobs Engineering Group Inc.
kV	kilovolt
LLC	limited liability company
MW	megawatt
NHD	<i>National Hydrography Dataset</i>
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	<i>National Wetlands Inventory</i>
O&M	operations and maintenance
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
ODOE	Oregon Department of Energy
ORBIC	Oregon Biodiversity Information Center
ORS	Oregon Revised Statute
POI	point of interconnection
PV	photovoltaic

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SHPO	State Historic Preservation Office
U.S.C.	<i>United States Code</i>
USFWS	U.S. Fish and Wildlife Service
WPCF	Water Pollution Control Facilities

Exhibit A. Applicant Information

OAR 345-020-0011(1)(a)

(a) **Exhibit A.** Information about the applicant and participating persons, including:

- (A) The name and address of the applicant including all co-owners of the proposed facility, the name, mailing address, email address and telephone number of the contact person for the NOI, and if there is a contact person other than the applicant, the name, title, mailing address, email address and telephone number of that person.

Response:

Name and mailing address of Applicant:

Klamath Falls Energy Center, LLC
c/o Ørsted North America Inc.
Attention: General Counsel
401 N Michigan Avenue, Suite 501
Chicago, IL 60611

Applicant Contact Person with Mailing Address, Email Address, and Telephone Number:

Amy Shanahan
Ørsted North America Inc.
401 N Michigan Avenue, Suite 501
Chicago, IL 60611
amysh@orsted.com
+1-458-600-2031

Contact persons other than the Applicant:

Emilio Candanoza
Jacobs Engineering Group Inc. (Jacobs)
2020 SW 4th Avenue, Suite 300
Portland, OR 97207
emilio.candanoza@jacobs.com
541-768-3509

Sarah Stauffer Curtiss
Stoel Rives LLP
760 SW 9th Avenue, Suite 3000
Portland, OR 97205
sarah.curtiss@stoel.com
503-294-9829

- (B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and persons upon whom the applicant will rely in meeting any facility standard adopted by the Council.

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Response:

Parent Corporation:

Ørsted North America Inc.
401 N Michigan Avenue, Suite 501
Chicago, IL 60611

Contact Name, Mailing Address, Email Address, and Telephone Number:

Amy Shanahan
Ørsted North America Inc.
401 N Michigan Avenue, Suite 501
Chicago, IL 60611
amysh@orsted.com
+1-458-600-2031

(C) *If the applicant is a corporation:*

- (i) *The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the NOI;*
- (ii) *The date and place of its incorporation;*
- (iii) *A copy of its articles of incorporation and its authorization for submitting the NOI; and*
- (iv) *In the case of a corporation not incorporated in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon;*

Response:

The Applicant is not a corporation; therefore, the preceding criteria are not applicable.

- (D) *If the applicant is a wholly owned subsidiary of a company, corporation or other business entity, in addition to the information required by paragraph (C), the full name and business address of each of the applicant's full or partial owners;*

Response:

Ørsted North America Inc. is the parent company of Klamath Falls Energy Center, LLC.

Address:

401 N Michigan Avenue, Suite 501
Chicago, IL 60611

- (E) *If the person submitting the NOI is an association of citizens, a joint venture or a partnership:*

- (i) *The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the NOI;*

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- (ii) *The name, business address and telephone number of each person participating in the association, joint venture or partnership and the percentage interest held by each;*
- (iii) *Proof of registration to do business in Oregon;*
- (iv) *A copy of its articles of association, joint venture agreement or partnership agreement and a list of its members and their cities of residence; and*
- (v) *If there are no articles of association, joint venture agreement or partnership agreement, the applicant shall state that fact over the signature of each member;*

Response:

The person submitting the Notice of Intent (NOI) is not an association of citizens, a joint venture, or a partnership.

- (F) *If the applicant is a public or governmental entity:*
 - (i) *The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the NOI; and*
 - (ii) *Written authorization from the entity's governing body to submit an NOI;*

Response:

The Applicant is not a public or governmental entity.

- (G) *If the applicant is an individual, the individual's mailing address, email address and telephone number; and*

Response:

The Applicant is not an individual.

- (H) *If the applicant is a limited liability company:*
 - (i) *The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the NOI;*
 - (ii) *The date and place of its formation;*
 - (iii) *A copy of its articles of organization and its authorization for submitting the NOI; and*
 - (iv) *In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.*

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Response:

Klamath Falls Energy Center, LLC
c/o Ørsted North America Inc.
Attention: General Counsel
401 N Michigan Avenue., Suite 501
Chicago, IL 60611

amysh@orsted.com
+1-458-600-2031

The Applicant is a limited liability company (LLC) originally organized as Klamath Falls Energy Center, LLC, under the laws of Oregon on May 16, 2022. The articles of incorporation for Klamath Falls Energy Center, LLC, and authorization for submitting this NOI are contained in Attachment A.

Exhibit B. Facility Description

OAR 345-020-0011(1)(b)

(b) *Exhibit B. Information about the proposed facility, including:*

(A) *A description of the proposed energy facility, including as applicable:*

Klamath Falls Energy Center, LLC (Applicant) proposes to construct and operate the Klamath Falls Energy Center (Facility) in Klamath County, Oregon (Figure 1). The Facility will generate electricity using solar photovoltaic (PV) modules connected to inverters, transformers, and a substation. PV modules (also known as “panels” but referenced herein as modules for consistency) contain solar cells that generate electricity by means of the PV effect, in which the semiconductor materials found inside the solar cells interact with photons from the sun to generate an electrical current that can be collected and supplied to the power grid. The solar modules will be mounted onto a metal racking structure and grouped into arrays (i.e., modules wired in series and in parallel). The electric output of each array feeds into an inverter, which takes the direct current output of the solar modules and turns it into the alternating current used by the electric grid. This output of the inverters is then “stepped up” in voltage to 34.5 kilovolts (kV), before the current is conveyed to the new onsite Facility substation via underground collector lines. At the Facility substation, the voltage will again be stepped up to 500 kV for delivery via direct overhead cables to a new, PacifiCorp-owned point of interconnection (POI) substation. The POI substation will connect with the existing PacifiCorp Klamath Falls-Meridian 500-kV transmission line that runs through the site (Figure 2). PacifiCorp will construct, own, and operate the POI substation.

The Applicant intends to begin Facility construction in 2031, pending issuance of a site certificate from the Energy Facility Siting Council (EFSC).

Design Options

While solar modules, racking, inverters, and other components are mostly interchangeable and substantially similar to other products of the same kind, manufacturers are continually making updates and refinements to existing models. This, combined with the fact that prices for specific components tend to decline over time, means that final specifications of selected models and manufacturers typically are not known until shortly before construction. As such, the descriptions provided herein are representative of typical products, but the precise description and number of individual components may change.

Facility Site Boundary

The Facility site boundary encompasses all of the various Facility components, structures, and systems, as well as related or supporting facilities.

(i) *For electric power generating plants, the nominal electric generating capacity and the average electrical generating capacity, as defined in ORS 469.300;*

Response:

The Facility will consist of up to 400 megawatts (MW) of alternating current nominal and average generating capacity as defined in Oregon Revised Statute (ORS) 469.300(4)(c).

(ii) *Major components, structures and systems, including a description of the size, type and configuration of equipment used to generate, store, transmit, or transport electricity, useful thermal energy, or fuels;*

Response:

The following descriptions of major components are based on the best available design information at this time and may be modified in the Application for Site Certificate (ASC) and at final design:

- **Solar Modules.** The Applicant will install the solar PV modules in rows. A group of individual rows of solar PV modules mounted on single-axis trackers will constitute an array block. The final number of modules will be determined by power ratings (in watts) of the specific modules chosen prior to construction. Additional components of each array block include the trackers, posts, cabling, inverters, transformers, and switchgear. Additional detail on each component is provided in the following paragraphs.
- **Trackers.** The solar PV modules will sit atop a steel single-axis tracking system, which will consist of metal frames or “racks” with a drive gear that can rotate up to 60 degrees in an east to west direction such that the modules track the sun throughout the day in order to increase solar production. The modules will be approximately 4 to 5 feet off the ground when fully stowed. When fully rotated, the highest point of the module will be approximately 8 feet off the ground, while the minimum distance to the ground when fully rotated will range from 1 to 2 feet.
- **Posts.** Each tracker will be bolted to steel posts driven into the ground to serve as the foundation. The post depths will vary depending on soil conditions, which will be confirmed via a detailed geotechnical investigation, but are typically driven to a depth of at least 8 feet below ground surface. Approximately 1,200 to 2,000 posts will be installed per array block or approximately 5 to 7.5 posts per string and 268 strings per inverter for the up-to-400-MW Facility. Post locations will be determined by the ground coverage ratio, which is the ratio of the area of the modules to the total area. The ground coverage ratio for the Facility is currently planned to be approximately 36 percent, meaning that the area occupied by the modules (when fully rotated) will be approximately 36 percent of the area within the array.
- **Cabling.** Electrical cables connecting the modules to each other are typically mounted to the back of the modules using cable trays or wire harnesses. Several rows of modules are then collected in a combiner box located at the end of one of the rows. Other electrical cables within arrays will be either overhead or buried to a depth of at least 3 feet.
- **Inverters, Transformers, and Switchgear.** The direct current output from the PV modules will be combined in parallel in combiner boxes and, from the combiner boxes, it will be converted into alternating current via the inverters, the output of which will be fed into transformers that step up in voltage to 34.5 kV. The inverters and transformers will be mounted on a steel pile foundations approximately 20 feet by 13 feet, with a total height of approximately 10 feet (including the inverters and transformers). The combination of the inverters and transformers is sometimes referred to as a power conversion station. Each tracker column will be equipped with on-board batteries that will act as a backup power source to rotate the tracker units into the stowed position during high wind events and a loss of the primary 500-kV connection to the electrical grid. The transformers will then convey the power via 34.5-kV underground collector lines to the switchgear, which consists of an industry-standard electrical protection device that controls, protects, and isolates electrical equipment. The metal-clad switchgear enclosures typically measure approximately 33 feet long by 12 feet wide and 11 feet high.

(iii) *Methods for waste management and waste disposal, including, to the extent known, the amount of wastewater the applicant anticipates, the applicant's plans for disposal of wastewater and stormwater, and the location of disposal;*

Response:

The Facility will not use water resources in the generation of electricity and will not produce significant quantities of wastewater for disposal, nor will it produce significant quantities of solid waste. Further details of stormwater drainage, water, solid waste management, and sewage treatment during both construction and operations are discussed in Exhibit K of this NOI.

- (iv) *For thermal power plants, combustion turbine power plants, or other facilities designed to generate electricity from any gas, liquid, or solid fuels:*
 - (I) *A discussion of the source, quantity and availability of all fuels proposed to be used in the facility to generate electricity or useful thermal energy.*
 - (II) *If the facility will generate electric power from natural gas, petroleum, coal or any form of solid, liquid or gaseous fuel derived from such material, a discussion of methods the facility will use to ensure that the facility does not emit greenhouse gasses into the atmosphere, and a description of any equipment the facility will use to capture, sequester, or store greenhouse gases;*
 - (III) *A discussion of the methods for the disposal of waste heat generated by the facility;*

Response:

The preceding rule is not applicable to solar energy generation.

- (v) *For transmission lines, approximate transmission line voltage, load carrying capacity and type of current;*

Response:

The proposed Facility does not involve construction of a new transmission line, as it will interconnect with an existing transmission line that runs through the site (Figure 2). Therefore, this criterion does not apply.

- (vi) *For pipelines, approximate operating pressure and delivery capacity in thousand cubic feet per day;*

Response:

The preceding rule is not applicable to solar energy generation.

- (vii) *For surface facilities related to underground gas storage, estimated daily injection and withdrawal rates, horsepower compression required to operate at design injection or withdrawal rates, operating pressure range and fuel type of compressors.*

Response:

The preceding rule is not applicable to solar energy generation.

- (viii) *For facilities to store liquefied natural gas, the approximate volume, maximum pressure, liquefaction and gasification capacity in thousand cubic feet per hour.*

Response:

The preceding rule is not applicable to solar energy generation.

- (B) *A description of major components, structures and systems of each related or supporting facility; and*

Response:

The related or supporting facilities detailed in this response comprise the 34.5-kV collector lines, battery energy storage system (BESS), onsite Facility substation, POI, operations and maintenance (O&M) building, security fences and service roads, and construction areas. The following descriptions are based on the best available design information at this time and may be modified in the ASC and at final design:

- **34.5-kV Collector Lines.** High-capacity 34.5-kV collector lines will carry power from the switchgear to the onsite Facility substation. The 34.5-kV medium-voltage conductors will run either overhead or underground for improved reliability. The collector lines will be buried at a depth of at least 3 feet; some portion of the conductors may also be above ground. Exact collector line routing within the Facility site boundary is still being decided.
- **Battery Energy Storage System.** The Facility's BESS will house 400 MW of alternating current adjacent to the PacifiCorp Klamath Falls-Meridian 500-kV transmission line. The BESS will consist of a series of modular enclosures, battery units with enclosure-integrated inverters, and transformers. Each enclosure will be on a concrete slab-on-grade or pier foundation within a centralized fenced area. The enclosures are rated for outdoor environments and hold the batteries and a battery management system. While use of lithium-ion batteries is anticipated, other battery options remain under consideration. The BESS options under consideration include fire containment systems.
- **Onsite Facility Substation.** The Applicant proposes to construct a substation within the Facility site boundary. Prior to construction, the substation site will be cleared and graded, with a bed of crushed rock applied for a durable surface. The substation is anticipated to consist of transformers, a bus bar, circuit breakers and fuses, control systems, meters, and other equipment that will be determined at final design.
- **Point of Interconnection Substation.** PacifiCorp will construct, own, and operate a POI substation adjacent to the Facility substation. The POI substation will connect to the existing PacifiCorp Klamath Falls-Meridian 500-kV transmission line that runs through the southeast portion of the Facility site boundary (Figure 2). The location of the POI will be within the Facility site boundary. The exact location will be confirmed with utility input at a later date.
- **Operations and Maintenance Building.** The O&M building will consist of a single, approximately 13,000-square-foot structure located within the Facility site boundary. The administrative area will be air conditioned and include offices, kitchen/break room, restrooms, and locker rooms with showers. Electric power and telephone will be provided via local service providers. Potable water at the O&M building will likely come from rain tanks, well water, or an offsite municipal or commercial source if reasonably nearby.
- **Security Fences and Service Roads.** The Facility will be enclosed by a security fence, typically consisting of chain-link or notch-style fencing. The security fence will either be 6 feet tall with two strands of barbed wire, or 8 feet tall with no barbed wire. The security fence will feature gated access at several points. Gravel service roads will be utilized to access the Facility's major components. The final configuration of any potential services roads will be determined in conjunction with the Klamath County and Keno Fire District(s), which may require gravel perimeter or access roads for fire-fighting purposes.
- **Construction Areas.** During construction, temporary laydown areas within the Facility site boundary will be used to stage construction activities and organize equipment and supplies. Temporary construction trailers will be installed onsite, consisting of office space, storage, and breakroom facilities. A gravel parking and storage area will be located adjacent to the construction trailer.

(C) *The approximate dimensions of major facility structures and visible features.*

Response:

This response provides the approximate dimensions of major and related or supporting Facility structures and visible features. The most notable features of the Facility are the solar modules, BESS, Facility substation, POI, and O&M building. The estimated dimensions of the structures, as currently available, including related or supporting facilities, are summarized in the following paragraphs and will be updated in the ASC and prior to construction at final design:

- **Solar Modules.** The solar modules will be arranged in rows. The maximum height will be 12 to 15 feet at full tilt. Final design of the Facility site boundary will determine the exact number and size of modules, layout, and related equipment specifications.
- **Battery Energy Storage System.** Containers placed on steel piers or concrete slabs surrounded by an aggregate base material and gravel will house the Facility batteries. Lithium-ion batteries may use a series of self-contained enclosures located on concrete pads within an approximately 25-acre centralized area near the Facility substation. The approximate dimensions for BESS enclosures will be provided with the ASC. Each container holds the batteries, a supervisory and power management system, and a fire prevention system. Cooling units will be placed either on top of the containers or along the side depending on the equipment selected at final design.
- **Facility Substation.** The Facility substation will occupy approximately 5 acres onsite.
- **Point of Interconnection.** The location and dimensions of the POI within the proposed Facility site boundary will be confirmed with utility input at a later date.
- **Operations and Maintenance Building.** The O&M building will consist of a single, approximately 13,000-square-foot structure located within the Facility site boundary.

Exhibit C. Facility Location

OAR 345-020-0011(1)(c)

- (c) **Exhibit C.** A description of the location of the proposed energy facility site and the proposed site of each related or supporting facility and all areas that might be temporarily disturbed during construction of the facility, including the approximate land area of each.

Response:

Figure 1 shows the proposed Facility site boundary in Klamath County, Oregon, approximately 1.5 miles northwest of the unincorporated community of Keno, Oregon. The preliminary NOI site boundary encompasses approximately 8,600 acres of private land, primarily north of Clover Creek Road (County Highway 603). The Facility site boundary is generally surrounded by private industrial forest land. The site boundary is due north of the Klamath River, south of Aspen Lake, east of Oatman Lake, and west of Round Lake. Table C-1 shows the townships, ranges, and section that encompass the site boundary.

Table C-1. Township, Range, and Section within the Facility Site Boundary

Township and Range	Section
38S 7E	029
	030
	031
	032
39S 7E	002
	003
	004
	008
	009
	010
	011
	014
	015
	016
	022
	023
	024
	025
	026
	027

Exhibit D. Alternative Locations

OAR 345-020-0011(1)(d)

- (d) ***Exhibit D.** If the proposed energy facility is a pipeline or a transmission line or has, as a related or supporting facility, a transmission line or pipeline that, by itself, is an energy facility under the definition in ORS 469.300, identification of at least two proposed corridors, as defined in OAR 345-001-0010, or identification of a single proposed corridor with an explanation of why alternate corridors are unlikely to better meet the applicant's needs and satisfy the Council's standards. The applicant must include an explanation of the basis for selecting the proposed corridors and, for each proposed corridor, the information described in subsections (e), (g), (i), (j), (k), (L), (o) and (q) that is available from existing maps, aerial photographs, and a search of readily available literature.*

Response: The Facility is not a pipeline nor a transmission line as defined by ORS 469.300. The Facility includes neither a pipeline nor transmission line that, by themselves, would be considered an energy facility under ORS 469.300(11)(a)(C).

Exhibit E. Permits Needed for Construction and Operation

OAR 345-020-0011(1)(e)

- (e) **Exhibit E.** *Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, address, email address and telephone number of the agency or office responsible for each permit. For each permit, the applicant must provide a preliminary analysis of whether the permit should or should not be included in and governed by the site certificate.*

Response:

Table E-1 identifies the federal, state, and local government permits needed to construct and operate the Facility and provides an assessment of whether the permit should or should not be included in and governed by the site certificate.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
Federal			
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attention: Danielle Erb, Project Manager PO Box 2946 Portland, OR 97208-2946 danielle.h.erb@usace.army.mil 503-808-4368	Clean Water Act, Section 404 (33 U.S.C. § 1344); 33 CFR §§ 320, 323, 325 28, and 330	A Section 404 permit will be required if dredge or fill occurs in waters of the United States. This federal process is outside the jurisdiction of EFSC and therefore should not be included in or governed by the site certificate. The Facility is not anticipated to impact jurisdictional waters and wetlands of the United States.
Notice of Proposed Construction or Alteration (Form 7460.1)	Federal Aviation Administration Attention: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group Dan.Shoemaker@faa.gov	Federal Aviation Act of 1958 (14 U.S.C. § 44718); 14 CFR § 77	Applicant proposes construction or alterations that could trigger the need for review by the FAA. Applicant may be required to file a Notice of Proposed Construction or Alteration with the FAA. This notice may be required for construction of structures within specified distances of runways or helipads. If notice is required, no permit will be issued by the FAA. Moreover, given that this federal process is outside the jurisdiction of EFSC, it should not be included in the site certificate.
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	Federal Aviation Administration Attention: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group Dan.Shoemaker@faa.gov 425-227-2791	Federal Aviation Act of 1958 (14 U.S.C. Section 44718); 14 CFR Section 77	If a Notice of Proposed Construction or Alteration with the FAA is required, then submission of the Supplemental Notice of Actual Construction or Alteration form must be filed within 5 days after construction reaches its greatest height as specified in the No Hazard Determination. No permit will be issued by the FAA. Moreover, given that this federal process is outside the jurisdiction of EFSC, it should not be included in the site certificate.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
State			
Energy Facility Site Certificate	Oregon Department of Energy and Energy Facility Siting Council Attention: Kellen Tardaewether 550 Capitol Street N.E. Salem, OR 97301 Kellen.TARDAEWETHER@energy.oregon.gov 503-373-0076	ORS 469.300 et seq.; OAR Chapter 345, Divisions 1, 15, 21-24, 26-27	The Facility is an "energy facility" as defined in ORS Chapter 469.300(11) and must be authorized through a site certificate issued by EFSC.
Airspace Review	Oregon Department of Aviation Attention: Heather Peck, Project Manager 3040 25th Street, SE Salem, OR 97302 Heather.Peck@odav.oregon.gov 503-378-3168	14 CFR § 77; ORS 836.530 and 836.535; OAR Chapter 738, Division 70	The Oregon Department of Aviation provides an airspace review and determination letter following review of Form 7460-1 for structures greater than 200 feet above ground surface or within the distances from airports listed in OAR 738-070-0110. No permit is issued by the Oregon Department of Aviation. The airspace review facilitates the 7460-1 process, but is outside Council jurisdiction. Therefore, this permit should not be included in and governed by the site certificate.
Removal/Fill Permit	Oregon Department of State Lands Attention: Richard Fitzgerald, Aquatic Resource Coordinator 951 SW Simpson Avenue, Suite 104 Bend, OR 97702 Richard.W.Fitzgerald@dsl.oregon.gov 503-910-4565	Oregon Removal-Fill Law (ORS 196.795 - 196.990) OAR Chapter 141, Divisions 85, 89, 90, 93, 100	A permit is required if an activity will involve filling or removing 50 cubic yards or more of material in a wetland or waterway. Sites within a state designated Essential Indigenous Anadromous Salmonid Habitat (ESH), State Scenic Waterway, or compensatory mitigation site, require a permit for any amount of removal or fill. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the state. If this is proposed or needed, the Removal-Fill Permit should be included in and governed by the EFSC site certificate under ORS 469.401(3).

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
National Pollutant Discharge Elimination System 1200-C Construction Stormwater Discharge Permit	Oregon Department of Environmental Quality - Water Quality Division Attention: Jackie Ray, Permit Coordinator Eastern Region 800 SE Emigrant #330 Pendleton, OR 97801 Ray.jackie@deq.state.or.us 541-278-4605	Clean Water Act, Section 402 (33 U.S.C. § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45	A NPDES 1200-C permit is required for construction activities that will disturb 1 or more acres of land. The Applicant will obtain this permit directly from DEQ. Given that this permit is outside the jurisdiction of EFSC, it should not be included in and governed by the site certificate.
Water Right Permit or Water Use Authorization	Oregon Water Resources Department Water Rights Section District 11 Attention: Danette Watson, District 17 Watermaster 3125 Crosby Ave Klamath Falls, OR 97603 Danette.M.Watson@water.oregon.gov 541-883-4182	ORS 537; OAR Chapter 690, Divisions 310, 340, 410 and 507	The Applicant does not anticipate the need for a water right or use authorization, and intends to obtain water for Facility construction and operation from an offsite municipal or commercial source via bilateral agreements. If water for construction and operation is not available from permitted sources, the Applicant will obtain the necessary water right permit or use authorization directly from the Oregon Water Resources Department. Given that this permit, if needed, is outside the jurisdiction of EFSC, it should not be included in and governed by the site certificate.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
General Water Pollution Control Facilities Permit, WPCF-1700-B, Washwater Discharge from Equipment Cleaning	Oregon Department of Environmental Quality Eastern Region Attention: Jeff Navarro, Water Quality Program Analyst 803 Main Street, Suite #201 Klamath Falls, OR 97604-9998 navarro.jeffrey@deq.state.or.us 503-229-5257	ORS 468B; OAR Chapter 340, Division 45	The solar modules may be washed twice annually and the washwater will be released to the ground and allowed to evaporate and infiltrate. The Applicant or a third-party contractor who will conduct solar module washing activities will seek coverage under the WPCF-1700-B permit from DEQ following completion of construction and before initiating any washing activities. Therefore, this permit should not be included in and governed by the site certificate.
General Water Pollution Control Facilities Permit, WPCF-1000, Gravel Mining and Batch Plant	Oregon Department of Environmental Quality Eastern Region Attention: Jeff Navarro, Water Quality Program Analyst 803 Main Street, Suite #201 Klamath Falls, OR 97604-9998 navarro.jeffrey@deq.state.or.us 503-229-5257	OAR Chapter 340, Division 45	A WPCF-1000 authorizes the permittee to operate a wastewater collection, treatment, control, and disposal system for sand, gravel, and other nonmetallic mineral quarrying and mining operations, including asphalt-mix batch plants, concrete batch plants, and other related activities. If a temporary batch plant is needed for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from DEQ, which would therefore not be included in and governed by the site certificate.
Basic Air Contaminant Discharge Permit	Oregon Department of Environmental Quality – Air Quality Division Eastern Region Attention: Nancy Swofford, Eastern Region Permit Coordinator 475 NE Bellevue, Suite 110 Bend, OR 97701 Swofford.nancy@deq.state.or.us 541-633-2026	Clean Air Act (42 U.S.C. Section 7401 et seq.). 40 CFR Parts 50, 51, and 52 ORS Chapters 468 and 468A OAR Chapter 340, Division 216	A Basic ACDP authorizes the permittee to operate a stationary or portable concrete manufacturing plant that produces more than 5,000 but less than 25,000 cubic yards per year output. If a portable concrete manufacturing plant is required for Facility construction, the Applicant's third-party contractor will obtain a Basic ACDP directly from DEQ. Given that this permit, in the unlikely event it is needed, is outside the jurisdiction of EFSC, it should not be included in and governed by the site certificate.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
Oversize Load Movement Permit/Load Registration	Oregon Department of Transportation (ODOT) Attn: Gary Farnsworth, Region 4 Manager Region 4 Headquarters 63055 North Highway 97 Bend, OR 97703 gary.c.farnsworth@odot.state.or.us 503-373-0000	ORS Chapter 818.030; OAR Chapter 734, Divisions 51, 82	This permit authorizes oversized loads. Movement of construction cranes and other equipment and materials may require this permit. If needed, the Applicant's third-party contractor will obtain this permit and load registration from the Oregon Department of Transportation before transporting large or overweight equipment. Therefore, this permit should not be included in and governed by the site certificate.
Access Management Permit	Oregon Department of Transportation (ODOT) Attn: Gary Farnsworth, Region 4 Manager Region 4 Headquarters 63055 North Highway 97 Bend, OR 97703 gary.c.farnsworth@odot.state.or.us 503-373-0000	OAR Chapter 734, Division 51	Access from Oregon state highways may require an access permit from ODOT. If needed, the Applicant's third-party contractor will obtain this permit directly from local ODOT district offices and therefore this permit should not be included in and governed by the site certificate.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
Archaeological Excavation Permit	Oregon Parks and Recreation Department, State Historic Preservation Office 725 Summer Street NE, Suite C Salem, OR 97301 Koren Tippet, Archaeology Inventory & Survey Coordinator arch.permits@opr.d.oregon.gov 503-986-0577	ORS Chapters 97, 358, and 390; OAR Chapter 736, Division 51 (Permit and Conditions for Excavation or Removal of Archaeological or Historical Materials on Private Land	This permit is required if excavation is needed within the boundaries of a known cultural site regardless of land ownership. If disturbance to cultural sites cannot be avoided, a SHPO Archaeological Permit will be required to determine if cultural sites are eligible for listing under the NRHP. An excavation permit will also be required for any data recovery mitigation efforts within an NRHP-eligible site. During Facility construction, if a previously unidentified archaeological site is discovered, all construction will cease, and the Applicant will report the finding to SHPO immediately. In that instance, SHPO will require this permit. Should this permit be required, the Applicant will obtain it from SHPO. Therefore, this permit should not be included in and governed by the site certificate.
Local			
Conditional Use Permit and Comprehensive Plan Amendment for a Goal 4 Exception	Klamath County Planning Division Jeremy Morris, Planning and Public Works Director 305 Main Street Klamath Falls Government Center Klamath Falls, OR 97601 jmorris@klamathcounty.gov 541-883-5121	Klamath County Land Development Code Ordinance Article 44 and Article 55	Construction and operation of "Commercial utility facilities for the purpose of generating power" is a conditional use in the Forestry (F) zone. The Applicant elects to obtain an EFSC determination under ORS Chapter 469.504(1)(b). Under ORS 469.401(3), following issuance of the site certificate, the County, upon the Applicant's submission or the proper application and fee, shall issue the permits addressed in the site certificate, subject only to the conditions set forth in the site certificate and without hearings or other proceedings.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
Building Permit	Klamath County Building Division Stephanie Brown, Community Development Manager 305 Main Street Government Center Klamath Falls, OR 97601 (541) 883-4210 sbrown@co.klamath.or.us	OAR Chapter 918, Divisions 309, 708	Prior to construction of a new structure, a building permit is required for review and approval from the Klamath County Building Division. The Applicant's third-party contractor will obtain right-of-way use permits (as needed) directly from Klamath County. Therefore, this permit should not be included in and governed by the site certificate.
Driveway and Road Approach Permit	Klamath County Public Works Jeremy Morris, Planning and Public Works Director 305 Main Street Klamath Falls Government Center Klamath Falls, OR 97601 jmorris@klamathcounty.gov 541-883-5121	Klamath County Public Works Right of Way Permit Regulations, Klamath County Ordinance No. 69, and ORS 758.010	A construction permit is required to make improvements to access roads that intersect with county road rights-of-way or to make improvements to existing public roads. If needed, the Applicant's third-party contractor will obtain this administrative permit from the County, which would therefore not be included in and governed by the site certificate.

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Table E-1. Permits Required for Construction and Operation of the Proposed Facility

Permit	Agency	Authority	Description
Right-of-Way Permit	Klamath County Public Works Jeremy Morris, Planning and Public Works Director 305 Main Street Klamath Falls Government Center Klamath Falls, OR 97601 jmorris@klamathcounty.gov 541-883-5121	ORS Chapter 374.305 and Klamath County Road Department	A right-of-way use permit is required in Klamath County whenever an individual, contractor, or utility company needs to perform work in the public road right-of-way. The Applicant's third-party contractor will obtain right-of-way use permits (as needed) directly from Klamath County. Therefore, this permit should not be included in and governed by the site certificate.

Notes:

ACDP	=	Air Contaminant Discharge Permit
CFR	=	Code of Federal Regulations
DEQ	=	Oregon Department of Environmental Quality
FAA	=	Federal Aviation Administration
NPDES	=	National Pollutant Discharge Elimination System
NRHP	=	National Register of Historic Places
OAR	=	Oregon Administrative Rule
SHPO	=	State Historic Preservation Office
U.S.C.	=	United States Code
WPCF	=	Water Pollution Control Facilities

Exhibit F. Property Ownership

OAR 345-020-0011(1)(f)

- (f) **Exhibit F.** *A list of the names and mailing addresses of property owners, as described in this rule:*
- (A) *The list must include all owners of record, as shown on the most recent property tax assessment roll, of property located:*
- (i) Within 100 feet of property which the subject of the NOI, where the subject property is wholly or in part within an urban growth boundary;*
 - (ii) Within 250 feet of property which is the subject of the NOI, where the subject property is outside an urban growth boundary and not within a farm or forest zone; or*
 - (iii) Within 500 feet of property which is the subject of the NOI, where the subject property is within a farm or forest zone; and*
- (B) *In addition to incorporating the list in the NOI, the applicant must submit the list to the Department in an electronic format acceptable to the Department.*

Response: In accordance with OAR 345-020-0011(1)(f), Attachment B is a list of the names and mailing addresses of property owners within 500 feet of the Facility's site boundary. The Facility is located in the Klamath County Forestry (F)zoning district, which is regulated by the Klamath County Land Development Code. Therefore, OAR 345-020-0011(1)(f)(A)(iii) applies to the Facility. Additionally, the Applicant has provided an electronic list of the property owner information to the Oregon Department of Energy (ODOE) in accordance with OAR 345-020-0011(1)(f)(B). Tax lot boundaries and assessor data for Klamath County were obtained from the Klamath County Assessor on December 16, 2025.

Exhibit G. Facility Maps

OAR 345-020-0011(1)(g)

(g) *Exhibit G. A map or maps showing:*

Response:

A series of seven maps (Figures 1 through 7) display the required information.

- (A) *The proposed locations of the energy facility site, all related or supporting facility sites and all areas that might be temporarily disturbed during construction of the facility in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;*

Response:

Figure 1 shows the location of the Facility site boundary in relation to major roads, waterbodies, cities and towns, important landmarks, and topographic features.

- (B) *The proposed locations of the corridors the applicant has identified under subsection (d) in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;*

Response:

No corridors are proposed or identified under subsection (d) above; thus, none are depicted on Figure 1.

- (C) *The study areas for the proposed facility as defined in OAR 345-001-0010;*

Response:

The study areas for the proposed Facility are depicted on Figure 3, specifically protected areas (20 miles), scenic resources and public services (10 miles), recreational opportunities (5 miles), threatened and endangered species (5 miles), land use (0.5 mile), and fish and wildlife habitat (0.5 mile). The Applicant developed this map to correspond with the study areas defined under OAR 345-001-0010(35). The Applicant understands that ODOE will formally establish analysis areas for the ASC in the Project Order.

- (D) *The topography of the study areas including streams, rivers, lakes, major roads and contour lines;*

Response:

Figure 4 shows the topography of the study areas, including streams, rivers, lakes, major roads, and contours.

- (E) *All protected areas in the study area as defined in OAR 345-001-0010 for impacts to protected areas;*

Response:

Figure 5 shows protected areas within the 20-mile study area as defined in OAR 345-001-0010(59) and as designated in OAR 345-001-0010(35).

- (F) *The location of any potential waters of the state or waters of the United States that are on or adjacent to the site; and*

Response:

Figure 6 shows the locations of any potential waters of the state or waters of the United States that are on or adjacent to the Facility site.

- (G) *For energy generation facilities, the approximate locations of any other energy generation facilities that are known to the applicant to be permitted at the state or local level within the study area as defined in OAR 345-001-0010 for impacts to public services.*

Response:

Figure 7 shows the locations of the energy generation facilities that are known to the Applicant to be permitted within the study area as defined in OAR 345-001-0010 for impacts to public services.

Exhibit H. Non-generating Energy Facility

OAR 345-020-0011(1)(h)

- (h) *Exhibit H. If the proposed facility is a non-generating energy facility for which the applicant must demonstrate need under OAR 345-023-0005, identification of the rule in division 23 of this chapter under which the applicant intends to demonstrate need and a summary statement of the need and justification for the proposed facility.*

Response:

The Facility is not a non-generating energy facility. Therefore, this rule is not applicable.

Exhibit I. Land Use

OAR 345-020-0011(1)(i)

- (i) *Exhibit I. A statement indicating whether the applicant intends to satisfy the Council's land use standard, OAR 345-022-0030, by obtaining local land use approval under ORS 469.504(1)(a) or by seeking a Council determination under ORS 469.504(1)(b).*

Response:

The proposed Facility and related or supporting facilities are in Klamath County. The Applicant will satisfy the Council's land use standard, OAR 345-022-0030, by seeking a Council determination of compliance with Klamath County land use standards under ORS 469.504(1)(b). The proposed Facility site boundary is located within Klamath County's Forestry (F) zoning district, where a "commercial utility facility for the purpose of generating power" may not preclude more than 10 acres from use as a commercial forest operation without obtaining an exception to Statewide Planning Goal 4. As the Facility will preclude more than 10 acres from use as commercial forest operation, a Goal 4 exception will be included with the ASC presented to the Council.

Exhibit J. Environmental Impacts

OAR 345-020-0011(1)(j)

- (j) *Exhibit J. Identification of potential significant environmental impacts of construction and operation of the proposed facility on resources in the study areas, including those impacts affecting air quality, surface and ground water quality and availability, wildlife and wildlife habitat, threatened and endangered plant and animal species, historic, cultural and archaeological resources, scenic resources, recreation opportunities, land use, and wildfire risk.*

Response:

This exhibit identifies potential environmental impacts of construction and operation of the proposed Facility on the study areas. Responses are organized into the following sections:

- J.1 Air Quality
- J.2 Surface and Groundwater Quality and Availability (includes wetlands and waters of the state and United States)
- J.3 Fish and Wildlife Habitat [study area, as defined in OAR 345-001-0010(35)(c), is 0.5 mile]
- J.4 Threatened, Endangered, and Sensitive Plant and Animal Species [study area, as defined in OAR 345-001-0010(35)(a), is 5 miles]
- J.5 Historic, Cultural, and Archaeological Resources (study area is within the site boundary)
- J.6 Scenic Resources [study area for scenic and aesthetic resources is 10 miles, as defined in OAR 345-001-0010(35)(b)]
- J.7 Recreation Opportunities [study area, as defined in OAR 345-001-0010(35)(d) is 5 miles]
- J.8 Land Use [study area, as defined in OAR 345-001-0010(35)(c), is 0.5 mile]
- J.9 Wildfire Risk [study area, as defined in OAR 345-001-0010(35)(c), is 0.5 mile]

J.1 Air Quality

During construction, air pollutant combustion emissions will be generated from diesel and gasoline engines in the various vehicles and construction equipment and facilities used in the construction of the Facility.

Fugitive dust may be generated from vehicle traffic on paved and unpaved roads and from equipment during construction activities. The Applicant will apply dust control measures, and will describe these further in the ASC.

The operation of the Facility will have no effect on air quality. During Facility operations, air pollutant sources will be limited to a small amount of fleet vehicles and equipment used by maintenance staff. The emissions and fugitive dust from these vehicles and equipment will be minor and will not exceed state emissions thresholds. Therefore, these emissions are not quantified and do not require a permit from DEQ.

A Basic ACDP permit may be required from DEQ if a portable concrete manufacturing plant is needed to provide concrete during construction. Obtaining the ACDP will be the responsibility of the batch plant owner or third-party contractor selected for Facility construction

J.2 Surface and Groundwater Quality and Availability

During construction, the Facility will not discharge pollutants to surface water or groundwater. Any temporary impacts from construction-related stormwater will be regulated under the conditions of the NPDES 1200-C permit and the associated erosion and sediment control plan (ESCP). Both the NPDES permit and the ESCP will be issued by DEQ. During operations, the O&M building will discharge domestic wastewater to approved onsite septic systems in compliance with local and state permitting requirements.

An estimated 45,000 gallons of water will be required during construction primarily for dust control, road compaction, and other activities. Generally, water used during operation of the O&M building is anticipated to be 30 gallons per person per day (no more than 500 gallons daily) and 160,000 gallons annually.

The Applicant will confirm the anticipated amount of water required for construction in the ASC. Additionally, the Applicant will confirm that the identified source or sources can meet the Facility's water requirements during construction. If the water source is not sufficient, an alternative source will be considered, or water will be obtained from a new well permitted under a limited water use license.

J.2.1 Wetlands and Waters of the State/United States

Data from the *National Wetlands Inventory* (NWI) and *National Hydrography Dataset* (NHD) were used to identify the potential presence of jurisdictional waters within the Facility site boundary (Figure 6). The NWI and NHD maps show several intermittent stream segments and ephemeral stream segments within the site boundary. Additional data from the NWI identified several wetlands in and near the Facility site boundary. These include palustrine scrub-shrub, palustrine forested, and palustrine emergent wetlands. Field surveys will be completed in the spring and a wetland delineation report detailing waters of the state, wetlands, and waters of the United States within the Facility site boundary will be provided in the ASC.

J.3 Fish and Wildlife Habitat

The proposed Facility and 0.5-mile study area are located on the western edge of the Eastern Cascades Slopes and Foothills Ecoregion, which encompasses the narrow region of the eastern slopes of the Cascade Mountain Range from central Washington through Northern California. This ecoregion is in the rain shadow of the Cascade Mountain Range, with greater temperature extremes and less precipitation than ecoregions to the west. The ecoregion is characterized by open forests of ponderosa pine (*Pinus ponderosa*) and some lodgepole pine (*P. contorta*), with vegetation adapted to the prevailing dry, continental climate and frequent fires. Volcanic cones and buttes are common in much of the region, and cropland and pastureland occur in the lake basins and larger river valleys.

Although the majority of the trees within the proposed Facility site boundary appear to have been previously harvested, patches of older forest may be present, especially in riparian areas protected from logging. The elevation within the proposed Facility site boundary ranges from approximately 3,792 to 4,694 feet above mean sea level. The proposed Facility is south of the Pelican Butte Sky-Lakes Conservation Area. Oregon Department of Fish and Wildlife (ODFW) modeled strategy habitats within the proposed Facility site boundary include aspen woodlands, oak woodlands and flowing water and riparian, ponderosa pine woodlands, and wetlands scattered throughout the site (ODFW 2025).

The Klamath River and Clover Creek are the only mapped fish-bearing streams within the study area of the proposed Facility site boundary, which ODFW has mapped as containing Chinook salmon, Coho salmon, steelhead, Pacific lamprey, and redband trout (ORBIC 2023, StreamNet 2025). The proposed Facility site boundary partially overlaps with mule deer and elk habitat (ODFW 2013, ODFW 2024, KCPD 2011).

J.4 Threatened, Endangered, and Sensitive Plant and Animal Species

Wildlife and habitat surveys will be conducted within the Facility site boundary in coordination with ODFW); an analysis of habitat and potential impacts will be detailed in the ASC. The Applicant considered a variety of publicly available resources to determine the threatened, endangered, and sensitive species, including listed plant species and state candidate plant species that may occur within the Facility site boundary and surrounding 5-mile study area (USFWS 2025a, ORBIC 2023, ODFW 2024). The information from these resources will inform the Applicant's surveys.

Based on a desktop review of available information, there is potential for federally protected species and state listed or candidate species to occur in the vicinity of the Facility. A query of the Oregon Biodiversity Information Center (ORBIC) database and U.S. Fish and Wildlife Service (USFWS) data also identified one bald eagle breeding site and nest and one golden eagle nest located within 5 miles of the proposed Facility.

Wildlife and habitat surveys will be performed to determine if federal or state threatened, endangered, candidate, or sensitive species are found within the Facility site boundary. Raptor nest surveys will be conducted to determine if raptor nests are found within 0.5 mile of the Facility site boundary.

Information collected in the wildlife and habitat reconnaissance surveys and raptor nest surveys will be used to analyze potential impacts to wildlife and wildlife habitat during construction and operation, as well as in the micro-siting of Facility components to minimize impacts. The results of these surveys will be presented in the ASC, including a site-specific habitat analysis and measures for avoiding, minimizing, and mitigating impacts developed in coordination with ODFW.

A desktop analysis using data provided by the National Land Cover Database (MRLC 2019) identified shrub/scrub and evergreen forest as the dominant land cover types within the Facility site boundary, as shown in Table J-1.

Table J-1. Land Cover within the Site Boundary

Land Cover	Acreage within Site Boundary	Percentage within Site Boundary
Developed, Open Space	495.53	5.8%
Developed, Low Intensity	11.82	0.1%
Evergreen Forest	5632.51	65.5%
Shrub/Scrub	2371.18	27.6%
Grassland/Herbaceous	55.96	0.7%
Woody Wetlands	25.66	0.3%
Emergent Herbaceous Wetlands	3.57	0.04%
Total	8,596.22	100%

Note: Totals are rounded.

J.5 Historic, Cultural, and Archaeological Resources

The Applicant will conduct cultural resource surveys within the Facility site boundary. These surveys will document the presence of historical, cultural, and archaeological resources and evaluate the significance of each for listing on the National Register of Historic Places. The study methodology will follow applicable Oregon State Historic Preservation Office regulations and standards for cultural resource

surveys and documentation, which meet the requirements of Section 106 of the National Historic Preservation Act (Public Law 89-665). The ASC will contain a detailed discussion of the potential impacts to potentially eligible resources.

J.6 Scenic Resources

The Applicant will perform a visual impact assessment of the potential effects of the Facility on areas identified and managed as scenic resources or for specific scenic qualities. The study areas for the visual impact assessment are 10 miles for scenic and aesthetic resources (ASC Exhibit R) and 20 miles for protected areas (ASC Exhibit L), in accordance with OAR 345-001-0010(35)(b).

Potential impacts to these areas will likely be negligible to minimal because the Facility does not include tall structures or features, may be screened by vegetation and topography, and may be outside of the viewshed of these areas. The visual assessment included in the ASC will propose mitigation measures for any significant potential impacts identified.

J.7 Recreation Opportunities

The study area for recreational opportunities consists of a 5-mile buffer around the Facility site boundary, in accordance with OAR 345-001-0010(59). Exhibit T of the ASC will include analysis of the potential impacts.

In general, recreational activities in the study area consist of wildlife viewing, boating, camping, hiking, photography, hunting, and angling. No existing recreational opportunities are located within the site boundary. In addition, the study area activities also occur in numerous locations outside the study area, and therefore provide recreational opportunities that are common and "replaceable" (OAR 345-022-0100).

J.8 Land Use

The study area for land use consists of a 0.5-mile buffer around the Facility site boundary, in accordance with OAR 345-001-0010(35)(d). The Facility's site boundary is within Klamath County's Forestry (F) zoning district. Applicable development standards for these zones, and any potentially applicable overlay zones, will be addressed in Exhibit K of the ASC. Land within the site boundary is currently used for commercial forestry and is open to the public for hunting. Impacts to forest land will also be further discussed in Exhibit K of the ASC.

J.9 Wildfire Risk

The study area for wildfire risk consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer, in accordance with OAR 345-001-0010(35)(c). Review of the Oregon Wildlife Risk Explorer (ODF n.d.) shows that the Facility site boundary and wildfire risk study area have low to moderate burn probability, based on wildfire simulation modeling. Exhibit V of the ASC will include more detailed analysis of baseline and seasonal fire risks, areas subject to heightened risk, and potential high-fire consequence areas in the wildlife study area pursuant to OAR 345-022-0115. If needed, the Applicant will prepare a Wildfire Mitigation Plan to demonstrate that the Facility will be designed, constructed, and operated in compliance with OAR 345-022-0115(b).

J.10 References

Klamath County Planning Division (KCPD). 2011. Official Klamath County Big Game Winter Range Overlay Map. Adopted in electronic format February 11, 2008. Updated August 24, 2011.

<https://klamathcounty.org/DocumentCenter/View/2682/Complete-Plan-PDF?bidId=>.

Multi-Resolution Land Characteristics Consortium (MRLC). 2019. National Land Cover Database (NLCD) 2016. <https://www.mrlc.gov/viewer/>.

Oregon Biodiversity Information Center (ORBIC). 2023. *Rare, Threatened, and Endangered Species of Oregon*. Institute for Natural Resources, Portland State University, Portland, Oregon. Oregon Department of Agriculture.

Oregon Department of Fish and Wildlife (ODFW). 2013. ODFW Winter Range for Eastern Oregon.

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Oregon Department of Fish and Wildlife (ODFW). 2024. Threatened, Endangered, and Candidate Fish and Wildlife Species. https://www.dfw.state.or.us/wildlife/diversity/species/docs/_and_Endangered_Species.pdf.

Oregon Department of Fish and Wildlife (ODFW). 2025. Oregon Conservation Strategy Database, online mapping tool. <https://compass.dfw.state.or.us/visualize>.

Oregon Department of Forestry (ODF). n.d. Oregon Wildfire Risk Explorer. Accessed August 28, 2025.

https://tools.oregonexplorer.info/oe_htmlviewer/index.html?viewer=wildfire.

StreamNet. 2025. StreamNet Mapper. Pacific States Marine Fisheries Commission.

<https://www.streamnet.org/home/data-maps/sn-mapper/>.

U.S. Fish and Wildlife Service (USFWS). 2025a. *Information for Planning and Consultation*.

<https://ecos.fws.gov/ipac/>.

U.S. Fish and Wildlife Service (USFWS). 2025b. *National Wetlands Inventory*.

<https://www.fws.gov/wetlands/>.

Exhibit K. Community Service Impacts

OAR 345-020-0011(1)(k)

- (k) *Exhibit K. Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of communities in the study area to provide the services listed in OAR 345-022-0110.*

Response:

This exhibit provides summary-level information about potential significant adverse impacts of construction and operation of the proposed Facility on the ability of communities in the study area [10 miles pursuant to OAR 345-001-0010(59)(b)] to provide sewers and sewage treatment, water, stormwater drainage, solid waste management, housing, traffic safety, police and fire protection, health care, and schools. Additional analysis of potential impacts to each of these community services resulting from construction and operation of the Facility will be included in the ASC.

K.1 Sewers and Sewage Treatment

During construction, sanitary waste will be collected onsite in portalets. During operations, the O&M building will discharge domestic wastewater to approved onsite septic systems in compliance with local and state permitting requirements. Because there will be no connection to the community sewer systems, no significant adverse impacts are anticipated.

K.2 Water

K.2.1 Construction

During Facility construction, water will be required for dust control, road compaction, and other activities. The contractor will arrange for delivery of water to the site via water trucks from a permitted municipal or commercial source with an existing water right. Approximately 45,000 gallons of water are anticipated to be used each day for site condition control and construction activities.

K.2.2 Operation

During Facility operations, water use will primarily be for the O&M building. The Applicant plans to obtain water from a permitted municipal or commercial water source with an existing water right, use rain tanks, or construct an exempt well, as allowed under ORS 537.545. Generally, water used during operation of the Facility at the O&M building is anticipated to be 30 gallons per person per day (no more than 500 gallons daily) and 160,000 gallons annually.

K.2.3 Summary

The Applicant will confirm the anticipated amount of water required for construction and operations in the ASC. Additionally, the Applicant will confirm that the identified source is capable of meeting the Facility's water requirements during construction. If the water source is not sufficient, an alternative offsite source will be considered.

During Facility construction and operation, water will only be obtained from permitted sources with adequate water rights. Therefore, public water systems will not be adversely affected by construction or operation of the Facility.

K.3 Stormwater Drainage

Currently, no community in the area provides stormwater drainage service to the area within the Facility site boundary, except for stormwater drainage facilities associated with public roads maintained by Klamath County. Because the ground under the arrays will be pervious, stormwater will be able to infiltrate onsite and erosion will be minimized. In addition, there will be gravel around the substation, POI switching station, and O&M building to allow stormwater infiltration onsite. A detailed civil design and hydrology assessment will be completed prior to construction to verify no negative downstream impacts will occur as a result of construction. Therefore, construction of the Facility will not result in large, new, impervious areas that generate significant stormwater runoff.

The Facility will be constructed and operated with its own stormwater management systems, consistent with a NPDES 1200-C permit issued by DEQ as well as a DEQ-approved ESCP.

Stormwater management infrastructure installed during construction of the solar modules will be left in place as needed to continue functioning throughout the life of the Facility and support O&M activities. One example is roadside ditches along service roads. These features will be located on private land, and will not affect stormwater management services provided by any public agency.

K.4 Solid Waste Management

The Facility will adhere to the relevant waste handling and disposal regulations governed by Klamath County. The public landfill closest to the Facility is the Klamath County Landfill, located approximately 11 miles northwest of the Facility. Solid waste disposal for the Facility during construction and operations will be provided through a private contract with a local commercial hauler (or haulers) and is not anticipated to disrupt services already being provided to local communities. The generated waste will be managed using best management practices to prevent any fire, health, or safety hazards and will be stored safely until the waste can be transported for recycling or proper disposal. The Facility's waste management plan, including private contracts for hauling, will be designed to avoid disrupting existing services in the surrounding communities.

K.5 Housing

K.5.1 Construction

During construction, a peak construction workforce of 600 workers will be employed. Most construction workers will be employees of construction and equipment companies under contract to the Applicant. Workers will include a mix of local and nonlocal personnel, with nonlocal personnel more likely for specialized construction (for example, substation construction, solar array assembly, and solar array testing). Thus, some construction workers are expected to come from outside of the study area and will require temporary housing. Construction workers hired from areas outside a commutable distance will likely stay in local motels, trailer parks, or other rental units during their stay. The increased demand created by construction workers could potentially impact temporary housing in the vicinity of the Facility if an adequate supply is unavailable. Local hiring may be greater and will depend on the availability of workers with appropriate skills. Additional workers may commute daily from communities outside the Facility study area (e.g., Klamath Falls and Ashland), which will lessen the impacts associated with the influx of outside workers.

Typical housing options for temporary workers include motels, hotels, apartments, short-term rental homes, and campgrounds or other areas where workers can park trailers or other mobile housing. Workers

from outside the area will benefit the community and local businesses by renting rooms, eating at local restaurants, and purchasing goods and services.

K.5.2 Operations

The Facility is not anticipated to require fulltime O&M staff. The Applicant will monitor the Facility remotely, with an estimated 8 to 14 technicians deployed on an as-needed basis for maintenance and repairs. It is expected that O&M staff will be hired locally (i.e., within a 2-hour radius of the Facility site), with the exception of positions that may require previous experience at other solar generation facilities. Some specialized third-party contractors also may be required for equipment repairs. The assumption is that operations will continue for at least 35 years. No significant adverse impacts are anticipated as a result of housing operational personnel.

K.6 Traffic Safety

The primary transportation corridors are assumed to carry the majority of construction-related heavy-duty and light-duty delivery vehicles, as well as some workforce traffic. These corridors will likely be Interstate 5, US-97, OR-66, and Klamath County local roads such as Clover Creek Road. For a facility this size, the Applicant anticipates approximately 2,500 trucks will be used during the course of construction.

During construction, trucks will be accessing the Facility using these transportation corridors. Heavy-duty trucks will carry Facility components as well as gravel and other materials required to improve access roads from existing roadways. Lighter-duty trucks will also deliver water, electrical equipment, and other materials. Construction-related vehicles are not expected to cause traffic safety hazards or traffic delays due to the rural nature of the area. Any improvements, if necessary, to County roads will be restricted to areas within the County rights-of-way and subject to approval. If necessary, a traffic management plan will be developed in cooperation with Klamath County to minimize traffic safety impacts. In addition, if necessary, the Applicant will enter into road use agreements with Klamath County to ensure that public roads impacted by construction will be left in “as good or better” condition than that which existed prior to the start of construction.

During operations, traffic impacts from technician visits are not anticipated. The Applicant intends to hire O&M personnel locally, where feasible. Employees will travel to work in their personal vehicles. Specialized personnel responsible for repairs of select pieces of equipment may be hired from outside the area and may travel in light-duty trucks. Delivery trucks may also access the site on an infrequent basis. An analysis of traffic generated from both construction and operation of the Facility will be included in the ASC.

K.7 Police and Fire Protection

Police service is primarily provided by county police departments in the vicinity of the Facility. The Applicant will seek assistance from the Klamath County Sheriff's Office, located in Klamath Falls, which serves the Facility area (KCSO 2025). The number of new temporary and permanent employees is not anticipated to place significant new demands on law enforcement agencies in the area.

The Applicant will work with the Keno Rural Fire Protection District, the Klamath County Fire District, or both, to verify adequate fire protection and develop a comprehensive Wildfire Prevention and Risk Mitigation Plan to be included in Exhibit V of the ASC (KRFPD 2025; KCFD 2025). The Applicant will provide construction plans and phasing information, and identify the location of Facility structures and their points of access. In addition, the Wildfire Prevention and Risk Mitigation Plan will include first aid and emergency response procedures tailored to the construction and operation phases of the Facility. The Facility will be equipped with fire protection equipment in accordance with the Oregon Fire Code. Given

the inherent fire safety features of Facility components and the relatively small number of new temporary residents during construction, significant new demands on fire protection resources are not anticipated.

K.8 Health Care

The Facility will be served by regional hospitals and healthcare services. The nearest hospitals to the Facility are the Sky Lakes Medical Center, approximately 9 miles east in Klamath Falls, and Asante Ashland Community Hospital, approximately 35 miles west in Ashland. Both facilities provide emergency and surgical services (Sky Lakes 2025; Asante 2025).

Ørsted holds safety as a top priority and strives for a zero Total Recordable Incident Rate on all projects. Impacts on local health care services during both construction and operation will be minimized by careful management of site health and safety risks. A health and safety plan will be developed for construction activities. The plan will include risk avoidance and minimization measures. During construction and operation, the Facility will rely on local emergency services and there will be a transportation plan for potential medical emergencies. The estimated number of new temporary and permanent employees is not expected to place significant new demands on routine health care services.

K.9 Schools

The Facility site boundary encompasses Klamath County School District, which has the nearest school, Keno Elementary School, approximately 2 miles south of the Facility site boundary. The Facility's 10-mile analysis area for public services also encompasses the Klamath Falls City Schools District. The school in this district closest to the Facility is Pelican Elementary School, located approximately 8 miles northwest of the Facility site boundary. No significant adverse impacts to schools are anticipated during construction and operation of the Facility. Construction will be temporary and short-term, and much of the peak work period (March through October) will occur during the summer months when school is not in session. Consequently, new students are not expected to relocate to the area as a result of construction.

During Facility operations, any increase in the local population due to hiring of Facility O&M staff would be too small to produce any kind of tangible increase in school enrollment. O&M staff will be hired locally if possible, and will consist of an estimated 8 to 14 individuals. Given the number of schools in the study area, the dispersed area in which new residents are likely to settle, and the small number of new school children expected, it is unlikely that any one school will receive more new students than it can accommodate.

K.10 References

Asante. 2025. "Asanta Ashland Community Hospital." <https://www.asante.org/Locations/location-detail/asante-ashland-community-hospital/>.

Klamath County Fire District 1 (KCFD). 2025. "About the District." <https://kcf1.com/about-the-district>.

Klamath County Sheriff's Office (KCSO). 2025. "Klamath County Sheriff's Office." <https://www.klamathcounty.org/291/Sheriffs-Office>.

Keno Rural Fire Protection District (KRFPD). 2025. "About Keno Fire Department." <http://www.kenofire.com/about.html>.

Sky Lakes. 2025. "Find Care." <https://www.skylakes.org/services/>.

Exhibit L. Protected Areas

OAR 345-020-0011(1)(l)

- (l) *Exhibit L. A list of all protected areas in the study area for impacts to protected areas identifying:*
- (A) *The distance and direction of the protected area from the proposed facility;*
 - (B) *The basis for protection of the area, by reference to a specific subsection of OAR 345-001-0010(26); and*
 - (C) *The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area;*

Response:

The protected areas study area is a 20-mile buffer surrounding the Facility site boundary, per OAR 345-001-0010(35)(e). Protected areas are defined and listed in OAR 345-001-0010(26). Table L-1 lists known protected areas within the study area. Figure 5 shows the protected areas. The ASC (Exhibit L) will provide a detailed analysis of the potential impacts to identified protected areas.

Table L-1. Protected Areas within 20 Miles of Site Boundary

Type	Area Name	Approximate Distance to Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
National Park or other unit of the National Park System OAR 345-001-0010(26)(a)	California National Historic Trail	0.01	S, SW, W	National Park Service National Trails 1100 Old Santa Fe Trail Santa Fe, NM 87505	Confirmed via US National Park Service, National Historic Trails map
National Monument OAR 345-001-0010(26)(b)	Cascade-Siskiyou National Monument	5.1	W-SW	Medford Ashland Field Office 3040 Biddle Rd, Medford, OR 97504 (541) 618-2200	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
Wilderness Area OAR 345-001-0010(26)(c)	Mountain Lakes Wilderness	4.0	N-NW	Klamath Ranger District 2819 Dahlia Street, Suite A Klamath Falls, OR 97601 USA (541) 885-3400	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
	Sky Lakes Wilderness	15.8	NW	Klamath Ranger District 2819 Dahlia Street, Suite A Klamath Falls, OR 97601 USA (541) 885-3400	
	Soda Mountain Wilderness	17.0	W-SW	Medford Ashland Field Office 3040 Biddle Rd, Medford, OR 97504 (541) 618-2200	
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	Klamath River (Upper)	6.2	S-SW	Klamath Falls Field Office 2795 Anderson Avenue, Bldg. #25 Klamath Falls, OR 97603 (541) 883-6916	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
	Spring Creek	18.0	SW	Medford Ashland Field Office 3040 Biddle Rd, Medford, OR 97504 (541) 618-2200	
	Jenny Creek	13.8	SW	Medford Ashland Field Office 3040 Biddle Rd, Medford, OR 97504 (541) 618-2200	
National Wildlife Refuge included in the National Wildlife Refuge System OAR 345-001-0010(26)(e)	Bear Valley National Wildlife Refuge	4.3	S	Klamath Basin National Wildlife Refuge Complex 4009 Hill Rd, Tulelake, CA 96134 (530) 667-2231	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
	Lower Klamath National Wildlife Refuge	10.1	SE	Klamath Basin National Wildlife Refuge Complex 4009 Hill Rd, Tulelake, CA 96134 (530) 667-2231	
	Upper Klamath National Wildlife Refuge	9.5	N-NW	Klamath Basin National Wildlife Refuge Complex 4009 Hill Rd, Tulelake, CA 96134 (530) 667-2231	

Table L-1. Protected Areas within 20 Miles of Site Boundary

Type	Area Name	Approximate Distance to Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
National Fish Hatcheries OAR 345-001-0010(26)(f)	Klamath Falls National Fish Hatchery	12.6	SE	Klamath Falls Fish and Wildlife Office 1936 California Avenue Klamath Falls, OR 97601 (541) 885-8481	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	N/A	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)
Wilderness Study Area OAR 345-001-0010(26)(h)	Mountain Lakes Wilderness Study Area	5.0	N	BLM, Klamath Falls Field Office 7879, 2795 Anderson Ave #25 Ste 25, Klamath Falls, OR 97603 (541) 883-6916	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	Moon Prairie	16.2	W	Medford Ashland Field Office 3040 Biddle Rd, Medford, OR 97504 (541) 618-2200	Confirmed via BLM Oregon Areas of Critical Environmental Concern (BLM 2021)
	Upper Klamath River	6.1	S-SW	Lakeview Klamath Falls Field Office 2795 Anderson Avenue, Bldg. #25 Klamath Falls, OR 97603 (541)-883-6916	
	Old Baldy	10.9	W	Lakeview Klamath Falls Field Office 2795 Anderson Avenue, Bldg. #25 Klamath Falls, OR 97603 (541)-883-6916	
	Upper Klamath River Addition	5.3	S	Lakeview Klamath Falls Field Office 2795 Anderson Avenue, Bldg. #25 Klamath Falls, OR 97603 (541)-883-6916	
	Tunnel Creek	7.2	W	Lakeview Klamath Falls Field Office 2795 Anderson Avenue, Bldg. #25 Klamath Falls, OR 97603 (541)-883-6916	
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	N/A	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)
Research Natural Area OAR 345-001-0010(26)(i)(C)	Old Baldy Research Natural Area	11.5	W	7879, 2795 Anderson Ave #25 Ste 25 Klamath Falls, OR 97603 (541) 883-6916	Confirmed via Oregon Natural Area Plan of 2020 (ORBIC 2020)
	Oregon Gulch Research Natural Area	19.9	SW	7879, 2795 Anderson Ave #25 Ste 25 Klamath Falls, OR 97603 (541) 883-6916	

Table L-1. Protected Areas within 20 Miles of Site Boundary

Type	Area Name	Approximate Distance to Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	N/A	N/A	N/A	N/A	Confirmed none via Experimental Forest and Range Areas data layer (USFS 2022)
Special Interest Area designated for scenic, geologic, botanic, zoologic, paleontological, archaeological, historic, or recreational values, or combinations of these values OAR 345-001-0010(26)(i)(E)	Hogback Mountain Special Recreation Management Area	13.3	E	Oregon BLM	Confirmed via Oregon Bureau of Land Management (2025)
	Pacific Crest Trail Corridor Special Recreation Management Area	11.6	W	Oregon BLM	
State park, wayside, corridor, monument, historic, or recreation area under the jurisdiction of the Oregon Parks and Recreation Department OAR 345-001-0010(26)(j)	OC&E Woods Line	9.7	E-NE	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707	Confirmed via Oregon Parks and Recreation, Oregon Spatial Data Library (OPRD 2014)
Willamette River Greenway OAR 345-001-0010(26)(k)	N/A	N/A	N/A	N/A	N/A
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(l)	Ewauna Flat Preserve	9.9	E	The Nature Conservancy 226 Pine St, Klamath Falls, OR 97601 (541) 273-0789	Confirmed via Oregon Natural Area Plan of 2020 (ORBIC 2020)
	Williamson River Delta Preserve	15.5	N	The Nature Conservancy 226 Pine St, Klamath Falls, OR 97601 (541) 273-0789	
	Williamson River Delta - Goose Bay Preserve	15.9	N	The Nature Conservancy 226 Pine St, Klamath Falls, OR 97601 (541) 273-0789	
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	N/A	N/A	N/A	N/A	Confirmed none via Oregon Natural Area Plan of 2020 (ORBIC 2020).
State Scenic Waterway OAR 345-001-0010(26)(n)	N/A	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)

Table L-1. Protected Areas within 20 Miles of Site Boundary

Type	Area Name	Approximate Distance to Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	Miller Island Wildlife Management Area	5.0	E	Klamath Wildlife Area 1850 Miller Island Road West Klamath Falls, OR 97603 (541) 883-5732	Confirmed via Oregon Department of Fish and Wildlife, Wildlife Areas Data Clearinghouse (ODFW 2022)
	Shoalwater Bay	10.1	N	Klamath Wildlife Area 1850 Miller Island Road West Klamath Falls, OR 97603 (541) 883-5732	
	Gorr Island	5.6	SE	Klamath Wildlife Area 1850 Miller Island Road West Klamath Falls, OR 97603 (541) 883-5732	
	Sesti Tgawaals Point	8.8	N-NE	Klamath Wildlife Area 1850 Miller Island Road West Klamath Falls, OR 97603 (541) 883-5732	
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	N/A	N/A	N/A	N/A	Confirmed none via Oregon Department of Fish and Wildlife - Natural Resources Information Management Program - Hatchery Data (ODFW 2014)
Agricultural experiment station, experimental area, or research center established by Oregon State University OAR 345-001-0010(26)(q)	Klamath Basin Research and Extension Center	9.8	E	Klamath Basin Research and Extension Center 6941 Washburn Way Klamath Falls, OR 97603 (541) 883-4590	Reviewed using OSU website and PDF maps (OSU 2025).
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	N/A	N/A	N/A	N/A	Reviewed using OSU website and PDF maps (OSU 2025).

Source: U.S. Geological Survey Gap Analysis Project. GAP. 2024, Protected Areas Database of the United States (PAD-US) 4.1: U.S. Geological Survey data release, <https://doi.org/10.5066/P96WBCHS>.

N/A = not applicable

Exhibit M. Water Sources and Use

OAR 345-020-0011(1)(m)

(m) *Exhibit M. Information about anticipated water use during construction and operation of the proposed facility, including:*

(A) *A description of each source of water and the applicant's estimate of the amount of water the facility will need from each source;*

Response:

M.1 Construction

The construction contractor will be responsible for obtaining water for construction including any required permits. Water will be required during Facility construction, primarily for dust control, road compaction, and other activities. During construction, the contractor will arrange for delivery of water to the site using water trucks from an existing offsite municipal or commercial source via bilateral agreements. Approximately 45,000 gallons of water per day will be needed for construction of the Facility. Daily water use will vary depending on the timing of construction and the weather (e.g., water use for dust control will increase in dry, windy summer conditions).

In the ASC, the Applicant will confirm the anticipated amount of water required for construction. Additionally, the ASC will confirm that the identified source is capable of meeting the Facility's water requirements during construction.

M.2 Operations

During Facility operations, water use will primarily be for the O&M building, where water will be used for a small kitchen, bathroom, shower, and eye wash station. Potable water at the O&M building will likely come from rain tanks, well water, or an offsite municipal or commercial source if reasonably nearby. The Applicant does not plan to wash solar panels during operations. Generally, water used during operations is expected to be no more than 500 gallons per day. If water for operations is not available from an existing well or nearby municipality or commercial source, the Applicant will construct an exempt onsite well allowed under ORS 537.545.

(B) *If a new water right is required, the approximate location of the points of diversion and the estimated quantity of water to be taken at each point; and*

Response:

The Applicant does not anticipate needing new water rights for the proposed Facility. Therefore, this rule is not applicable.

(C) *For operation, the source of cooling water and the estimated consumptive use of cooling water, based on annual average conditions.*

Response:

The proposed Facility does not require cooling water. Therefore, this rule is not applicable.

Exhibit N. Carbon Dioxide Emissions

OAR 345-020-0011(1)(n)

- (n) ***Exhibit N.** If the proposed facility would emit carbon dioxide, an estimate of the gross carbon dioxide emissions that are reasonably likely to result from the operation of the facility and a statement of the means by which the applicant intends to comply with the applicable carbon dioxide emissions standard under OAR 345-024-500.*

Response:

The proposed Facility will not emit carbon dioxide. Therefore, this exhibit is not applicable.

Exhibit O. Evaluation of Statutes, Rules, and Ordinances

OAR 345-020-0011(1)(o)

- (o) **Exhibit O.** Identification, by legal citation, of all state statutes and administrative rules and local government ordinances containing standards or criteria that the proposed facility must meet for the Council to issue a site certificate, other than statutes, rules and ordinances identified in Exhibit E, and identification of the agencies administering those statutes, administrative rules and ordinances. The applicant must analyze and describe any problems the applicant foresees in satisfying the requirements of any such statute, rule or ordinance.

Response:

Table O-1 identifies state statutes, administrative rules, and local government ordinances not identified in Exhibit E. The statutes, rules, and ordinances identified in Table O-1 specify the standards or criteria that the proposed Facility must meet for the Council to issue a site certificate. The Applicant does not anticipate difficulty in meeting specific requirements.

Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria

Department	Legal Citation	Agency Address
Oregon Department of Agriculture	OAR 345-022-0070 Threatened and Endangered Species Plant Conservation Biology Program—ORS 564; OAR Chapter 603, Division 73	Oregon Department of Agriculture 635 Capitol Street, N.E. Salem, OR 97301-2532 503-986-4550
Oregon Biodiversity Information Center (formerly the Oregon Natural Heritage Information Center)	OAR 345-022-0070 Threatened and Endangered Species ORS 564.105; OAR 603, Division 73 and OAR 345-022-0070	Oregon Biodiversity Information Center Oregon State University Institute for Natural Resources University Center Building, Suite 335 527 SW Hall Street Portland, OR 97201
Oregon Department of Environmental Quality—Hazardous Waste Management	OAR 345-022-0120 Waste Minimization ORS 465 and 466; OAR Chapter 340, Divisions 100-113	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 503-229-5696
Oregon Department of Environmental Quality—Noise	OAR 345-022-0020 General Standard of Review ORS 467; OAR Chapter 340, Division 35	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 503-229-5696
Oregon Department of Environmental Quality—Solid Waste	OAR 345-022-0120 Waste Minimization ORS 459; OAR Chapter 340, Division 93	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 503-229-5696

Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria

Department	Legal Citation	Agency Address
Oregon Department of Environmental Quality—Water Quality	OAR 345-022-0022 Soil Protection ORS 468 and 468B; OAR Chapter 340, Divisions 14, 41, 45, 52, and 55	Oregon Department of Environmental Quality 803 Main Street, Suite #201 Klamath Falls, OR 97604-9998 (503) 229-5257
Oregon Department of Fish and Wildlife—Habitat Conservation Division	OAR 345-022-0060 Fish and Wildlife Habitat and OAR 345-022-0070 Threatened and Endangered Species ORS 496 and 506; OAR Chapter 635, Divisions 100 and 415	Oregon Department of Fish and Wildlife 1850 Miller Island Road Klamath Falls, OR 97603 (541) 883-5732
Oregon Department of Geology and Mineral Industries	OAR 345-022-0020 Structural Standard OAR Chapter 632	Oregon Department of Geology and Mineral Industries 800 NE Oregon Street, Suite 965 Portland, OR 97232 971-673-1555
Oregon Department of Land Conservation and Development	OAR 345-022-0030(2) and (3) Land Use Oregon Statewide Planning Goals, applicable Klamath County municipal code and criteria, and any exceptions granted by the Council under OAR 345-022-0030(4). ORS Chapter 197, ORS 215.274; OAR Chapter 660	Oregon Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301-2540 503-373-0050
Oregon Office of State Fire Marshal	OAR 345-022-0115 Wildfire Prevention and Risk Mitigation ORS 453; OAR Chapter 837, Divisions 85 and 95	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473
Oregon Parks and Recreation Department—Archaeological	OAR 345-022-0090 Historic, Cultural and Archaeological Resources Native American Graves and Protected Objects—ORS 97.740-97.760 Archaeological Objects and Sites—ORS 358.905-358.961	State Historic Preservation Office 725 Summer St. NE, Suite C Salem, OR 97301 503-986-0671

Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria

Department	Legal Citation	Agency Address
Oregon Water Resources Department–Water Rights Division	OAR 345-022-0020 General Standard of Review Appropriation of Water Generally–ORS Chapter 537 Distribution of Water; Watermasters; Change in Use; Transfer or Forfeiture of Water Rights–ORS Chapter 540 Water Resources Administrative Rules–OAR Chapter 690	Oregon Water Resources Department Water Rights Section, District 17 3125 Crosby Ave Klamath Falls, OR 97603 (541) 883-4182

Exhibit P. Schedule

OAR 345-020-0011(1)(p)

(p) **Exhibit P.** A schedule stating when the applicant expects to submit a preliminary application for a site certificate.

Response:

Table P-1 provides a schedule of key EFSC milestones, including the expected submittal date for the preliminary ASC.

Table P-1. Proposed Schedule for Submittal of Notice and Intent and Preliminary Application for Site Certificate

Activity	Target Completion Date
Applicant submits NOI to ODOE	December 2025
ODOE reviews NOI, distributes public notice, conducts public information meeting, facilitates comment period, and issues Project Order	December 2025 – May 2026
Applicant submits preliminary ASC to ODOE	May 2027

Exhibit Q. Evidence of Consultation with Legislative Commission on Indian Services

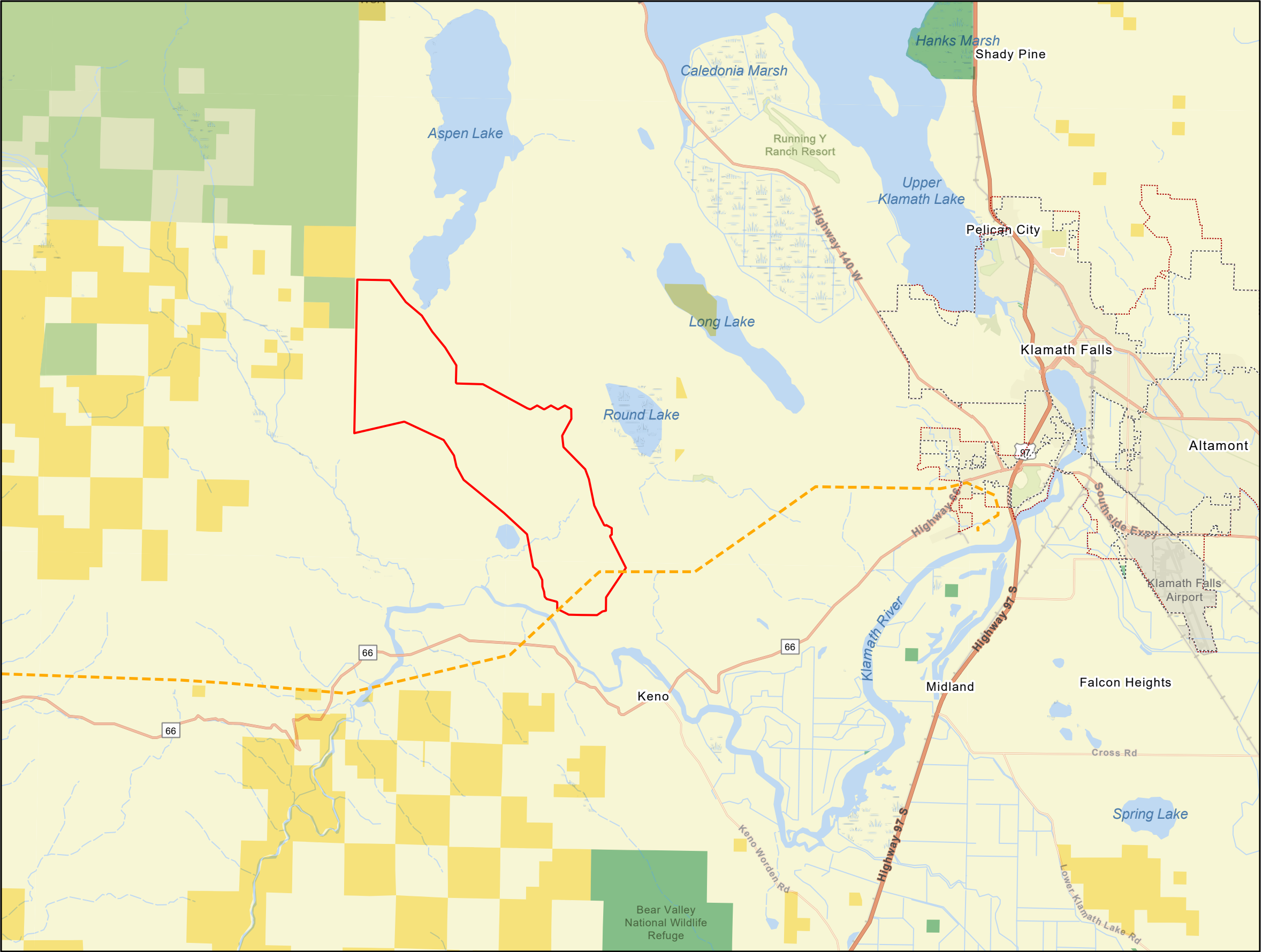
OAR 345-020-0011(1)(q)

(q) ***Exhibit Q.** Evidence of consultation with the Legislative Commission on Indian Services to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources.*

Response:

Evidence of consultation with the Legislative Commission on Indian Services is provided as Attachment C.

Figures



Legend

- Facility Site Boundary
- PacifiCorp Klamath Falls-Meridian 500-kV Transmission Line
- City Limit
- Urban Growth Boundary

Federal Land Ownership

- Bureau of Land Management
- Fish and Wildlife Service
- Forest Service

Basemap Source:
Esri World Street Map

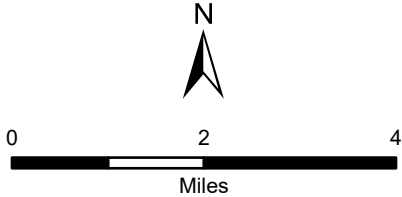


Figure 1
Facility Vicinity
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon





- Legend**
- Facility Site Boundary
 - PacifiCorp Klamath Falls-Meridian 500-kV Transmission Line

Basemap Source:
Esri World Imagery

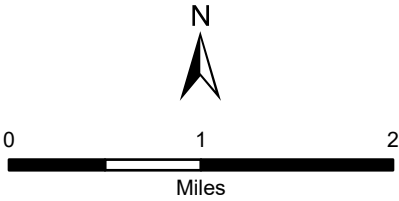
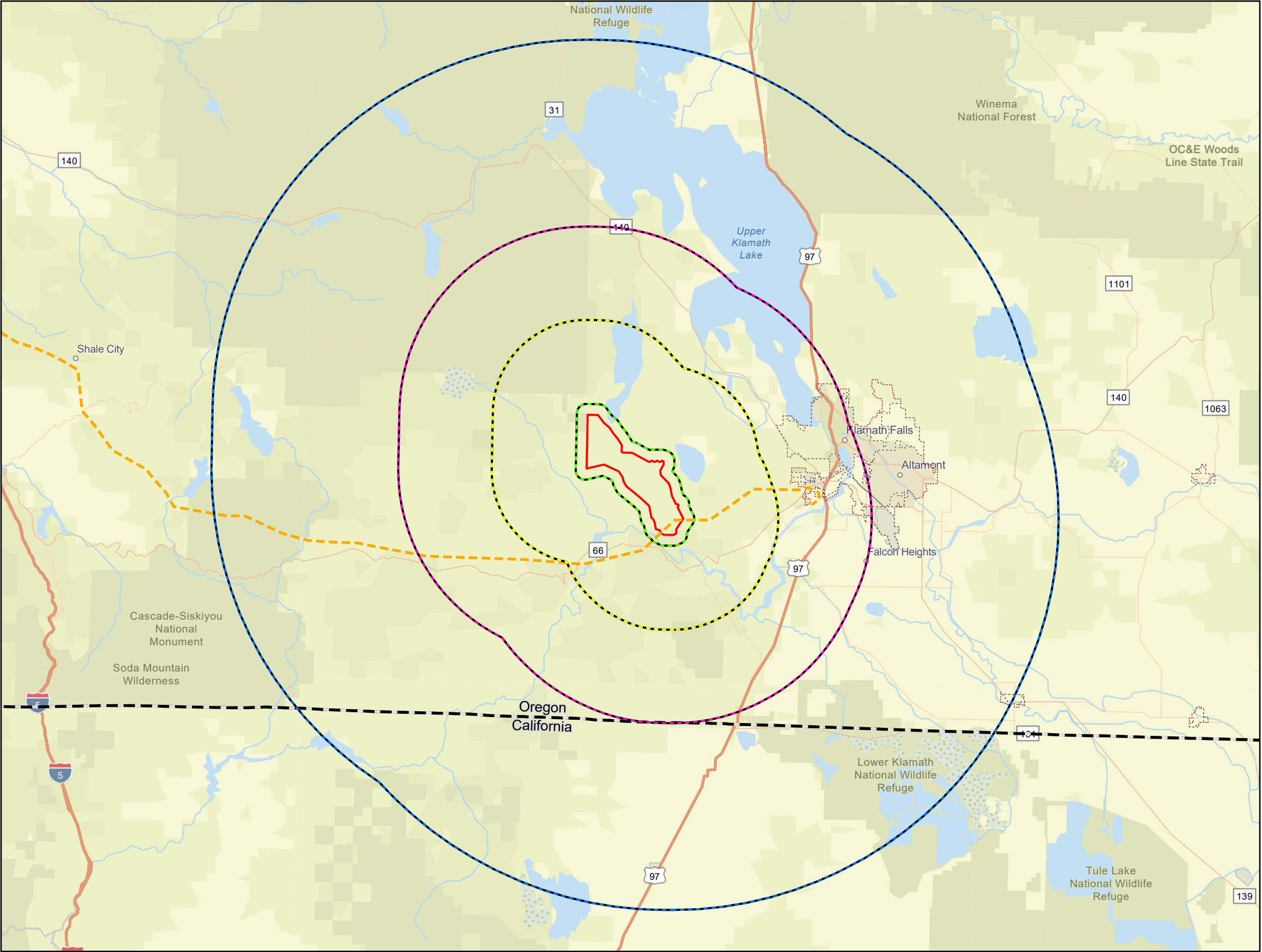


Figure 2
Overview of Facility
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon





- Legend**
- Facility Site Boundary
 - PacifiCorp Klamath Falls-Meridian 500-kV Transmission Line
 - State Boundary
 - City Limit
 - Urban Growth Boundary
 - Land Use and Fish and Wildlife Habitat Areas (0.5-mile)
 - Recreational Opportunities/Threatened and Endangered Species Areas (5-mile)
 - Scenic Resources and Public Services Areas (10-mile)
 - Protected Areas (20-mile)

Basemap Source:
Esri World Street Map

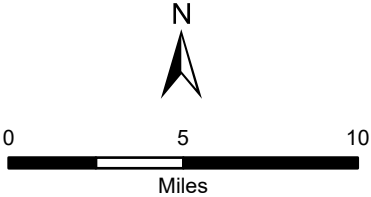
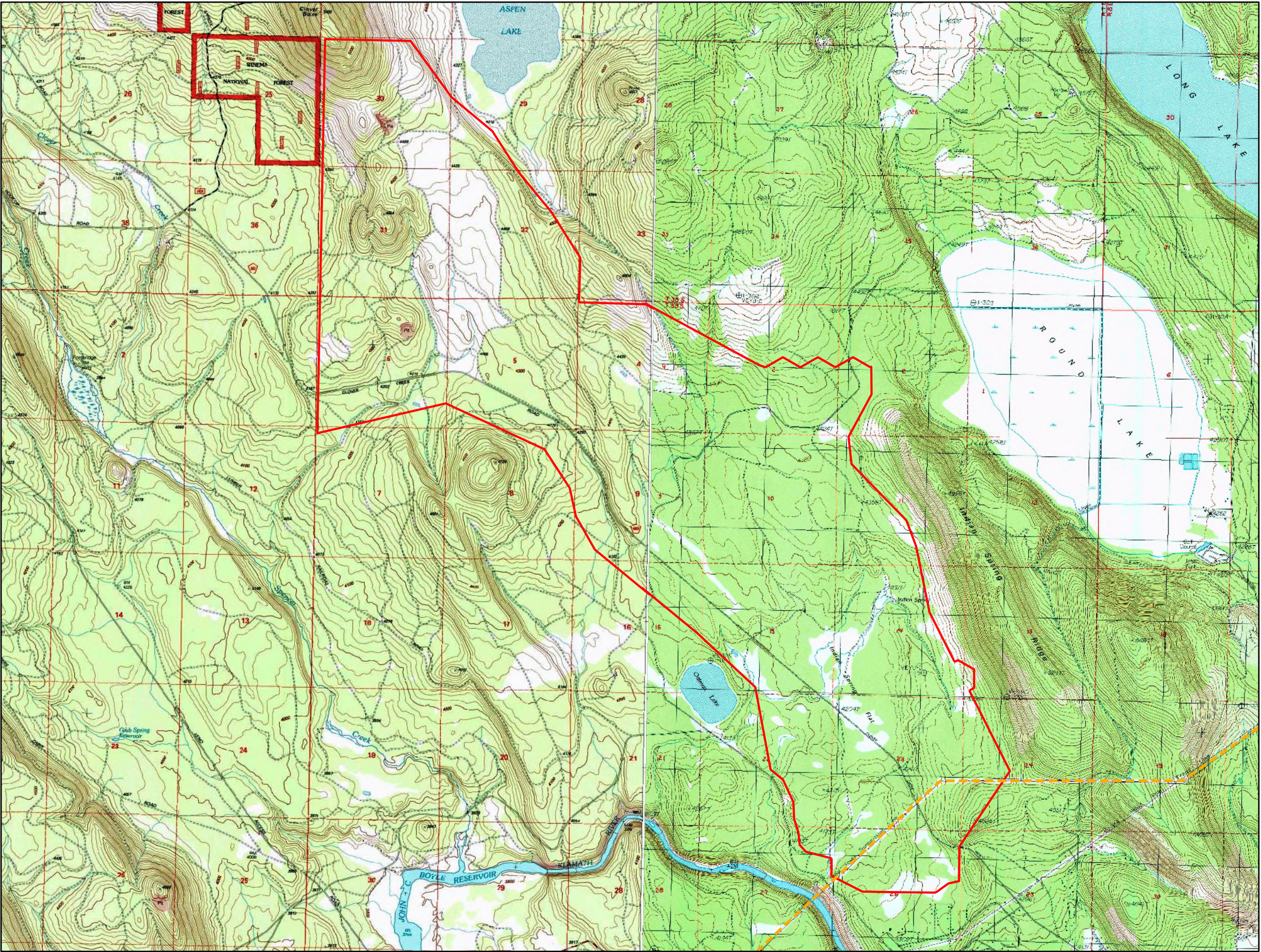


Figure 3
Study Area Boundaries
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon



Legend

- Facility Site Boundary
- PacifiCorp Klamath Falls-Meridian 500-kV Transmission Line

Basemap Source:
USGS 1:24,000 topographic maps: Keno, OR (1985)
and Spencer Creek, OR (1998).

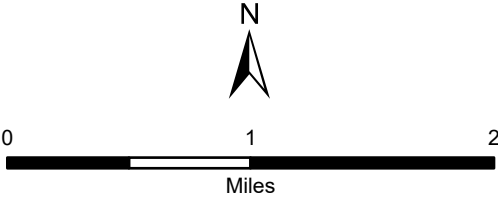
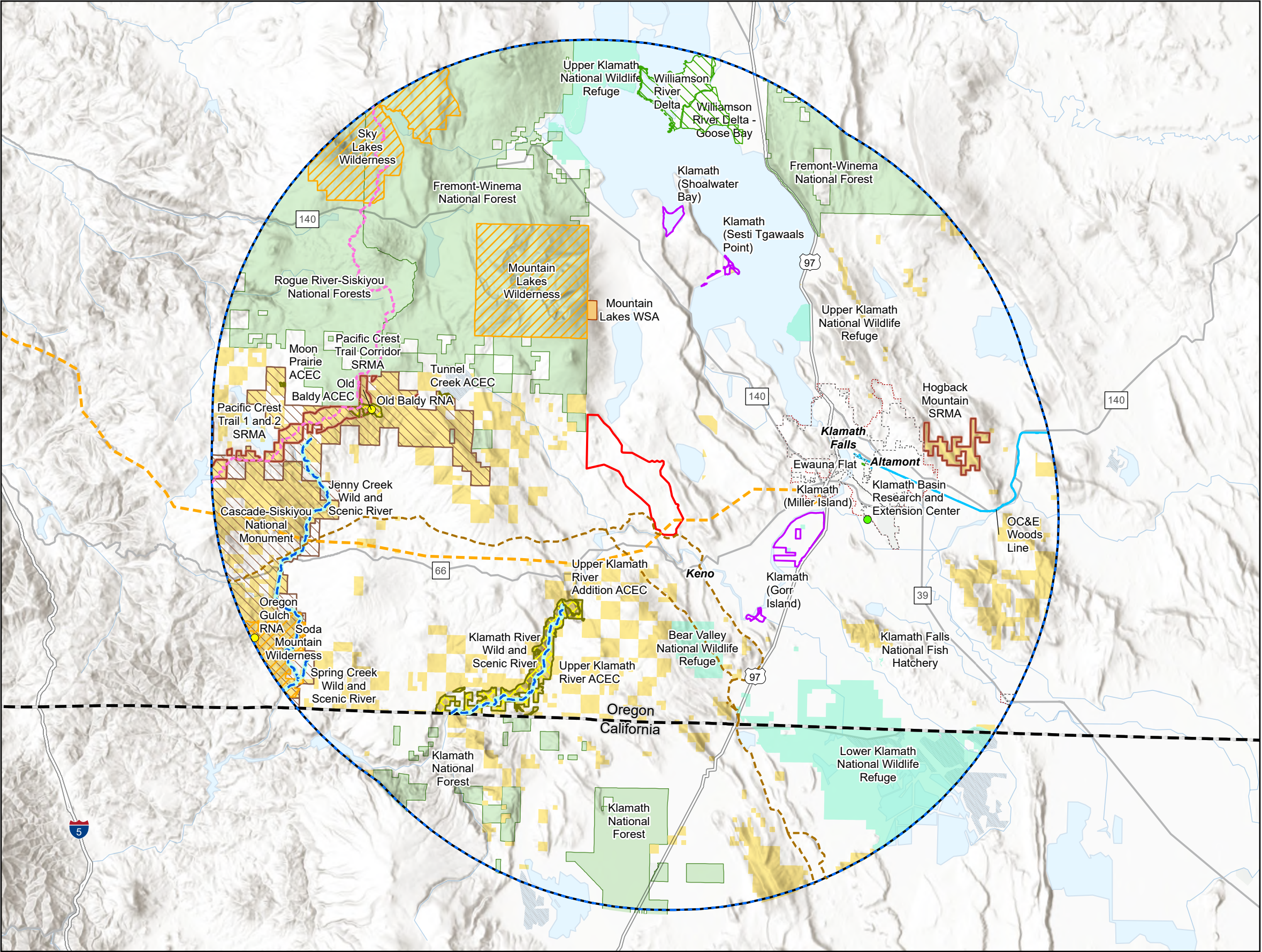


Figure 4
Topography
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon





- Legend**
- Facility Site Boundary
 - PacifiCorp Klamath Falls-Meridian 500-kV Transmission Line
 - Protected Areas Analysis Area (20 miles)
 - State Boundary
 - City Limit
 - Urban Growth Boundary
 - Agricultural Experiment Station
 - Research Natural Area (RNA)
 - ODFW Wildlife Areas
 - Oregon State Trail
 - Pacific Crest Trail
 - California National Historic Trail
 - National Wild and Scenic River
 - National Monument
 - Area of Critical Environmental Concern (ACEC)
 - Special Recreation Management Area (SRMA)
 - Designated Wilderness
 - Wilderness Study Area (WSA)
 - Nature Preserve
 - Federal Land Ownership
 - Bureau of Land Management
 - Forest Service
 - Fish and Wildlife Service

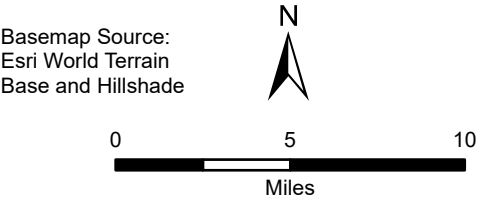


Figure 5
Protected Areas
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon

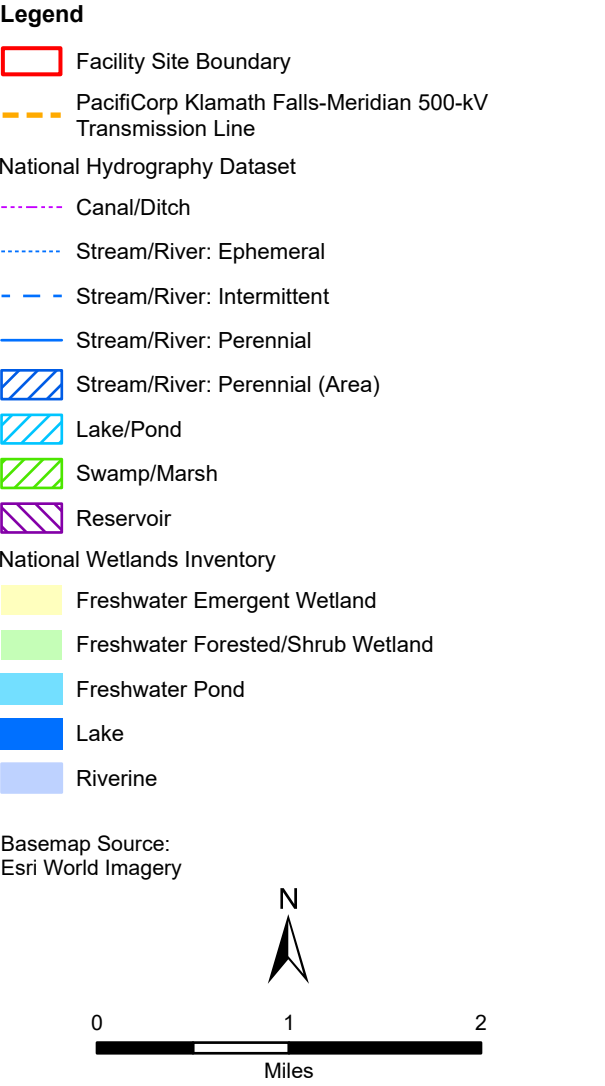
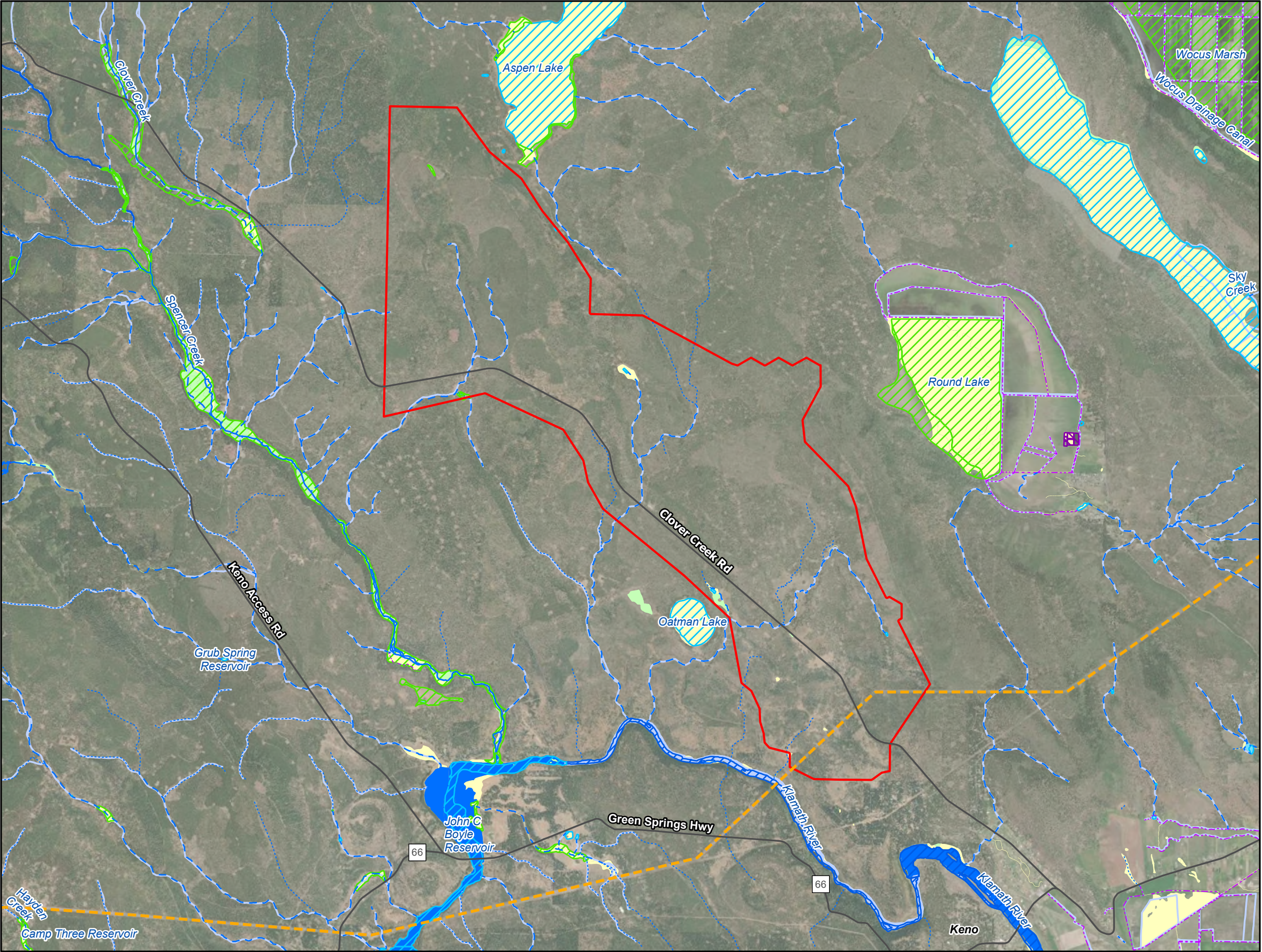
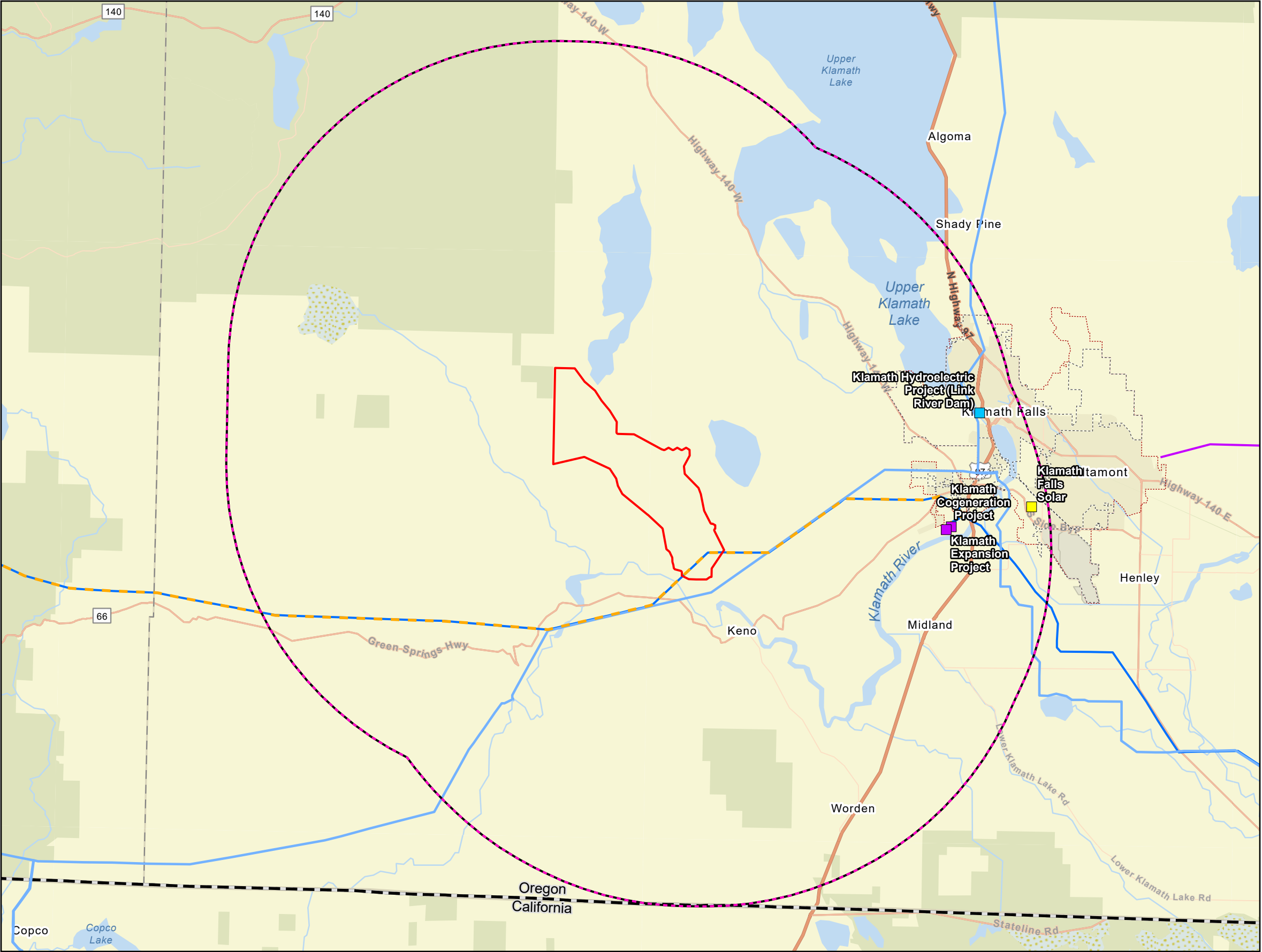


Figure 6
Wetlands and Waters
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon



Legend

- Facility Site Boundary
- PacifiCorp Klamath Falls-Meridian 500-kV Transmission Line
- Public Services Areas (10-mile)
- State Boundary
- City Limit
- Urban Growth Boundary
- Natural Gas Pipeline
- Energy Generation Facilities
 - Hydroelectric
 - Natural Gas
 - Solar
- Electric Power Transmission Lines
 - 230 kV
 - 230 kV

Basemap Source:
Esri World Street Map

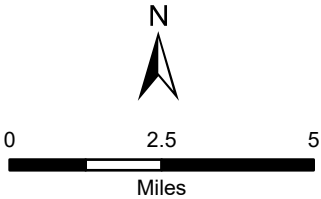


Figure 7
Energy Generation Facilities within
10-mile Study Area for Public Services
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon

Attachment A
Articles of Incorporation and
Authorization

Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "KLAMATH FALLS ENERGY
CENTER, LLC", FILED IN THIS OFFICE ON THE SIXTEENTH DAY OF MAY,
A.D. 2022, AT 12:40 O'CLOCK P.M.*

CONFIDENTIAL
Downloaded by:
Griffin Golden
Orsted
Project Dasher VDR
2024/11/01 13:39:00 -04:00



Jeffrey W. Bullock, Secretary of State

6800819 8100
SR# 20222017206

Authentication: 203440329
Date: 05-16-22

You may verify this certificate online at corp.delaware.gov/authver.shtml

CERTIFICATE OF FORMATION
OF

State of Delaware
Secretary of State
Division of Corporations
Delivered 12:40 PM 05/16/2022
FILED 12:40 PM 05/16/2022
SR 20222017206 - File Number 6800819

KLAMATH FALLS ENERGY CENTER, LLC

The undersigned, for the purpose of forming a limited liability company under the Delaware Limited Liability Company Act, 6 Del. § 18-101, et seq. (the “Act”), as amended and supplemented, hereby adopts the following Certificate of Formation:

ARTICLE 1 – NAME

The name of the limited liability company (the “Company”) is: Klamath Falls Energy Center, LLC.

ARTICLE 2 – REGISTERED OFFICE AND REGISTERED AGENT

The address, including street, number, city, and county, of the registered office of the Company in the State of Delaware is: 251 Little Falls Drive, Wilmington, Delaware 19808, County of New Castle. The name of the Company’s resident agent at such address is: Corporation Service Company

The Undersigned hereby declares, under penalty of perjury, according to the laws of Delaware, that the foregoing is true and correct.

Dated: May 16, 2022

DocuSigned by:

Mark Alexander

008DCC66FE6874371

Mark Alexander, Authorized Person

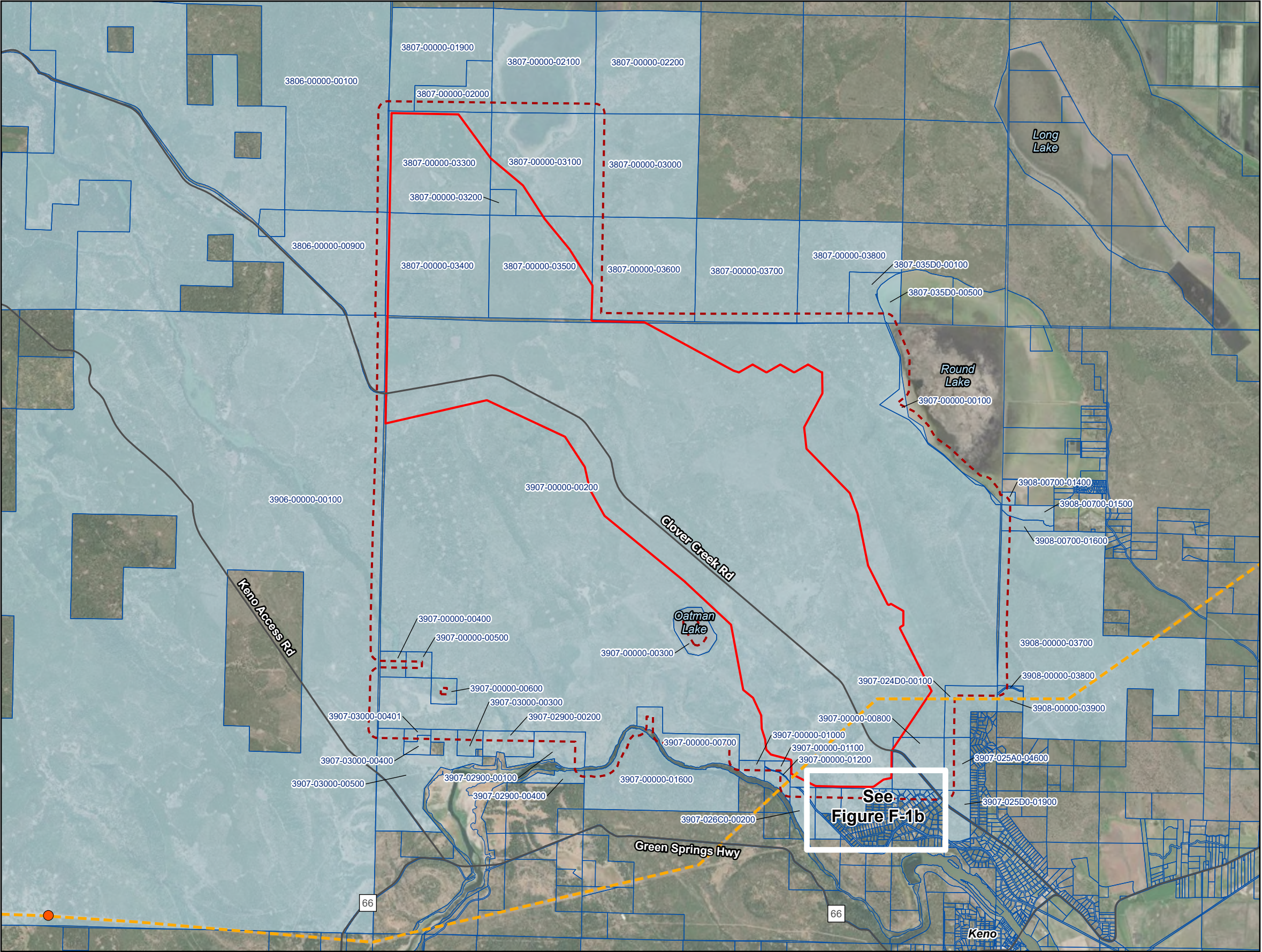
Attachment B
Klamath County Landowners
(List and Maps)

Notice of Intent to Apply for a Site Certificate for the Klamath Falls Energy Center
Property Owner List and Tax Lot Map - Klamath County Assessor Data (obtained December 16, 2025)

Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
3806-00000-00100	UNITED STATES	<Null>	<Null>	<Null>	<Null>	<Null>
3806-00000-00900	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-01900	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-02000	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-02100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-02200	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03000	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03200	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03300	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03400	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03500	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03600	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03700	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-00000-03800	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-035D0-00100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3807-035D0-00500	PARKER FAMILY RANCHES LLC	4582 FRESHWATER RD	WILLIAMS	CA	95987	4582 FRESHWATER RD WILLIAMS CA 95987
3906-00000-00100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-00000-00100	PARKER FAMILY RANCHES LLC	4582 FRESHWATER RD	WILLIAMS	CA	95987	4582 FRESHWATER RD WILLIAMS CA 95987
3907-00000-00200	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-00000-00300	STATE OF OREGON & DEPARTMENT OF STATE LANDS	775 SUMMER ST NE STE 100	SALEM	OR	97301-1279	775 SUMMER ST NE STE 100 SALEM OR 97301-1279
3907-00000-00400	SPENCER CREEK RANCH LLC & ANDERSON KENNETH	5759 TINGLEY LN	KLAMATH FALLS	OR	97603	5759 TINGLEY LN KLAMATH FALLS OR 97603
3907-00000-00500	JAMES LARRY ORVILLE & SIEBENLIST GEORGIA LYNN	1564 WHITMAN AVE	MEDFORD	OR	97501-4069	1564 WHITMAN AVE MEDFORD OR 97501-4069
3907-00000-00600	SIMMERS TIMOTHY ALLEN & SIMMERS JACK DANIEL	1840 E 24TH AVE	ANCHORAGE	AK	99508	1840 E 24TH AVE ANCHORAGE AK 99508
3907-00000-00700	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-00000-00800	GREEN DIAMOND RESOURCE CO	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101	1301 FIFTH AVE STE 2700 SEATTLE WA 98101
3907-00000-00900	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-00000-01000	PACIFIC POWER & LIGHT CO	825 NE MULTNOMAH ST STE 1900	PORTLAND	OR	97232-2151	825 NE MULTNOMAH ST STE 1900 PORTLAND OR 97232-2151
3907-00000-01100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-00000-01200	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-00000-01600	WHISKEY CREEK TIMBER COMPANY	4764 GLENWOOD	KLAMATH FALLS	OR	97603	4764 GLENWOOD KLAMATH FALLS OR 97603
3907-024D0-00100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-025A0-04600	STATE OF OREGON & BOARD OF FORESTRY	2600 STATE ST	SALEM	OR	97310	2600 STATE ST SALEM OR 97310
3907-025C0-00100	NACCARATI SUSAN	PO BOX 825	KENO	OR	97627	PO BOX 825 KENO OR 97627
3907-025C0-00200	NACCARATI SUSAN	PO BOX 825	KENO	OR	97627	PO BOX 825 KENO OR 97627
3907-025C0-00300	MC'LAUGHLIN PATRICK & SUSAN	16712 CLOVER CREEK RD	KLAMATH FALLS	OR	97601	16712 CLOVER CREEK RD KLAMATH FALLS OR 97601
3907-025C0-00400	MC'LAUGHLIN SUSAN	16712 CLOVER CREEK RD	KLAMATH FALLS	OR	97601-8007	16712 CLOVER CREEK RD KLAMATH FALLS OR 97601-8007
3907-025C0-00500	TOSCHIK FAMILY TRUST ET AL	16809 FREIGHT ROAD LN	KLAMATH FALLS	OR	97601	16809 FREIGHT ROAD LN KLAMATH FALLS OR 97601
3907-025C0-00600	MARCOUX DAVID J & PAULA K	PO BOX 891	KENO	OR	97627	PO BOX 891 KENO OR 97627
3907-025C0-00601	JOHNSON GLEN A & STACY M	PO BOX 805	KENO	OR	97627	PO BOX 805 KENO OR 97627
3907-025C0-00700	SKIDMORE BILLY L & CASSIDY RHONDA M	PO BOX 87	KENO	OR	97627	PO BOX 87 KENO OR 97627
3907-025C0-00800	SCHILL LIVING TRUST ET AL	17005 PONDEROSA LN	KLAMATH FALLS	OR	97601	17005 PONDEROSA LN KLAMATH FALLS OR 97601
3907-025C0-00900	DURAND CHARLES H JR & DARLINE M	143 N LAGUNA ST	KLAMATH FALLS	OR	97601	143 N LAGUNA ST KLAMATH FALLS OR 97601
3907-025C0-01000	DURAND CHARLES H JR & DARLINE M	143 N LAGUNA ST	KLAMATH FALLS	OR	97601	143 N LAGUNA ST KLAMATH FALLS OR 97601
3907-025C0-01100	BEATY DOYLE C	PO BOX 5154	KLAMATH FALLS	OR	97601	PO BOX 5154 KLAMATH FALLS OR 97601
3907-025C0-01300	DICKENS TAMMIE & RANDALL	PO BOX 763	KENO	OR	97627	PO BOX 763 KENO OR 97627
3907-025C0-01400	DURAND CHARLES H JR & DARLINE M	143 N LAGUNA ST	KLAMATH FALLS	OR	97601	143 N LAGUNA ST KLAMATH FALLS OR 97601
3907-025C0-01500	FARRAR SCOTT T & FARRAR LINDA L	8710 PONDEROSA PL	KLAMATH FALLS	OR	97601	8710 PONDEROSA PL KLAMATH FALLS OR 97601
3907-025C0-01600	TORKKO DAVID T & TORKKO RILEY THOMAS	PO BOX 146	KENO	OR	97627	PO BOX 146 KENO OR 97627
3907-025C0-01700	KOENIG KRISTINA ET AL	2244 MCNEIL CIR	CORONA	CA	92882	2244 MCNEIL CIR CORONA CA 92882
3907-025C0-01800	MATHEWS JERRY R AND BARBARA REVOC A ET AL	1847 COLIN CT	YUBA CITY	CA	95993	1847 COLIN CT YUBA CITY CA 95993
3907-025C0-02700	PISCOPO TAMMY & ROBERT	17008 PONDEROSA LN	KLAMATH FALLS	OR	97601	17008 PONDEROSA LN KLAMATH FALLS OR 97601
3907-025C0-02800	PISCOPO TAMMY & ROBERT	17008 PONDEROSA LN	KLAMATH FALLS	OR	97601	17008 PONDEROSA LN KLAMATH FALLS OR 97601
3907-025C0-02900	PRICE ETHEL A	PO BOX 538	KENO	OR	97627	PO BOX 538 KENO OR 97627
3907-025C0-03000	HALE JUDY A	16812 PONDEROSA LANE	KLAMATH FALLS	OR	97601	16812 PONDEROSA LANE KLAMATH FALLS OR 97601
3907-025C0-08300	POUND BENJAMIN E & CRYSTAL S	16712 FREIGHT ROAD LN	KLAMATH FALLS	OR	97601	16712 FREIGHT ROAD LN KLAMATH FALLS OR 97601
3907-025D0-01900	STATE OF OREGON & BOARD OF FORESTRY	2600 STATE ST	SALEM	OR	97310	2600 STATE ST SALEM OR 97310
3907-026C0-00100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-026C0-00200	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-026D0-00100	HAUGEN CURTIS M	8705 BIG PINE WAY	KLAMATH FALLS	OR	97601	8705 BIG PINE WAY KLAMATH FALLS OR 97601
3907-026D0-00200	GRADO GABRIEL	29855 AVENIDA DE SERENO	SUN CITY	CA	92586	29855 AVENIDA DE SERENO SUN CITY CA 92586
3907-026D0-00300	SHEEHY NANCY E & PATRICK D PORTER	PO BOX 693	KENO	OR	97627	PO BOX 693 KENO OR 97627
3907-026D0-00400	CAHOON DARREL	8811 BIG PINE WAY	KLAMATH FALLS	OR	97601-9007	8811 BIG PINE WAY KLAMATH FALLS OR 97601-9007
3907-026D0-01700	HORGAN KENNETH L & RODRIGUEZ KELLY	8808 BIG PINE WAY	KLAMATH FALLS	OR	97601	8808 BIG PINE WAY KLAMATH FALLS OR 97601
3907-026D0-01800	DEPUY DONALD & APRIL	8706 BIG PINE WAY	KLAMATH FALLS	OR	97601	8706 BIG PINE WAY KLAMATH FALLS OR 97601

Notice of Intent to Apply for a Site Certificate for the Klamath Falls Energy Center
Property Owner List and Tax Lot Map - Klamath County Assessor Data (obtained December 16, 2025)

Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
3907-026D0-01900	DEPUY DONALD DEAN & CARLSON-DEPUY APRIL SHAR	8706 BIG PINE WAY	KLAMATH FALLS	OR	97601	8706 BIG PINE WAY KLAMATH FALLS OR 97601
3907-026D0-02000	DEPUY DONALD D & CARLSON-DEPUY APRIL S	8706 BIG PINE WAY	KLAMATH FALLS	OR	97601	8706 BIG PINE WAY KLAMATH FALLS OR 97601
3907-026D0-02100	DEPUY DONALD & APRIL	8706 BIG PINE WAY	KLAMATH FALLS	OR	97601	8706 BIG PINE WAY KLAMATH FALLS OR 97601
3907-026D0-02200	HENSLEY SEAN J & LYNNE M	PO BOX 975	KENO	OR	97627	PO BOX 975 KENO OR 97627
3907-026D0-03700	GRAHAM LORI L	8812 CEDAR WAY	KLAMATH FALLS	OR	97601	8812 CEDAR WAY KLAMATH FALLS OR 97601
3907-026D0-03800	DOPKOWSKI LINDA V	8806 CEDAR WAY	KLAMATH FALLS	OR	97601-9009	8806 CEDAR WAY KLAMATH FALLS OR 97601-9009
3907-026D0-03900	THOMAS ALBERT M	20510 KENO WORDEN RD	KLAMATH FALLS	OR	97603	20510 KENO WORDEN RD KLAMATH FALLS OR 97603
3907-026D0-04000	DEPUY DONALD D & APRIL S	8706 BIG PINE WAY	KLAMATH FALLS	OR	97601	8706 BIG PINE WAY KLAMATH FALLS OR 97601
3907-026D0-04100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-02900-00100	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-02900-00200	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-02900-00400	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-03000-00300	GLIDDEN FAMILY TRUST ET AL	1800 FAIRMOUNT ST	KLAMATH FALLS	OR	97601	1800 FAIRMOUNT ST KLAMATH FALLS OR 97601
3907-03000-00400	ANDERSON DAVID E & ANDERSON THOMAS M ET	432 W ARCHWOOD DR	EAGLE POINT	OR	97524	432 W ARCHWOOD DR EAGLE POINT OR 97524
3907-03000-00401	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3907-03000-00500	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3908-00000-03700	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3908-00000-03800	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613
3908-00000-03900	MORROW CARL D	5845 N CARLISLE RD	COEUR D ALENE	ID	83815-8478	5845 N CARLISLE RD COEUR D ALENE ID 83815-8478
3908-00700-01400	MOYLES HUNTER & STACEY	3030 ROUND LAKE RD	KLAMATH FALLS	OR	97601	3030 ROUND LAKE RD KLAMATH FALLS OR 97601
3908-00700-01500	ROUND LAKE MHP LLC	14 CORPORATE PLAZA SUITE 120	NEWPORT BEACH	CA	92660	14 CORPORATE PLAZA SUITE 120 NEWPORT BEACH CA 92660
3908-00700-01600	GREEN DIAMOND RESOURCE COMPANY	1301 FIFTH AVE STE 2700	SEATTLE	WA	98101-2613	1301 FIFTH AVE STE 2700 SEATTLE WA 98101-2613



- Legend**
- Facility Site Boundary
 - Point of Interconnect
 - Transmission Line
 - Tax Lot Boundary
 - 500-foot Buffer of Property on which the Facility Site Boundary is Located
 - Tax Lot Within 500 feet of the Property on which the Facility Site Boundary is Located

Basemap Source:
Esri World Imagery

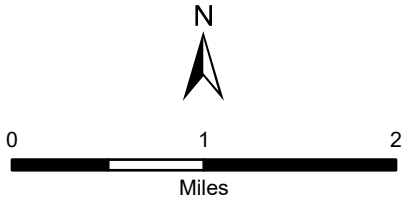
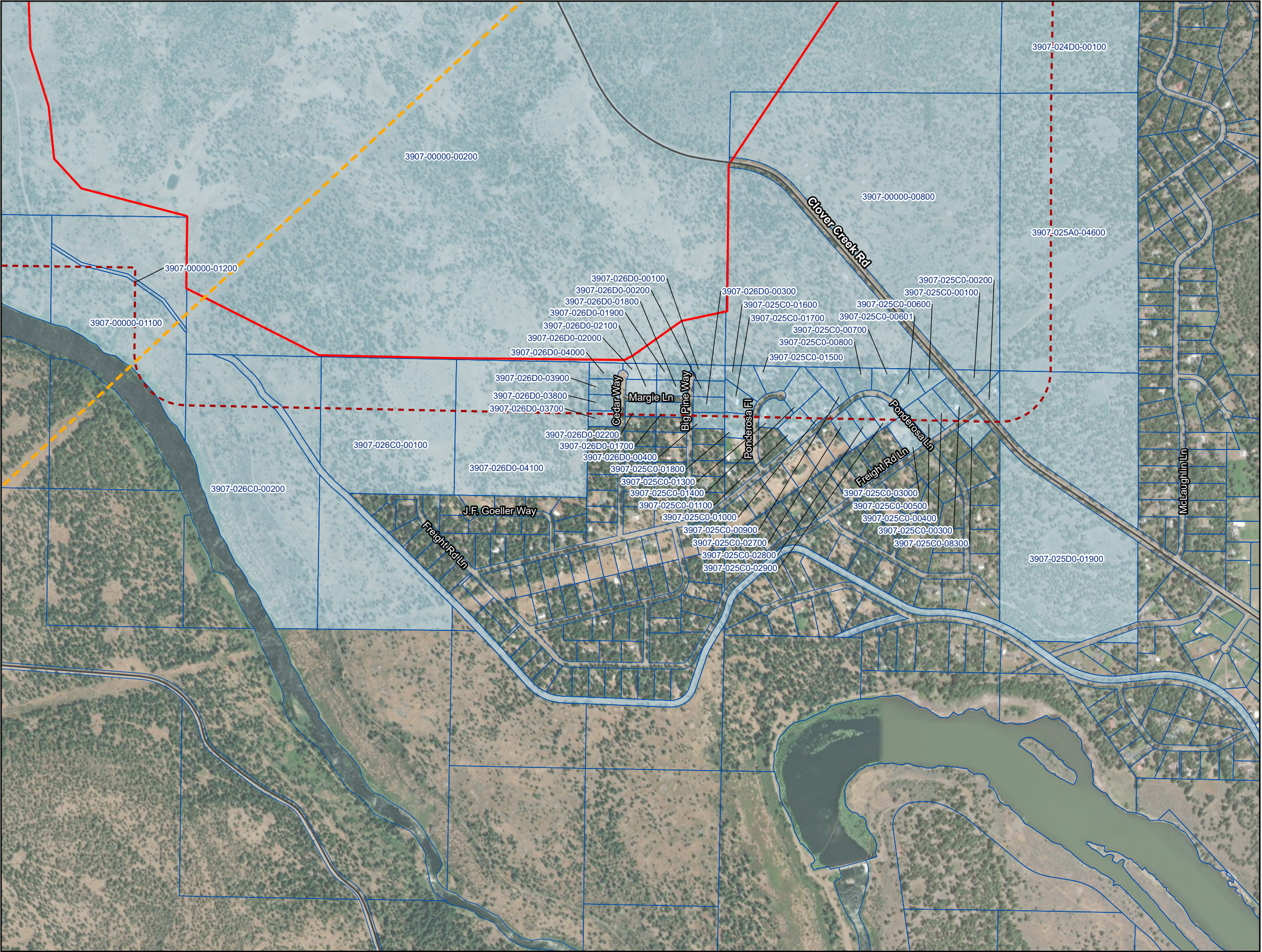


Figure F-1a
Tax Lots Within and Adjacent to the
Facility Site Boundary
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon

Jacobs



- Legend**
- Facility Site Boundary
 - Point of Interconnect
 - Transmission Line
 - Tax Lot Boundary
 - 500-foot Buffer of Property on which the Facility Site Boundary is Located
 - Tax Lot Within 500 feet of the Property on which the Facility Site Boundary is Located

Basemap Source:
Esri World Imagery

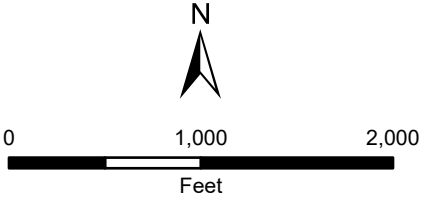


Figure F-1b
Tax Lots Within and Adjacent to the
Facility Site Boundary
Notice of Intent
Ørsted Klamath Falls Energy Center
Klamath County, Oregon

Attachment C
Evidence of Consultation with
Legislative Commission on Indian
Services

[EXTERNAL] RE: Seeking Tribal Contacts for Orsted's proposed Klamath Falls Energy Center in Klamath County, Oregon.

From Bullion Elissa <Elissa.Bullion@oregonlegislature.gov>

Date Tue 9/2/2025 4:23 PM

To Sheldon, David <David.Sheldon@jacobs.com>

Cc Hawkinson, Eric <Eric.Hawkinson@jacobs.com>; Candanoza, Emilio <Emilio.Candanoza@jacobs.com>

This Message Is From an External Sender

This message came from outside your organization.

Good afternoon David,

Thanks for reaching out to our office. For this project location in Klamath Co., I recommend contacting the following Tribes:

**Confederated Tribes of Warm Springs Reservation of Oregon
Klamath Tribes**

Contact information for culture and heritage Tribal staff can be found on our website: [Commission on Indian Services archaeology \(oregonlegislature.gov\)](https://www.oregonlegislature.gov/Commission-on-Indian-Services/archaeology). Please let me know if you have any further questions.

Cheers,

Elissa

Dr. Elissa Bullion, PhD (she/her/hers)
State Physical Anthropologist
Legislative Commission on Indian Services
Oregon State Capitol Building
900 Court Street, NE, Room 167
Salem, Oregon 97301
Phone: 971-707-1372
LCIS Office: 503-986-1067
Elissa.Bullion@oregonlegislature.gov



From: Sheldon, David <David.Sheldon@jacobs.com>

Sent: Tuesday, September 2, 2025 2:27 PM

To: LCIS <LCIS@oregonlegislature.gov>

Cc: Hawkinson, Eric <Eric.Hawkinson@jacobs.com>; Candanoza, Emilio <Emilio.Candanoza@jacobs.com>

Subject: Seeking Tribal Contacts for Orsted's proposed Klamath Falls Energy Center in Klamath County, Oregon.

CAUTION: This email originated from outside the Legislature. Use caution clicking any links or attachments.

Hello,

I am seeking information on appropriate tribes to contact regarding a proposed solar project. Orsted, a leading renewable energy developer, is planning to build a 400-megawatt solar and battery energy storage facility called the Klamath Falls Energy Center. The proposed project would be located on private land (industrial forest) approximately 1.5 miles northwest of the community of Keno in unincorporated Klamath County, Oregon. The project is planned to go through the Oregon Department of Energy Energy Facility Siting Council's application for site certificate process, which consolidates all applicable state and local standards and permits necessary for siting an energy facility into a single process. In this case, Oregon Department of Energy will be the lead permitting agency. Could you please provide me a list of tribes who may have an interest in the project?

Thank you,

David Sheldon, M.S.

Senior Archaeologist

Email: David.sheldon@jacobs.com

Mobile: 360-219-6953

Jacobs Challenging today.
Reinventing tomorrow.

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