Amendment Determination Request for
Wheatridge Renewable Energy Facility II

Prepared for

[Logo]

Prepared by

[Logo]

August 2020
Table of Contents

1.0 Introduction and Request ............................................................................................................. 1
2.0 Description of Proposed Change (OAR 345-027-0357(4)(a & b)) .................................................. 1
3.0 Amendment Determination Evaluation (OAR 345-027-0357(4)(c)) .............................................. 2
4.0 Additional Information – Standards Evaluation (OAR 345-027-0357(4)(d)) .............................. 3
5.0 Conclusion ........................................................................................................................................ 11

List of Tables
Table 1. Standards, Laws and Site Certificate Evaluation ........................................................................ 5

List of Figures
Figure 1. Wheatridge Renewable Energy Facility II Site Boundary (August 2020)
Figure 2. Wheatridge Renewable Energy Facility II – Collector Line Adjustment (August 2020)
1.0 Introduction and Request

Wheatridge Wind II, LLC (Certificate Holder) is submitting this Amendment Determination Request (ADR) for the Wheatridge Wind Energy Facility II (WREFII) in Morrow and Umatilla counties, Oregon. Construction commenced in January 2020 for 200 megawatts (MW) of wind within the Wheatridge West portion of WREFII, and it is anticipated to be completed by October 2020. In late July 2020, the Certificate Holder determined the need to reroute a short extent of underground collection line (approximately 1500 feet) that will be located outside of the Site Boundary (the Site Boundary represents the micrositing corridors). This minor reroute of the underground collector line will add approximately 4 acres of new Site Boundary to WREFII (proposed change).

Increasing the Site Boundary by 4 acres (between existing areas already designated as part of the 12,432-acre Site Boundary) increases the overall area of the Site Boundary by only 0.03 percent. No new facilities or changes to the dimensions of the permitted facilities are being proposed. Therefore, the Certificate Holder is requesting a written determination under Oregon Administrative Rules (OAR) 345-027-0357(1)(b) for concurrence that the proposed change to the Site Boundary does not require a Site Certificate amendment because WREFII is being constructed substantially as described in the Site Certificate. The Certificate Holder provides an amendment determination evaluation (Section 3.0) and demonstrates that the proposed change complies with the requirements of all applicable standards and all existing Site Certificate Conditions (Section 4.0), and could be included in and governed by the Site Certificate without an amendment.

2.0 Description of Proposed Change (OAR 345-027-0357(4)(a & b))

The Site Boundary between Turbines 92 and 111 has been determined by the construction contractor to have terrain that is too steep for the trenching and boring equipment to operate safely. The terrain had a grade that exceeded 15%. The trenchers can only operate at grades of 15% or less. In addition, the support equipment (water trucks, etc.) would not be able to operate safely on that steep of grade. The support equipment for the construction crews are heavy and have a high chance of tipping over on such steep terrain. Therefore, the Certificate Holder seeks to add approximately 4 acres of Site Boundary to the approved 12,432 acres of Site Boundary for construction modifications for an extent of rerouted underground collector line (see Figure 1). The proposed reroute is not as steep, so can be constructed safely. In addition, it provides a more direct and thus shorter system of collection corridor between turbine strings. Trenching and boring activities for the rerouted underground collection line would require a 60-foot wide by 1,500-foot long corridor. A fifty foot buffer was added to the limits of trenching and boring activities to provide the maximum limits of disturbance for the rerouting, which is the proposed additional Site Boundary (see Figure 2).
3.0 Amendment Determination Evaluation (OAR 345-027-0357(4)(c))

Pursuant to OAR 345-027-0357(1)(b), the purpose of this ADR is to obtain the Oregon Department of Energy’s (ODOE) determination that the proposed change to WREFII’s Site Boundary do not require a Site Certificate amendment. OAR 345-027-0353 provides exemptions for changes not requiring an amendment. Only one of these exemptions applies to wind energy facilities and is related to an increase in electrical energy generating capacity. The proposed change isn’t proposing a change to electrical energy generating capacity, therefore the proposed change is not exempt under OAR 345-027-0353. OAR 345-027-0350 identifies the types of changes that would require the Certificate Holder to amend its Site Certificate. This section demonstrates that the modifications proposed in this ADR are not subject to a Site Certificate amendment based on the OAR 345-027-0350 factors.

(1) Transfer ownership of the facility or the certificate holder as described in OAR 345-027-0400;

The proposed change does not affect the ownership of the facility or Certificate Holder as described in OAR 345-027-0400. Therefore, a Site Certificate amendment is not required based on this factor.

(2) Apply later-adopted law(s) as described in OAR 345-027-0390;

The proposed change is not the result of a later-adopted law, as described in OAR 345-027-0390. Therefore, a Site Certificate amendment is not required based on this factor.

(3) Extend the construction beginning or completion deadline as described in OAR 345-027-0385;

The proposed change will not extend the previously approved construction’s beginning or completion deadlines. Therefore, a Site Certificate amendment is not required based on this factor.

(4) Design, construct or operate a facility in a manner different from the description in the site certificate, if the proposed change:

(a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource or interest protected by a Council standard;

No new facilities or changes to the dimensions of the permitted facilities are being proposed. The proposed change will not result in a significant impact because it is only adding 4 acres of Site Boundary in between areas of the existing Site Boundary; 4 acres out of 12,432 acres of existing Site Boundary is only a 0.03 percent increase area.

Section 4 demonstrates that the proposed change will neither result in significant adverse impact the Oregon Energy Facility Siting Council (Council) has not addressed in an earlier order, nor an impact that affects a resource or interest protected by a Council standard. The analysis provided in
Section 4 demonstrates that the change to the Site Boundary will not result in any adverse impacts to any resources protected by Council standards, as described under OAR 345-027-0050(4)(a).

(b) Could impair the certificate holder’s ability to comply with a Site Certificate condition; or

Section 4 describes how the proposed change will not impair the Certificate Holder’s ability to comply with any Site Certificate condition.

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

The proposed change will neither require a new condition, nor change a condition in the Site Certificate.

The Certificate Holder concludes the proposed change does not meet any of the factors indicated above, and that a Site Certificate amendment is not required. Section 4 further demonstrates how the proposed change is consistent with Council’s previous findings, applicable laws, and Council standards, and will not require changes to the Site Certificate. Therefore, this evaluation confirms that the proposed change could be included in and governed by the Site Certificate without an amendment to the Site Certificate.

4.0 Additional Information – Standards Evaluation (OAR 345-027-0357(4)(d))

The proposed change does not require a Site Certificate amendment because it does not add a significant increase to the Site Boundary; adding 4 acres in between areas of the existing 12,432-acre of Site Boundary is only an increase of 0.03 percent. No new facilities or changes to the dimensions of the permitted facilities is being proposed. Table 1 provides an evaluation of the proposed change compliance with the Division 22 and Division 24 standards, and identifies the associated Site Certificate Conditions that the proposed change will comply with, as applicable, to support the conclusion that no Site Certificate amendment is required for the proposed change.
The Council previously found that the Facility complies with the General Standard of Review. The proposed change does not affect this finding and complies with the related Site Certificate Conditions. No new facilities or changes to the dimensions of the permitted facilities is being proposed. The proposed change will not result in a significant impact not previously reviewed by the Council because it is only adding 4 acres of Site Boundary in between areas of the existing 12,432 acres of Site Boundary - a 0.03% increase in Site Boundary. With the proposed change, the Facility is still being designed and constructed, and will be operated and retired substantially as described in the Site Certificate; in compliance with ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances; and, in compliance with all applicable permit requirements of other state agencies (see also review of other standards).

The Council has previously determined that NEER has adequate organizational expertise to construct, operate and retire a wind energy facility. There is no proposed change to organizational expertise. The Certificate Holder management team and the NEER family of companies have deep regional expertise, derived over years of successfully permitting and operating hundreds of MWs of wind energy projects and solar energy facilities in the Oregon. The contractor expressed safety concerns regarding constructability and the NEER team promptly began coordinating with ODOE to implement a safe solution that would be in compliance with the Site Certificate, and all applicable rules, laws and ordinances.

The Certificate Holder complied with all pre construction Site Certificate conditions related to the Structural Standard including those related to steep slopes. Although the collector line could be constructed as is in compliance with the pre construction conditions, the temporary construction activities can be completed more safely for the rerouted section of collector line in the proposed new area of Site Boundary. Therefore, the proposed change does not change the Council’s earlier findings and the Facility is being constructed avoid dangers to human safety.

The Certificate Holder complied with all pre construction Site Certificate conditions related to the Soil Protection Standard including those related to steep slopes. Construction including the rerouted collection line will comply with the Conditions CON-SP-01 and CON-SP-02. The Certificate Holder will notify DEQ of the proposed change in accordance with the National Pollutant Discharge Elimination System 1200-C. The area disturbed by the rerouted collection line will be restored consistent with the approved Revegetation Plan. Therefore, the proposed change does not change the Council’s earlier findings regarding the Soil Protection standard and compliance with the existing conditions during construction for the proposed change demonstrates that the proposed change can be included in and governed by the Site Certificate without an amendment.

### Table 1. Standards, Laws and Site Certificate Evaluation

<table>
<thead>
<tr>
<th>Standard</th>
<th>Evaluation</th>
<th>Related Site Certificate Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAR 345-022-0000 General Standard of Review</td>
<td>The Council previously found that the Facility complies with the General Standard of Review. The proposed change does not affect this finding and complies with the related Site Certificate Conditions. No new facilities or changes to the dimensions of the permitted facilities is being proposed. The proposed change will not result in a significant impact not previously reviewed by the Council because it is only adding 4 acres of Site Boundary in between areas of the existing 12,432 acres of Site Boundary - a 0.03% increase in Site Boundary. With the proposed change, the Facility is still being designed and constructed, and will be operated and retired substantially as described in the Site Certificate; in compliance with ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances; and, in compliance with all applicable permit requirements of other state agencies (see also review of other standards).</td>
<td>GEN-GS-01: Commencement of construction&lt;br&gt;GEN-GS-02: Completion of construction&lt;br&gt;GEN-GS-03: Compliance during all phases&lt;br&gt;GEN-GS-04: Permission to construct&lt;br&gt;GEN-GS-05: Notification of environmental impacts&lt;br&gt;GEN-GS-06: Inclusion of representations&lt;br&gt;GEN-GS-07: Vegetation restoration&lt;br&gt;GEN-GS-08: Construct to prioritize human safety&lt;br&gt;GEN-GS-09: Notification of foundation changes&lt;br&gt;GEN-GS-10: Notification of other geological observations&lt;br&gt;GEN-GS-11: Notification of new owners&lt;br&gt;GEN-GS-12: Specification of corridor&lt;br&gt;OPR-GS-01: Submission of legal description</td>
</tr>
<tr>
<td>OAR 345-022-0010 Organizational Expertise</td>
<td>The Council has previously determined that NEER has adequate organizational expertise to construct, operate and retire a wind energy facility. There is no proposed change to organizational expertise. The Certificate Holder management team and the NEER family of companies have deep regional expertise, derived over years of successfully permitting and operating hundreds of MWs of wind energy projects and solar energy facilities in the Oregon. The contractor expressed safety concerns regarding constructability and the NEER team promptly began coordinating with ODOE to implement a safe solution that would be in compliance with the Site Certificate, and all applicable rules, laws and ordinances.</td>
<td>GEN-GE-01: Responsibility of non-compliance&lt;br&gt;GEN-GE-02: Report of Site Certificate violations&lt;br&gt;GEN-GE-03: Report of change in corporate structure&lt;br&gt;GEN-GE-04: Compliance with laws for battery disposal &amp; transport&lt;br&gt;PRE-GE-01: Notification of contractor identities&lt;br&gt;PRE-GE-02: Notification of construction manager&lt;br&gt;PRE-GE-03: Compliance of construction workers&lt;br&gt;PRE-GE-04: Notification of non-surveying activities&lt;br&gt;PRE-GE-05: Proof of aggregate source and county permits&lt;br&gt;PRE-GE-06: Proof of third-party approvals and permits</td>
</tr>
<tr>
<td>OAR 345-022-0020 Structural Standard</td>
<td>The Certificate Holder complied with all pre construction Site Certificate conditions related to the Structural Standard including those related to steep slopes. Although the collector line could be constructed as is in compliance with the pre construction conditions, the temporary construction activities can be completed more safely for the rerouted section of collector line in the proposed new area of Site Boundary. Therefore, the proposed change does not change the Council’s earlier findings and the Facility is being constructed avoid dangers to human safety.</td>
<td>GEN-SS-01: Compliance with building codes&lt;br&gt;PRE-SS-01: Geological investigation reporting&lt;br&gt;PRE-SS-02: Investigation of active faults&lt;br&gt;PRE-SS-03: Investigation of slope instability&lt;br&gt;PRE-SS-04: Investigation of loose soil</td>
</tr>
<tr>
<td>OAR 345-022-0022 Soil Protection</td>
<td>The Certificate Holder complied with all pre construction Site Certificate conditions related to the Soil Protection Standard including those related to steep slopes. Construction including the rerouted collection line will comply with the Conditions CON-SP-01 and CON-SP-02. The Certificate Holder will notify DEQ of the proposed change in accordance with the National Pollutant Discharge Elimination System 1200-C. The area disturbed by the rerouted collection line will be restored consistent with the approved Revegetation Plan. Therefore, the proposed change does not change the Council’s earlier findings regarding the Soil Protection standard and compliance with the existing conditions during construction for the proposed change demonstrates that the proposed change can be included in and governed by the Site Certificate without an amendment.</td>
<td>PRE-SP-01: Spill Prevention, Control, and Countermeasure construction plans&lt;br&gt;PRE-SP-02: Restoration of agricultural soils&lt;br&gt;PRE-SP-03: Septic system permitting&lt;br&gt;CON-SP-01: Erosion and Sediment Control Plan&lt;br&gt;CON-SP-02: Best management practices to be included in the Erosion and Sediment Control Plan&lt;br&gt;PRO-SP-01: Submission of operational Spill Prevention, Control, and Countermeasure plan&lt;br&gt;OPR-SP-01: Prevention of erosion, soil disturbance</td>
</tr>
</tbody>
</table>
### Standard

- **OAR 345-022-0030**  
  **Land Use**

  The proposed change would not result in any land use impacts that have not been addressed by the Council. No new facilities or changes to the dimensions of the permitted facilities are being proposed. The proposed change is internal to other areas of approved Site Boundary. Consistent with CON-LU-03, the collection system in the new Site Boundary is being constructed underground and installed at a depth of 3 feet or deeper. Therefore, the proposed change makes no changes that would alter the basis for the Council’s earlier findings under OAR 345-022-0030 that the Land Use Standard is satisfied.

### Evaluation

- GEN-LU-01: Compliance with county setbacks
- GEN-LU-02: County road permits and standards
- GEN-LU-03: Meteorological tower requirements
- GEN-LU-04: Usage of minimum land area
- GEN-LU-05: Blending with natural surroundings
- PRE-LU-01: Obtain local permitting
- PRE-LU-02: Obtain Conditional Use Permit
- PRE-LU-03: Preparation of Weed Control Plan
- PRE-LU-04: Recording of a Covenant Not to Sue for Morrow County
- PRE-LU-05: Consultation with landowners
- PRE-LU-06: Identification of construction traffic concerns
- PEE-LU-06: Installation of gates and signs to private access roads
- CON-LU-01: Minimization of footprint
- CON-LU-02: Installation of bird deterring devices
- CON-LU-03: Installation of underground cable system
- OPR-LU-01: Submission of as-built surveys for construction phases
- OPR-LU-02: Restoration of disturbed areas
- OPR-LU-03: Completion of final retirement plan
- OPR-LU-04: Preparation of Operating and Facility Maintenance Plan
- OPR-LU-06: Retirement restoration activities

### Related Site Certificate Conditions

- N/A

### OAR 345-022-0040  
**Protected Areas**

The proposed change is within the existing analysis area for Protected Areas Standard. No new facilities or changes to the dimensions of the permitted facilities are being proposed. The proposed change is internal to other areas of approved Site Boundary. Therefore, the proposed change makes no changes that would alter the basis for the Council’s earlier findings that under OAR 345-022-0040 the Protected Areas Standard is satisfied.

### Related Site Certificate Conditions

- N/A

### OAR 345-022-0050  
**Retirement and Financial Assurance**

The proposed change will not alter the Certificate Holder’s ability to restore the site to a useful, nonhazardous condition following permanent cessation of construction or operation of the facilities. A cost estimate and retirement bond was provided for the Facility being constructed as part of pre-construction compliance. Underground collector lines are "left in place" at retirement of the Facility; there is no associated cost. Therefore, the proposed change does not change the cost of restoring the site to non-hazardous condition. The proposed change would not alter the basis for the Council’s earlier findings that the OAR 345-022-0050 Retirement and Financial Assurance Standard is satisfied.

### Related Site Certificate Conditions

- GEN-RF-01: Prevention of non-restorable site
- PRE-RF-01: Letter of credit to restore site to non-hazardous condition
- PRE-RF-02: Letter of credit naming State as payee
- OPR-RF-01: Evidence of monthly inspections of battery storage and insurance for high loss catastrophic events
- RET-RF-01: Compliance with retirement plan
- RET-RF-02: Retirement of Facility upon cessation of activities

---

**Wheatridge Renewable Energy Facility II**  
6
### Related Site Certificate Conditions

<table>
<thead>
<tr>
<th>Standard</th>
<th>Evaluation</th>
<th>Related Site Certificate Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAR 345-022-0060 Fish and Wildlife Habitat</td>
<td>The new area of Site Boundary was included in the pre-construction surveys for Washington ground squirrel and raptor nests. No Washington ground squirrels were identified, and this new area of Site Boundary does not fall within a raptor nest buffer. Part of the new area of Site Boundary was surveyed for Laurent's milkvetch. The survey identified areas of Laurent’s milkvetch near the rerouted collection line that are flagged and will be avoided by construction. A biologist surveyed (August 6, 2020) the remaining new area of Site Boundary and didn’t identify any evidence of the plant species. The entire new Site Boundary area is in the Mule Deer Winter Range. Consistent with CON-FW-01 construction of the rerouted underground collector line will occur during summer.</td>
<td>GEN-FW-01: Mule Deer Winter Range&lt;br&gt;GEN-FW-02: Avian protection&lt;br&gt;PRE-FW-01: Confirmation of habitat categories, nests via habitat survey&lt;br&gt;PRE-FW-02: Implementation of Wildlife Monitoring and Mitigation Plan&lt;br&gt;PRE-FW-03: Flagging of environmentally sensitive areas&lt;br&gt;PRE-FW-04: Approval of Habitat Mitigation Plan&lt;br&gt;PRE-FW-05: Approval of Revegetation Plan&lt;br&gt;CON-FW-02: Buffer zones for nest sites&lt;br&gt;CON-FW-03: Environmental training by professional&lt;br&gt;CON-FW-04: Appointment of on-site environmental inspector</td>
</tr>
<tr>
<td>OAR 345-022-0070 Threatened and Endangered Species</td>
<td>The new area of Site Boundary was included in the pre-construction surveys for Washington ground squirrel and raptor nests. No Washington ground squirrels were identified, and this new area of Site Boundary does not fall within a raptor nest buffer. Part of the new area of Site Boundary was surveyed for Laurent’s milkvetch. The survey identified areas of Laurent’s milkvetch near the rerouted collection line that are flagged and will be avoided by construction. A biologist surveyed (August 6, 2020) the remaining new area of Site Boundary and didn’t identify any evidence of the plant species. The proposed change will be covered under the Habitat Mitigation Plan and Wildlife Monitoring and Mitigation, Conditions PRG-FW-02 and PRG-FW-04, without requiring any changes to those approved plans.</td>
<td>PRE-TE-01: Determination of Washington ground squirrel (WAGS) boundaries&lt;br&gt;PRE-TE-02: Implementation of Wildlife Monitoring and Mitigation Plan for WAGS&lt;br&gt;PRE-TE-03: Avoidance of Laurent’s milkvetch impacts</td>
</tr>
<tr>
<td>OAR 345-022-0080 Scenic Resources</td>
<td>The proposed change is within the existing analysis area for the Scenic Resources Standard. No new facilities or changes to the dimensions of the permitted facilities are being proposed. The proposed change is internal to other areas of approved Site Boundary. Therefore, the proposed change makes no changes that would alter the basis for the Council’s earlier findings that the OAR 345-022-0080 Scenic Resources Standard is satisfied.</td>
<td>GEN-SR-01: Reduction of lighting Facility visual impacts&lt;br&gt;GEN-SR-02: Minimization of visual impacts</td>
</tr>
<tr>
<td>OAR 345-022-0090 Historic, Cultural and Archaeological Resources</td>
<td>A cultural survey was conducted for the new area of Site Boundary on August 3, 2020. (The survey report is being submitted to ODOE under a separate cover). No historic, cultural or archaeological resources were identified. Consistent with CON-HC-02, work will cease if potential resources are identified during construction and appropriate procedures followed. Therefore, the proposed change makes no changes that would alter the basis for the Council’s earlier findings that the OAR 345-022-0090 Historic, Cultural and Archaeological Resources is satisfied.</td>
<td>PRE-HC-01: Submission of final design&lt;br&gt;PRE-HC-02: Marking of buffer areas&lt;br&gt;PRE-HC-03: Training by qualified archeologist&lt;br&gt;CON-HC-01: Flagging of 200-foot avoidance buffer&lt;br&gt;CON-HC-02: Work cease due to historical find</td>
</tr>
<tr>
<td>OAR 345-022-0100 Recreation</td>
<td>The proposed change is within the existing analysis area for the Recreation standard. The proposed change will not be any closer or make any change that would alter the basis for the Council’s earlier findings that the OAR 345-022-0100 Recreation Standard is satisfied.</td>
<td>N/A</td>
</tr>
<tr>
<td>Standard</td>
<td>Evaluation</td>
<td>Related Site Certificate Conditions</td>
</tr>
<tr>
<td>----------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| OAR 345-022-0110 Public Services                                                                                                             The proposed change is within the existing analysis area for Public Services. The proposed change will be underground and will not alter the Facility’s impacts on the ability of public and private service providers to supply sewer and sewage treatment, water, stormwater drainage, solid waste management, housing, traffic safety, police and fire protection, health care, and schools. | GEN-PS-01: Coordination with solid waste handler  
GEN-PS-02: Installation of security measures  
GEN-PS-03: Fire prevention and response training  
GEN-PS-04: 100-foot vegetation free zone around battery storage systems  
PRE-PS-01: Preparation of Traffic Management Plan  
PRE-PS-02: Road Use Agreements with counties  
PRE-PS-03: Access road and private road modification approvals  
PRE-PS-04: FAA and ODA aeronautical studies and determinations  
PRE-PS-05: Preparation of Emergency Management Plan  
PRE-PS-06: Development of health and safety plan  
CON-PS-01: Waste management plan protocols  
CON-PS-02: Establish on-site security  
CON-PS-03: Assurance of fall, high angle, confined space trained personnel  
CON-PS-04: Usage of concrete pads, nonflammable ground cover  
CON-PS-05: Maintenance of non-vegetated area  
PRO-PS-01: Fall protection/tower rescue training  
PRO-PS-02: Submission of site plan to fire protection officials  
PRO-PS-03: Assurance of current first aid/CPR/AED personnel  
OPR-PS-01: Discharge of wastewater  
OPR-PS-02: On-site well water usage  
OPR-PS-03: Implementation of waste management plan  
OPR-PS-04: Current contact information for personnel  |
| OAR 345-022-0120 Waste Minimization                                                                                                            The proposed change will not increase the amount of solid waste and wastewater generated by the Facility. Therefore, the proposed changes makes no changes that would alter the basis for the Council’s earlier findings that the OAR 345-022-0120 Waste Minimization Standard is satisfied. | PRE-WM-01: Minimum waste management plan requirements  
PRE-WM-02: Confirmation of no surface/ground/drinking water impacts  
CON-WM-01: Requirements of off-site soil disposal  
CON-PS-01: Waste management plan protocols  |
| OAR 345-024-0010 Public Health and Safety Standards for Wind Energy Facilities                                                                 The proposed change is on private land not accessible to the public and does not propose any changes to the turbines or turbine locations. The NEER family of companies has expertise, derived over years of successfully and safely constructing and operating thousands of MWs of wind energy. The proposed changes does not alter the basis for the Council’s prior findings regarding public and safety for the Facility and does not alter the Certificate Holder’s ability to comply with the Site Certificate conditions. | GEN-WF-01: Following handling instructions  
GEN-WF-02: Notification of accidents/failures  
PRE-PS-04: FAA and ODA aeronautical studies and determinations  
CON-WF-01: Installation of step-up transformers  
CON-WF-02: Maintenance of self-monitoring devices  
OPR-WF-01: Assurance of operation security fencing and gates  |
<p>| OAR 345-024-0015 Siting Standards for Wind Energy Facilities                                                                                   The proposed change provides a more direct route for a section of underground collector line that avoids steep slopes and combines underground collector line routes. Therefore, the proposed change does not alter the basis for the Council’s prior findings for OAR 345-024-0015 Siting Standards for Wind Energy Facilities and does not alter the Certificate Holder’s ability to comply with the Site Certificate conditions. | N/A  |</p>
<table>
<thead>
<tr>
<th>Standard</th>
<th>Evaluation</th>
<th>Related Site Certificate Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAR 345-024-0090</td>
<td>There will be no change to the approved Intraconnection Line.</td>
<td>GEN-GS-12: Specification of corridor</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CON-TL-01: Management of human exposure to electromagnetic fields</td>
</tr>
<tr>
<td></td>
<td></td>
<td>OPR-TL-01: Final Facility design operations information provided to OPUC Safety Staff</td>
</tr>
<tr>
<td>OAR 340-035-0035</td>
<td>The proposed change will be all underground and there will be no changes to the physical components of the Facility that would change the noise impact already assessed for the Facility.</td>
<td>PRE-NC-01: Final Facility design noise analysis and noise waiver if applicable</td>
</tr>
<tr>
<td>Noise</td>
<td></td>
<td>CON-NC-01: Measure to reduce noise impacts during construction</td>
</tr>
<tr>
<td></td>
<td></td>
<td>OPR-NC-01: Noise Reduced Operating mode turbines operating noise level documentation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>OPR-NC-02: Certificate Holder to maintain a noise complaint response system</td>
</tr>
<tr>
<td></td>
<td></td>
<td>OPR-NC-03: Certificate Holder will provide a monitoring plan for noise levels in response to a noise complaint</td>
</tr>
<tr>
<td>Removal-Fill Law</td>
<td>The proposed change doesn't change that a removal-fill permit is not needed for the Facility because the Facility will not temporarily or permanently impact waters of the state.</td>
<td>N/A</td>
</tr>
<tr>
<td>Water Rights</td>
<td>The proposed change does not change the water volumes and sources as previously approved by Council for use during construction and operation of the Facility.</td>
<td>N/A</td>
</tr>
</tbody>
</table>
This page intentionally left blank
5.0 Conclusion

The Certificate Holder provides this ADR to demonstrate that the proposed change does not fall under a factor requiring amendment under OAR 345-027-0350. Furthermore, as established by the findings and conclusions discussed in this ADR, WREFII, including the proposed change:

1. Complies with the requirements of the Oregon energy facility siting statutes, Oregon Revised Statutes (ORS) 469.300 to ORS 469.570 and ORS 469.590 to ORS 469.619;
2. Complies with the applicable standards adopted by the Council pursuant to ORS 469.501; and,
3. Complies with all other Oregon statutes and administrative rules applicable to the amendment of the Site Certificate that are within the Council’s jurisdiction.

Therefore, ODOE may provide a written determination that no amendment of the Site Certificate is required for the proposed change.
Figures
This page intentionally left blank.
Wheatridge Renewable Energy Facility II

Figure 1
Site Boundary
(August 2020)

MORROW AND UMATILLA COUNTIES, OR

Wheatridge Renewable Energy Facility II
Site Boundary Overlap with Wheatridge Renewable Energy Facility I
Collector Line 50 ft Disturbance Buffer - Proposed New Site Boundary
State Highway
County Boundary
Figure 2
Collector Line Adjustment
(August 2020)

Wheatridge Renewable Energy Facility II

Survey Areas
- WAGS (2019)
- Rare Plants (2019)
*Area entirely within Raptor Nest Survey Area (2019)

NWI Waterbodies
- Freshwater Emergent Wetland

Project Infrastructure
- Wheatridge Renewable Energy Facility II Site Boundary
- Access Road
- Collection Line

Constraints
- Laurent's Milkvetch Observations
**Area entirely within Mule Deer Winter Range

Habitat Subtype
- Exotic Annual
- Native Perennial
- Revegetated or Other Planted Grassland

Reference Map