

Notice of Intent to Apply for a Site Certificate (Amended)

**Wagon Trail Solar Project
May 2021**

**Submitted to
Oregon Energy Facility Siting Council**



Wheatridge East Wind, LLC

Prepared by



Tetra Tech, Inc.

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Acronyms and Abbreviations

AC	alternating current
ACDP	Air Contaminant Discharge Permit
Applicant	Wheatridge East Wind, LLC
ASC	Application for Site Certificate
BPA	Bonneville Power Administration
CFR	Code of Federal Regulations
DC	direct current
EFSC	Energy Facility Siting Council
FAA	Federal Aviation Administration
Facility	Wagon Trail Solar Project
I-84	Interstate 84
kV	kilovolt
met	meteorological
MW	megawatt
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NextEra	NextEra Energy Resources, LLC
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O&M	operations and maintenance
OAR	Oregon Administrative Rule
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
ODFW	Oregon Department of Fish and Wildlife
ORS	Oregon Revised Statute
PCB	polychlorinated biphenyl
PV	photovoltaic
SHPO	State Historic Preservation Office
USC	United States Code

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:

Wheatridge East Wind, LLC c/o NextEra Energy Resources, LLC
700 Universe Boulevard
Juno Beach, FL 33408

Applicant contact persons with mailing address and telephone numbers:

David Lawlor
Director of Development
Wheatridge East Wind, LLC
700 Universe Boulevard
Juno Beach, FL 33408
(587) 956-0081
david.lawlor@nexteraenergy.com

(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.

Response:

Wheatridge East Wind, LLC is a subsidiary of NextEra Energy Resources, LLC (NextEra).

Parent Company:

NextEra Energy Resources, LLC
FEW/JB
700 Universe Boulevard
Juno Beach, FL 33408

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

Chris Powers
Project Manager
NextEra Energy Resources, LLC
700 Universe Boulevard
Juno Beach, FL 33408
760-522-7563
Christopher.Powers@nexteraenergy.com

Contact persons other than the Applicant:

Carrie Konkol
Tetra Tech, Inc.
1750 SW Harbor Way, Suite 400
Portland, OR 97213
(503) 721-7225
carrie.konkol@tetrattech.com

(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, this rule is 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:

As noted above, the Applicant is a subsidiary of NextEra. NextEra is a subsidiary of NextEra Energy. The parent company names and business addresses are as follows:

NextEra Energy Resources, LLC
FEW/JB
700 Universe Boulevard
Juno Beach, FL 33408

NextEra Energy
700 Universe Boulevard
Juno Beach, FL 33408
<http://www.nexteraenergy.com/>

(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;

(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 must state that fact over the signature of each member.

Response:

The Applicant is not an association of citizens, a joint venture, or partnership. Therefore, this rule is not applicable.

(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. Therefore, this rule is not applicable.

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

Response:

The Applicant is not an individual. Therefore, this rule is not applicable.

(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.

Response:

The Applicant is a limited liability company. The officer responsible for submitting the Notice of Intent (NOI) is as follows:

David Lawlor
Project Director
Wheatridge East Wind, LLC
700 Universe Boulevard
Juno Beach, FL 33408

Wheatridge East Wind, LLC was organized and acknowledged by the Oregon Secretary of State on August 26, 2020, in Salem, Oregon. The articles of organization and authorization for submitting the NOI are provided in Attachment 1. Wheatridge East Wind, LLC is registered in Oregon; therefore, information for the resident attorney-in-fact is not required.

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:

Response:

The Applicant proposes to construct and operate a photovoltaic (PV) solar energy generation facility and related or supporting facilities including an energy storage system in Morrow County, Oregon. As described in more detail below, the proposed Wagon Trail Solar Project (Facility) will consist of up to 500 megawatts (MW) of solar generation and will generate electricity using PV solar panels wired in series and in parallel to form arrays and connected to electrical infrastructure. The Facility Site Boundary (also the micrositing corridor) encompasses approximately 7,339 acres. The proposed Facility will overlap with portions of Wheatridge Renewable Energy Facility I and II (See Attachment 2, Figure 1).

The proposed Facility is located entirely on private land, and the number, size, and actual layout of the Facility infrastructure has not yet been determined. New Facility components proposed will include distributed battery storage within the solar fields, an underground electrical collection system connecting the solar arrays, collector substations, overhead 230-kilovolt (kV) transmission lines connecting to the existing Blue Ridge Substation, new private access and service roads, gates and security fencing, and additional temporary construction areas. Figure 2 in Attachment 2 shows the Site Boundary for the Facility.

The Applicant seeks micrositing flexibility within the Site Boundary for the layout of the solar fields and related and supporting facility, the flexibility to develop the solar energy sites in phases, and to divide the overall facility into separate energy facilities to provide for the maximum efficiency of space and available technology while also providing for the maximum flexibility of potential customers. The Applicant intends to begin on-site construction by 2023, pending issuance of a Site Certificate from the Energy Facility Siting Council (EFSC), with commissioning completed and commercial operation targeted for the end of 2023.

(i) The nominal electric generating capacity and the average electrical generating capacity, as defined in ORS 469.300.

Response:

The Facility will have up to 500 MW of 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 electricity and useful thermal energy.

Response:

The solar array will be composed of a combination of solar modules, tracker systems, posts, and related electrical equipment. The Applicant seeks to permit a range of technology and quantity of facilities in order to preserve design and layout flexibility. The solar modules and associated equipment, and precise layout of the solar arrays and related or supporting facilities, have not yet been determined. Because technology is changing rapidly, the Application for Site Certificate (ASC) will analyze impacts associated with the largest solar array footprint and impacts. The actual solar array equipment and layout selected will not exceed the impacts analyzed. During pre-construction and final design engineering, the Applicant will specify the precise details of the energy generation and related or supporting facilities equipment and layout in accordance with reporting requirements to the Oregon Department of Energy. Therefore, the following description of major components is based on the best available design information at this time which also may be modified in the ASC, but may not reflect the final design or equipment used.

Solar Modules. Solar modules use mono- or poly-crystalline cells to generate electricity by converting sunlight into direct current (DC) electrical energy. The electrical generation from a single module varies by module size and the number of cells per module. The dimensions of each module will be approximately 6 feet long and 3 feet wide. Other than the crystalline cell, solar modules consist of antireflective glass, a metal frame, and factory installed “quick connect” wire connectors. The modules will be connected in series to form long rows. The rows of modules are then connected via combiners, cables, and switchboards. The configuration of multiple rows (the array) can vary depending on the equipment type and topography. The actual number of modules will vary depending on the module technology, spacing, mounting equipment, and other design criteria, which are subject to change during final design.

Tracker Systems. Strings of solar modules will be mounted on single-axis tracker systems that optimize electricity production by rotating the solar modules to follow the path of the sun throughout the day. The length of each tracker row may vary by topography and the number of modules that the tracker can hold. The drive unit for the tracking system can control a single row or multiple rows of modules through a series of mechanical linkages and gearboxes. As the solar modules tilt throughout the day, the height of their top edges will shift accordingly (i.e., up to 16 feet high). The tracker system, and associated posts, will be specifically designed to withstand wind, snow, and seismic loads anticipated at the site.

Posts. Each tracker will be supported by multiple steel posts, which could be round hollow posts, or pile-type posts (i.e., H-pile, C-pile, S-pile). Post depth may vary depending on soil conditions, but the posts are typically installed 5 to 20 feet below the surface and protrude approximately 5 feet above grade. Posts at the end of tracker rows are usually installed to greater depth to withstand wind uplift. In some soil conditions, concrete backfill is required for each post. For the purposes of the ASC, the Applicant will assume that all posts will use concrete foundations, but site-specific conditions will determine whether concrete actually will be required for construction. Post

locations will be determined by the final layout of the tracker system and geotechnical investigations of the solar area.

Inverters. The direct current collected from the solar modules via combiner boxes must be converted into alternating current (AC) before connecting to the collector substations. Low-voltage cabling will link each solar module to inverters to convert panel output from 400-watt DC to 1,500-volt AC. Inverters serve the function of converting DC power supply to an AC power supply in accordance with electrical requirements. The number of inverters will vary depending on the actual generation output of the solar array. The inverter specification will comply with the applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.

Transformers. The alternating current from the inverters will be routed to transformers that will increase the output voltage from the inverter (480 volts) to the desired substation feed voltage (34.5 kV). The transformers could be collocated with the inverters associated with each array, or centrally located. Transformers at these locations will step up the voltage from the inverters. Transformers will be non-polychlorinated biphenyl (PCB) oil-filled types.

Cabling. The electrical current produced by solar modules is in the form of DC. Cables collect and aggregate the DC before it is converted to AC and sent to the Facility substations. Low-voltage cabling will connect the solar modules of each tracker string in series and combine multiple strings to a single combiner box. Cabling from multiple combiner boxes will connect to a single inverter, which will convert the DC to AC and connect to the buried collection system. Cabling can be mounted to the tracker system, placed in cable trays, or buried. The majority of buried cable associated with the solar array will be located within the solar area fence line and included in the estimated total permanent impact associated with the solar array (i.e., no temporary impacts are calculated for buried cable inside the solar array fence line).

Collection System. The transformers will connect the generation output of the solar array to the 34.5-kV collector lines, which will be underground. Underground AC electrical cables will be buried to a minimum of 3 feet. These will be located underground to the extent practicable. In areas where they must be overhead, the collector lines will be supported by a wooden or steel pole structure and buried approximately 6 feet in the ground, extending to a height of approximately 60 feet above ground, spaced 100 to 200 feet apart. Specific locations of overhead collector lines, if necessary, will not be known until site geotechnical work has been completed during pre-construction activities.

(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 storm water, and the location of disposal.

Response:

The Facility will not consume water in the generation of electricity nor will it produce wastewater for disposal or significant quantities of solid waste. Further details of stormwater drainage, water,

solid waste management, and sewage treatment during construction and operations are provided in Exhibit K of this NOI.

(iv) For thermal power plants:

(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) Methods for disposal of waste heat.

Response:

The Facility is not a thermal power plant. The Facility will generate solar power; consequently, no waste heat will be generated.

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

Response:

The Facility will utilize up to 8 miles of 230-kV AC transmission line, which could be broken up into up to three extents of transmission line. The 230-kV transmission line or associated transmission lines themselves are not transmission lines within the meaning of EFSC jurisdiction. The 230-kV overhead lines will be supported either by H-frame structures with two galvanized steel or wood poles, or by galvanized steel or wood monopole structures. The structures will rise to a height of approximately 60 to 150 feet above grade depending on design and terrain.

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

Response:

The Facility is not a pipeline. Therefore, this rule is not applicable.

(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 Facility does not involve underground gas storage. Therefore, this rule is not applicable.

(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 Applicant does not propose the storage of liquefied natural gas. Therefore, this rule is not applicable.

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

Response:

Related or supporting facilities consist of the battery storage systems, collector substations, 230-kV transmission lines, operations and maintenance (O&M) building, meteorological (met) towers, access roads and security infrastructure, and temporary construction areas. As noted earlier, the Applicant is requesting micro-siting flexibility for the solar modules and associated equipment, as well as the layout of the solar arrays and related or supporting facilities. Therefore, the following descriptions are based on the best available information at this time, might be modified in the ASC and consider the potential for various phases of development.

Distributed Battery Storage. There will be distributed battery storage throughout the proposed solar fields, which will consist of lithium-ion batteries in storage containers. Each container will be placed on a foundation. Each container holds the batteries, a supervisory and power management system, and a fire prevention system. Lithium-ion battery systems are modular systems in which each module contains multiple smaller battery cells. The cells are the primary containment for the gel or liquid electrolyte materials. The module containing the cells is relatively small, generally about the size of a desktop computer processor, and serves as leak-proof secondary containment. Modules are placed in anchored racks within the concrete containers; typically, each rack houses battery modules along with a switchgear assembly. Cooling units will be placed either on top of the concrete containers or along the side.

Collector Substations. Up to four collector substations will be used for the proposed Facility. Prior to construction, any new substation sites will be cleared and graded, with a bed of crushed rock applied for a durable surface. Each collector substation will be located on a 3- to 10-acre site. Each substation consists of transformers, transmission line termination structures, a bus bar, circuit breakers and fuses, control systems, meters, and other equipment.

Operations and Maintenance Buildings. There will be one O&M building for the proposed Facility. The O&M building will be new, or the Facility may share the O&M building with the previously approved Wheatridge Facilities. The O&M building will be located on approximately one acre, be one-story, prefabricated, and approximately 6,000 to 9,000 square feet in size. The O&M building may include an office, break room, kitchen, lavatory with shower, utility room, covered vehicle parking, storage for maintenance supplies and equipment, and Supervisory Control and Data Acquisition system. A permanent, fenced, graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building. The building will be served by

an on-site well and septic system and power supplied by a local service provider using overhead and/or underground lines.

Meteorological Towers. The Facility will have up to three met towers. Each met tower has a free-standing, non-guyed design and is approximately 328 feet in height. Installation of permanent met towers results in approximately 98 feet in diameter of temporary land disturbance per tower and approximately 32 feet in diameter of permanent land disturbance per tower. Permanent met towers are fitted with safety lighting and paint as required by the Federal Aviation Administration.

Site Access, Service Roads, Perimeter Fencing, and Gates. The Facility will utilize existing access roads to the extent practicable. Primary transportation corridors to the Facility include Interstate 84 (I-84) and Oregon Route 207. Other major county and state roads that will be heavily utilized include Bombing Range Road, Strawberry East Road, and Oregon Route 320. New roads will be constructed as necessary to access Facility infrastructure in areas not previously reviewed through EFSC.

Currently, an exact layout of proposed new roads is not final. It is the Applicant's intent to use existing roads wherever possible, and to minimize impacts to the agricultural and grazing effectiveness of the land by working in conjunction with the landowners on new road construction when necessary. All newly constructed roads will be graded and graveled to meet load requirements for all equipment. Service roads, approximately 16 feet wide, will be constructed to facilitate access for construction and maintenance purposes. Vegetation will be cleared and maintained along perimeter roads to provide a vegetation clearance area for fire safety. Internal roads will be all-weather, compacted gravel, with an internal turning radius of 28 feet. Vegetation maintenance along proposed solar array interior roads will include mowing to a height no more than 3 inches. Use of the roads may continue after construction, or new roads may be removed and the land reclaimed to pre-construction conditions.

The locations of specific access points and gates will depend on the final configuration of the solar array and related infrastructure. Chain-link perimeter fencing, 6 feet in height, will enclose the solar array as well as other infrastructure. The perimeter fencing will have lockable vehicle and pedestrian access gates.

Temporary Construction Areas. Up to four construction areas will be required for the proposed Facility, to facilitate the delivery and assembly of materials and equipment. These construction areas may contain temporary storage of diesel and gasoline fuels, located in an aboveground 1,000-gallon diesel and 500-gallon gasoline tanks, within designated secondary containment areas. In addition, the Applicant may utilize one or more temporary concrete batch plants areas, located within the construction areas. The temporary construction staging areas will be within the Site Boundary.

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

Response:

The most notable features of the Facility are: (1) the various components of the solar array; (2) distributed battery storage; (3) the substations; (4) the collector lines; (5) the 230-kV overhead transmission lines; (6) the O&M building; (7) the met towers; and (8) the construction areas. The estimated dimensions of the major Facility structures, as currently available, are summarized below. As noted previously, the ASC will access the worst-case scenario impact of Facility structures and visible features.

Solar Array. The solar modules will be grouped in blocks approximately 3 feet wide by 6 feet long; this will be a targeted standard dimension, with variations at each block due to micrositing considerations. The maximum height of the solar modules will be 16 feet when the modules are tilted. The exact number and size of modules, layout, and associated equipment specifications will be determined during micrositing.

Distributed Battery Storage. The Facility will include battery sites, to be dispersed within the solar arrays. Each individual site will include a concrete container housing, with each container measuring up to 12 feet wide, 36 feet long, and 10 feet tall. 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 concrete containers or along the side.

Substations. The four collector substations will be situated on a five to ten-acre site, enclosed by a locked wire mesh fence.

Collector Lines. The medium-voltage conductors will run underground for improved reliability. The collector lines will be directly buried at a depth up to 3 feet; however, some portion of the conductors may also be above ground. Any overhead collector line segments will likely be placed on steel or wood monopoles at least 30 feet high and subject to the requirements of the National Electrical Safety Code.

230-kV Transmission Lines. The 230-kV lines will be supported either by H-frame structures with two galvanized steel or wood poles or by a galvanized steel or wood monopole structure. The structures will rise to a height of approximately 60 to 150 feet above grade, depending on the terrain. The transmission line corridor is approximately 1,000 feet in width. The 230-kV lines will generally have 400- to 800-foot-long spans between structures; however, spans may be shorter or longer depending on the terrain. Up to 8 miles of 230-kV transmission line will be used, which could be broken up into up to three extents of transmission line.

O&M Building. The new O&M building (if the Facility does not share an O&M building with the Wheatridge Facilities) will be one-story structures located on approximately one acre with an area of approximately 6,000 to 9,000 square feet. A permanent, fenced, graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building.

Meteorological Towers. The three permanent met towers will be free-standing using a non-guyed design, approximately 328 feet in height. Installation of permanent met towers will result in

approximately 98 feet in diameter of temporary land disturbance per tower and approximately 32-feet in diameter of permanent land disturbance per tower.

Temporary Construction Areas. The four construction areas will occupy up to 20 acres total.

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:

The proposed Facility is located south of I-84 in Morrow County, Oregon. The Facility Site Boundary includes approximately 7,339 acres of private land adjacent to the Wheatridge Facilities (see Figure 1 in Attachment 2). The Site Boundary, which is also the micrositing corridor, provides for flexibility for micrositing the Facility and related and supporting facilities.

The Site Boundary encompasses some or all of the townships, ranges, and sections identified in Table C-1.

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

Township and Range	Sections
1N 25E	1, 11, 12, 13, 14, 22, 23, 24, 25, 26, 27, 28, 34, 35, 36
1N 26E	5, 6, 7, 8, 17, 18, 19, 30
2N 25E	25, 26, 27, 36

In the ASC, the Applicant will confirm the Site Boundary shown on Figure 2. The Applicant requests micrositing flexibility within the Site Boundary to site the energy facility and related and supporting facilities using the most efficient and effective equipment and layout. The Site Boundary provides the limits of the area that may be temporarily or permanently disturbed during construction of the facility. The land area for full build-out of the Facility solar arrays, and all facilities within the fence line of the solar arrays would be approximately 5,000 acres of the Site Boundary. Worst-case temporary and permanent acreage impacts will be provided by facility component in the ASC.

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 shall include an explanation of the basis for selecting the proposed corridor(s) and, for each proposed corridor, the information described in subsections (e), (g), (i), (j), (k), (n) and (p) that is available from existing maps, aerial photographs, and a search of readily available literature.

Response:

The Facility is not a pipeline or 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 shall 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 required for construction and operation of the Facility.

Table E-1. Permits or Other Approvals Required for Construction and Operation of the Facility

Permit	Agency	Authority/Description
Federal Permits		
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Peter Olmstead, Project Manager PO Box 2946 Portland, OR 97208 (503-808-4373 Brian.I.Zabel@usace.army.mil	Clean Water Act, Section 404 (33 USC § 1344); 33 CFR §§ 320, 323, 325-28, and 330 Description: A Section 404 permit will be required if dredge or fill occurs in waters of the United States. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Notice of Proposed Construction or Alteration (Form 7460.1)	Federal Aviation Administration (FAA) Attn: Dan Shoemaker, Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77 Description: The Applicant proposes construction or alterations that may affect navigable airspace pertaining to potential glare from the Facility’s solar arrays, or for construction of structures within specified distances of runways or helipads, may be required to file this notice. No permit is issued by the FAA. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	FAA Attn: Dan Shoemaker, Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77 Description: 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. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
State Permits		
Energy Facility Site Certificate	Oregon Department of Energy and Energy Facility Siting Council Attn: Todd Cornett, Division Administrator 550 Capitol Street NE Salem, OR 97301 (503) 378-8328 todd.cornett@oregon.gov	ORS 469.300 et seq.; Oregon Administrative Rules (OAR) Chapter 345, Divisions 1, 21-24 Description: This site certificate is the subject of this NOI.
Removal/Fill Permit	Oregon Department of State Lands, Eastern Region Attn: Bethany Herrington, Resource Coordinator 1645 NE Forbes Road, Suite 112 Bend, OR 97701 (541) 325-6142 Bethany.Herrington@state.or.us	ORS 196; OAR Chapter 141, Division 85 Description: A removal-fill permit is required if 50 cubic yards or more of material is removed, filled, or altered within a jurisdictional water of the State. If this is proposed, the Removal-Fill Permit should be included in and governed by the site certificate under ORS 469.401(3).
On-site Sewage Disposal Construction-Installation Permit	Oregon Department of Environmental Quality (ODEQ), Eastern Region Water Quality On-site Program, Eastern Region Attn: Bob Baggett, Technical Assistance and Variances 800 SE Emigrant, Suite 330 Pendleton, OR 97801 (541) 633-2036 baggett.robert@deq.state.or.us	ORS 454 and 468B; OAR Chapter 340, Divisions 71 Description: Facilities with on-site sewage disposal system must obtain a Construction-Installation Permit before construction. The Facility will have a daily sewage flow of fewer than 2,500 gallons and the Applicant's third-party contractor will obtain from ODEQ a Construction-Installation Permit for the operations and maintenance facility. Therefore, this permit should not be included in and governed by the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
<p>National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit 1200-C</p>	<p>ODEQ, Eastern Region Attn: Jackie Ray, Permit Coordinator 800 SE Emigrant, Suite 330 Pendleton, OR 97801 (541) 278-4605 Ray.Jackie@deq.state.or.us</p>	<p>Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: NPDES permit is required for construction activities that will disturb one or more acres of land. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.</p>
<p>401 Water Quality Certification</p>	<p>ODEQ, Eastern Region Attn: Linda Hayes-Gorman, Eastern Region Administrator 800 SE Emigrant, Suite 330 Pendleton, OR 97801 (541) 633-2018 Hayes-gorman.linda@deq.state.or.us</p>	<p>Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48 Description: Water quality certification is required for projects that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.</p>
<p>Water Right Permit or Water Use Authorization</p>	<p>Oregon Water Resources Department Water Rights Section, District 5 Attn: Greg Silbernagel, District 5 Watermaster 116 SE Dorion Ave Pendleton, OR 97801 (541) 278-5456 Greg.M.Silbernagel@oregon.gov</p>	<p>ORS 537; OAR 690 Divisions 310, 340, and 410 Description: If water for construction 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. It is outside the jurisdiction of EFSC and should not be included in and governed by the site certificate.</p>
<p>General Water Pollution Control Facilities Permit, WPCF-1700-B</p>	<p>ODEQ, Eastern Region Attn: Larry Brown, Water Pollution Control Facility Assistance 800 SE Emigrant, Suite 330 Pendleton, OR 97801 (541) 276-4063 Brown.Larry@deq.state.or.us</p>	<p>ORS 468B; OAR Chapter 340, Division 45 Description: The Applicant or a third-party contractor who will conduct the solar panel washing activities may seek coverage under the WPCF-1700-B permit from ODEQ following completion of construction and before initiating any washing activities. Therefore, this permit should not be included in and governed by the site certificate.</p>

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
General Water Pollution Control Facilities Permit, WPCF-1000, Gravel Mining and Batch Plant	<p>ODEQ, Eastern Region</p> <p>Attn: Larry Brown, Water Pollution Control Facility Assistance 800 SE Emigrant, Suite 330 Pendleton, OR 97801 (541) 276-4063 Brown.Larry@deq.state.or.us</p>	<p>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 required for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from the Oregon Department of Environmental Quality, which would therefore not be included in and governed by the site certificate.</p>
Air Contaminant Discharge Permit (ACDP)	<p>ODEQ, Eastern Region</p> <p>Attn: Linda Hayes-Gorman, Eastern Region Administrator 800 SE Emigrant, Suite 330 Pendleton, OR 97801 (541) 633-2018 Hayes-gorman.linda@deq.state.or.us</p>	<p>OAR Chapter 340, Division 216</p> <p>Description: Each mobile concrete batch plant used will require an associated Air Contaminant Discharge Permit. Depending on the anticipated volume of concrete to be made by each plant, either a Basic or General ACDP would be required. This permit is outside the jurisdiction of EFSC and should not be included in and governed by the site certificate.</p>
Oversize Load Movement Permit/Load Registration	<p>Oregon Department of Transportation (ODOT)</p> <p>Attn: Christy Jordan, Manager Motor Carriers Transportation Division 3930 Fairview Industrial Drive SE Salem, OR 97302 (503) 378-6192 Christy.A.Jordan@odot.state.or.us</p>	<p>ORS 818.030; OAR Chapter 734, Division 82</p> <p>Description: Authorization for 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 ODOT and therefore this permit should not be included in and governed by the site certificate.</p>
Access Management Permit	<p>ODOT</p> <p>Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 12 1327 SE Third Street Pendleton, OR 97801 (541) 276-1241</p>	<p>OAR Chapter 734, Division 51</p> <p>Description: Access from Oregon state highways would require an access permit, which may be issued by the local ODOT District Offices. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in and governed by the site certificate.</p>

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Permit to Occupy or Perform Operations Upon a State Highway	<p>ODOT</p> <p>Attn: ODOT Utility and Miscellaneous Permit Specialist</p> <p>ODOT District 12 1327 SE Third Street Pendleton, OR 97801 (541) 276-1241</p>	<p>OAR Chapter 734, Division 55 (Pole Lines, Buried Cables, and Miscellaneous Operations)</p> <p>Description: Utility installations within the right-of-way of a state highway in Oregon require a permit issued by the ODOT. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in and governed by the site certificate.</p>
Archaeological Excavation Permit	<p>Oregon Parks and Recreation Department, State Historic Preservation Office</p> <p>Attn: John Pouley, State Archaeologist</p> <p>725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0577 John.Pouley@oregon.gov</p>	<p>ORS Chapter 97, 358, and 390; OAR Chapter 736, Division 51</p> <p>Description: Ground-disturbing activity that may affect a known or unknown archaeological resource on public or private lands requires a permit issued by the Oregon Parks and Recreation Department. If needed, the Applicant will obtain it from the State Historic Preservation Office and therefore this permit should not be included in and governed by the site certificate.</p>
Local Permits		
Conditional Use Permit and Zoning Permit	<p>Morrow County Planning Department</p> <p>Attn: Carla McLane, Planning Director</p> <p>P.O. Box 40 205 Third Street NE Irrigon, OR 97844 (541) 922-4624 cmclane@co.morrow.or.us</p>	<p>Morrow County Zoning Ordinance Section 3.010(C)-(D) and 3.010(K)(3)</p> <p>Description: 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.</p>
Building Permit	<p>City of Boardman Building Department (provides services for building projects within Morrow County)</p> <p>Attn: Brett Cook, Building Official</p> <p>200 City Center Circle P.O. Box 229 Boardman, Oregon 97818 (541) 481-9252 brettc@cityofboardman.com</p>	<p>OAR 734 Division 51</p> <p>Description: A building permit is required prior to beginning construction of the Facility. Morrow County does not have its own building department, so relies on the City of Boardman Building Department for review and approval of all building permits in the county.</p>

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Utility Crossing Permit and Access Approach Site Permit	Morrow County Public Works Attn: Matt Scrivner, Public Works Director Morrow County Public Works PO Box 428 Lexington, OR 97839 (541) 989-9500 mscrivner@co.morrow.or.us	ORS 374.305 to 374.325 Description: A Utility Crossing permit is required any time a utility is constructed within or across a County road right-of-way. An Approach Site Permit will be required for each location where Facility access roads intersect with county roads, or if necessary upgrades to existing access roads affect a county road.
Construction Permit to Build on Right-of-Way	Morrow County Public Works Attn: Matt Scrivner, Public Works Director Morrow County Public Works PO Box 428 Lexington, OR 97839 (541) 989-9500 mscrivner@co.morrow.or.us	Morrow County Zoning Ordinance Section 4.010(B) Description: 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.
Oversize Load Movement Permit	Morrow County Public Works Attn: Matt Scrivner, Public Works Director Morrow County Public Works PO Box 428 Lexington, OR 97839 (541) 989-9500 mscrivner@co.morrow.or.us	Morrow County Zoning Ordinance Section 4.010(B) Description: This permit will be required to transport loads that exceed standard size and/or weight limits on county roads.

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 is 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; and

(iii) Within 500 feet of property which is the subject of the NOI, where the subject property is within a farm or forest zone.

Response:

In accordance with OAR 345-020-0011(1)(f)(A), Table F-1 in Attachment 3 lists the names and mailing addresses of all owners of record in Morrow County, where the Facility will be sited, and any adjacent counties that are within 500 feet of the proposed Facility Site Boundary. An electronic list of property ownership will also be provided to the Oregon Department of Energy in a format suitable to produce mailing labels, as requested.

Exhibit G. Facility Maps – OAR 345-020-0011(1)(g)

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

Response:

Attachment 2 contains six maps that show the required information, as follows:

(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, cities and towns, important landmarks, topographic features.

Figure 2 identifies the Facility Site Boundary and point of interconnection at Blue Ridge Substation, and the previously approved Wheatridge Facilities Site Boundaries that overlap with the Facility Site Boundary.

Figures 3 identifies the important landmarks, recreation and historic resources and scenic areas, and major 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:

The Applicant has not identified proposed alternative corridors under subsection (d). As noted above, 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).

(C) The study area(s) for the proposed facility as defined in OAR 345-001-0010.

Response:

Figure 4 shows the study areas as defined by OAR 345-001-0010(58) for land use (0.5 mile), fish and wildlife habitat (0.5 mile), recreational opportunities (5 miles), threatened and endangered species (5 miles), scenic resources (10 miles), and public services (15 miles), as well as for protected areas (20 miles), as described in OAR 345-022-0040.

(D) The topography of the study area(s) including streams, rivers, lakes, major roads and contour lines.

Figure 5 details the Site Boundary in relation to nearby geographic features and illustrates the range of elevations within the vicinity of the Facility.

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

Response:

Figure 6 displays and labels all protected areas in the study area as defined by OAR 345-001-0010(58).

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

Response:

Figures 7 and 8 show NWI and NHD features respectively, display potential waters of the State or potential waters of the United States within the vicinity of the Facility. A comprehensive waters and wetlands field survey, including a formal wetland delineation, will be conducted, and detailed information regarding the location of and impacts to waters of the State or of the United States will be provided in the ASC.

(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 9 shows approximate locations of proposed and existing energy facilities known to the Applicant within 10 miles of the Site Boundary, in accordance with OAR 345-001-0010(58) for impacts to public services. Existing energy facilities within 10 miles of the Facility include the Boardman Coal Plant, Carty Generating Station, Three Mile Canyon Wind, Wheatridge Facilities, Echo Wind Farm and Finley Butte Renewable Energy Facility. Proposed energy facilities within 10 miles of the Facility include the Boardman to Hemingway 500-kV transmission line, Sunset Solar, Harp Solar, and Trail Solar, and Pine City Windfarm.

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 Applicant intends to satisfy EFSC's land use standard, OAR 345-022-0030, by seeking an EFSC determination under ORS 469.504(1)(b). The Applicant seeks a determination by EFSC of compliance with land use standards from Morrow County.

Exhibit J. Environmental Impacts – OAR 345-020-0011(1)(j)

(j) Exhibit J. Identification of significant potential environmental impacts of construction and operation of the proposed facility on 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 and aesthetic areas, recreation, and land use.

Response:

This exhibit presents potential environmental impacts from the Facility’s construction and operation on air quality; surface and groundwater quality and availability (including wetlands and waters of the State or of the United States); wildlife and wildlife habitat; threatened and endangered plant and animal species; historic, cultural, and archaeological resources; scenic and aesthetic areas (including protected areas); recreation; protected areas; and land use. The analyses are based on the study area for each resource, as defined in OAR 345-001-0010(58) and shown in Table J-1.

Table J-1. Study Areas for Environmental Impacts

Resource	Study Area	Regulatory Requirement
Air Quality	Site Boundary	Not applicable
Surface and Groundwater Quality and Availability (includes Wetlands and Waters of the United States)	Site Boundary	Not applicable
Wildlife and Wildlife Habitat	0.5 miles from Site Boundary	OAR 345-001-0010(58)(c)
Threatened and Endangered Plant and Animal Species	5 miles from Site Boundary	OAR 345-001-0010(58)(a)
Historic, cultural and archaeological resources	Site Boundary	Not applicable
Scenic and Aesthetic Areas	10 miles from Site Boundary	OAR 345-001-0010(58)(b)
Recreation	5 miles from Site Boundary	OAR 345-001-0010(58)(d)
Protected Areas	20 miles from Site Boundary	OAR 345-001-0010(58)(e)
Land Use	0.5 miles from Site Boundary	OAR 345-001-0010(58)(c)

Air Quality

Air quality has the potential to be affected during construction, as well as during the operation and maintenance of the Facility, primarily due to vehicle emissions and fugitive dust generation. The solar modules, collector lines, and associated facilities will not generate emissions of air contaminants, so they will consequently not have a negative impact on air quality. Because it is not

a potential emitter of air contaminants, the Facility will not require air quality permits, such as a Prevention of Significant Deterioration or Title V operating permit.

During construction, air quality impacts will be associated with gasoline and diesel engine exhaust from construction equipment and maintenance vehicles, fugitive dust resulting from vehicles driving on dirt and gravel roads, land clearing, and other construction-related activities such as rock crushing. Post-construction impacts on air quality will be limited to vehicle exhaust emissions and from dust emissions associated with vehicular traffic on dirt and gravel roads. Vehicle trips during operations will be limited to up to 10 Facility personnel and occasional deliveries. The Applicant will implement dust control measures during construction, which will be detailed in the ASC.

Because vehicles and dust generated during construction and operations are mobile, temporary, and non-point sources, they are not subject to air quality permitting. All Facility-related vehicles, workers' vehicles, and vehicles used for delivery of construction supplies and equipment, or operational supplies, are subject to the Oregon Department of Transportation (ODOT) and United States Department of Transportation regulations for registration and emissions. Facility construction equipment will be subject to the federal non-road engine standards in 40 Code of Federal Regulations (CFR) Part 89. These standards establish the maximum allowable emission rates for compression ignition non-road engines based on the model year of the engine.

Surface and Groundwater

Surface and Groundwater Quality

The Facility will not discharge pollutants to surface water or groundwater. Temporary impacts due to construction stormwater runoff will be controlled in compliance with a National Pollutant Discharge Elimination System (NPDES) 1200-C permit to be issued by the Oregon Department of Environmental Quality (ODEQ), which will include an Erosion and Sediment Control Plan and NPDES 1200-A permits for the concrete batch plant. During Facility operation, the existing Wheatridge Facilities O&M building or the new O&M facility will discharge domestic wastewater to approved on-site septic systems and drain fields in compliance with local or state permitting requirements.

Surface and Groundwater Availability

During Facility construction, approximately 1,000,000 gallons of water per month over an estimated 12-month period will be required for dust suppression and road and earthwork compaction, although this depends on how construction of the Facility is phased. The Applicant will confirm the estimated amount of water and will provide additional detail on water use in the ASC. Water use during construction is not expected to adversely affect any existing water rights or exceed the amount of water available for beneficial use within the watersheds on which the Facility is located.

During Facility construction, water will be obtained from an existing municipal water source with valid water rights and trucked to the site. It is anticipated that water will be obtained from cities of Hermiston, Stanfield, Boardman, or other nearby municipalities like the Port of Morrow. In the ASC, the Applicant will both confirm the anticipated amount of water required for construction and confirm with nearby cities that one or more can provide enough water to meet the Facility requirements during construction.

If water is not available from these sources, the Applicant may apply to the Oregon Water Resources Department for a limited water use license, to allow either a new well or an existing landowner's well to be used for Facility construction water. The construction contractor will be responsible for identifying water sources and ensuring that any needed permits or approvals are obtained for water use. Water will either be used immediately or stored in a tank or holding pond.

Water will be used during Facility operations at the existing Wheatridge Facilities O&M or new O&M building, at the level of a standard commercial office employing up to 10 people. The Applicant plans to rely on exempt wells allowed under ORS 537.545 to provide water to the O&M building. The Facility will use less than 5,000 gallons per day, which will not require a new water right.

Wetlands and Waters of the United States

A desktop analysis of the Facility Site Boundary was performed, to identify potential impacts from construction and operation of the Facility on potentially jurisdictional wetlands and waters of the State or of the United States. Desktop tools included NWI and NHD data sets; NWI and NHD locations and feature types are shown on Figures 7 and 8, respectively. Wetland and water resource surveys were also conducted in the proposed Facility Site Boundary. The delineation and assessment were conducted to meet the Oregon Removal/Fill Law (ORS 196; OAR Chapter 141, Division 85) and Section 404 of the Clean Water Act. The NWI showed no wetlands in the Facility study area. Field surveys confirmed this finding. Eight ephemeral streams and one roadside drainage ditch were delineated within the Site Boundary. There was no water present in the ditch at the time of survey, and a desktop study shows that the ditch does not connect to any mapped waterway.

The ASC will provide more detail on the wetland and waters delineation and assessment and contain a detailed discussion of the potential impacts to potentially jurisdictional wetlands and waters, including required mitigation (if any), and will identify necessary permits. Where impacts may occur, they will be mitigated in accordance with state and federal law.

Wildlife and Wildlife Habitat

A desktop analysis using data provided by the National Land Cover Database (MRLC 2019) was conducted to identify preliminary habitat types within the Site Boundary. Most of the land within the Site Boundary is dominated by cultivated croplands and dryland wheat, with the remaining land

consisting primarily of grassland/herbaceous. These cover types likely provide habitat for a variety of wildlife species, including raptors and predatory mammals and their prey, such as small mammals, reptiles, and amphibians. Based on Oregon Department of Fish and Wildlife (ODFW) range maps, the Facility is outside of winter ranges for big game, including mule deer, elk, and pronghorn (ODFW 2013). Therefore, impacts to big game winter ranges are not expected to occur due to the proposed Facility.

Biological reconnaissance surveys were conducted for the proposed Facility Site Boundary. This information will be used to analyze potential impacts to wildlife and wildlife habitat during construction and operation, as well as in the micrositing of Facility components to minimize impacts. The results of these surveys, including a site-specific habitat analysis and measures for avoiding, minimizing, and mitigating impacts, will be presented in the ASC.

Sensitive, Threatened, and Endangered Species

As noted above, biological reconnaissance surveys were conducted for the proposed Facility Site Boundary. The Applicant considered a variety of publicly available resources to determine the threatened, endangered, and sensitive species that may occur within the Site Boundary and surrounding area. The Applicant conducted special status wildlife and plant surveys within the proposed Site Boundary, with a special focus on species likely to occur at the Facility, such as Washington ground squirrel (*Urocitellus washingtoni*) and Laurence's milkvetch (*Astragalus collinus* var. *laurentii*). An analysis of potential impacts to sensitive, endangered, and threatened species will be provided in the ASC including minimization and mitigation measures developed as necessary in coordination with the ODFW.

Historic, Cultural, and Archaeological Resources

Cultural resource surveys were conducted for the proposed Facility Site Boundary. This inventory evaluated the presence or absence of historic properties and other cultural resources that may or may not meet the threshold of significance necessary to qualify them as historic properties. The study area for this field inventory consisted of the entire Facility Site Boundary (see Figure 4). The study methodology followed applicable Oregon State Historic Preservation Office (SHPO) regulations and was consistent with U.S. Secretary of Interior standards for cultural resource surveys and documentation under Section 106 of the National Historic Preservation Act (Public Law 89-665). The ASC will contain a detailed discussion of the potential impacts to any potentially eligible resources.

Scenic and Aesthetic Areas

The study area for scenic and aesthetic resources consists of the area within the Site Boundary plus a 10-mile buffer around the Site Boundary (Figure 3), in accordance with OAR 345-001-0010(58)(b). Pursuant to OAR 345-021-0010(1)(r) and 345-022-0080(1), scenic resources to be

considered are those “identified as significant or important in local land use plans, tribal land management plans and federal land management plans for any lands located within the analysis area...”

Local land use plans to be considered include the Morrow County Comprehensive Plan, and the comprehensive plans for the cities of Lexington, Heppner, Ione, Echo, Stanfield, and Hermiston. Federal plans include those pertaining to U.S. Bureau of Land Management of nearby parcels, National Park Service management of the Oregon Trail and its significant sites, U.S. Forest Service and ODOT management of the Blue Mountain Scenic Byway, and Department of Defense management of the Boardman Bombing Range. Requirements of these plans will be reviewed as part of the ASC. There are no tribal management plans for lands within the study area.

Potential impacts to identified scenic resources in the study area (see Figure 3) will likely be negligible because the Facility structures will be of the same height of similar agricultural structures in the surrounding area, screened by vegetation and topography, will be near existing agricultural development, and will be viewed from long distances. The visual assessment that will be included in the ASC will include proposed mitigation measures, if necessary.

Recreation

The study area for recreational opportunities consists of the Site Boundary plus a surrounding 5-mile buffer (Figure 3), in accordance with OAR 345-001-0010(58)(d). In general, recreational activities in the study area consist of hiking, fishing, boating, camping, bicycling, photography, game and bird hunting, and sightseeing. These activities occur in numerous locations outside the study area, and therefore the recreational opportunities within the study area do not rise to the level of uniqueness or irreplaceability that is required by OAR 345-022-0100(1).

Some specific recreational opportunities within the study area include the Blue Mountain Scenic Byway, a portion of the Oregon Trail, and the Wells Springs Interpretive Site for the trail, all located west of the Site Boundary. Exhibit T of the ASC will include more detailed analysis of the potential impacts to these recreational resources.

Protected Areas

The study area for protected areas is the Site Boundary plus a surrounding 20-mile buffer (Figure 6), in accordance with OAR 345-001-0010(58)(e). Protected areas are defined and listed in OAR 345-022-0040. Table J-2 lists all protected areas within the study area, which are shown on Figure 6. No protected areas are located within the Site Boundary. The Facility is not anticipated to significantly affect any protected area due to the distance and topography between the Facility and the nearest protected area. Exhibit L of the ASC will include more detailed analysis of the potential impacts to protected areas.

Table J-2. Protected Areas¹ within the Study Area

Type	Area Name	Approximate Closest Distance to Site Boundary (Miles)	Direction from Facility
(a) National Parks	None	NA	NA
(b) National Monuments	None	NA	NA
(c) Wilderness Areas	None	NA	NA
(d) National and State Wildlife Refuges	Umatilla National Wildlife Refuge	14.1	North
(e) National Coordination Areas	None	NA	NA
(f) Fish Hatcheries	Irrigon Hatchery	19.3	North
	Umatilla Hatchery	19.6	North
(g) National Recreation and Scenic Areas	None	NA	NA
(h) State Parks and Waysides	None	NA	NA
(i) State Natural Heritage Areas	Lindsay Prairie Preserve	0.5	West
(j) State Estuarine Sanctuaries	None	NA	NA
(k) Scenic Waterways/Wild and Scenic Rivers	None	NA	NA
(l) Experimental Areas (Rangeland Resources Program)	None	NA	NA
(m) Agricultural Experimental Stations	Oregon State University Agriculture Research and Extension Center, Hermiston	9.1	Northwest
(n) Research Forests	None	NA	NA
(o) BLM Areas of Critical Environmental Concern (ACEC)	Oregon Trail ACEC, Echo Meadows	15.6	Northeast
	Horn Butte Curlew ACEC	16.4	Northwest
(o) BLM Research Natural Areas and Outstanding Natural Areas	Boardman RNA	2.3	Northwest
(p) State Wildlife Areas and Management Areas (per OAR 635, Div. 8)	Columbia Basin-Irrigon ODFW Wildlife Refuge	19.8	North
	Columbia Basin-Coyote Springs ODFW Wildlife Refuge	14.1	North

Type	Area Name	Approximate Closest Distance to Site Boundary (Miles)	Direction from Facility
	Columbia Basin-Willow Creek ODFW Wildlife Refuge	18.9	Northwest
¹ Protected Areas are defined and listed in OAR 345-022-0040. BLM – Bureau of Land Management NA – not applicable RNA – Research Natural Area			

Land Use

The study area for land use consists of the area within the Site Boundary plus a surrounding 0.5-mile buffer (Figure 4), in accordance with OAR 345-001-0010(58)(c). All land within the study area is zoned for Exclusive Farm Use by Morrow County. Some conversion of agricultural land will occur; these impacts will be fully evaluated in the ASC, as required by OAR 345-022-0030. The Facility is compatible with agricultural uses, and there are no significant impacts on surrounding land uses.

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:

Pursuant to OAR 345-001-0010(58)(b), the study area for impacts to the public services listed in OAR 345-022-0110 includes the Site Boundary plus a surrounding 15-mile buffer. Public services that will be evaluated for potential impacts from the construction and operation of the Facility are listed in OAR 345-020-0011(1)(k) and outlined below:

- Sewers and sewage treatment;
- Water;
- Stormwater drainage;
- Solid waste management;
- Housing;
- Traffic safety;
- Police and fire protection;
- Health care; and
- Schools.

Sewers and Sewage Treatment

Sewage treatment in this rural area is limited to on-site septic systems. During construction, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. During operation, sanitary waste will be limited to domestic wastewater from the Wheatridge Facilities O&M building or new O&M building, which will be discharged to licensed on-site septic systems. The nearest developed sewer system is located in the city of Heppner, approximately 10 miles from the Facility. The Applicant does not anticipate requiring connection to sewers or sewage treatment facilities. Therefore, significant adverse impacts to community sewer systems are not anticipated.

Water

Facility construction will require water for several activities, including concrete mixing for solar tracker system post foundations, road construction, underground collection line installation, and dust control. Actual daily water use will vary depending on weather and the final construction schedule (e.g., the need for dust control will be far greater in dry, windy summer conditions than at other times of year). The Applicant expects to rely on exempt wells allowed under ORS 537.545 to provide water to the existing Wheatridge Facilities O&M building or new O&M building. These wells will use less than 5,000 gallons per day, which will not require the Applicant to obtain a new water right.

The Applicant will confirm the anticipated amount of water required for construction and operation in the ASC. Additionally, the Applicant will confirm that the identified sources can meet the Facility's water requirements during construction, and a detailed analysis of water use requirements for accessing a private or municipal source will be included. If the water sources are found to be insufficient, the Applicant will seek to obtain water from other licensed providers in nearby cities or from an existing or newly constructed well or wells permitted under a limited water use license.

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.

Stormwater Drainage

The proposed Facility will have no significant adverse impact on stormwater drainage services or infrastructure. In the rural area in which the Facility is proposed, developed stormwater infrastructure is limited to minimal facilities associated with public roads maintained by Morrow County. There are no communities located within the Site Boundary; therefore, the Facility will have no impact on stormwater drainage services provided in urban areas.

Construction of the proposed Facility will add new impervious surfaces to a small fraction of the total Facility acreage. Stormwater runoff generated in areas disturbed by Facility construction will be managed on-site, typically using retention and infiltration systems that will be described in the Facility NPDES 1200-C construction permit and accompanying Erosion and Sediment Control Plan. Most of the area within the Site Boundary is vegetated, which will serve as a buffer to promote infiltration and minimize erosion. No impact on stormwater drainage is expected from the Facility.

Stormwater management infrastructure put in place during construction will be left in place as needed, to continue functioning throughout the life of the Facility where impermeable or semi-impermeable surfaces (e.g., access roads) remain to support O&M activities. Such features may include roadside ditches, infiltration swales, or retention basins. These facilities will be located on private land and will not affect the provision of stormwater management services by any public agency.

Solid Waste Management

Morrow County provides solid waste disposal and recycling services through franchise agreements with various private providers. 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 cause adverse impacts to services already being provided in the county or nearby communities. The public landfill closest to the Facility is the Finley Buttes Regional Landfill, located approximately 10 miles south of Boardman, Oregon.

Concrete waste and packaging material will be produced during construction. Collector line construction will generate a variety of solid wastes, including concrete, scrap metal, wood, and plastics (the latter two used to secure and protect components during shipping). Excess soil from road construction and foundation excavation will be spread on-site to the extent practicable or disposed of in accordance with applicable regulations. Equipment and component replacement as well as packaging material will be produced during operations. Regular replacement of batteries will occur at the battery energy storage facilities, over the course of operations. Small amounts of office waste will also be produced during operations.

Housing

Construction

An average of approximately 150 employees will be present on-site during construction. This number will fluctuate during periods where multiple teams of contractors perform their work simultaneously. The Applicant estimates that a maximum of 200 employees will be on-site at one time, when multiple disciplines of contractors complete their work simultaneously during periods of the highest activity.

Construction workers will include a combination of locally hired workers for road and facility construction, and specialized workers for certain types of specialized construction (e.g. solar array installation and testing). Some workers are expected to come from outside of the study area and will require temporary housing. The percentage of the construction workforce that is hired locally will depend on the availability of workers with appropriate skills. The size of the skilled local workforce is continually growing as more solar energy projects are built in eastern Oregon. Additional workers may commute daily from communities outside the study area (e.g., Boardman, Hermiston, Pendleton), which will lessen impacts to housing associated with the in-migration of outside workers.

Construction workers hired from areas outside a commutable distance may choose to stay in local motels or other rental units for the duration of their stay, which could have potential impacts on housing if there is an inadequate supply of housing in relation to the demand from the new temporary and permanent residents associated with the Facility. 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. Availability of temporary housing is best in larger communities within a commutable distance of the construction site, where hotels, motels, and trailer parking are available. Communities that could potentially house temporary workers include Pendleton, Umatilla, and Boardman. Because workers can spread out to many communities within a commutable distance, the impact to housing in the immediate vicinity of the Facility associated with the in-migration of outside workers will be lessened. Workers from outside the area will also benefit the communities and local businesses by renting rooms, eating at local restaurants, and purchasing goods and services from local stores.

Operations

An estimated 10 operational personnel, including contract workers, will be permanently employed at the Facility at its full 500-MW capacity. Where possible, the O&M staff will be hired locally, except for those positions that require previous experience at other solar energy generation facilities. Some outside contractors may also be required from time to time for specialized maintenance tasks, such as solar module inspections, electrical system maintenance, or the repair of solar panel and tracker equipment. The Applicant expects that the Facility will be in operation for at least 30 years. No significant adverse impacts to housing in the area are anticipated because of housing operational personnel.

Traffic Safety

Primary transportation corridors are assumed to carry most construction-related heavy-duty and light-duty delivery vehicles, as well as some workforce traffic. These corridors include I-84 and Oregon Route 207.

During construction, many trucks may be accessing the site on these transportation corridors. Heavy-duty trucks will carry facility components as well as gravel and other materials required to improve or construct access roads from existing roadways. Heavy-duty trucks will also provide concrete for the solar tracker system post foundations. Lighter-duty trucks will be required to deliver water, electrical equipment, and other materials. Construction-related traffic impacts are not expected to result in any significant adverse impacts to traffic safety. Any improvements to county or state roads will be restricted to areas within the respective rights-of-way and subject to approval by the applicable agency.

During operation, significant traffic impacts from the Facility 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 inspections of the solar array may be hired from outside the area, and may travel in light-duty trucks. Delivery trucks may also access the Facility during operation on an infrequent basis. A detailed analysis of traffic generation resulting from both construction and operation of the Facility will be included in the ASC.

The construction of the proposed Facility will result in a temporary increase in local traffic, including large trucks and construction equipment as well as construction workers' vehicles. The

primary transportation corridor will be I-84, and it is assumed it will carry, along with a few major state and county roads, most construction-related truck traffic and workforce traffic. Major county and state roads that will convey significant amounts of construction traffic include Bombing Range Road, Strawberry East Road, and Oregon Routes 207 and 320. Additional private access roads will be developed for each of the solar arrays and associated facilities. A traffic management plan will be developed in cooperation with Morrow County, and with nearby cities if necessary, to minimize impacts to traffic safety. In addition, the Applicant will enter into road use agreements with Morrow 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.

Police and Fire Protection

The Morrow County Sheriff’s Office, located in Heppner, serves the Facility area. The Applicant will seek assistance from the county sheriff’s office, for police services. The relatively small number of new temporary and permanent residents is not anticipated to place significant new demands on the providers of police protection in the area.

The Applicant will work with the Heppner Volunteer Fire Department and/or the Ione Rural Fire Protection District (Morrow County) to address any potential needs for a construction phase fire prevention and management plan. The Applicant will also develop First Aid and Emergency Response procedures for the construction and operation phases for the Facility. Development of these plans will involve consultation with local emergency response agencies. The Applicant will notify the fire protection districts of construction plans, identify the location of and access to Facility facilities, and assist (if able) in the case of fire in or around the Facility. The Facility will be equipped with fire protection equipment in accordance with the Oregon Fire Code. Fire danger during construction will be reduced through implementation of safe working practices, such as maintaining adequate firefighting equipment and water supplies on hand during operations that carry a high fire risk, conducting welding within a cleared or graveled area, and preventing parking of vehicles in areas with high, dry grass. Given the inherent fire-safety features of Facility components and the relatively small number of new temporary and permanent residents, significant new demands on the fire protection forces that serve the area are not anticipated.

Health Care

Because population density in the study area is relatively low, hospitals and health care services tend to be regional. The nearest hospitals are the Pioneer Memorial Hospital, located approximately 12 miles south in Heppner, and the Good Shepherd Medical Center, located approximately 25 miles northeast in Hermiston. The nearest Level III trauma center is the Mid-Columbia Medical Center in The Dalles (Oregon Rural Health Association 2019). Ambulance service in the area is provided by the Morrow County Health District’s Emergency Medical Services (Oregon Licensed Ambulance Service Providers 2019). Some of the nearby fire districts also have First Response Vehicles, with equipment and crew trained to stabilize a patient until the arrival of an ambulance for transport. In

the event of a serious injury during construction or operation of the Facility, the patient may be flown by helicopter (operated by Life Flight) to one of the two Level 1 hospitals located in Portland: Oregon Health & Science University Hospital or Legacy Emmanuel Medical Center.

As per the Occupational Safety and Health Administration's regulations for sites with greater than 100 workers on-site, the Applicant anticipates the need to have a safety manager on-site for the Facility. Fulfilling this requirement will be the responsibility of the Facility construction contractor hired by the Applicant. Having site-specific procedures and a dedicated individual on-site to deal with health and safety matters ensures appropriate oversight and timely response to potential incidents that may occur during Facility construction.

Impacts on health care could occur if Facility construction activities or increases in temporary residents (during construction) and permanent residents (during operations) were to result in an increase in the use of routine and emergency health care services exceeding the capacity of local providers. Impacts on local health care services will be minimized by careful management of site health and safety risks. The small number of new temporary and permanent residents is not expected to place significant new demands on the health care facilities that serve the area.

Schools

The Facility is located within Morrow County School District No. 1. The schools closest to the Facility are Echo High School and the Ione High School, located 24 miles and less than 10 miles from the proposed Facility's northeast and southwest Site Boundary, respectively. Other nearby school districts (most of which are outside of the 15-mile analysis area) that may experience an increase in enrollment due to the Facility include the Hermiston, Stanfield, and Pendleton school districts in Umatilla County; the Ione School District in Morrow County; and the Richland, Kennewick, Prosser, Kiona-Benton City, and Finley school districts in Benton County, Washington. Because construction work for the Facility will be short-term and temporary, and because peak construction will occur during the summer months, no new students are anticipated in association with Facility construction. Only minimal demand is expected from the small increase in local population resulting from new permanent employees during Facility operations. Actual impacts on schools will depend on the housing choices of new residents with children, which is unknown. Given the dispersed area in which new residents are likely to settle, the small number of new school children expected, and the number of schools available, it is unlikely that any one school will receive more new students than it can accommodate. As a result, no significant adverse impacts on the ability of communities to provide school services are anticipated because of Facility operation.

Exhibit L. Water Sources and Use – OAR 345-020-0011(1)(I)

(I) Exhibit L. 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:

Construction

During construction, the Applicant anticipates using water trucks for the delivery of water from nearby locations with existing water rights: Hermiston Public Works, Stanfield Public Works, Boardman Public Works, and the Port of Morrow. Correspondence with these suppliers has confirmed a supply of up to 10.8 million gallons per month will be available. If these are not sufficient sources of water, the Applicant will seek to obtain water from other licensed providers in nearby cities or from an existing or newly constructed well or wells permitted under a limited water use license.

In the ASC, the Applicant will verify the anticipated amount of water required for construction and confirm that the local utilities are capable of serving as a water source to meet the Facility requirements during construction. The construction contractor will be responsible for obtaining water for construction. An estimated 12 million gallons of water will be required for dust control, road compaction, concrete mixing, and other construction uses. However, the amount of water applied daily is highly dependent on weather and varies between construction periods and duration. In addition, the Applicant is still determining the phasing of construction, solar panel vendor and quantity as well as overall Facility layout. The ASC will contain a detailed analysis of water use requirements during construction.

Operation

During Facility operation, water use will be limited and will be obtained from the same sources as during construction. The Facility will utilize the existing Wheatridge Facilities O&M building or a new O&M building, each requiring an exempt well, providing no more than 5,000 gallons per day. If a well is installed and used for construction water under a limited water use license, this well may also be used during Facility operation.

(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.

Response:

At this time, it is not anticipated that the Facility will require new water rights.

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

Response:

The Facility is a solar energy facility. No cooling water is required for operation. Therefore, these rules are not applicable.

Exhibit M. Carbon Dioxide Emissions – OAR 345-020-0011(1)(m)

(m) Exhibit M. If the proposed facility would emit carbon dioxide, an estimate of the gross rate of carbon dioxide emissions, a table listing all the factors that form the basis for calculating the estimate, and a statement of the means by which the applicant intends to comply with the applicable carbon dioxide emissions standard under OAR 345-024-560, 345-024-600, or 345-024-630.

Response:

The Facility will not emit carbon dioxide. Therefore, these rules are not applicable.

Exhibit N. Evaluation of Statutes, Rules, and Ordinances – OAR 345-020- 0011(1)(n)

(n) Exhibit N. 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 shall analyze and describe any problems the applicant foresees in satisfying the requirements of any such statute, rule or ordinance.

Response

Table N-1 identifies state statutes, administrative rules, and local government ordinances containing standards or criteria that the Applicant must meet for EFSC to issue a Site Certificate beyond the statutes, rules, and ordinances identified in Exhibit E. The Applicant does not anticipate difficulty in meeting specific requirements.

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

Department	Legal Citation	Agency Address
Oregon Department of Agriculture	Plant Conservation Biology Program— ORS 564; OAR Chapter 603, Division 73	Oregon Department of Agriculture 635 Capitol Street NE Salem, OR 97301 (503) 986-4550
Oregon Department of Fish and Wildlife	ORS 496-497, and ORS 506, Divisions 109 and 119; OAR Chapter 635, Divisions 100 and 415	Oregon Department of Fish and Wildlife 2042 SE Paulina Highway Prineville, OR 97754 (541) 447-5111
Oregon Water Resources Department – Water Rights Division	ORS Chapters 537, 540; OAR Chapter 690	Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301
Oregon Department of State Lands	OAR Chapter 141	Oregon Department of State Lands 775 Summer Street NE. Suite 100 Salem, OR 97301
Oregon Department of Land Conservation and Development	Comprehensive Land Use Planning Coordination - ORS Chapter 197; Oregon Department of Land Conservation and Development Administrative Rules - OAR Chapter 660	Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050

Notice of Intent to Apply for a Site Certificate

Department	Legal Citation	Agency Address
Oregon Department of Environmental Quality (ODEQ) – Water Quality	ORS 468 and 468B; OAR Chapter 340, Divisions 41, 45, 52, and 55	Oregon Department of Environmental Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 (541) 388-6146
ODEQ—Noise	ORS 467; OAR Chapter 340, Division 35	Oregon Department of Environmental Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 (541) 388-6146
ODEQ—Hazardous Waste Management	ORS 465 and 466; OAR Chapter 340, Divisions 100-113	Oregon Department of Environmental Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 (541) 388-6146
ODEQ—Solid Waste	ORS 459; OAR Chapter 340, Division 93	Oregon Department of Environmental Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 (541) 388-6146
Oregon Department of Geology and Mineral Industries	OAR Chapter 632, Division 1	Oregon Department of Geology and Mineral Industries 800 NE Oregon Street, Suite 965 Portland, OR 97232 (971) 673-1555
Oregon Parks and Recreation Department, State Historic Preservation Office —Archaeological	Native American Graves and Protected Objects—ORS 97.740-97.760 Archaeological Objects and Sites—ORS 358.90-358.955 Permit and Conditions for Excavation or Removal of Archaeological or Historical Materials on Private Lands (OAR 736-051-0090)	State Historic Preservation Office 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0671
Oregon Office of State Fire Marshal—Emergency Planning and Community Right to Know Act	ORS 453; OAR Chapter 837, Divisions 85 and 95; Fire and Life Safety Regulations, OAR 837, Division 40	Oregon Office of State Fire Marshal 4760 Portland Road NE Salem, OR 97305-1760 (503) 378-3473
Oregon Office of State Fire Marshal	2014 Oregon Fire Code	Oregon Office of State Fire Marshal 4760 Portland Road NE Salem, OR 97305 (503) 378-3473

Notice of Intent to Apply for a Site Certificate

Department	Legal Citation	Agency Address
Oregon Biodiversity Information Center	ORS 564.105; OAR 603-73-0070 and 345-022-0070	Oregon Biodiversity Information Center Oregon State University Institute for Natural Resources Portland State University Science and Education Center, Suite 140 2112 SW 5 th Avenue Portland, OR 97201 (503) 725-9950
Morrow County Planning Department – Land Use ¹	Morrow County Zoning Ordinance	Morrow County Planning Department Irrigon Annex P.O. Box 40 205 Third Street NE Irrigon, OR 97844 (541) 922-4624
<p>1. As stated in Exhibit I: The Applicant intends to satisfy EFSC’s land use standard, OAR 345-022-0030, by seeking an EFSC determination under ORS 469.504(1)(b). The Applicant seeks a determination by EFSC of compliance with land use standards from Morrow County.</p>		

Exhibit O. Schedule for Application for Site Certificate – OAR 345-020-0011(1)(o)

(o) Exhibit O. A schedule stating when the applicant expects to submit a preliminary application for a site certificate.

Response:

The Applicant intends to submit the NOI and Preliminary ASC according to the schedule shown in Table O-1.

Table O-1. Proposed Schedule for Application for Site Certificate Submittal

Activity	Anticipated Date
Applicant submits the NOI to ODOE	October 2020
ODOE reviews the NOI, distributes public notice, conducts public information meeting, facilitates comment period, and issues Project Order	October – January 2021
Applicant submits Preliminary ASC to ODOE	March 2021

Exhibit P. Evidence of Consultation with State Commission on Indian Services – OAR 345-020-0011(1)(p)

(p) Exhibit P. 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:

The Applicant submitted a letter to the Oregon Legislative Commission on Indian Services to identify appropriate tribes to contact regarding possible effects of the Facility on Indian historic and cultural resources. On September 25, 2020 the Legislative Commission provided a letter identifying the Confederated Tribes of Warm Springs and Confederated Tribes of the Umatilla Indian Reservation as the appropriate tribal governments and the Confederate Tribes of Yakama, and the Nez Perce Tribe as tribal governments that should be notified (Attachment 4).

References

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

ODFW (Oregon Department of Fish and Wildlife). 2013. ODFW Winter Range for Eastern Oregon. Accessed at: <https://nrimp.dfw.state.or.us/DataClearinghouse/default.aspx?p=202&XMLname=885.xml> .

Oregon Licensed Ambulance Service Providers. 2019. Accessed at: <http://www.morrowcountyhealthdistrict.org/emergency-medical-services/> .

Oregon Rural Health Association. 2019. ORHA Website. Accessed at: <https://orha.wildapricot.org/>.

Attachment 1. Articles of Incorporation and Authorization



Application for Authority to Transact Business - Foreign Limited Liability Company

Secretary of State - Corporation Division - 255 Capitol St. NE, Suite 151 - Salem, OR 97310-1327 - sos.oregon.gov/business - Phone: (503) 986-2200

FILED: AUG 26, 2020
OREGON SECRETARY OF STATE



171205090-21377433

REGISTRY NUMBER: 171205090
For office use only

WHEATRIDGE EAST WIND, LLC

NEWAUT

In accordance with Oregon Revised Statute 192.410-192.490, the information on this application is public record. We must release this information to all parties upon request and it will be posted on our website.

For office use only

Please Type or Print Legibly in Black Ink. Attach Additional Sheet if Necessary.

1) NAME: Wheatridge East Wind, LLC

NOTE: (Must contain the words "Limited Liability Company" or the abbreviations "LLC" or "L.L.C.") Must be identical to the name of record in home jurisdiction.

2) REGISTRY NUMBER IN HOME JURISDICTION

OR: CERTIFICATE OF EXISTENCE (ATTACHED)

(Please provide a web-verifiable registry number from the entity's home jurisdiction. Certain states, such as Delaware and New Jersey, do not provide status information online. Entities from such places must instead attach an official certificate of existence, current within 60 days of delivery to this office.)

7) REGISTERED AGENT'S PUBLICLY AVAILABLE ADDRESS:

(Must be an Oregon Street Address, which is identical to the registered agent's business office.)

1127 Broadway Street NE, Suite 310

Salem, OR 97301

3) DATE OF ORGANIZATION: 08/20/2020 DURATION, IF NOT PERPETUAL:

8) ADDRESS OF PRINCIPAL OFFICE OF THE BUSINESS:

700 Universe Blvd.

Juno Beach, FL 33408

4) STATE OR COUNTRY OF ORGANIZATION: Delaware

9) ADDRESS WHERE THE DIVISION MAY MAIL NOTICES:

700 Universe Blvd.

Juno Beach, FL 33408

5) THIS FOREIGN LIMITED LIABILITY COMPANY SATISFIES THE REQUIREMENTS OF ORS 63.714(3).

10) HOW WILL THIS LIMITED LIABILITY COMPANY BE MANAGED?

6) NAME OF OREGON REGISTERED AGENT: Corporation Service Company

- [X] This LLC will be member-managed by one or more members.
[] This LLC will be manager-managed by one or more managers.

11) EXECUTION: (At least one member or manager must sign.)

I declare as an authorized signer, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any members, managers, employees or agents of the limited liability company. This filing has been examined by me and is, to the best of my knowledge and belief true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment or both.

Signature:

Printed Name:

Title:

Melissa A. Plotsky

Melissa A. Plotsky

Secretary of Member

CONTACT NAME: (To resolve questions with this filing.)

Angela Ewers

PHONE NUMBER: (Include area code.)

561.304.5923

FEES

Required Processing Fee \$275

Processing Fees are nonrefundable. Please make check payable to "Corporation Division."

Free copies are available at sos.oregon.gov/business, using the Business Name Search program.

Delaware

Page 1

The First State

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 "WHEATRIDGE EAST WIND, LLC", FILED IN THIS OFFICE ON THE TWENTIETH DAY OF AUGUST, A.D. 2020, AT 9:48 O`CLOCK A.M.




Jeffrey W. Bullock, Secretary of State

3487699 8100
SR# 20206843068

Authentication: 203511068
Date: 08-21-20

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

STATE OF DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE OF FORMATION
OF
WHEATRIDGE EAST WIND, LLC

The undersigned, an authorized natural person, for the purpose of forming a limited liability company under the provisions and subject to the requirements of the laws of the State of Delaware (including Chapter 18, Title 6 of the Delaware Code and the acts amendatory thereof and supplemental thereto, and known, identified, and referred to as the "Delaware Limited Liability Company Act"), hereby certifies that:

FIRST: The name of the limited liability company (hereinafter called the "limited liability company") is **Wheatridge East Wind, LLC**.

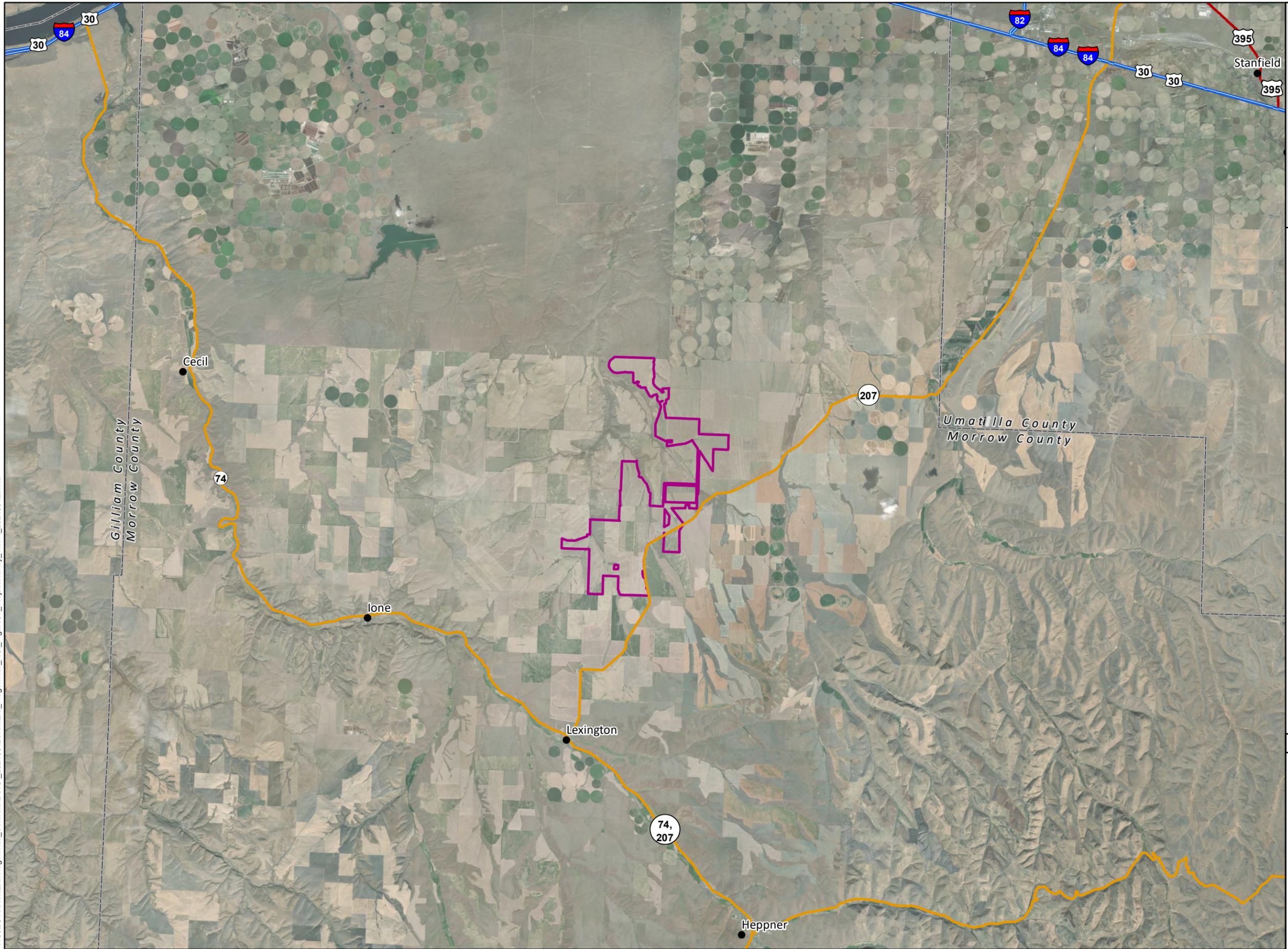
SECOND: The address of the registered office and the name and address of the registered agent of the limited liability company required to be maintained by Section 18-104 of the Delaware Limited Liability Company Act are:

NextEra Registered Agency, LLC
1105 N. Market Street, Suite 1300
Wilmington, Delaware 19801

Executed on August 20, 2020.


By: Melissa A. Plotsky
An Authorized Person

Attachment 2. Figures



Wagon Trail Solar Project



**Figure 1
Vicinity Map**

MORROW COUNTY, OREGON

-  Site Boundary
-  City/Town
-  Interstate Highway
-  US Highway
-  State Highway
-  County Boundary



Data Sources

NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries

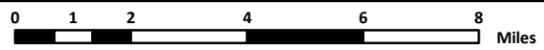
Reference Map



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1:200,000 WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

Wagon Trail Solar Project



Figure 2 Facility Layout

MORROW COUNTY, OREGON

- Site Boundary
- Overlapping Site Boundary
- Substation
- Transmission Line
- State Highway
- County Boundary



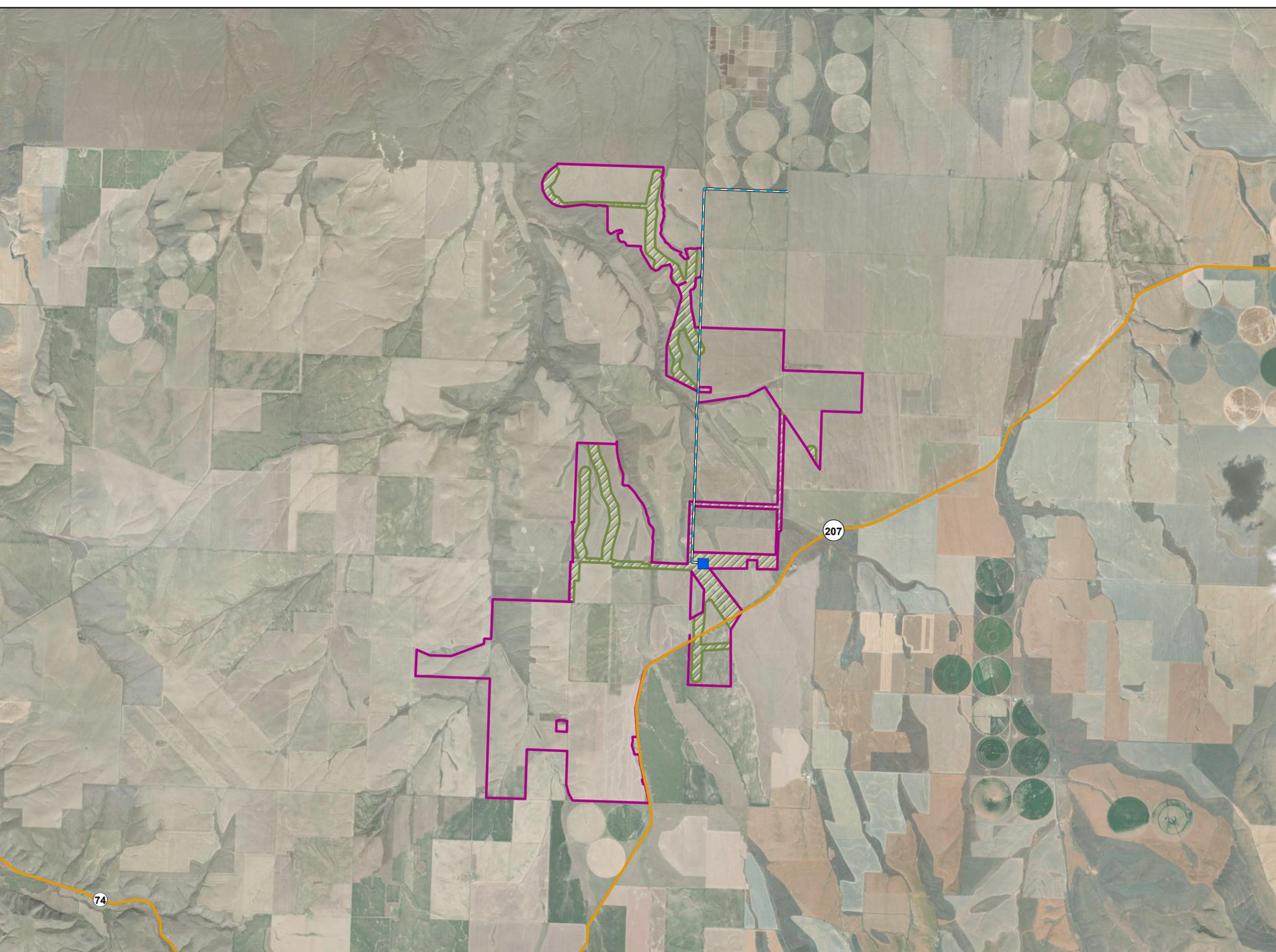
Data Sources

Reference Map

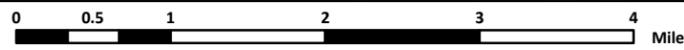
NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



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1:75,000 WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

Wagon Trail Solar Project



Figure 3
Recreation, Historic and Scenic Areas

MORROW COUNTY, OREGON

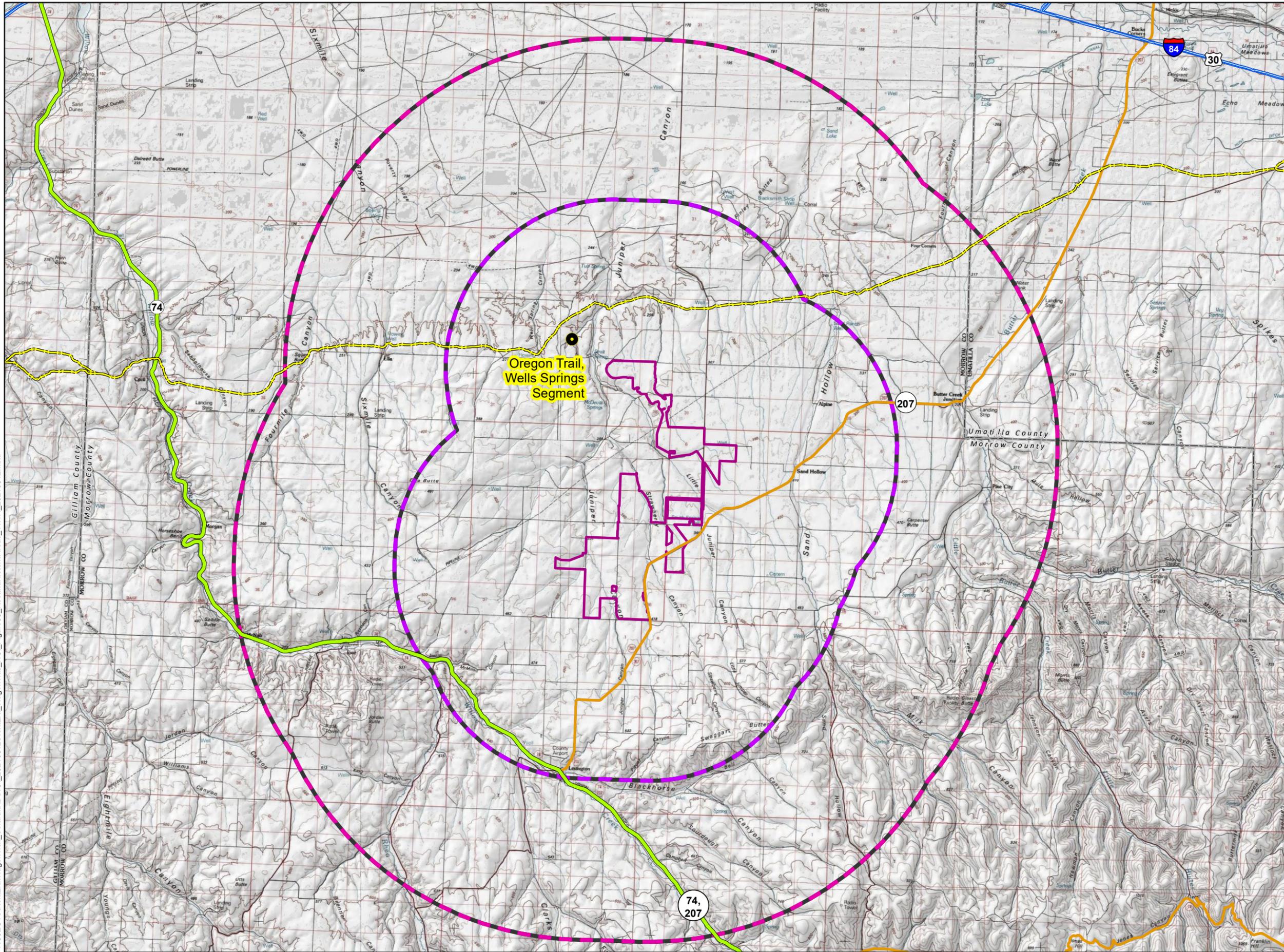
-  Site Boundary
-  5-mile Site Boundary Buffer
-  10 mile Site Boundary Buffer
-  County Boundary
-  Interstate Highway
-  US Highway
-  State Highway
-  National Register Historic Place
-  Oregon Trail
-  Blue Mountain Scenic Byway



Data Sources

Reference Map

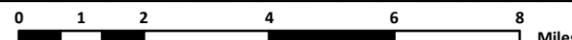
NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



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1:185,000 WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

Wagon Trail Solar Project



Figure 4
Study Area Boundaries

MORROW COUNTY, OREGON

-  Site Boundary
-  Interstate Highway
-  US Highway
-  State Highway
-  County Boundary
- Study Area**
-  0.5 miles, Land Use and Fish and Wildlife Habitat
-  5 miles, Recreation and Threatened and Endangered Species
-  10 miles, Scenic Resources
-  15 miles Public Services
-  20 miles, Protected Areas



Data Sources

NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries

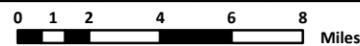
Reference Map



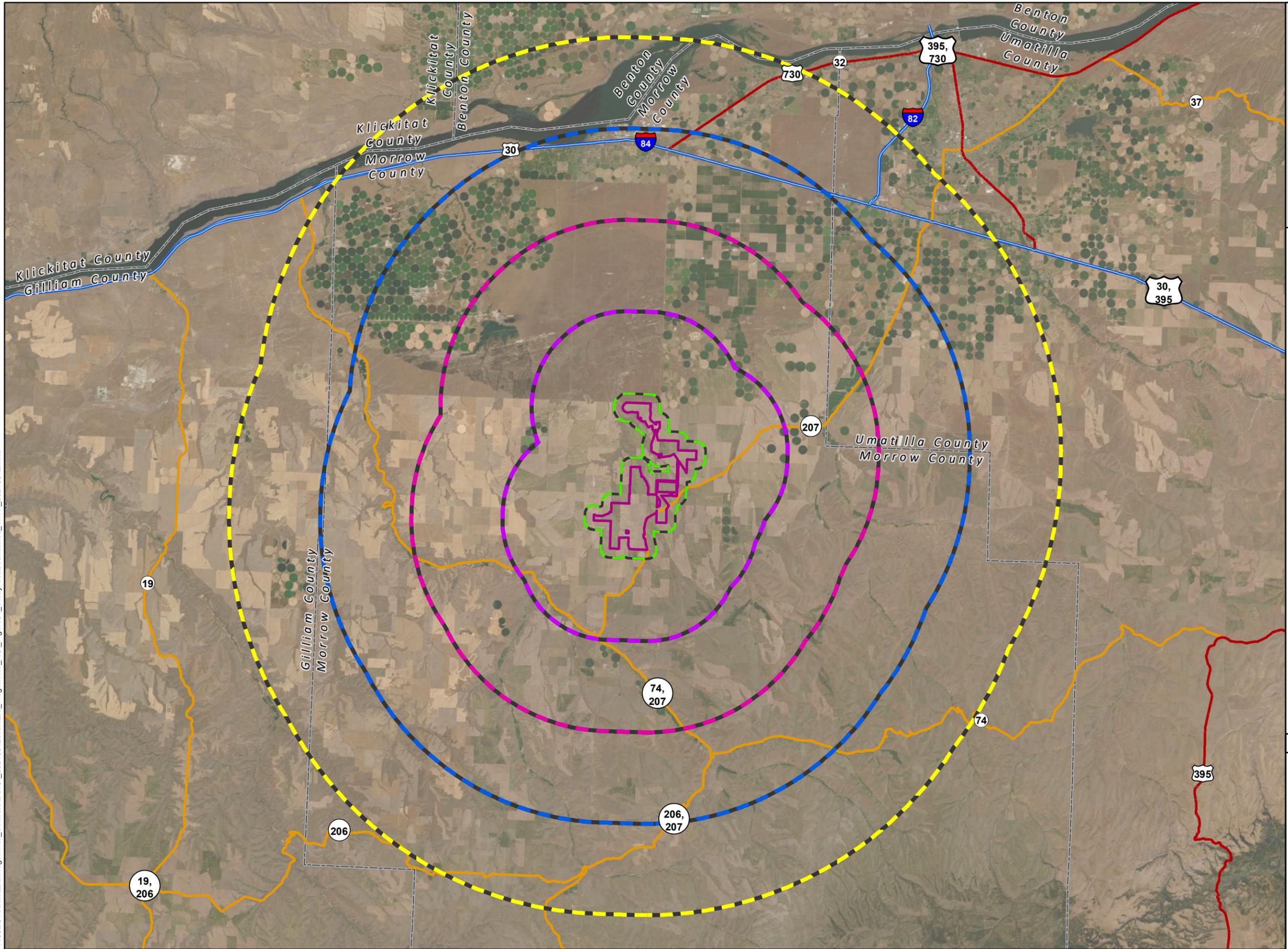
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1:325,000 WGS 1984 UTM Zone 11N



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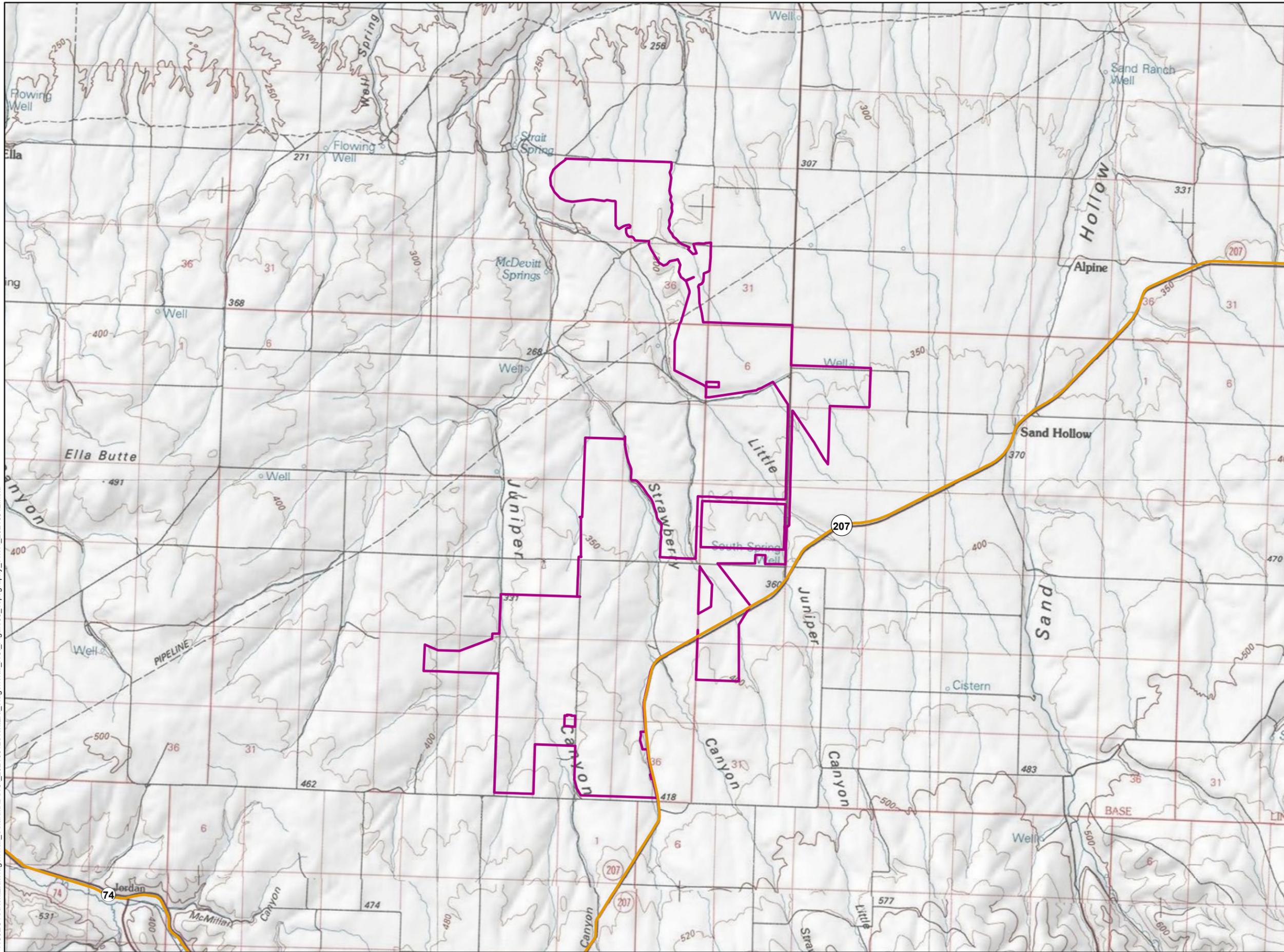
Wagon Trail Solar Project



Figure 5 Topography

MORROW COUNTY, OREGON

- Site Boundary
- State Highway
- County Boundary



Data Sources

Reference Map

NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



P:\GIS\PROJECTS\NextEra\Wagon Trail_Solar\MXD\NOI_20210512\NextEra_Wagon Trail_NOI_Figure05_Topography_111171_20210512.mxd



1:75,000 WGS 1984 UTM Zone 11N



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Wagon Trail Solar Project



**Figure 6
Protected Areas**

MORROW COUNTY, OREGON

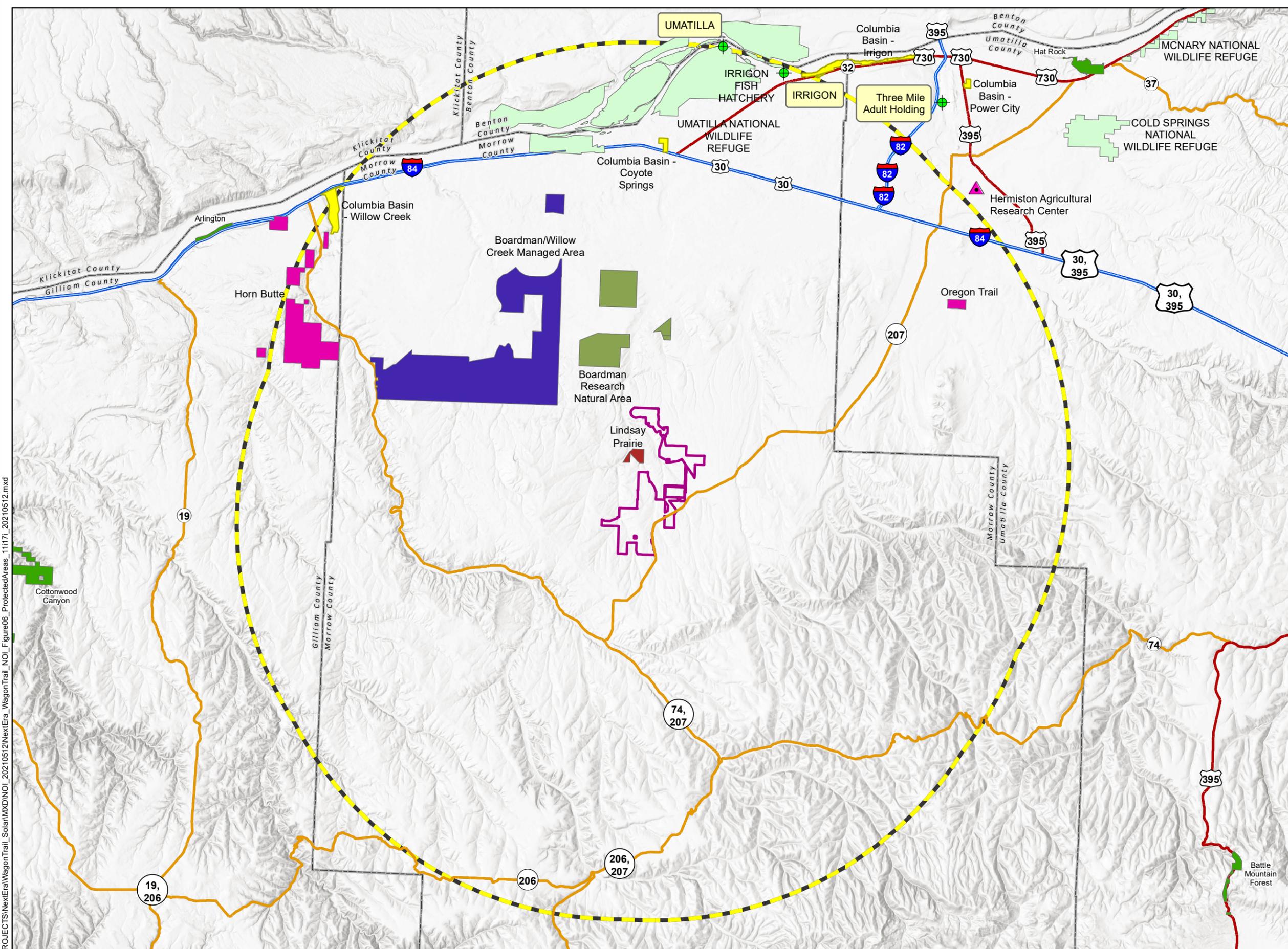
-  Site Boundary
-  20-mile Site Boundary Buffer
-  County Boundary
-  Interstate Highway
-  US Highway
-  State Highway
-  Research Center (OSU)
-  Fish Hatchery
-  US Fish and Wildlife Service Refuge (USFWS)
-  Oregon Department of Fish and Wildlife Wildlife Refuge (ODFW)
-  Areas of Critical Environmental Concern (BLM)
-  Oregon Parks and Recreation Department Site (OPRD)
- Natural Areas**
-  Department of Defence
-  Department of Defence and Private
-  The Nature Conservancy



Data Sources

Reference Map

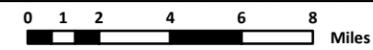
NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



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1:325,000 WGS 1984 UTM Zone 11N



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Wagon Trail Solar Project



Figure 7 National Wetlands Inventory

MORROW COUNTY, OREGON

- Site Boundary
- State Highway
- Wetland Type
 - Freshwater Emergent wetland
 - Freshwater- Forested and Shrub wetland
 - Freshwater pond
 - Riverine



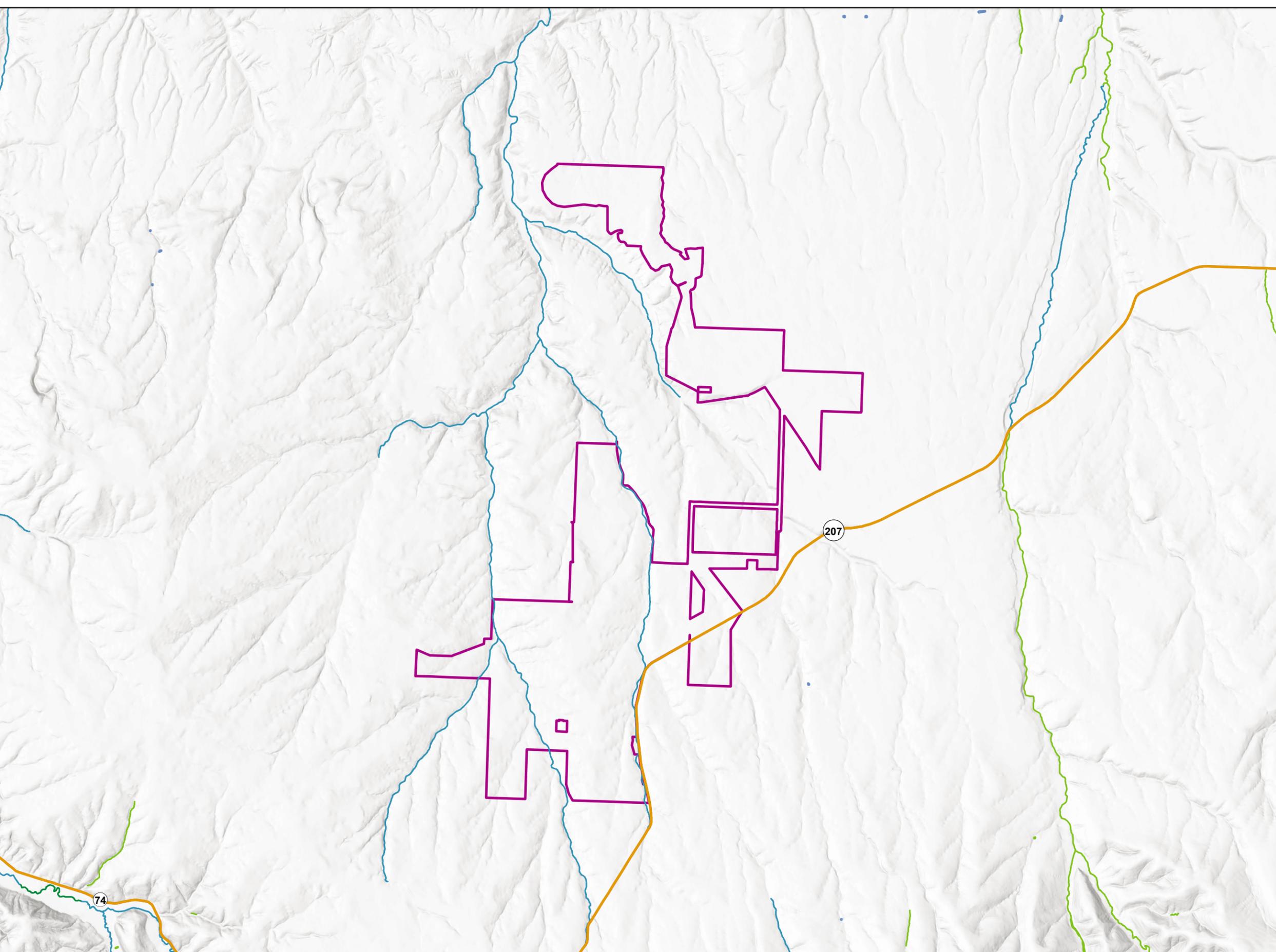
Data Sources

Reference Map

NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



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1:75,000 WGS 1984 UTM Zone 11N

0 0.5 1 2 3 4 Miles

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Wagon Trail Solar Project



Figure 8 National Hydrography Data

MORROW COUNTY, OREGON

- Site Boundary
- State Highway
- Streams
 - Perennial
 - Intermittent
- Waterbody
 - Lake/Pond



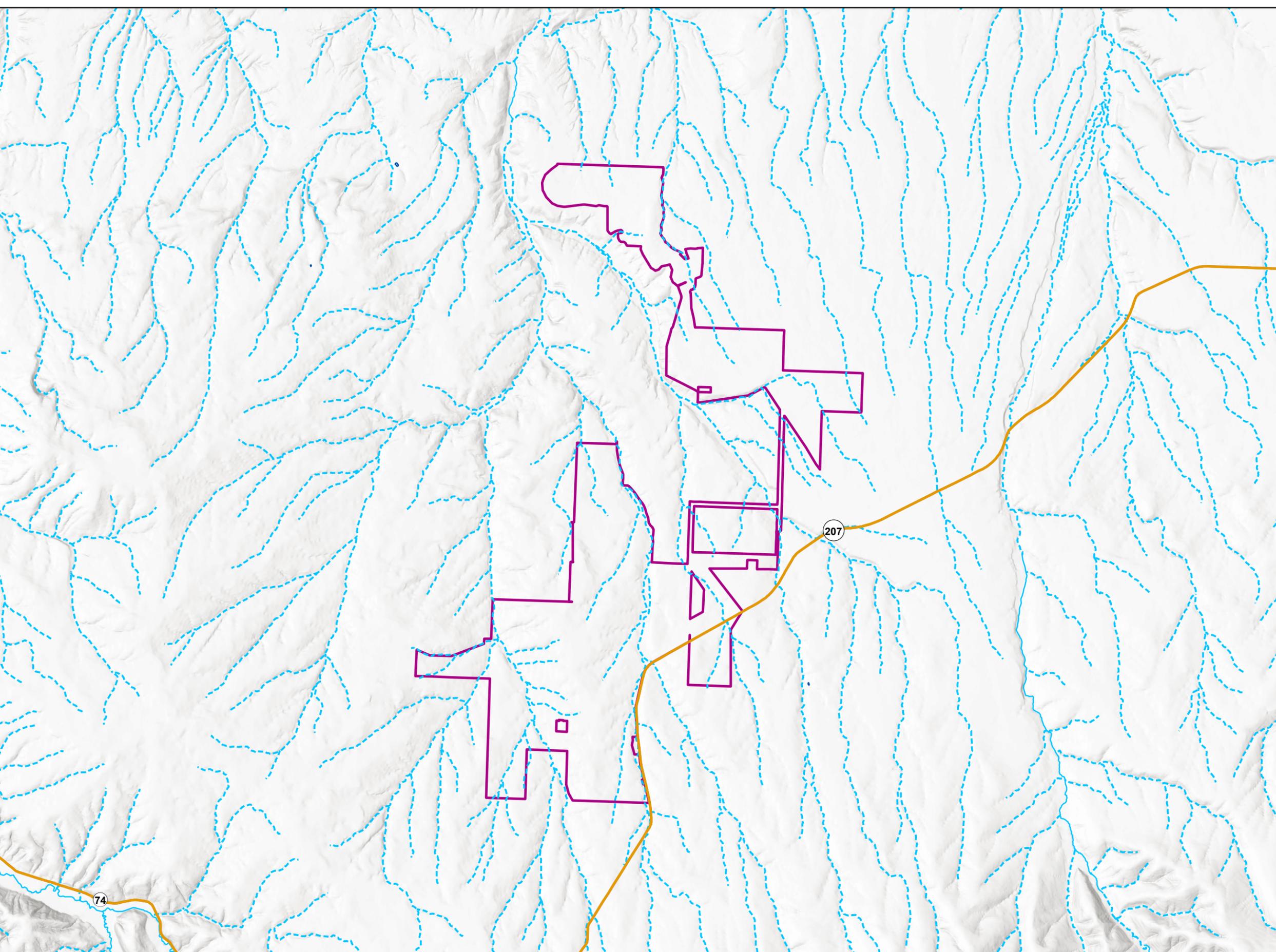
Data Sources

Reference Map

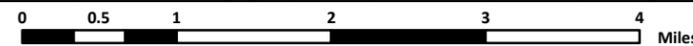
NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



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1:75,000 WGS 1984 UTM Zone 11N



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Wagon Trail Solar Project



Figure 9 Energy Facilities

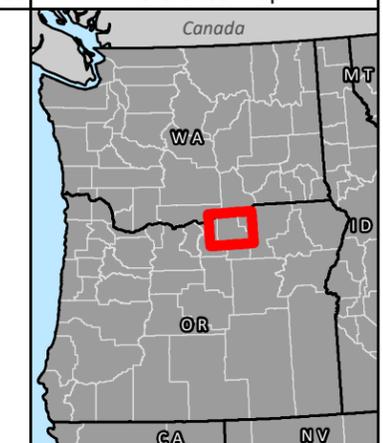
MORROW COUNTY, OREGON

- Site Boundary
- 15-mile Site Boundary Buffer
- Interstate Highway
- US Highway
- State Highway
- City/Town
- County Boundary
- Energy Facility**
- Coal, Boardman
- Natural Gas, Carty Generating Station
- Finley Butte Renewable Energy Facility
- Echo Windfarm, Operating
- Three Mile Canyon Wind, Operating
- Wheatridge Renewable Energy Facility I, Under Construction
- Wheatridge Renewable Energy Facility II, Under Construction
- Carty Generating Station, Solar and Natural Gas, Operating
- Transmission Line**
- In Service
- Proposed

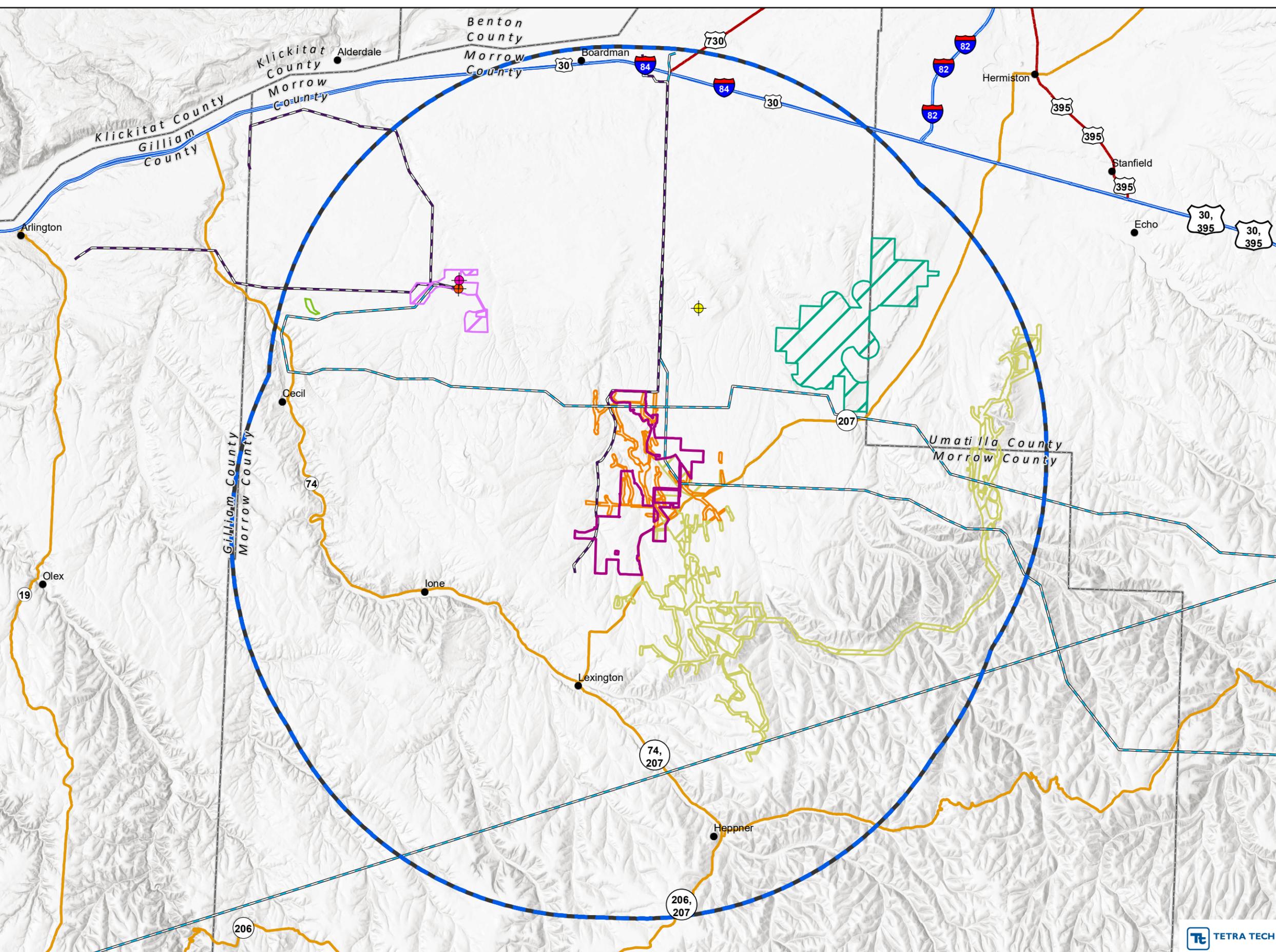
Data Sources

Reference Map

NextEra-Project Infrastructure;
USDA-Aerial Imagery; ESRI-
County Boundaries



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1:260,000 WGS 1984 UTM Zone 11N



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Attachment 3. Tax Lot IDs of Morrow County Landowners

MapTaxlot	First Name	Last Name	Name 2	Company/Org.	C/O-Attn.	Address	City	State	Zip Code
01N25E000003402				HUGHES, MAJO MARQUARDT TRUST	BELLAMY, MARY KAY, TRUSTEE	PO BOX 626	LEXINGTON	OR	97839
01N25E000003403				HUGHES, MAJO MARQUARDT TRUST	BELLAMY, MARY KAY, TRUSTEE	PO BOX 626	LEXINGTON	OR	97839
01N25E000002803	LAWRENCE D	LINDSAY	CORRINE ANN			PO BOX 307	LEXINGTON	OR	97839
01N25E000004100				STATE OF OREGON		417 TRANSPORTATION BLDG	SALEM	OR	97310
01N25E000004000				BILL & RENA MARQUARDT, LLC		67070 MARQUARDT RD	LEXINGTON	OR	97839
01N25E000003201				MARTIN, KATHERINE A CO TRUSTEE ET AL	MARTIN, KATHERINE & BRENT TRUSTEES	68702 HWY 207	LEXINGTON	OR	97839
01N25E000003204	THOMAS G	MARTIN	SHIRLEY L		MARTIN, THOMAS & SHIRLEY, 72%	68700 HWY 207	LEXINGTON	OR	97839
01N25E000002800	BERNARD P	LINDSAY	KIMBERLY L			PO BOX 483	LEXINGTON	OR	97839
01N25E000002804	LAWRENCE D	LINDSAY	CORRINE ANN			PO BOX 307	LEXINGTON	OR	97839
01N25E000003404	RANDY	HUGHES				67554 JUNIPER CANYON RD	LEXINGTON	OR	97839
01N25E000003400	RANDY	HUGHES				67554 JUNIPER CANYON RD	LEXINGTON	OR	97839
01N25E000003202				MARTIN, THOMAS, 28% &	MARTIN, THOMAS & SHIRLEY, 72%	68700 HWY 207	LEXINGTON	OR	97839
01N25E000003300	THOMAS	MARTIN	SHIRLEY		MARTIN, THOMAS & SHIRLEY, 72%	68700 HWY 207	LEXINGTON	OR	97839
01N25E000003500	VIRGIL	MORGAN	DEBBIE A			PO BOX 322	IONE	OR	97843
01N25E000003200				MUNKERS, SHEILA H ETAL		PO BOX 34	COTTONWOOD	ID	83522
01N25E000002801				BILL & RENA MARQUARDT LLC		67070 MARQUARDT RD	LEXINGTON	OR	97839
01N25E000002802	RANDY	HUGHES				67554 JUNIPER CANYON RD	LEXINGTON	OR	97839
01N25E000002805	LAWRENCE D	LINDSAY	CORRINE ANN			PO BOX 307	LEXINGTON	OR	97839
01N25E000003000	GABRIEL E	MARTIN				1912 RHODODENDRON WAY	BELLINGHAM	WA	98229
01N25E000002500				MORGAN, KOREY & MICHELLE ETAL		79561 AGNEW RD	HERMISTON	OR	97838
01N25E000001900				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N25E000002900	LAWRENCE D	LINDSAY	CORRINE ANN			PO BOX 307	LEXINGTON	OR	97839
01N25E000001400	RANDY	HUGHES				67554 JUNIPER CANYON RD	LEXINGTON	OR	97839
01N25E000001800	RANDY	HUGHES				67554 JUNIPER CANYON RD	LEXINGTON	OR	97839
01N25E000001401	RANDY WILLIAM	HUGHES				67554 JUNIPER CANYON RD	LEXINGTON	OR	97839
01N25E000001600				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N25E000001700				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N25E000001500				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E00000301				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E00000100				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E00000300				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E000000700	KENNETH MICHAEL	KLINGER				68280 IMMIGRANT LN	IONE	OR	97843
01N25E000000503				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E000000302				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E000000200				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N25E000003100				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000004800	MARK T	MILLER	SHANNON E			67775 CUTSFORTH RD	HEPPNER	OR	97836
01N26E000004600				JAMES & KATHERINE MARTIN TRUST ET AL	MARTIN, KATHERINE & BRENT TRUSTEES	68702 HWY 207	LEXINGTON	OR	97839
01N26E000004500	SUEZANNE	DUNCAN	ROBERT			1547 ALPENSEE STRA	LEAVENWORTH	WA	98826
01N26E000004400	ERIC M	OREM	BRANDI L			72028 BLACKHORSE CYN LN	HEPPNER	OR	97836
01N26E000003501				RJK FAMILY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N26E000002806	AARON D	HEIDEMAN				33999 RIVER VIEW DR	HERMISTON	OR	97838
01N26E000003700				STATE OF OREGON		417 TRANSPORTATION BLDG	SALEM	OR	97310
01N26E000002801	AARON D	HEIDEMAN				33999 RIVER VIEW DR	HERMISTON	OR	97838
01N26E000002807	AARON D	HEIDEMAN				33999 RIVER VIEW DR	HERMISTON	OR	97838
01N26E000003502				RJK FAMILY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N26E000003500				RJK FAMILY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
01N26E000003400				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003300				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003301				HILL, STEPHEN TRUSTEE ET AL		73114 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003202				WHEATRIDGE WIND LAND HOLDINGS, LL	MAP RENEWABLE ENERGY, 3000 EL CAMINO RE	5 PALO ALTO SQUARE SUITE 70	PALO ALTO	CA	94306
01N26E000002900				PETTYJOHN, KERRY D, TRUSTEE ET AL		26675 ICE HARBOR DR	BURBANK	WA	99323
01N26E000002700				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003100				PETTYJOHN, KERRY D, TRUSTEE ET AL		26675 ICE HARBOR DR	BURBANK	WA	99323
01N26E000002805				HEIDEMAN, LOREN A & DELLA K, TRUSTEES		22948 FAIRVIEW LN	IONE	OR	97843
01N26E000002804				KARYL SMITH, INC		8825 N ORCHARD PR RD	SPOKANE	WA	99217
01N26E000001500				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000001102				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000001300				WILLIAM J DOHERTY RANCH, LLC		70644 DOHERTY RD	LEXINGTON	OR	97839
01N26E000001700				WILLIAM J DOHERTY RANCH, LLC		70644 DOHERTY RD	LEXINGTON	OR	97839
01N26E000001101	STANLEY M	RAUCH				72629 JUNIPER LN	LEXINGTON	OR	97839
01N26E000000700				WILLIAM J DOHERTY RANCH, LLC		70644 DOHERTY RD	LEXINGTON	OR	97839
01N26E000004700	COREY M	MILLER	M JILL			74655 BASELINE LN	HEPPNER	OR	97836
01N26E000000400				WILLIAM J DOHERTY RANCH, LLC		70644 DOHERTY RD	LEXINGTON	OR	97839
01N26E000001200				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000001301				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000000701				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000000600				GRIEB FARMS, INC		70575 BOMBING RANGE RD	LEXINGTON	OR	97839
01N26E000001100				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003200				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003201	CHRISTIAN	RAUCH	KATHERINE A			72967 STRAWBERRY LN	LEXINGTON	OR	97839
01N26E000003000				MORROW COUNTY GRAIN GROWERS		PO BOX 367	LEXINGTON	OR	97839
01N26E000003600				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
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01S25E000000500				PROUDFOOT, PAUL J, ET AL		PO BOX 28	IONE	OR	97843
01S25E000000400				BILL & RENA MARQUARDT LLC		67070 MARQUARDT RD	LEXINGTON	OR	97839
01S25E000000100				PROUDFOOT, PAUL J ET AL		PO BOX 28	IONE	OR	97843
01S26E000000900				PROUDFOOT, PAUL J, ET AL		PO BOX 28	IONE	OR	97843
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02N25E000001400	KENNETH MICHAEL	KLINGER				68280 IMMIGRANT LN	IONE	OR	97843
02N25E000001600	KENNETH MICHAEL	KLINGER				68280 IMMIGRANT LN	IONE	OR	97843
02N25E000001800				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
02N25E000001700				NORTH LEX POWER AND LAND, LLC	RAUCH, CHRISTIAN K	72967 STRAWBERRY LN	LEXINGTON	OR	97839
02N25E000000600	KENNETH MICHAEL	KLINGER				68280 IMMIGRANT LN	IONE	OR	97843
02N25E000000700	MATTHEW P	DOHERTY	DORIS L			79972 AGNEW RD	HERMISTON	OR	97838
02N25E000000200				USA (BOMBING RANGE)					0
02N25E000000500				KILKENNY LAND COMPANY, LLC	HALE, KELLY	1124 SW MYRTLE DR	PORTLAND	OR	97201
02N26E000001700	KEN	GRIEB	CARRI			72540 ALPINE LN	LEXINGTON	OR	97839
02N26E000001600	KEN	GRIEB	CARRI			72540 ALPINE LN	LEXINGTON	OR	97839
02N26E000001200				GRIEB FARMS, INC		70575 BOMBING RANGE RD	LEXINGTON	OR	97839
02N26E000001900	KEN	GRIEB	CARRI			72540 ALPINE LN	LEXINGTON	OR	97839
02N26E000000500				BAKER PRODUCE SOUTH, INC		PO BOX 4063	PASCO	WA	99302

Wagon Trail Solar Project



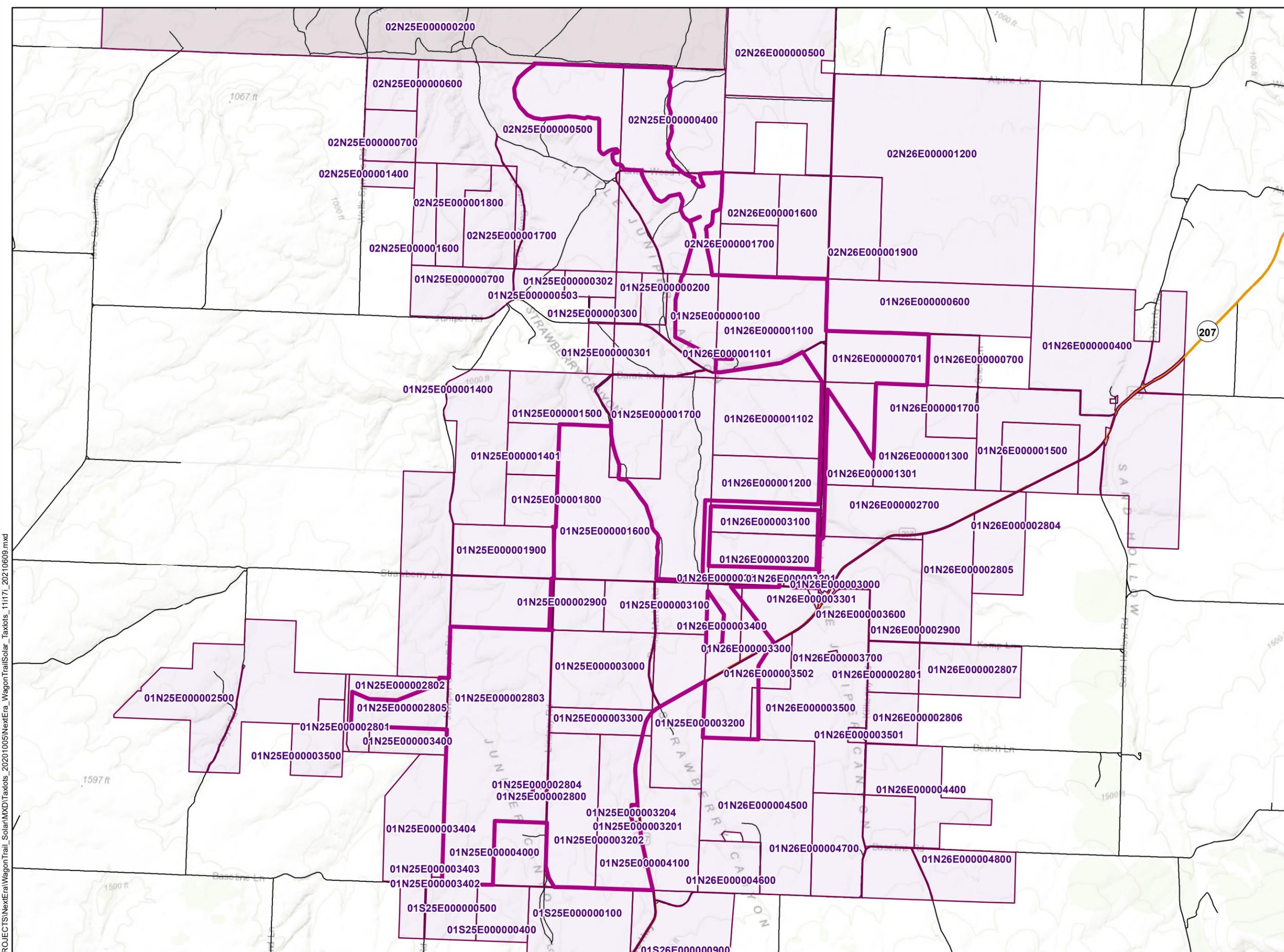
Figure 1
Tax Lot Boundaries within 500 feet of
a Tax Lot that includes Site Boundary

MORROW COUNTY, OREGON

- Site Boundary
- State Highway
- Local Road
- Taxlot Boundary



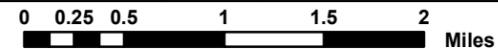
Reference Map



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1:58,000 WGS 1984 UTM Zone 11N



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Attachment 4. Correspondence with Legislative Commission on Indian Services

From: [Konkol, Carrie](#)
To: [Konkol, Carrie](#)
Subject: FW: Potential Wagon Trail Solar Project - Morrow County, Oregon
Date: Tuesday, September 29, 2020 11:16:12 AM

From: LCIS <LCIS@oregonlegislature.gov>
Sent: Friday, September 25, 2020 11:07 AM
To: Solsby, Anneke <Anneke.Solsby@tetrattech.com>
Subject: RE: Potential Wagon Trail Solar Project - Morrow County, Oregon

 **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. 

Good Morning,

Thank you for your email. The most appropriate Tribes are Warm's Spring and Umatilla.

Please also send to: Yakama (WA) and Nez Perce (ID)

Thank you,

Adrienne Fischer
Commission Assistant
Legislative Commission on Indian Services
Oregon State Capitol, Room 167
(503)986-1067

From: Solsby, Anneke <Anneke.Solsby@tetrattech.com>
Sent: Friday, September 25, 2020 9:26 AM
To: LCIS <LCIS@oregonlegislature.gov>
Subject: FW: Potential Wagon Trail Solar Project - Morrow County, Oregon

Hello,

Please see below and attached for a potential energy project. I'm hoping you can assist me with my below request to Karen. 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 is required as part of submitting a Notice of Intent for potential projects to ODOE.

Please feel free to reach out with any questions.

Thank you,

Anneke Van der Mast Solsby | Environmental Planner
Anneke.Solsby@tetrattech.com

Tetra Tech | Portland

1750 SW Harbor Way, Suite 400 | Portland, OR 97201
Direct: 503.721.7217 | Fax: 503.227.1287 | Cell: 503.860.9076

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From: Solsby, Anneke

Sent: Monday, September 21, 2020 9:40 PM

To: Karen.M.Quigley@oregonlegislature.gov

Subject: Potential Wagon Trail Solar Project - Morrow County, Oregon

Hello,

I am working for a client that is exploring development of a photovoltaic (PV) solar power generation project in Morrow County, Oregon. I have attached a preliminary map for your review which shows the general evaluation area under consideration. The project proponent will conduct cultural resource file searches at the State Historic Preservation Office (SHPO) and field surveys within the proposed project area. I respectfully request your assistance in identifying appropriate tribes to consult with regarding tribal historic and cultural resources in the vicinity of this proposed project.

Thank you very much for your assistance.

Anneke Van der Mast Solsby | Environmental Planner

Anneke.Solsby@tetrattech.com

Tetra Tech | Portland

1750 SW Harbor Way, Suite 400 | Portland, OR 97201
Direct: 503.721.7217 | Fax: 503.227.1287 | Cell: 503.860.9076

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