

Notice of Intent to Apply for a Site Certificate

**Buckley Solar Facility
August 2024**

**Submitted to
Oregon Energy Facility Siting Council**

**Prepared for
Buckley Solar LLC**

Prepared by



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Acronyms and Abbreviations

AC	alternating current
ACDP	Air Contaminant Discharge Permit
Applicant	Buckley Solar LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
BPA	Bonneville Power Administration
CFR	Code of Federal Regulations
DC	direct current
EFSC	Energy Facility Siting Council
FAA	Federal Aviation Administration
Facility	Buckley Solar Facility
gen-tie	generation tie
kV	kilovolt
MW	megawatt
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O&M	operations and maintenance
OAR	Oregon Administrative Rule
ODOE	Oregon Department of Energy
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
ODFW	Oregon Department of Fish and Wildlife
ORBIC	Oregon Biodiversity Information Center
ORS	Oregon Revised Statute
POI	point of interconnect
RFPD	Rural Fire Protection District
SCZO	Sherman County Zoning Ordinance

USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WPCF	Water Pollution Control Facilities

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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:

Buckley Solar LLC
PO Box 2576
Boise, ID 83701

Applicant contact person for the Notice of Intent (NOI) with mailing address and telephone number:

Eric Desmarais
Director of Development
Clenera LLC
PO Box 2576
Boise, ID 83701
(503) 901-7853
eric.desmarais@clenera.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:

Parent Company:

Clenera DevCo LLC
PO Box 2576
Boise, ID 83701
(208) 639-3232
information@clenera.com

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

Eric Desmarais
Director of Development
Clenera LLC
PO Box 2576
Boise, ID 83701
(503) 901-7853
eric.desmarais@clenera.com

Contact persons other than the Applicant:

Paul Seilo
Tetra Tech, Inc.
1750 S Harbor Way, Suite 400
Portland, OR 97201
(503) 221-8636
paul.seilo@tetrattech.com

Timothy McMahan
Stoel Rives LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97204
(503) 294-9517
tim.mcmahan@stoel.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.

(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: The Applicant, Buckley Solar LLC, is a subsidiary of their parent company:

Clenera DevCo LLC

PO Box 2576

Boise, ID 83701

(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.

(F) If the applicant is a public or governmental entity:

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

(ii) Written authorization from the entity's governing body to submit an NOI.

Response:

The Applicant is not a public or governmental entity.

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

Response:

The Applicant is not an individual.

(H) If the applicant is a limited liability company:

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

(ii) The date and place of its formation;

(iii) A copy of its articles of organization and its authorization for submitting the NOI; and

(iv) In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.

Response:

The Applicant is a limited liability company. The Applicant contact submitting this NOI is:

Eric Desmarais

Director of Development

Clenera LLC

PO Box 2576

Boise, ID 83701

(503) 901-7853

eric.desmarais@clenera.com

The officer for Buckley Solar LLC is:

Adam Pishl

Chief Operating Officer

PO Box 2576

Boise, ID 83701

(208) 639-3232

adam@clenera.com

Buckley Solar LLC was formed with the Secretary of State of the State of Delaware on December 8, 2023, and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State on December 27, 2023, in Salem, Oregon. The articles of organization and registration to do business in Oregon are provided in Attachment 1.

Buckley Solar 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 the Buckley Solar Facility (Facility), a photovoltaic solar energy generation facility with a battery energy storage system (BESS), located in unincorporated Sherman County, Oregon (Figure 1). As described in more detail below, the Facility will consist of up to 1200 megawatts (MW) of solar generation and 1200 MW of energy storage with four-hour duration. The Facility's site boundary encompasses 7,852 acres of privately owned land and is approximately 9 miles east of Tygh Valley and 8 miles southwest of Grass Valley. The Facility's proposed point of interconnect (POI) to the regional electrical grid is Bonneville Power Administration's (BPA) existing Buckley Substation, located in the center of the site boundary (Figure 2).

The Applicant is in the process of conducting studies that will be included in the Application for Site Certificate (ASC) to Oregon's Energy Facility Siting Council (EFSC). The Applicant intends to begin on-site construction in Q1 2026, pending issuance of a site certificate from EFSC, with a commercial operation target date of Q1 2028 for the first phase.

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

Response:

The Facility will have up to 1200 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, store, transmit, or transport electricity, useful thermal energy, or fuels;

Response:

The Facility will generate electricity using photovoltaic solar panels wired in series and in parallel to form arrays. Each solar array will be composed of a combination of solar modules, tracker systems, posts, and related electrical equipment. Solar technology is rapidly evolving and the solar modules and associated equipment, and the precise layout of the solar arrays and related or supporting facilities, have not yet been determined. Therefore, the following description of major components is based on the best available design information at this time. This information will be

revised and updated as necessary in the ASC. During pre-construction and final design engineering, the Applicant will specify the Facility components, equipment, and layout in accordance with the reporting requirements of the Oregon Department of Energy (ODOE). The Applicant seeks flexibility to permit a range of solar array technology to accommodate market changes and to preserve design and layout flexibility.

The following description of major components is based on the best available design information at this time and may be modified in the ASC and at final design:

- **Solar Modules.** Solar modules use bifacial mono- or poly-crystalline cells to generate electricity by converting sunlight energy into direct current (DC) electrical energy. The electrical generation from a single solar module will vary by module size and the number of cells per module. As technology continues to evolve, final module specification is usually in flux until late in the development process. The solar industry as a whole is moving away from poly-crystalline silicon and it is likely that the facility will use mono-crystalline silicon modules. The modules used in current preliminary site design each have a nameplate rating of 595 watts and measure 7.5 feet by 3.6 feet. Solar modules consist of a crystalline cell, 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 or connector cables. The configuration of multiple rows (the array) can vary depending on the equipment type and topography. The actual number of modules will depend on the module technology, spacing, mounting equipment, and other design criteria that will be determined during final design.
- **Tracker Systems.** Strings of solar modules will be mounted on ground fixed tilt or 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 string may vary by topography and the number of modules that the tracker can hold. The drive unit for the single-axis tracking system can control a single string or multiple strings 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. The top edge of the modules will typically be up to 10.6 feet high, but in potential rare instances it could be up to 17.6 feet off the ground where it spans dips in topography. 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 driven 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 6 to 8 feet below the surface and protrude approximately 5 feet above grade. Posts at the end of tracker strings are usually installed to greater depth to withstand wind uplift. In some soil conditions, concrete backfill is required for each post. Post locations will be determined by the final layout of the tracker system and geotechnical investigations of the solar array area within the Facility site boundary prior to final design.

- **Inverters and Transformers.** DC collected from the solar modules will be converted into alternating current (AC) before connecting to Facility collector substations. Low-voltage cabling will link each solar module to the inverters and transformers. Inverters serve the function of converting DC power supply to an AC power supply in accordance with electrical requirements. The AC from the inverters is routed to transformers that will increase the output voltage from the inverter to the desired Facility collector substations feed voltages of 34.5-kilovolts (kV). The transformers could be collocated with the inverters and could be centrally located within the Facility site boundary or dispersed throughout the solar array. The number of inverters and transformers will vary depending on the final solar array layout. The inverter and transformer specifications will comply with applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.
- **Cabling.** Solar modules generate DC electricity. Cables collect and aggregate the DC before it is converted to AC and sent to Facility collector substations. Low-voltage cabling will connect the solar modules of each tracker string in a 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.
- **Collection System.** The inverters and transformers will connect the generation output of the solar array to 34.5-kV collector lines which may be underground. If they are underground, AC electrical cables will be buried to a minimum of 3 feet. If they are overhead, the collector lines will be supported by wooden or steel pole structures. Specific locations and dimensions of overhead collector lines, if necessary, will not be known until site geotechnical work has been completed during pre-construction activities and prior to final design.

(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 use water in the generation of electricity, nor will it produce wastewater for disposal or significant quantities of solid waste. Waste and recyclable products will be hauled off site and disposed of at licensed waste management facilities. Further details of stormwater drainage and wastewater disposal during construction and operations are provided in Exhibit K of this NOI.

(iv) For thermal power plants, combustion turbine power plants, or other facilities designed to generate electricity from any gas, liquid, or solid fuels:

(I) A discussion of the source, quantity and availability of all fuels proposed to be used in the facility to generate electricity or useful thermal energy;

(II) If the facility will generate electric power from natural gas, petroleum, coal or any form of solid, liquid or gaseous fuel derived from such material, a discussion of methods the facility will use to ensure that the facility does not emit greenhouse gasses into the atmosphere, and a description of any equipment the facility will use to capture, sequester, or store greenhouse gases;

(III) A discussion of the methods for the disposal of waste heat generated by the facility;

Response:

The Facility is not a thermal power plant, combustion turbine power plant, or other facility designed to generate electricity from any gas, liquid, or solid fuels. 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 does not have a transmission line that, by itself, is an energy facility under the definition in ORS 469.300. The Facility will have up to three new collector substations located within the Facility site boundary. The collector substations will collect generation output from the 34.5-kV collector lines and step it up to 500-kV for delivery to the Facility's POI at the existing BPA Buckley Substation (Figure 2). The collector substations will transport power to the Buckley Substation via 500-kV generation-tie (gen-tie) transmission lines, which will be located within the Facility site boundary.

(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; and

Response:

Related or supporting facilities consist of the BESS, collector substations, operations and maintenance (O&M) building, generation-tie transmission lines, site access, service roads, perimeter fencing, gates, temporary construction areas, and potentially temporary workforce housing. The following descriptions are based on the best available information at this time and may be modified in the ASC and at final design prior to construction:

- **Battery Energy Storage System.** The Facility includes an up to 1200 MW BESS centralized in an area near the Facility's collector substations (Figure 2). The BESS is capable of storing and later deploying energy generated by the Facility. Many battery manufacturer options are under consideration as the technology continues to rapidly evolve. The battery options are anticipated to use a series of self-contained enclosures located on suitable foundations within a centralized fenced area. The BESS options under consideration include fire suppression systems.
- **Collector Substations.** Up to three collector substations will be used for the proposed Facility and will be located within the Facility site boundary. These new substations will collect generation output from the 34.5-kV collection system and step it up for delivery to the existing BPA Buckley Substation. Prior to construction, the collector substation sites will be cleared and graded, with a bed of crushed rock applied for a durable surface. The collector substations are anticipated to consist of transformers, gen-tie transmission line termination structures, a bus bar, circuit breakers and fuses, control systems, meters, and other equipment that will be determined at final design.
- **Operations and Maintenance Building.** There will be one O&M building for the proposed Facility, located on an approximately 5-acre area. The O&M building may include a utility room, kitchen, restrooms, storage for maintenance supplies and equipment, and a Supervisory Control and Data Acquisition system. Graveled parking and a storage area for employees, visitors, and equipment will be located adjacent to the O&M building. The building will may have an on-site well and may have a septic system. and power will be supplied by a local service provider using overhead and/or underground lines. The manufacturer of the battery could drive additional placements of storage containers and an additional office trailer.

- **Generation-tie Transmission Lines.** The Facility will include up to three collector substations that will interconnect with the existing BPA Buckley Substation via new gen-tie lines. The specific locations and lengths of the gen-tie lines are not yet known, but they will be within the Facility site boundary and used to interconnect with the POI in the center of the Facility (Figure 2).
- **Site Access and Service Roads.** The Facility will utilize existing access roads to the extent practicable. Primary transportation corridors to the Facility include I-84, US-197, US-97, and OR-216. The bulk of the site is accessible via OR-216. New service roads will be constructed within the Facility site boundary to provide access to Facility infrastructure.

Corridors between module racking will be at approximately 10 feet wide and racking will range from approximately 20 to 50 feet from perimeter fencing. Some new road construction will be required to access site features. Roads will be compacted gravel and typically 20 feet in width, with some exceptions, including main travel corridors where two-way traffic is required. In these cases, roads will be approximately 24 feet wide. Vegetation maintenance along proposed solar array interior roads will include mowing to a height no more than approximately 24 inches (pollinator friendly and low enough to keep modules clear of vegetation).
- **Perimeter Fencing and Gates.** Chain-link or fixed-knot (wildlife friendly) perimeter fencing, up to 6 feet in height and topped with 1-foot of barbed or razor wire, will enclose the solar array as well as other infrastructure. The perimeter fencing will have lockable vehicle and pedestrian access gates.
- **Temporary Construction Areas.** Temporary construction areas will be used for development of the proposed Facility to facilitate the delivery and assembly of materials and equipment. These temporary construction areas may contain temporary storage of diesel and gasoline fuels located in aboveground tanks and within designated secondary containment areas. If a temporary concrete batch plant is needed, it will be located within the temporary construction staging areas. The temporary construction staging areas will be within the Facility site boundary.
- **Temporary Workforce Housing.** The Applicant is considering options for incorporating temporary workforce housing and will describe these further in the ASC, if the Applicant finds after evaluation of available housing options that the provision of temporary housing may be needed and it would be feasible to provide temporary housing at the Facility site.

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

Response:

The ASC will assess the maximum anticipated impacts of Facility structures and visible features. Preliminary estimates of dimensions for major Facility structures are summarized below and will be updated in the ASC and prior to construction at final design:

- **Solar Array.** The solar modules will be grouped in blocks approximately 1100 feet wide by 900 feet long, with a maximum height of approximately 17.6 feet when the modules are fully tilted.
- **Battery Energy Storage System.** The BESS may use a series of self-contained enclosures measuring approximately 29 feet long, 9 feet wide, and 9.5 feet tall and located within an approximately 95-acre centralized area near a Facility collector substation. Each container holds the batteries, a supervisory control and data acquisition system and power management system, and a fire prevention system. Cooling units will be placed either on top of the containers or along the side depending on the equipment selected at final design. Typically, there are four BESS containers per Medium Voltage Skid.
- **Medium Voltage Skid.** The BESS system may use a Medium Voltage Skid measuring approximately 20 feet long, 9 feet wide, and 9 feet tall to step up the inverter voltage to the level of the collection system (typically 34.5 kV). The Medium Voltage skid is typically composed of a medium voltage transformer, switchgear, and possibly inverters.
- **Collector Substation.** Up to three collector substations will be used for the proposed Facility and will be located within the Facility site boundary. Each collector substation will be located on an approximately 5-to-15-acre area within the Facility site boundary and will be enclosed by the locked chain-link fence surrounding the Facility.
- **O&M Building.** There will be one O&M building for the proposed Facility, located on an approximately 5-acre area. The O&M building will be a one-story structure approximately 4,500 square feet in size. A permanent, fenced, graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building.
- **Generation-tie Transmission Line.** Each project collector substation will have a 500-kV gen-tie line within an up to 200-foot-wide corridor. The 500-kV gen-tie lines will be supported either by H-frame structures with two steel or wood poles or by a steel or wood monopole structure. The structures will rise to a height of approximately 75 to 200 feet above grade, depending on the terrain. The specific interconnection components will be described in further detail in the ASC and will be dictated by BPA during micrositeing at final design.
- **Collector Lines.** The 34.5-kV collector lines may run underground for improved reliability. The collector lines would be directly buried to a minimum depth of 3 feet; however, some portion of the lines may be above ground. If needed, overhead collector line segments will likely be placed on steel or wood monopoles approximately 35 to 75 feet high and subject to the requirements of the National Electrical Safety Code.

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 Facility site boundary includes approximately 7,852 acres of privately owned land in Sherman County, Oregon. The Facility is generally bounded by US-97 to the east, US-197 to the west, Buck Hollow Creek to the south, and the Deschutes River to the north. The site boundary is composed of the townships, ranges, and sections listed in Table C-1.

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

Township and Range	Section	Tax Lots
3S 15E	26, 27, 33, 34, 35, 36	2900, 3000
4S 15E	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 21, 22, 23, 24	100, 300, 301, 400, 500, 1700, 1900, 2000, 2100, 2200, 2300, 3300
4S 16E	7, 18, 19	1700, 3800

Exhibit D. Alternative Locations – OAR 345-020-0011(1)(d)

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

Response:

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

Exhibit E. Permits Needed for Construction and Operation – OAR 345-020-0011(1)(e)

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

Response:

Table E-1 identifies the applicable federal, state, and local 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		
Record of Decision/ National Environmental Policy Act Compliance	Bonneville Power Administration (BPA) Attn: Laura Green, Manager PO Box 3621 Portland, OR 97208-3621 (360) 418-8633 legreen@bpa.gov	National Environmental Policy Act (NEPA), Section 102 (42 United States Code [USC] § 4332); 40 Code of Federal Regulations [CFR] § 1500 Description: Interconnection to BPA's transmission system is subject to review under NEPA. BPA will lead this process as a separate action from the solar facility site certificate process. This federal process is not within the jurisdiction of EFSC and therefore should not be included within the site certificate.
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Danielle Erb, Sherman County Contact PO Box 2946 Portland, OR 97208-2946 (503) 808-4368 danielle.h.erb@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.

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Permit	Agency	Authority/Description
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, and 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.
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.
Incidental Take Permit or Eagle Take Permit	U.S. Fish and Wildlife Service (USFWS) Attn: Jeffrey A Dillon, Endangered Species Division Manager 2600 SE 98th Avenue, Suite 100 Portland, OR 970266 (503) 231-6179 Jeffrey_Dillon@fws.gov	Section 7, 9, and 10 Consultation under the Endangered Species Act; Bald and Golden Eagle Protection Act Description: The Facility is not anticipated to impact federally listed species or protected eagles. However, if impacts to federally listed species or eagles are determined not to be avoidable based on the results of field surveys and ongoing coordination with USFWS, the Applicant will pursue an Incidental Take Permit or Eagle Take Permit with the USFWS as applicable. 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, Assistant Director 550 Capitol Street NE Salem, OR 97301 (503) 428-2962 todd.cornett@oregon.gov	ORS 469.300 et seq.; Oregon Administrative Rule (OAR) Chapter 345, Divisions 1, 21-24 Description: This site certificate is the subject of this NOI.

Permit	Agency	Authority/Description
Removal/Fill Permit	Oregon Department of State Lands Attn: Richard Fitzgerald, Removal Fill 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112 richard.w.fitzgerald@dsl.oregon.gov	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. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the state. If this is proposed or needed, the Removal-Fill Permit should be included in and governed by the EFSC site certificate under ORS 469.401(3).
National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit 1200-A	Oregon Department of Environmental Quality (ODEQ), Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-A permit is required for concrete and asphalt mix batch plants which discharge stormwater to surface water. If needed, the Applicant or a third-party contractor 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.
NPDES Stormwater Discharge Permit 1200-C	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-C 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.
401 Water Quality Certification	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48 Description: Water quality certification is required for facilities that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the United States. The Applicant will obtain this permit, if needed, directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
General Water Pollution Control Facilities (WPCF) Permit, WPCF-1700-B	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	ORS 468B; OAR Chapter 340, Division 45 Description: If solar panel washing is determined to be needed, 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 washing activities. Therefore, this permit should not be included in or governed by the site certificate.
WPCF Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	OAR Chapter 340, Division 45 Description: A WPCF-1000 authorizes the permittee to operate a wastewater collection, treatment, control, and disposal system for sand, gravel, and other nonmetallic mineral quarrying and mining operations, including asphalt-mix batch plants, concrete batch plants, and other related activities. If a temporary batch plant is needed for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from ODEQ, which would therefore not be included in or governed by the site certificate.
Air Contaminant Discharge Permit (ACDP)	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	OAR Chapter 340, Division 216 Description: A Basic ACDP authorizes the operation of a stationary or portable concrete manufacturing plant that produces more than 5,000 but less than 25,000 cubic yards per year output. If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant's third-party contractor will obtain a Basic ACDP from ODEQ. This permit is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Oversize Load Movement Permit/Load Registration	Oregon Department of Transportation (ODOT) Attn: Gary Farnsworth, Region 4 Manager Region 4 Headquarters 63055 N Highway 97 Bend, OR 97703 (541) 388-6071	ORS 818.030; OAR Chapter 734, Division 82 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 or governed by the site certificate.

Permit	Agency	Authority/Description
Access Management Permit	<p>ODOT 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 will require an access permit, which may be issued by the local ODOT District Office. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.</p>
Permit to Occupy or Perform Operations Upon a State Highway	<p>ODOT 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 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 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 or governed by the site certificate.</p>
Water Right Permit or Water Use Authorization	<p>Oregon Water Resources Department Water Rights Section, District 3 Attn: Robert Wood, Watermaster 2705 E 2nd Street The Dalles, OR 97058 (541) 506-2652</p>	<p>ORS 537; OAR 690 Divisions 310, 340, and 410</p> <p>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 or governed by the site certificate.</p>
Archaeological Excavation Permit	<p>Oregon Parks and Recreation Department, State Historic Preservation Office Attn: Koren Tippet, Archaeology Inventory & Survey Coordinator 725 Summer Street NE, Suite C Salem, OR 97301 (971) 304-4737 arch.permits@opr.d.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 or governed by the site certificate.</p>

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
State Electrical Permit	Oregon Department of Consumer & Business Services, Building Codes Division Pendleton Field Office 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 bcd.info@dcbs.oregon.gov	OAR 918, Division 309 A state electrical permit is required prior to the installation of electric, phone, or cable service to any Facility infrastructure. Electrical permits may be obtained in person at the Building Codes Division Pendleton office, or online through the state's e-permitting system (available at: https://aca-oregon.accela.com/oregon/Default.aspx). A state electrical permit will be obtained by the construction contractor prior to construction of each component for which electrical, phone, or cable service will be required and therefore should not be included in or governed by the site certificate.
Local Permits		
Conditional Use Permit (CUP), Goal 3 Comprehensive Plan Amendment	Sherman County Planning Department Attn: Georgia Macnab, Planning Director Sherman County Planning Department PO Box 381 Moro, OR 97039 (541) 565-3601 gmacnab@co.sherman.or.us	Sherman County Zoning Ordinance (SCZO) Section 3.1, Exclusive Farm Use, F-1 Zone; SCZO Section 5.2, General Criteria; SCZO Section 5.4, Application for Conditional Use; SCZO Section 5.8, Standards Governing Specific Conditional Uses; SCZO Section 11.2, Zoning or Other Land Development Permit or Approval. 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.
Building Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Ave, Ste. 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR Chapter 918, Divisions 309 & 780; Oregon Structural Specialty Code Description: In Sherman County building permits are administered by the State of Oregon Building Codes Pendleton Field Office. A building permit is required for review and approval prior to commencement of construction of energy facilities. Again, these are applied for and issued by the State of Oregon Building Codes Pendleton Field Office.

Permit	Agency	Authority/Description
Site Evaluation Application & New Construction Permit (Septic)	North Central Public Health District On-site Wastewater Program 419 E 7th St, The Dalles, OR 97058 (541) 506-2600 publichealth@ncphd.org	ORS 454 and 468B; OAR Chapter 340, Division 71 (340-071-0120(1) allows ODEQ to delegate authority to local governmental units) Facilities with an on-site sewage disposal system must obtain a Site Evaluation & New Construction 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 the permit from North Central Public Health District and Wasco County for the O&M building. Therefore, this permit should not be included in or governed by the site certificate.
Road Approach Permit	Sherman County Road Department Attn: Mark Coles, Road Master PO Box 365 Moro, OR 97039 (541) 565-3271 mcoles@co.sherman.or.us	SCZO Article 5 Conditional Uses Description: New driveways and increases or changes of use for existing driveways which access a public road shall obtain a Road Approach Permit from Sherman County Road Department or ODOT.

Exhibit F. Property Ownership – OAR 345-020-0011(1)(f)

(f) Exhibit F. A list of the names and mailing addresses of property owners, as described in this rule:

(A) The list must include all owners of record, as shown on the most recent property tax assessment roll, of property located:

(i) Within 100 feet of property which the subject of the NOI, where the subject property is wholly or in part within an urban growth boundary;

(ii) Within 250 feet of property which is the subject of the NOI, where the subject property is outside an urban growth boundary and not within a farm or forest zone; or

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

(B) In addition to incorporating the list in the NOI, the applicant must submit the list to the Department in an electronic format acceptable to the Department.

Response:

In accordance with OAR 345-020-0011(1)(f), Attachment 2 is a list of the names and mailing addresses of property owners within 500 feet of the Facility's site boundary. The Facility is located in the Sherman County Exclusive Farm Use (F-1) zone (Figure 3). Therefore, OAR 345-020-0011(1)(f)(iii) applies to the Facility. Additionally, the Applicant has provided an electronic list of the property owner information to ODOE in accordance with OAR 345-020-0011(1)(f)(B). Assessor data services for Sherman County is provided by Wasco County. Tax lot boundaries and assessor information for Sherman County was obtained from the Wasco County Assessor on August 1, 2024.

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

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

The required information appears on eight map figures, 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:

The components of each figure addressing the above criteria are listed below:

- **Figure 1** shows the vicinity of the Facility site boundary in relation to county boundaries, major roads, highways, cities and towns, and airports.
- **Figure 2** is an overview of the Facility layout in relation to the surrounding area.
- **Figure 3** shows the underlying zoning designation for the Facility. The site boundary is within Sherman County's F-1 zone.
- **Figure 4** identifies the study areas and their associated mileage that are defined by OAR 345-001-0010(35).
- **Figure 5** shows the topographic features of the surrounding area in comparison to the proposed site boundary. Local roads and county boundaries are also shown.
- **Figure 6** identifies the federal, state, and local protected areas as defined by OAR 345-001-0010(26), within a 20-mile buffer of the proposed site boundary.
- **Figure 7** shows hydrology and wetland data within the vicinity of the Facility from the National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD).
- **Figure 8** shows the permitted energy facilities within 10 miles of the proposed site boundary. Additionally, major roads, existing transmission lines, and existing substations are shown on the figure.

(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:

As previously mentioned, the Facility is not a pipeline or transmission line as defined under OAR 469.300. Additionally, the Facility is not proposing a pipeline or transmission line that would be

considered an energy facility. Therefore, alternate corridors were not identified for the Facility under subsection (d).

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

Response:

As shown on Figure 4, the study areas defined under OAR 345-001-0010(35) include the area within the site boundary and the area within the following distances from the site boundary: a 0.5-mile area for land use, wildfire risk, and fish and wildlife habitat; a 5-mile recreational opportunities area; a 5-mile threatened and endangered plant and animal species area; a 10-mile scenic resources and public services area; and a 20-mile protected areas buffer.

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

Response:

As previously mentioned, Figure 5 shows topographic features of the surrounding area in relation to the proposed site boundary. Local roads, county boundaries, contour lines, and waterbodies also are shown.

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

Response:

Protected areas defined under OAR 345-001-0010 are shown and labeled on Figure 6.

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

Response:

Figure 7 shows potential waters of the state and potential waters of the United States using data from the NWI and NHD. Intermittent and perennial streams cross through and around the proposed site boundary according to the NHD; there is also a very small area categorized as a lake/pond. The NWI identified a few small freshwater ponds and emergent wetlands within the Facility site boundary, and a few small areas of freshwater emergent wetlands were identified outside the Facility site boundary.

(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:

The Bakeoven, Daybreak, and Sunset solar energy generation facilities are permitted under EFSC and located within 10 miles of the proposed site boundary, as shown on Figure 8. Existing transmission lines and substations are also within 10 miles of the Facility. No other existing energy generation facilities have been identified within 10 miles of the Facility.

Exhibit H. Non-generating Energy Facility – OAR 345-020-0011(1)(h)

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

Response:

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

Exhibit I. Land Use – OAR 345-020-0011(1)(i)

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

Response:

The proposed Facility site boundary is within Sherman County's F-1 zoning district (Figure 3). 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) of compliance with Sherman County's land use standards for the Facility.

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

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

Response:

This exhibit addresses the potential environmental impacts of Facility 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; land use; and wildfire risk. The following discussions are based on the analysis area for each resource, as defined in OAR 345-001-0010(35) and shown in Figure 4. The analysis area and related regulatory requirements for each resource are identified in Table J-1.

Table J-1. Study Areas for Environmental Impacts

Resource	Study Area	Regulatory Requirement
Air Quality	Facility site boundary	Not applicable
Surface and Groundwater Quality and Availability (includes wetlands and waters of the state)	Facility site boundary	Not applicable
Fish and Wildlife Habitat	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Threatened and Endangered Plant and Animal Species	5 miles from Facility site boundary	OAR 345-001-0010(35)(a)
Historic, Cultural and Archaeological Resources	Facility site boundary	Not applicable
Scenic Resources	10 miles from Facility site boundary	OAR 345-001-0010(35)(b)
Recreation	5 miles from Facility site boundary	OAR 345-001-0010(35)(d)
Land Use	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Wildfire Risk	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)

Air Quality

The primary sources of air pollution during construction and operation of the Facility are pollutants coming from the emissions of vehicles traveling to and from the Facility and fugitive dust. Solar

modules, collector lines, BESS, and related and supporting components will not produce air contaminants and therefore will not have a negative impact on air quality in the area. Generally, vehicles traveling to and from the site will include large trucks carrying various materials and employees commuting to the site. Fugitive dust can be generated from vehicles driving on unpaved gravel roads. Dust control best management practices, which will be thoroughly discussed in the ASC, will be implemented during construction to minimize the effects of dust.

Because vehicles and dust generated during construction and operations are mobile, temporary, and non-point sources, they are not subject to air quality permitting. Facility-related vehicles, workers' vehicles, and vehicles used for delivery of construction supplies and equipment, or operational supplies, are subject to ODOT and U.S. 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 Part 89 (National Archives 2023). 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 NPDES 1200-C permit to be issued by ODEQ, which will include an Erosion and Sediment Control Plan. If a temporary concrete batch plant is needed for construction, the Facility will also obtain NPDES 1200-A and WPCF-1000 permits from ODEQ. During construction, employees will use on-site portable toilets; waste will be disposed of off-site by a licensed contractor. During operation, restroom facilities within the O&M building will be served by a septic system.

Surface and Groundwater Availability

During Facility construction, approximately 175 million gallons of water will be required for dust suppression and road and earthwork compaction. Water is anticipated to come from nearby municipalities with existing water rights. The expected water amounts used for construction of the Facility will be discussed in the ASC.

During construction, the construction contractor will be responsible for identifying water sources, as needed, and ensuring that any needed permits or approval are obtained for construction water use. Water will either be used immediately or stored in a tank or holding pond.

During operations, water may be provided by an on-site permit exempt well or nearby municipalities with existing water rights. Generally, water during operation will be used for solar panel washing and washing Facility vehicles. The average amount of water used at the O&M building will be less than 5,000 gallons per day during operations.

Wetlands and Waters of the State of Oregon

Potential wetlands and waters have been identified in Figure 7 using data from the NWI and NHD. Intermittent and perennial streams cross through and around the proposed site boundary according to the NHD; there is also a very small area categorized as a lake/pond. The NWI identified a few small freshwater ponds and emergent wetlands within the Facility site boundary, and a few small areas of freshwater emergent wetlands were identified outside the Facility site boundary. An in-depth analysis of wetlands and waters will be provided in the ASC including detail on the wetland and waters delineation, discussion of the potential impacts to potentially jurisdictional wetlands and waters, including required mitigation (if any), and identification of necessary permits.

Wildlife and Wildlife Habitat

As shown in Table J-2, land cover within the Facility site boundary is primarily Herbaceous and Shrub/Scrub (MRLC 2021). The site boundary also contains some areas of Cultivated Crops, and a small amount of Developed land.

Table J-2. Land Cover within the Facility Site Boundary

Land Cover Type	Area (acres) ¹	Percent of Total Area ¹
Cultivated Crops	1044.9	13%
Developed, High Intensity	0.2	0%
Developed, Low Intensity	3.9	0%
Developed, Medium Intensity	3.9	0%
Developed, Open Space	111.7	1%
Herbaceous	3378.0	43%
Shrub/Scrub	3309.3	42%
Total	7851.9	100%
1. Values may not add up to the total due to rounding.		

Wildlife surveys will be performed to determine what species are present within the site boundary. Habitat surveys will be conducted to evaluate habitat functions and values present to support wildlife within the Facility site boundary. Habitat surveys will be informed by the Oregon Department of Fish and Wildlife (ODFW) Fish and Wildlife Habitat Mitigation Policy ([OAR] 635-415-0025), which defines six habitat quality categories ranging from Category 1 habitat (i.e., essential, limited, and irreplaceable habitat) to Category 6 habitat (i.e., habitat that has low potential to become essential or important habitat for fish and wildlife). A more in-depth analysis of specific species and their habitats will be provided in the ASC.

Sensitive, Threatened, and Endangered Species

Surveys for special status plant and wildlife species will be conducted within the Facility site boundary. A raptor and eagle nest survey will be conducted for the Facility and within a 0.5-mile buffer around the Facility site boundary. According to available data from the Oregon Biodiversity Information Center (ORBIC), multiple special status wildlife species have been documented in the vicinity of the Facility site boundary, including three golden eagle nests within 0.5-mile. The Facility is also located entirely within the ODFW Mule Deer Winter Range habitat. This information will help inform the wildlife and habitat surveys for the Facility.

Results of field surveys and analysis of potential impacts to sensitive, threatened, and endangered species will be provided in the ASC, along with measures to reduce impacts to these species.

Historic, Cultural, and Archaeological Resources

The Applicant will conduct cultural resource surveys within the Facility site boundary. These surveys will evaluate 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. Oregon State Historic Preservation Office study methodologies will be followed and be consistent with U.S. Secretary of Interior standards for cultural resource surveys under Section 106 of the National Historic Preservation Act (Public Law 89-665).

Any archaeological or historic sites discovered during the field investigation will be officially recorded and filed with the Oregon State Historic Preservation Office. If an archaeological or historic site is identified, the Applicant will undertake the appropriate avoidance or mitigation actions to avoid significant impacts.

Scenic Resources

The analysis area for scenic and aesthetic resources consists of the area within the Facility site boundary plus a 10-mile buffer around the site boundary in accordance with OAR 345-001-0010(35)(b) (see Figure 4). Pursuant to OAR 345-021-0010(1)(r) and 345-022-0080(3), scenic resources to be considered are those “identified as significant or important in a land use management plan adopted by one or more local, tribal, state, regional, or federal government or agency applicable to lands within the analysis area for scenic resources.”

Local land use plans to be considered include the Sherman County Comprehensive Land-Use Plan and local comprehensive plans for jurisdictions within 10 miles of the Facility site boundary. The visual assessment included with the ASC will include proposed mitigation measures, if needed, for significant potential impacts identified through the ASC process.

Recreational Opportunities

The recreational opportunities study area consists of the Facility site boundary plus a surrounding 5-mile buffer (Figure 4), in accordance with OAR 345-001-0010(35)(d). Generally, recreational activities in the study area include camping, cycling, fishing, hiking, hunting, and rafting (County 2024d). Exhibit T in the ASC will include a specific analysis of the impacts to recreational opportunities within the study area. These recreational opportunities will be evaluated for uniqueness and irreplaceability required by OAR 345-022-0100(1).

Land Use

As shown on Figure 4, the study area for land use consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer in accordance with OAR 345-001-0010(35)(c). As shown in Figure 3, the Facility's site boundary is within Sherman County's F-1 zoning district. Applicable development standards for these zones and overlay zones will be addressed in Exhibit K of the ASC. Land within the site boundary is primarily vacant, but some of it is used for dryland wheat cultivation with occasional grazing. Impacts to agricultural land will also be further discussed in Exhibit K of the ASC.

The Facility will use and occupy more than 20 acres of arable land and will require an exception to Oregon Statewide Planning Goal 3, Agricultural Lands. The Goal 3 exception will be evaluated in Exhibit K of the ASC as required by OAR 345-022-0030.

Wildfire Risk

The study area for wildfire risk consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer, in accordance with OAR 345-001-0010(35)(c) (see Figure 4). The Oregon Wildlife Risk Explorer shows the study area has a high to very high burn probability. Additionally, average flame lengths for the area generally range from 4 to 8 feet (ODF 2018). During construction, water trucks will be on-site for dust management and can provide water to support fire control if/as needed. Exhibit V of this ASC will provide a detailed analysis of baseline fire risk, seasonal fire risk, heightened risk area, and high fire consequence areas for the study area. Prior to construction, the Applicant will coordinate with the South Sherman Rural Fire Protection District (RFPD) and continue to do so through all stage of Facility development. If needed, the Applicant will develop and implement a Wildfire Mitigation Plan in compliance with OAR 345-022-0115(1)(b).

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(35)(b), the public services study area for impacts listed in OAR 345-022-0110 includes the Facility site boundary plus a surrounding 10-mile buffer. Public services that will be evaluated for potential impacts from the construction and operation of the Facility are listed in OAR 345-022-0110(1) and outlined below:

- Sewers and sewage treatment;
- Water;
- Storm water 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 and operation, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. The Applicant is proposing an O&M building that will contain a kitchenette, bathrooms, desk space, meeting space, and storage space. A septic system will be necessary to support the building. Required permits to construct the system will be obtained from Sherman County and ODEQ. The septic system will not rely on community services and will not cause significant adverse impacts to community sewer systems.

Water

During construction, approximately 175 million gallons of water will be required, mostly for dust suppression and access road and earthwork compaction. Actual daily water use will vary depending on weather and the final construction schedule. The need for water for dust control, for example, will be far greater in dry, windy summer conditions than at other times of year. As currently proposed, the anticipated water source is water obtained from existing private or municipal water sources with existing water rights and trucked to the site. The Applicant will confirm the anticipated amount of water required for construction and operation and will provide additional detail on water sourcing and use in the ASC. Water will only be obtained from permitted sources with adequate water rights.

During operations, the primary water use will be at the O&M building. Water could be used for the kitchen, drinking, showers, and toilets. Additionally, water will be trucked in for solar panel washing as needed. Generally, water used during operations is anticipated to be under 5,000 gallons per day.

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 not have significant adverse impacts on stormwater drainage services or infrastructure, due to the rural nature of the area and minimal existing stormwater infrastructure in the area. Stormwater from access roads and solar panels is expected to be minimal and will flow to the adjacent ground and infiltrate on-site.

For construction, the Applicant will obtain a NPDES 1200-C Permit and prepare an Erosion and Sediment Control Plan. Construction stormwater will be handled in accordance with the terms of the permit. 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. There are no incorporated communities located within the Facility site boundary; therefore, the Facility will have no impact on stormwater drainage services provided in urban areas.

Solid Waste Management

Potential impacts on the ability of communities to provide solid waste management services could occur if the solid waste management needs from the proposed Facility during construction or

operations cannot be met through existing facilities or if meeting those demands interferes with the ability of service providers to meet other community waste management needs (e.g., if local landfill capacity is inadequate to handle the needs of the proposed Facility).

The Dalles Disposal and Waste Connections, Inc. provide solid waste management and recycling services to Sherman County. Solid waste generated at the Facility during construction activities will be non-hazardous. Waste materials generated through the construction of the solar array, BESS, and associated infrastructure will consist of scrap metal, concrete waste, and packaging materials. Disposal of this waste will be provided through a private contract with commercial haulers. The Dalles Disposal and Waste Connections, Inc. collects non-hazardous solid waste including trash, cardboard, organics, recycling, construction, and demolition debris. Waste that cannot be recycled or sold for reuse will be disposed of at a collection facility operated by the Tri-County Hazardous Waste & Recycling Program and located in The Dalles (County 2024e).

The O&M building will generate small amounts of solid waste during operation of the Facility. Typical waste will include paper, plastic, and food. Replacement of equipment throughout the lifetime of the Facility will produce scrap metal, solar panels, inverters. As mentioned above, waste that is not recyclable will be disposed of at the collection facility operated by the Tri-County Hazardous Waste & Recycling Program. The Applicant will contract with a specific hazardous waste disposal for periodic disposal of batteries from the BESS.

The proposed Facility will, therefore, not have any significant adverse impact on the ability of any community in the area to provide solid waste management services.

Housing

Construction

The Applicant anticipates a maximum of 400 employees on-site at one time, and this number will fluctuate due to multiple disciplines of contractors that will need to complete their work simultaneously during construction.

The construction workforce will include a wide variety of specialized workers for certain construction tasks such as solar array and BESS installation. Construction workers hired from outside the local area will need temporary housing. The amount of temporary housing will depend on the percentage of workers hired from outside of the local area. The percentage of the construction workforce that is hired locally will depend on the availability of workers with appropriate skills. This percentage is continually growing due to the number of solar energy projects that are being built in eastern Oregon. For employees hired nonlocally, there are several options for temporary housing within a commutable distance to the site, such as The Dalles, Hood River, and Madras. Since a portion of the temporary workers will be hired locally, the Applicant does not anticipate a significant impact on housing within the 10-mile analysis area. Due to the number of regional communities that workers can choose for housing, their impact to housing in the immediate vicinity of the Facility is anticipated to be reduced. Workers from outside the area

will benefit local businesses with their patronage for housing, food, or other daily needs. In addition, the Applicant is considering options for incorporating temporary workforce housing and will describe these in more detail in the ASC, if the provision of temporary housing is needed and feasible to provide within the Facility site.

Operation

It is estimated that, if the full capacity is built, approximately 15 full-time employees will work on-site for the 40-year lifetime of the Facility. Preference will be given to local candidates, but some outside contractors who specialize in maintenance tasks may need to be hired. The Applicant does not anticipate significant impacts to housing in the surrounding community as a result of Facility operations.

Traffic Safety

Primary transportation corridors for the Facility include I-84, US-197, US-97, and OR-216. These primary transportation routes will carry heavy-duty and light-duty delivery vehicles and workforce traffic during construction of the Facility. Heavy-duty trucks will generally hold concrete, gravel, and larger materials needed for construction of the Facility. Light-duty trucks typically carry water and electrical equipment. A traffic management plan will be developed in cooperation with Sherman County to minimize impacts to traffic safety. In addition, the Applicant will enter into road use agreements with Sherman County to ensure that public roads impacted by construction will be left in “as good or better” condition than that which existed prior to the start of construction.

During operation, significant traffic impacts from the Facility are not anticipated. Approximately 15 permanent on-site employees will be required for Facility operations, along with a minimal number of seasonal vegetation maintenance personnel. Specialized personnel responsible for occasional inspections of the solar array may be hired from outside the area and may travel in light-duty trucks to the Facility. 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.

Police and Fire Protection

The Sherman County Sheriff’s Office and Oregon State Police Department provide police services for Sherman County (County 2024b). The Applicant will provide on-site security, and effective communications will be established between on-site security personnel and the Sherman County Sheriff’s Office. As necessary, back-up law enforcement will be available from the Oregon State Police, with offices in The Dalles, Madras, and Hermiston. Construction and operation of the Facility are not anticipated to place significant new demands on the provision of law enforcement in the vicinity of the Facility site boundary or in nearby communities.

The Facility is within the South Sherman RFPD coverage area (OOSFM 2024). The Applicant will work with the appropriate RFPDs to address any potential needs for a fire prevention and management plan during construction. The Applicant will also develop first aid and emergency response procedures for the construction and operation of the Facility. Development of these plans will involve consultation with local emergency response agencies. The Applicant will notify the RFPDs of construction plans and identify the location of and access to Facility components. 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. Fire danger during the operational phase of the Facility will be minimal. Therefore, significant new demands on the fire protection forces that serve the area are not anticipated.

Health Care

Due to the lower population density near the Facility, hospital and medical centers tend to be regional. The nearest hospitals are St. Charles in Madras (approximately 39 miles southwest of the Facility) and Adventist Health Columbia Gorge in The Dalles (approximately 26 miles northwest of the Facility). Both hospitals provide emergency and surgical services (St. Charles 2024; Adventist 2024). 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 I trauma centers located in Portland: Oregon Health & Science University Hospital or Legacy Emanuel Medical Center.

Sherman County Ambulance Service provides ambulance services to Sherman County. According to Sherman County's FAQ page, the Sherman County Ambulance Service has one Registered Nurse, 16 Emergency Medical Technicians, two Emergency Medical Technician-Intermediates, seven Emergency Medical Responders, and three Certified Drivers (County 2024c). This ambulance service would be used to take patients to the closest hospital in the event of an emergency.

As per the Occupational Safety and Health Administration's regulations for sites with greater than 100 workers on-site, the Applicant anticipates that a safety manager will be on-site during Facility construction. 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 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 on-site health and safety risks. The small number of new temporary residents is not expected to place significant new demands on the health care facilities that serve the area.

Schools

Sherman County School (a grade school, junior/senior high school, and athletic complex) and Sherman Preschool service all of Sherman County (County 2024a). Construction work for the proposed Facility will be short term and few, if any, workers temporarily relocating to the area are expected to be accompanied by family members. In addition, some of the peak construction work period will occur during the summer months when school is not in session. Therefore, little to no construction-related impacts on schools are expected. Operation of the Facility will require approximately 15 permanent employees. Some employees may be hired locally, and others may relocate from outside the region with their families. Conservatively estimating that all 15 employees are hired from outside the region and on average, each brings two school-age children, up to approximately 30 children could enroll at area schools. Because children would be different ages, the number of children at any one grade level will be very low. As a result, construction and operation of the Facility is not expected to substantially affect local school enrollment. Additional information will be provided in the ASC.

Exhibit L. Protected Areas – OAR 345-020-0011(1)(L)

*(L) **Exhibit L.** A list of all protected areas in the study area for impacts to protected areas identifying:*

(A) The distance and direction of the protected area from the proposed facility;

(B) The basis for protection of the area, by reference to a specific subsection of OAR 345-001-0010(26); and

(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area;

Response:

The protected areas study area is the Facility site boundary plus a surrounding 20-mile buffer (Figure 6), in accordance with OAR 345-001-0010(35)(e). Protected areas are defined and listed in OAR 345-001-0010(26). Table L-1 lists known protected areas within the study area, which are shown on Figure 6. Exhibit L of the ASC will include more detailed analysis of the potential impacts to protected areas.

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Table L-1. Protected Areas Inventory

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
National Park or other unit of the National Park System OAR 345-001-0010(26)(a)	Oregon National Historic Trail	10.25	West	National Trails Office - Regions 6, 7, 8 Oregon National Historic Trail 1100 Old Santa Fe Trail Santa Fe, NM 87505	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
National Monument OAR 345-001-0010(26)(b)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)
Wilderness Area OAR 345-001-0010(26)(c)	Badger Creek Wilderness	19.0	West	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	White Wild and Scenic River	4.5	Southwest	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
	Deschutes Wild and Scenic River	2.1	West		
	John Day Wild and Scenic River	14.7	East		
National Wildlife Refuge included in the National Wildlife Refuge System OAR 345-001-0010(26)(e)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)
National Fish Hatcheries OAR 345-001-0010(26)(f)	None	N/A	N/A	N/A	Confirmed none via U.S. Fish and Wildlife Service – Visit National Fish Hatcheries (USFWS 2024).
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)
Wilderness Study Area OAR 345-001-0010(26)(h)	Lower John Day Wilderness Study Area	11.4	Northeast	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024)
	North Pole Ridge Wilderness Study Area	17.9	Southeast		
	Thirtymile Wilderness Study Area	14.4	East		

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
Land designated in a federal land management plan or by an act of Congress as (includes Areas of Critical Environmental Concern, Outstanding Natural Areas, Research Natural Areas, Experimental Forests or Ranges, and Special Interest Areas)					
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	Armstrong Canyon	19.5	Southeast	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2023)
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2023).
Research Natural Area OAR 345-001-0010(26)(i)(C)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2024)
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2023).
Special Interest Area designated for scenic, geologic, botanic, zoologic, paleontological, archaeological, historic, or recreational values, or combinations of these values OAR 345-001-0010(26)(i)(E)	None	N/A	N/A	N/A	Confirmed none via USGS Protected Areas Database of the United States (PADUS 2023).
State park, wayside, corridor, monument, historic, or recreation area under the jurisdiction of the Oregon Parks and Recreation Department OAR 345-001-0010(26)(j)	Lawrence Memorial Grassland	17.8	South	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (800) 551-6949 park.info@oregon.gov	Confirmed via Oregon Parks and Recreation Department State Parks database (OPRD 2014).
	Deschutes River State Recreation Area	6.8	North		
	White River Falls State Park	5.0	West		
Willamette River Greenway OAR 345-001-0010(26)(k)	None	N/A	N/A	N/A	Confirmed none via Oregon Parks and Recreation Department State Parks database (OPRD 2014).
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(L)	Tygh Valley State Natural Area	5.5	West	NR-Corvallis (headquarters) Oregon State University 234 Strand Hall 170 SW Waldo Place Corvallis, OR 97331-8680 (541) 737-9918 inr@oregonstate.edu	Confirmed via Oregon Natural Area Plan of 2020 (ORBIC 2020).
	Lawrence Memorial Grassland Natural Area	17.8	South		
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	None	N/A	N/A	N/A	Confirmed none via Oregon Natural Area Plan of 2020 (ORBIC 2020).

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
State Scenic Waterway OAR 345-001-0010(26)(n)	Deschutes River State Scenic Waterway	6.8	North	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707 park.info@oregon.gov	Confirmed via USGS Protected Areas Database of the United States (PADUS 2024) and Oregon Parks and Recreation Department State Parks database (OPRD 2014).
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	White River Wildlife Area	11.0	West	ODFW 4034 Fairview Industrial Drive SE Salem, OR 97302 (503) 947-6000	Confirmed via Oregon Department of Fish and Wildlife, Wildlife Areas Data Clearinghouse (ODFW 2021).
	Lower Deschutes Wildlife Area	11.4	Northwest		
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	Oak Springs	5.4	West	ODFW 4034 Fairview Industrial Drive SE Salem, OR 97302 (503) 947-6000	Confirmed via Oregon Department of Fish and Wildlife - Natural Resources Information Management Program - Hatchery Data (ODFW 2014).
Agricultural experiment station, experimental area, or research center established by Oregon State University OAR 345-001-0010(26)(q)	None	N/A	N/A	N/A	Confirmed none using OSU website and .pdf maps (OSU 2024a)
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	None	N/A	N/A	N/A	Confirmed none using OSU website and .pdf maps (OSU 2024b)

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Exhibit M. Water Sources and Use – OAR 345-020-0011(1)(m)

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

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

Response:

Information regarding the anticipated water use during construction and operation of the proposed Facility is described below.

Construction

During construction, approximately 175 million gallons of water will be required, mostly for dust suppression and access road and earthwork compaction. Actual daily water use will vary depending on weather and the final construction schedule. The need for water for dust control, for example, will be far greater in dry, windy summer conditions than at other times of year. As currently proposed, anticipated sources include existing private or municipal water sources with existing water rights. Water from these sources will be trucked to the site. The Applicant will confirm the anticipated amount of water required for construction and operation and will provide additional detail on water sourcing and use in the ASC. Water will only be obtained from permitted sources with adequate water rights.

Operation

During operations, the primary water use will be at the O&M building. Water may be used for a kitchen, drinking, showers, and toilets. Additionally, water will be trucked in for solar panel washing as needed, which is anticipated to be approximately once per year. Generally, water used during operations is anticipated to be under 5,000 gallons per day.

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

Response:

At this time, the Applicant does not anticipate 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 photovoltaic power generation facility. No cooling water is required for operation.

Exhibit N. Carbon Dioxide Emissions – OAR 345-020-0011(1)(n)

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

Response:

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

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

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

Response:

The applicable state statutes, administrative rules and ordinances are listed below in Table O-1. These statutes, rules, and local ordinances contain standards or criteria that must be met by the Applicant for EFSC to issue a site certificate beyond what is listed in Exhibit E. The Applicant does not anticipate problems in meeting specific requirements.

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

Department	Legal Citation	Agency Address
Oregon Department of Agriculture	OAR 345-022-0070 Threatened and Endangered Species Plant Conservation Biology Program— ORS 564.105; OAR Chapter 603, Division 73-0070	Oregon Department of Agriculture 635 Capitol Street NE Salem, OR 97301 (503) 986-4550
ODFW	OAR 345-022-0060 Fish and Wildlife Habitat and OAR 345-022-0070 Threatened and Endangered Species Habitat Conservation - ORS 496.172(2); OAR Chapter 635, Divisions 100 and 415	ODFW The Dalles Fish Screens and Field Office 3561 Klindt Dr The Dalles, OR 97058 (541) 296-8026
Oregon Water Resources Department – Water Rights Division	OAR 345-022-0020 General Standard of Review ORS Chapters 537, 540; OAR Chapter 690	Oregon Water Resources Department Water Rights Section, District 3 2705 E 2nd Street The Dalles, OR 97058 (541) 506-2652
Oregon Department of State Lands	OAR 345-022-0020 General Standard of Review OAR Chapter 141	Oregon Department of State Lands 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112

Department	Legal Citation	Agency Address
ODEQ—Water Quality & Stormwater Control	OAR 345-022-0022 Soil Protection ORS 468 and 468B; OAR Chapter 340, Divisions 41, 45, and 55	ODEQ 400 E. Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
ODEQ—Noise	OAR 345-022-0020 General Standard of Review ORS 467; OAR Chapter 340, Division 35	ODEQ 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Hazardous Waste Management	OAR 345-022-0120 Waste Minimization ORS 465 and 466; OAR Chapter 340, Divisions 100-122	ODEQ 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Solid Waste	OAR 345-022-0120 Waste Minimization ORS 459; OAR Chapter 340, Division 93	ODEQ 811 SW Sixth Avenue Portland, OR 97204-1390 (541) 298-7255 ext. 221 (Eastern Region)
Oregon Department of Geology and Mineral Industries	OAR 345-022-0020 Structural Standard 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	OAR 345-022-0090 Historic, Cultural and Archaeological Resources Native American Graves and Protected Objects—ORS 97.740-97.760 Archaeological Objects and Sites—ORS 358.90-358.955 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) 986-0690
Oregon Office of State Fire Marshal—Emergency Planning and Community Right to Know Act	OAR 345-022-0115 Wildfire Prevention and Risk Mitigation ORS 453; OAR Chapter 837, Divisions 85 and 95; Fire and Life Safety Regulations, OAR 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473
Oregon Office of State Fire Marshal	OAR 345-022-0115 Wildfire Prevention and Risk Mitigation 2019 Oregon Fire Code; OAR Chapter 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473

Department	Legal Citation	Agency Address
Oregon Department of Land Conservation and Development	OAR 345-022-0030(2) and (3) Land Use Oregon Statewide Planning Goals, applicable sections of OAR Chapter 660, applicable substantive criteria of the Sherman County Comprehensive Land-Use Plan and land use ordinances, and any exceptions to the same may be granted by the Council under OAR 345-022-0030(4).	Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
Sherman County Planning Department	OAR 345-022-0030(2)(a) Land Use Sherman County Zoning Ordinance	Sherman County Planning Department 66365 Lonerock Road Moro, OR 97039 (541) 565-3601

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

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

Response:

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

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

Activity	Anticipated Date
Applicant submits the NOI to ODOE	August 2024
EFSC reviews the NOI, distributes public notice, conducts public information meeting as needed, facilitates comment period, and issues Project Order	August – November 2024
Applicant submits Preliminary ASC to ODOE	May 2025

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

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

Response:

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 11, 2023, the Legislative Commission provided a letter identifying the Burns Paiute Tribe, Confederated Tribes of Warm Springs Reservation of Oregon, and Confederated Tribes of the Umatilla Indian Reservation as Tribal governments that should be notified (Attachment 3).

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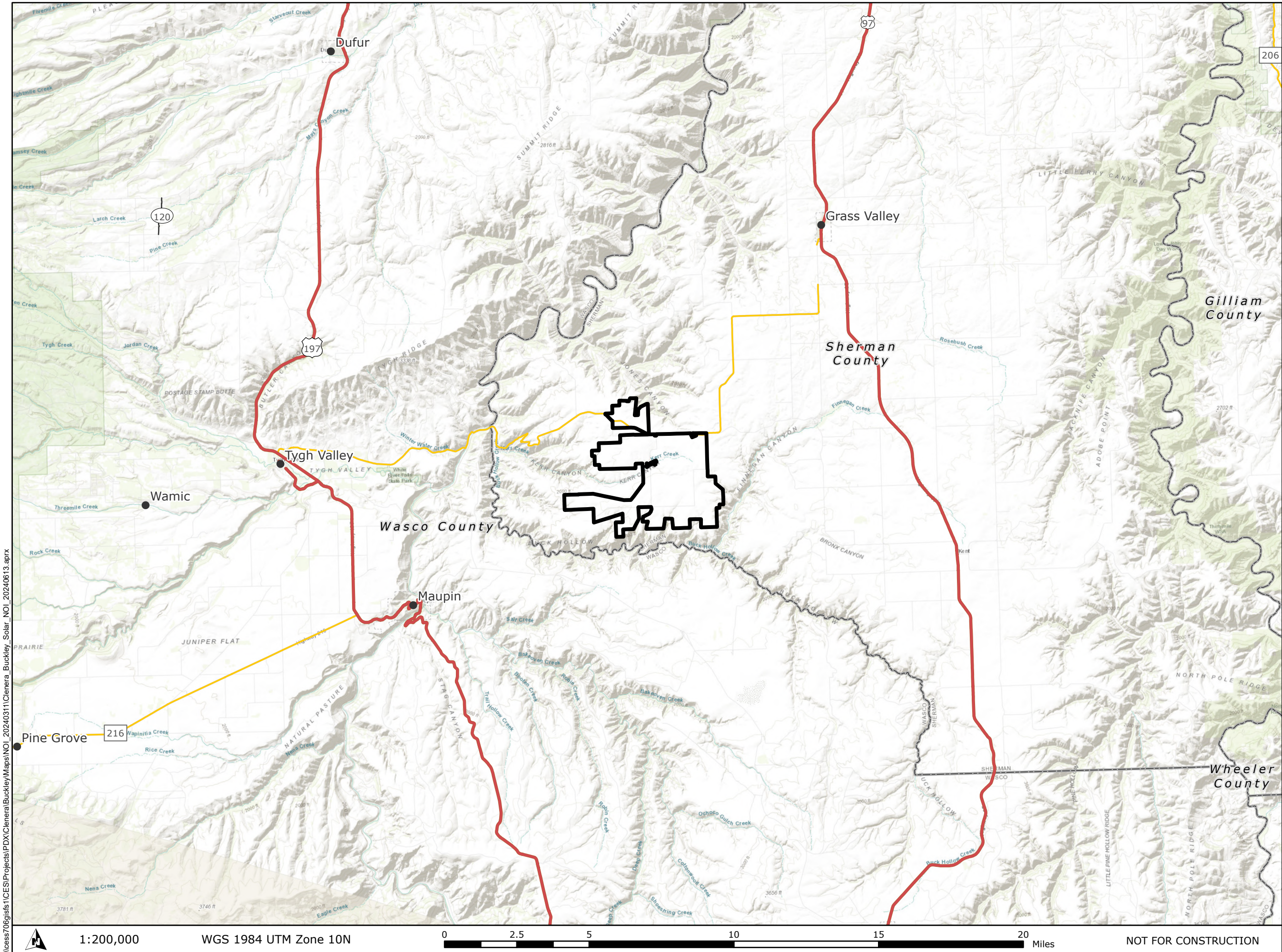
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Figures

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Buckley Solar Facility

Figure 1 Site Vicinity

SHERMAN COUNTY, OR

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

Reference Map

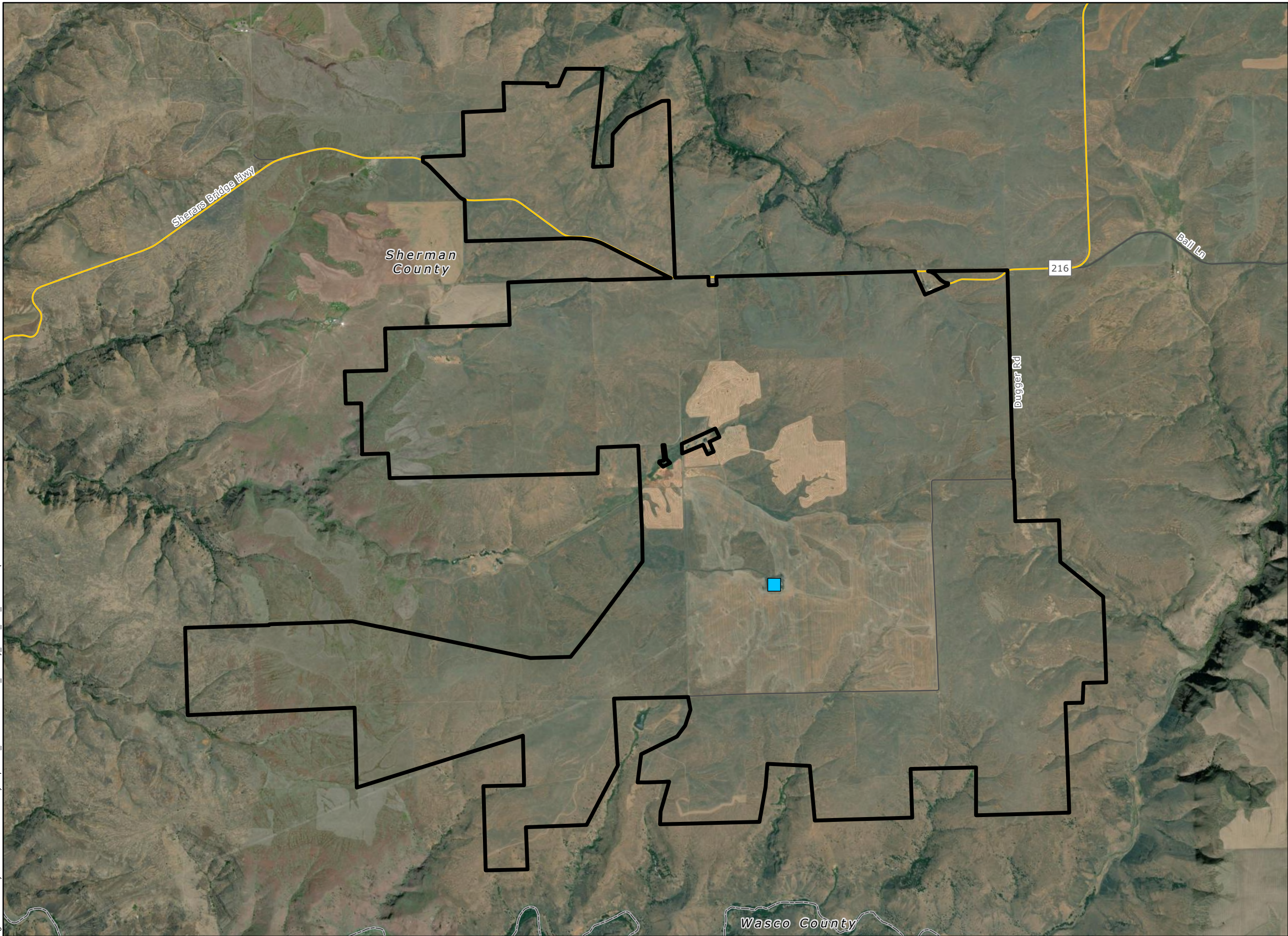
Reference map showing the location of the facility within the state of Oregon and its neighboring states (WA, MT, ID, NV, CA).

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0 2.5 5 10 15 20 Miles

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



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Buckley Solar Facility

Figure 2
Facility Site Overview

SHERMAN COUNTY, OR

-  Facility Site Boundary
-  City/Town
-  County Boundary
-  State Highway
-  Local Roads
-  Existing Substation



Reference Map



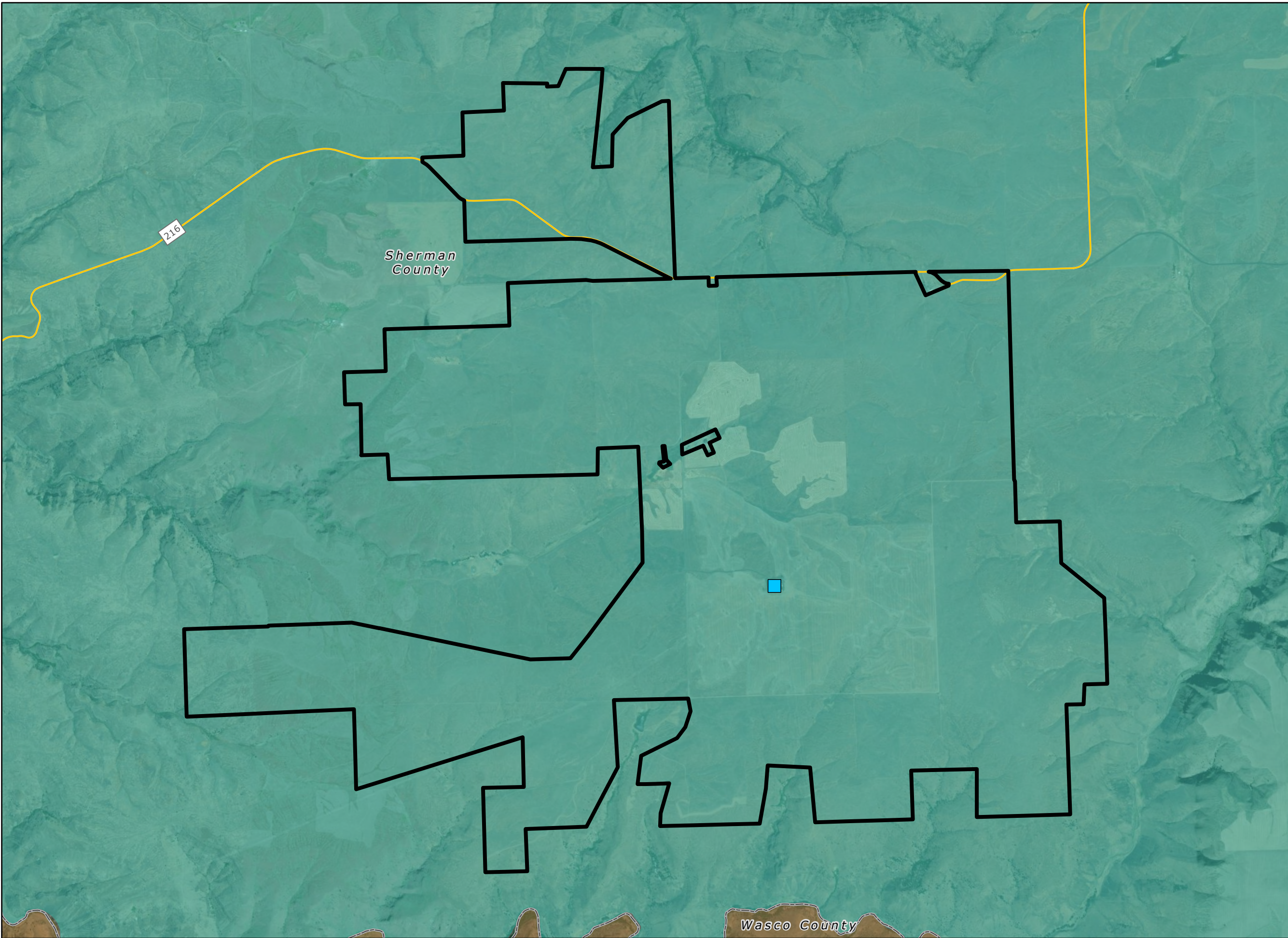
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Buckley Solar Facility

**Figure 3
Zoning**

SHERMAN COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Existing Substation
- Sherman County Zoning
Exclusive Farm Use (F-1)
- Wasco County Zoning
Exclusive Farm Use (A-1)



Reference Map

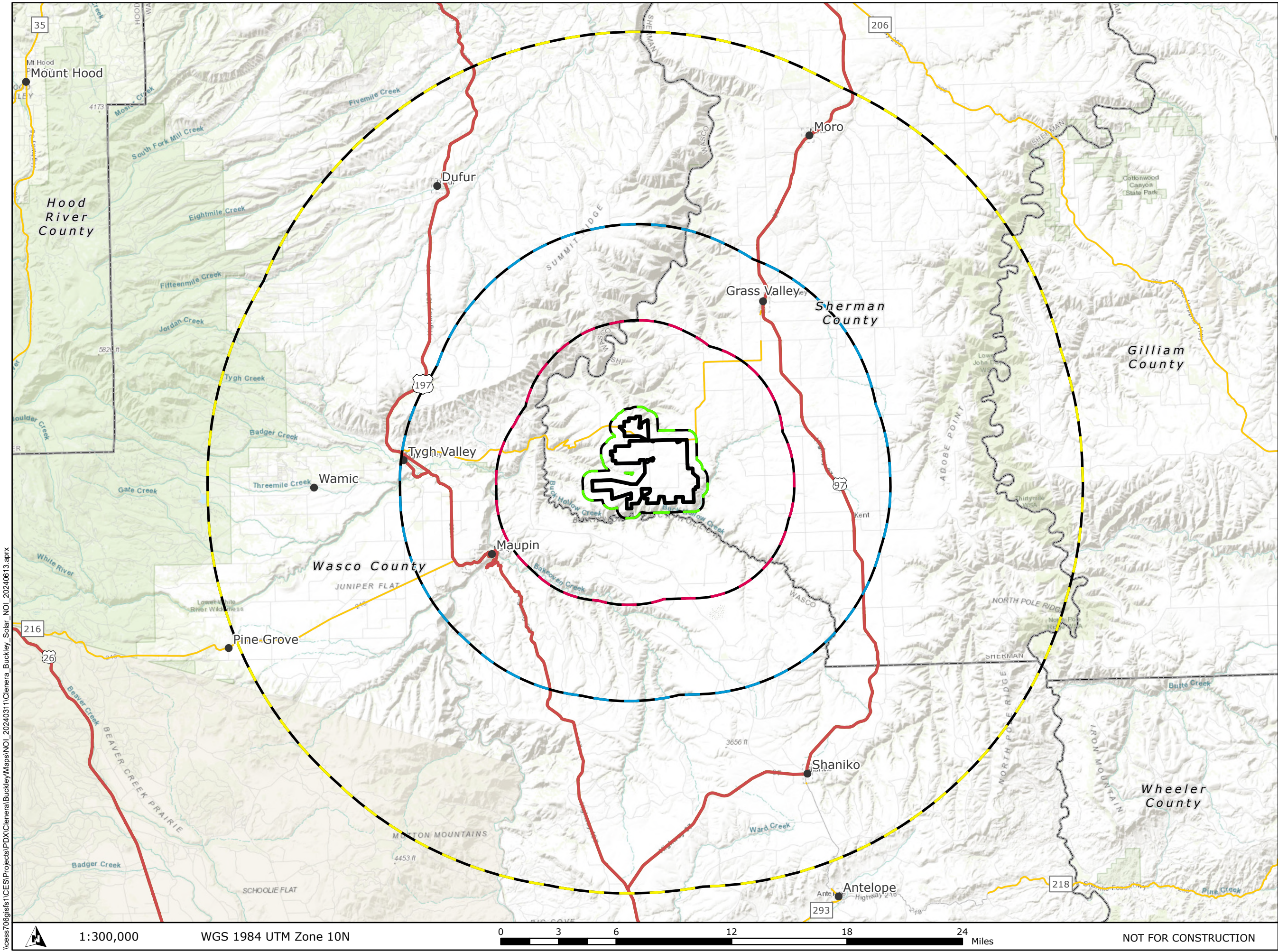


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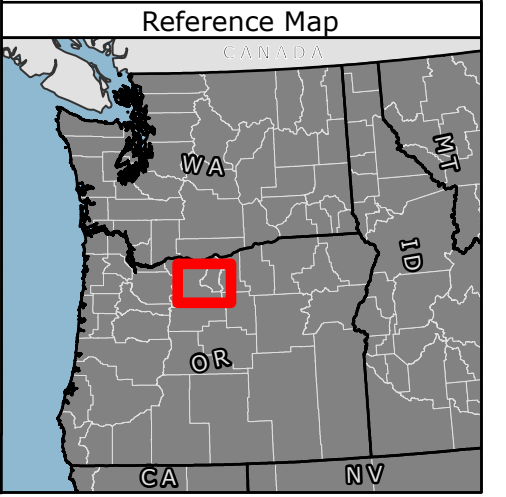


Buckley Solar Facility

Figure 4 Study Area Boundaries

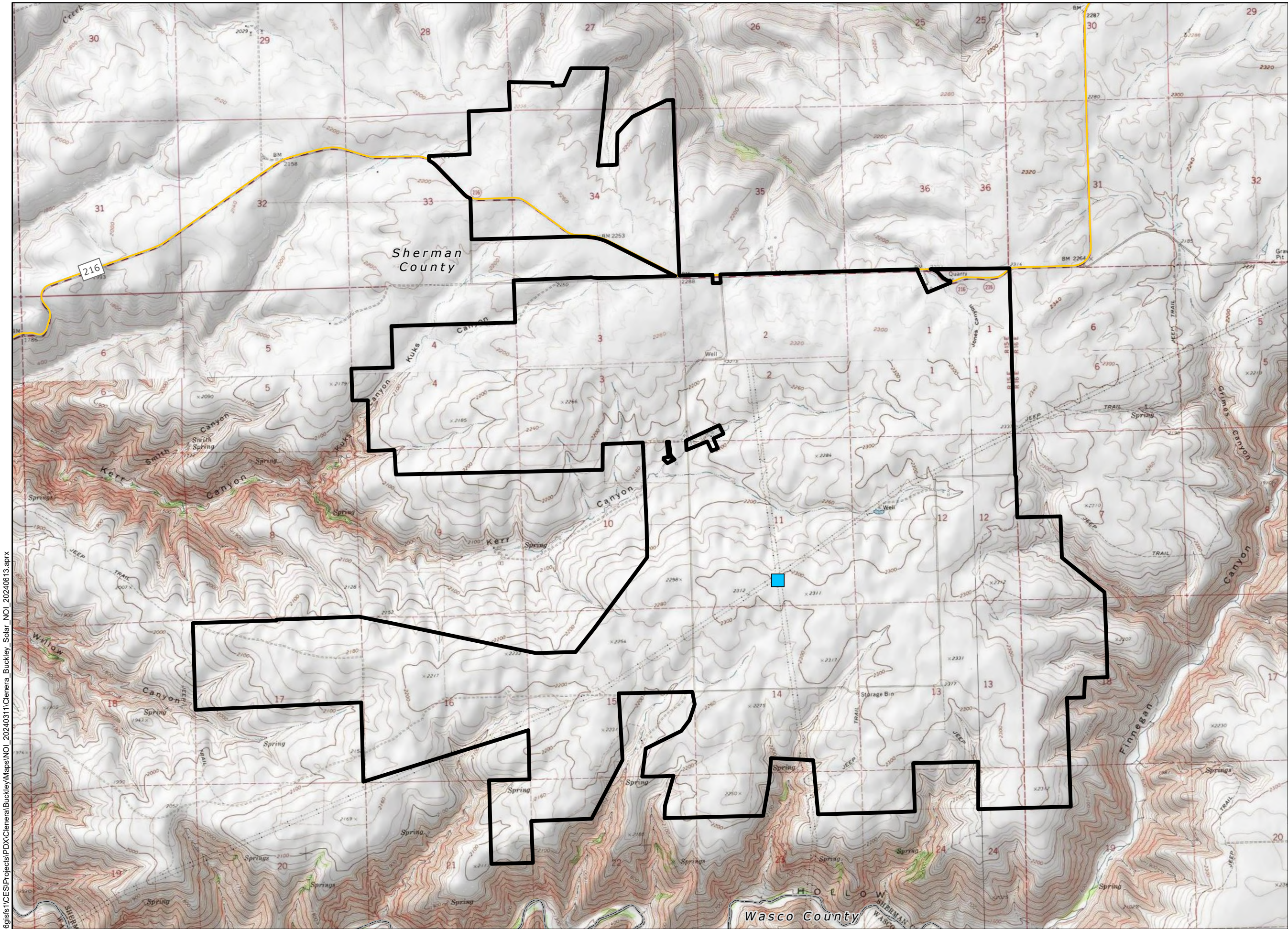
SHERMAN COUNTY, OR

- Facility Site Boundary
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - Study Area Boundaries
 - 0.5 miles: Land Use; Wildfire Risk; Fish and Wildlife Habitat
 - 5 miles: Recreational Opportunities; Threatened and Endangered Plant and Animal Species
 - 10 miles: Scenic Resources and Public Services
 - 20 miles: Protected Areas
- TETRA TECH Clēnera AN ENLIGHT COMPANY



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Buckley Solar Facility

Figure 5
Topography

SHERMAN COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Existing Substation



Reference Map













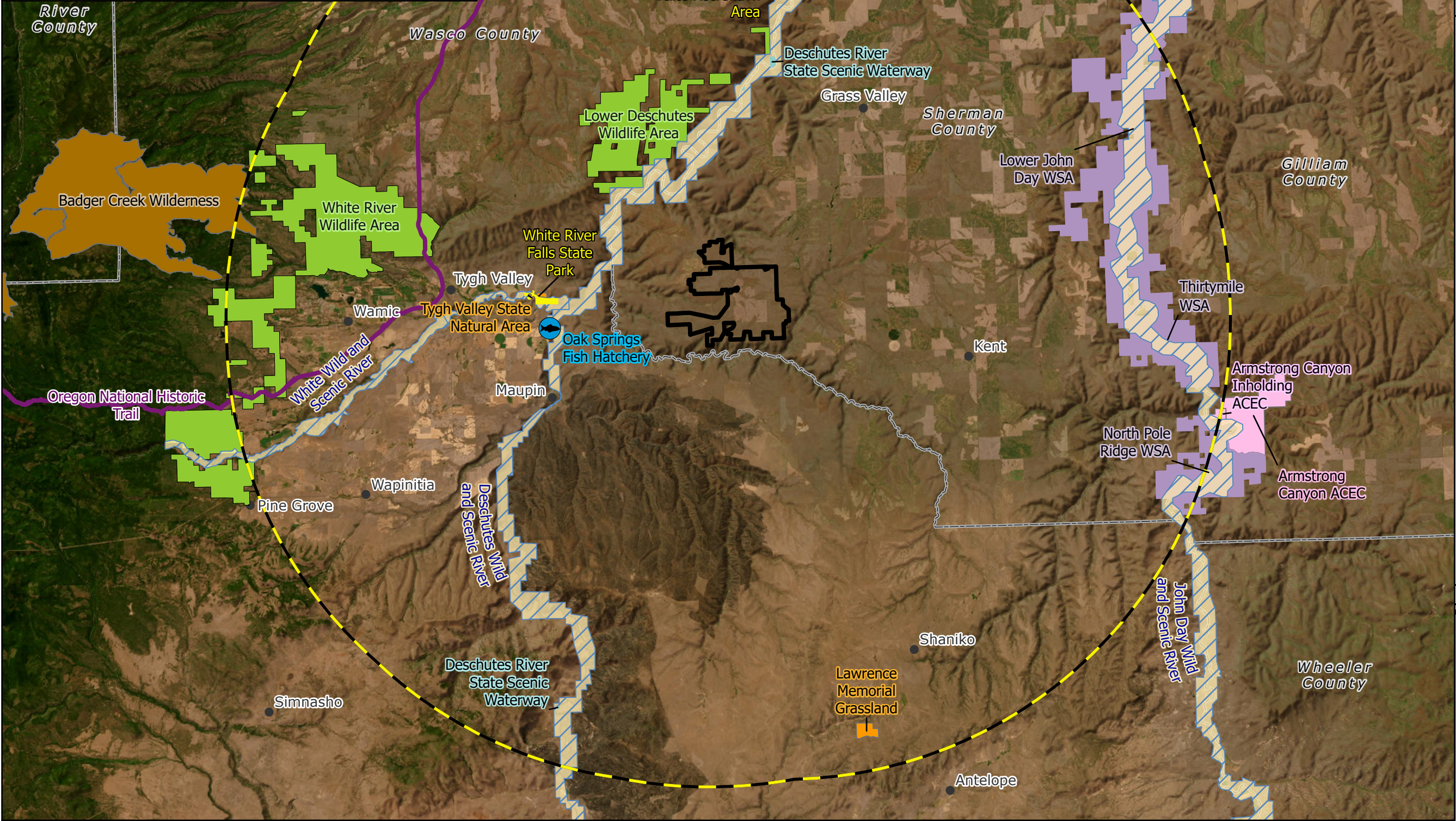
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- Protected Areas
- | | |
|---|---|
|  Wild, Scenic, or Recreational River (BLM) |  State Parks and Recreation Areas (OPRD) |
|  Area of Critical Environmental Concern (BLM) |  State Scenic Waterway (OPRD) |
|  Wilderness Area (USFS) |  Oregon Natural Area (OPRD and TNC) |
|  Wilderness Study Area (BLM) |  State Wildlife Refuge or Management Area (ODFW) |
|  National Scenic or Historic Trail |  State Fish Hatchery (ODFW) |



Buckley Solar Facility

Figure 6
Protected Areas

SHERMAN COUNTY, OR

-  Facility Site Boundary
-  20 miles: Protected Areas
-  City/Town
-  County Boundary

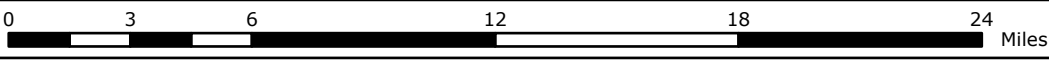


Reference Map



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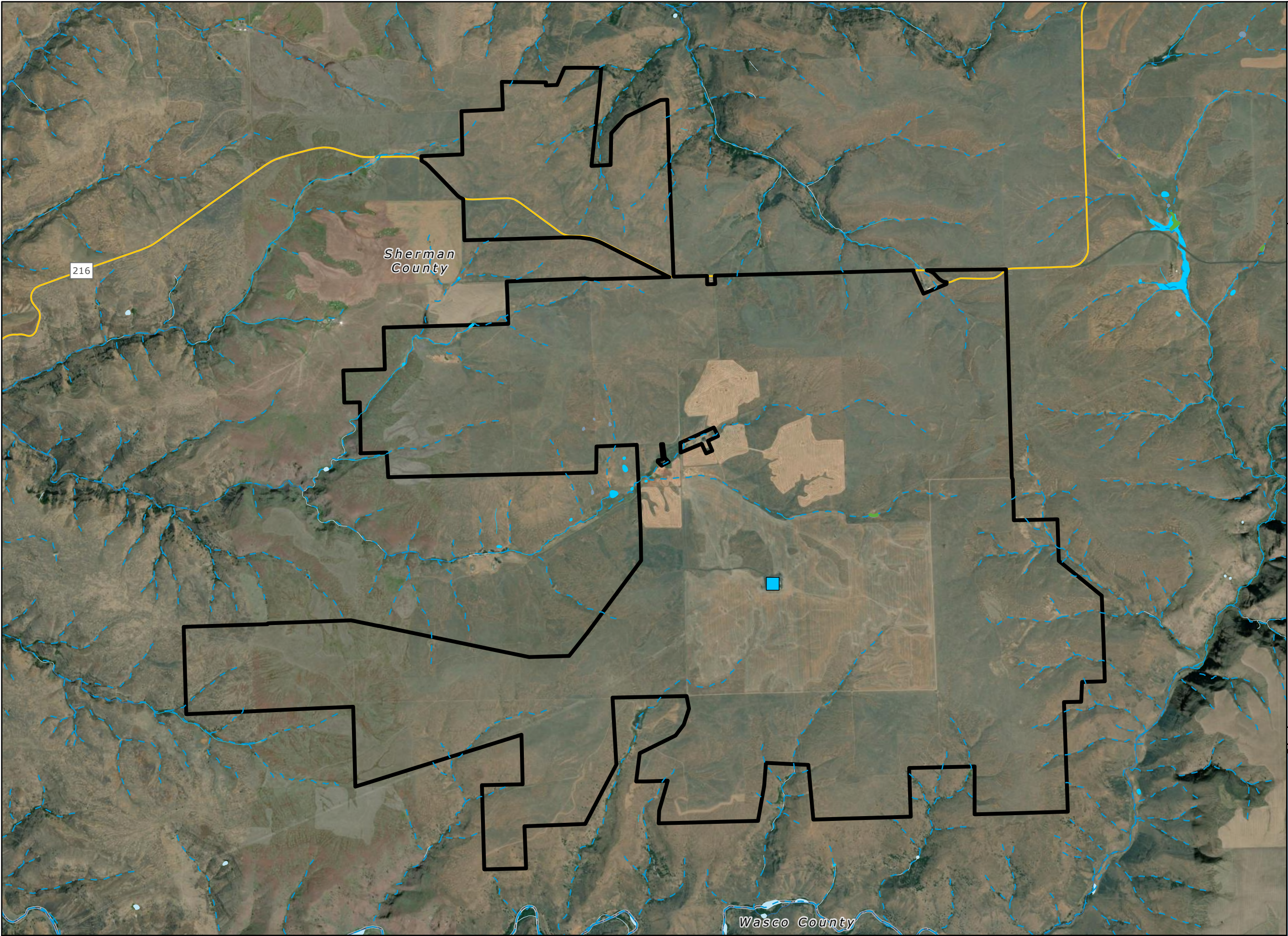
WGS 1984 UTM Zone 10N



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Buckley Solar Facility

Figure 7
National Wetlands
Inventory and National
Hydrography Data

SHERMAN COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Existing Substation
- National Hydrography Data
 - Stream/River
 - Lake/Pond
- National Wetlands Inventory
 - Freshwater Emergent Wetland
 - Freshwater Forested/Shrub Wetland
 - Freshwater Pond
 - Riverine



Reference Map

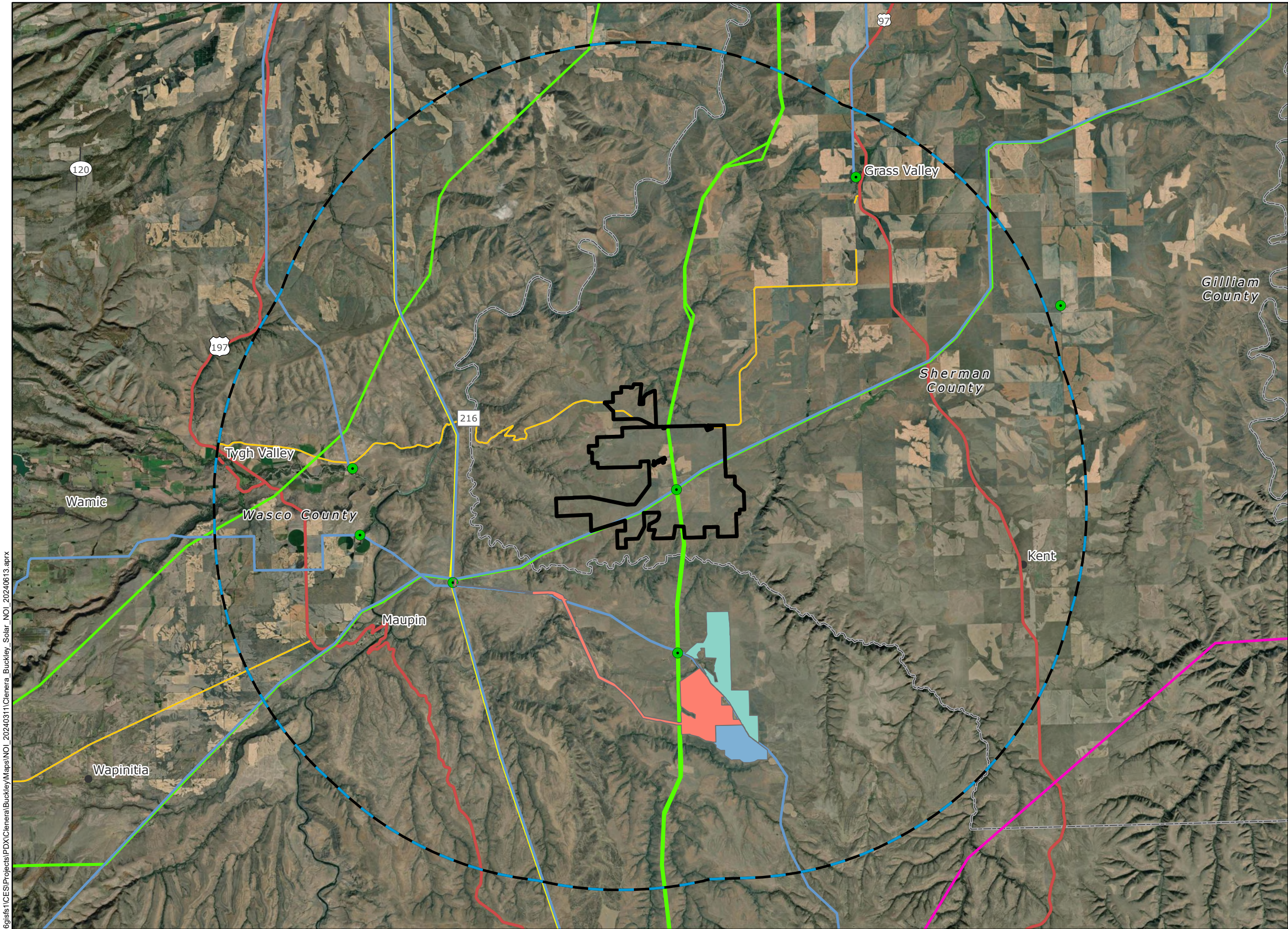


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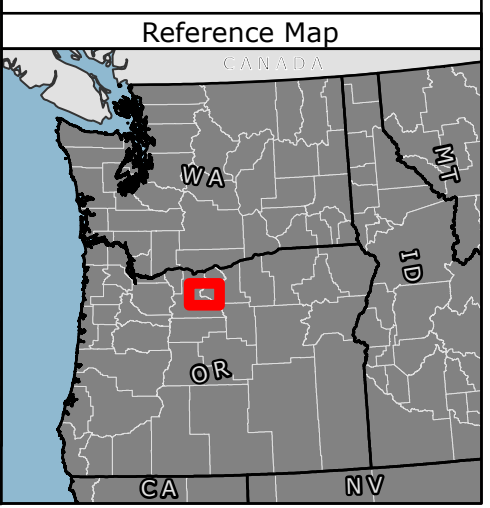


Buckley Solar Facility

Figure 8 Energy Facilities

SHERMAN COUNTY, OR

- Facility Site Boundary
 - 10 mile buffer
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - County Highway
- Energy Facilities
- Bakeoven Solar Project
 - Daybreak Solar Project
 - Sunset Solar Project
- Existing Energy Infrastructure
- Transmission Line 1000 kV
 - Transmission Line 500 kV
 - Transmission Line 69 - 230 kV
 - Natural Gas Pipeline
 - Substations
- TETRA TECH
- Clēnera
AN ENLIGHT COMPANY



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Attachment 1. Articles of Organization

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Secretary of State
Corporation Division
255 Capitol Street NE, Suite 151
Salem, OR 97310-1327

Phone: (503) 986-2200
FAX: (503) 378-4381
sos.oregon.gov/business

Attachment 1.

REGISTRY NUMBER: 220904494
TYPE: FOREIGN LIMITED LIABILITY COMPANY

Next Renewal Date: 12/27/2024

BUCKLEY SOLAR LLC
C/O CLENERA, LLC- ATTN: ADMIN DEPT
PO BOX 2576
BOISE ID 83701

Acknowledgment Letter

The document you submitted was recorded as shown below. Please review and verify the information listed for accuracy.

DOCUMENT	FILED ON	STATUS
APPLICATION FOR AUTHORITY	12/27/2023	ACTIVE

NAME
BUCKLEY SOLAR LLC

JURISDICTION
DELAWARE

PRINCIPAL PLACE OF BUSINESS
C/O CLENERA, LLC
999 W MAIN STREET, SUITE 800
BOISE, ID 83709

REGISTERED AGENT
C T CORPORATION SYSTEM
780 COMMERCIAL STREET SE, STE 100
SALEM, OR 97301

MAILING ADDRESS
C/O CLENERA, LLC- ATTN: ADMIN DEPT
PO BOX 2576
BOISE, ID 83701

GODKOU
ACK - NEWAUT
12/27/2023



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: DEC 27, 2023
OREGON SECRETARY OF STATE



220904494-25680045

REGISTRY NUMBER: 220904494

For office use only

BUCKLEY SOLAR 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: Buckley Solar 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

CORONA 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.)

3) DATE OF ORGANIZATION: DURATION, IF NOT PERPETUAL:

12/08/2023

4) STATE OR COUNTRY OF ORGANIZATION:

Delaware

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

6) NAME OF OREGON REGISTERED AGENT:

C T Corporation System

7) REGISTERED AGENT'S PUBLICLY AVAILABLE ADDRESS:

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

780 Commercial Street SE, STE 100,

Salem, OR 97301

8) ADDRESS OF PRINCIPAL OFFICE OF THE BUSINESS:

c/o Clenera, LLC

999 W. Main Street, Suite 800, Boise, ID 83709

9) ADDRESS WHERE THE DIVISION MAY MAIL NOTICES:

c/o Clenera, LLC - Attn: Admin Dept.

P.O. Box 2576, Boise, ID 83701

10) HOW WILL THIS LIMITED LIABILITY COMPANY BE MANAGED?

☒ 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.

2) Signature:

Printed Name:

Title:

Jason Ellsworth, Chief Executive Officer of Clenera Holdings, LLC, the Sole Member of Clenera DevCo, LLC, the Sole Member of Buckley Solar LLC

Chief Executive Officer

3) DATE:

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

PHONE NUMBER: (Include area code.)

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

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "BUCKLEY SOLAR LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTIETH DAY OF DECEMBER, A.D. 2023.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.



2736627 8300

SR# 20234293794

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

A handwritten signature in black ink, appearing to read "JBullock", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Authentication: 204873694

Date: 12-20-23

Attachment 2. Tax Lots and Property Owner Information

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Notice of Intent to Apply for a Site Certificate for the Buckley Solar
Facility Property Owner List and Tax Lot Map - Sherman County Assessor Data (Obtained August 1, 2024)

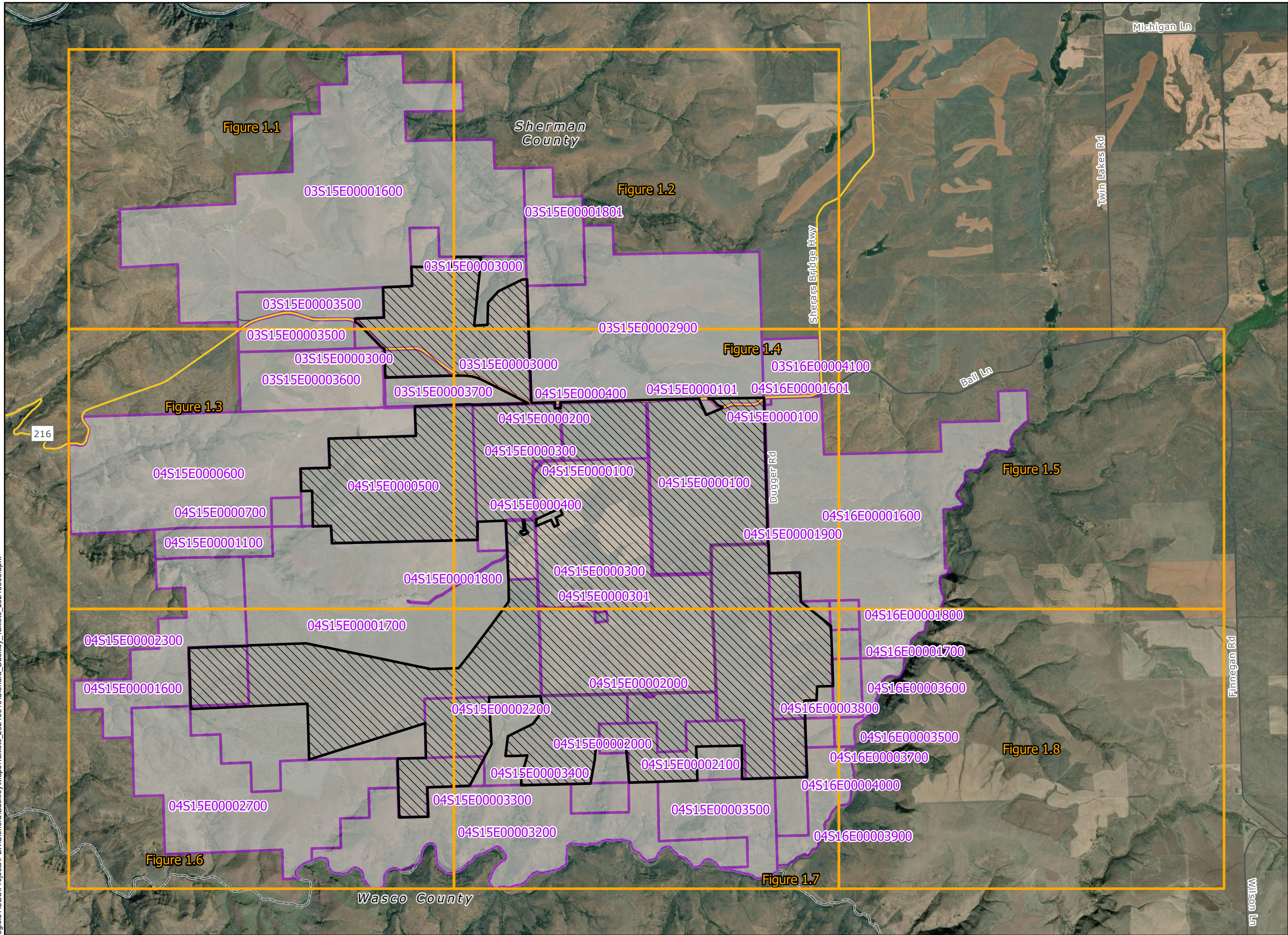
Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
04S15E0000700	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
04S15E0000400	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
04S15E00001100	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S15E00001600	S & K RANCHES, LLC	502 RANCHO SANTA BARBARA DR	MESQUITE	NV	89027	502 RANCHO SANTA BARBARA DR MESQUITE, NV 89027
04S15E0000301	FEDERAL GOVERNMENT**	P.O. BOX 3621	PORTLAND	OR	97208-3621	P.O. BOX 3621 PORTLAND, OR 97208-3621
04S15E00002300	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
04S15E00002200	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
03S15E00003000	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
03S15E00003500	TEENY, MINERVA TRUSTEE	2177 SE DOUGLAS PLACE	GRESHAM	OR	97080	2177 SE DOUGLAS PLACE GRESHAM, OR 97080
03S15E00003000	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
04S15E0000500	BUCKLEY RANCH, LLC	30 SIMPSON RD	SEQUIM	WA	98382	30 SIMPSON RD SEQUIM, WA 98382
04S15E0000400	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
04S15E0000300	LEMLEY RANCH LLC	30 SIMPSON ROAD	SEQUIM	WA	98382	30 SIMPSON ROAD SEQUIM, WA 98382
03S15E00001801	RECKMANN, DOUGLAS	3850 SE 40TH	PORTLAND	OR	97202-1713	3850 SE 40TH PORTLAND, OR 97202-1713
04S15E00002000	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
04S15E00002100	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
04S15E00003300	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
04S15E00003400	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S16E00001601	JUSTESEN, JON & FRED	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	59720 TWIN LAKES RD GRASS VALLEY, OR 97029
04S16E00003800	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
04S16E00003700	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S16E00003900	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S15E0000200	BONNEY, JODY JO	58044 BUCKLEY RD	GRASS VALLEY	OR	97029	58044 BUCKLEY RD GRASS VALLEY, OR 97029
04S15E00001900	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
04S15E0000600	WILSON, JAMIE	90110 PAYNE LOOP	GRASS VALLEY	OR	97029	90110 PAYNE LOOP GRASS VALLEY, OR 97029
04S15E0000101	WHITLEY, CHRISTOPHER & KRISTIN	PO BOX 20005	OWENSBORO	KY	42304-0005	PO BOX 20005 OWENSBORO, KY 42304-0005
03S15E00001600	FRED L. BENSEN DISCLAIMER TRUST	58914 BROWN ROAD	GRASS VALLEY	OR	97029	58914 BROWN ROAD GRASS VALLEY, OR 97029
03S15E00003600	WILSON, JAMIE	90110 PAYNE LOOP	GRASS VALLEY	OR	97029	90110 PAYNE LOOP GRASS VALLEY, OR 97029
03S15E00003000	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
03S15E00003700	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	1435 E 16 ST THE DALLES, OR 97058
04S16E00001600	BROWN, JAMES E	2235 NW LARCHLEAF LANE	REDMOND	OR	97756	2235 NW LARCHLEAF LANE REDMOND, OR 97756
04S16E00001700	SKORO RANCH, LLC	PO BOX 38	BORING	OR	97009	PO BOX 38 BORING, OR 97009
04S16E00001800	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S16E00003600	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S16E00003500	BIBBY, DOUGLAS J	92018 KOPKE LANE	GRASS VALLEY	OR	97029	92018 KOPKE LANE GRASS VALLEY, OR 97029
04S16E00004000	BIBBY, DOUGLAS J	92018 KOPKE LANE	GRASS VALLEY	OR	97029	92018 KOPKE LANE GRASS VALLEY, OR 97029
03S16E00004100	GALLEY, JOHN & J DIANE TRUST	PO BOX 65	MORO	OR	97039	PO BOX 65 MORO, OR 97039
04S15E0000100	RICHARDS CORPORATION	2800 156TH AV SE SUITE 130	BELLEVUE	WA	98007	2800 156TH AV SE SUITE 130 BELLEVUE, WA 98007
04S15E00001800	BUCKLEY RANCH, LLC	30 SIMPSON RD	SEQUIM	WA	98382	30 SIMPSON RD SEQUIM, WA 98382
03S15E00002900	RICHARDS CORPORATION	2800 156TH AV SE SUITE 130	BELLEVUE	WA	98007	2800 156TH AV SE SUITE 130 BELLEVUE, WA 98007
04S15E00001700	CLODFELTER, D WENDELL & JOYCE	58650 BUCKLEY ROAD	GRASS VALLEY	OR	97029	58650 BUCKLEY ROAD GRASS VALLEY, OR 97029
04S15E00003500	FEDERAL GOVERNMENT*	3050 NE 3RD ST	PRINEVILLE	OR	97754	3050 NE 3RD ST PRINEVILLE OR 97754
04S15E00003200	ODOM, BETTY JEAN ETAL	55133 JUNIPER FLAT ROAD	MAUPIN	OR	97037-9704	55133 JUNIPER FLAT ROAD MAUPIN, OR 97037-9704
04S15E00002700	S & K RANCHES, LLC	502 RANCHO SANTA BARBARA DR	MESQUITE	NV	89027	502 RANCHO SANTA BARBARA DR MESQUITE, NV 89027

*Note: The Applicant reviewed available data on the Protected Areas Database of the United States (PADUS 2024) to determine that these properties are managed by the Bureau of Land Management (BLM) Prineville District. The address for the BLM Prineville District Office is provided.

**The Applicant reviewed available data on the Protected Areas Database of the United States (PADUS 2024) and was unable to determine the specific federal management agency for Tax Lot 04S15E0000301. This tax lot is associated with the Bonneville Power Administration (BPA) Buckley Substation and the property is understood to be managed by the BPA. As such, the Applicant provides the BPA mailing address identified here: <https://www.bpa.gov/about/who-we-are/contact-form>.

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Buckley Solar Facility

Attachment 2 Figure 1 Tax Lot Boundary Index Map

SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- Grid Index Feature
- County Boundary
- State Highway
- Local Roads

¹Data received from
Sherman County 08/01/2024

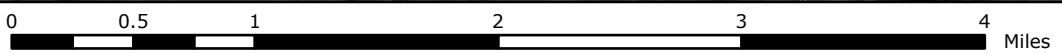


Reference Map



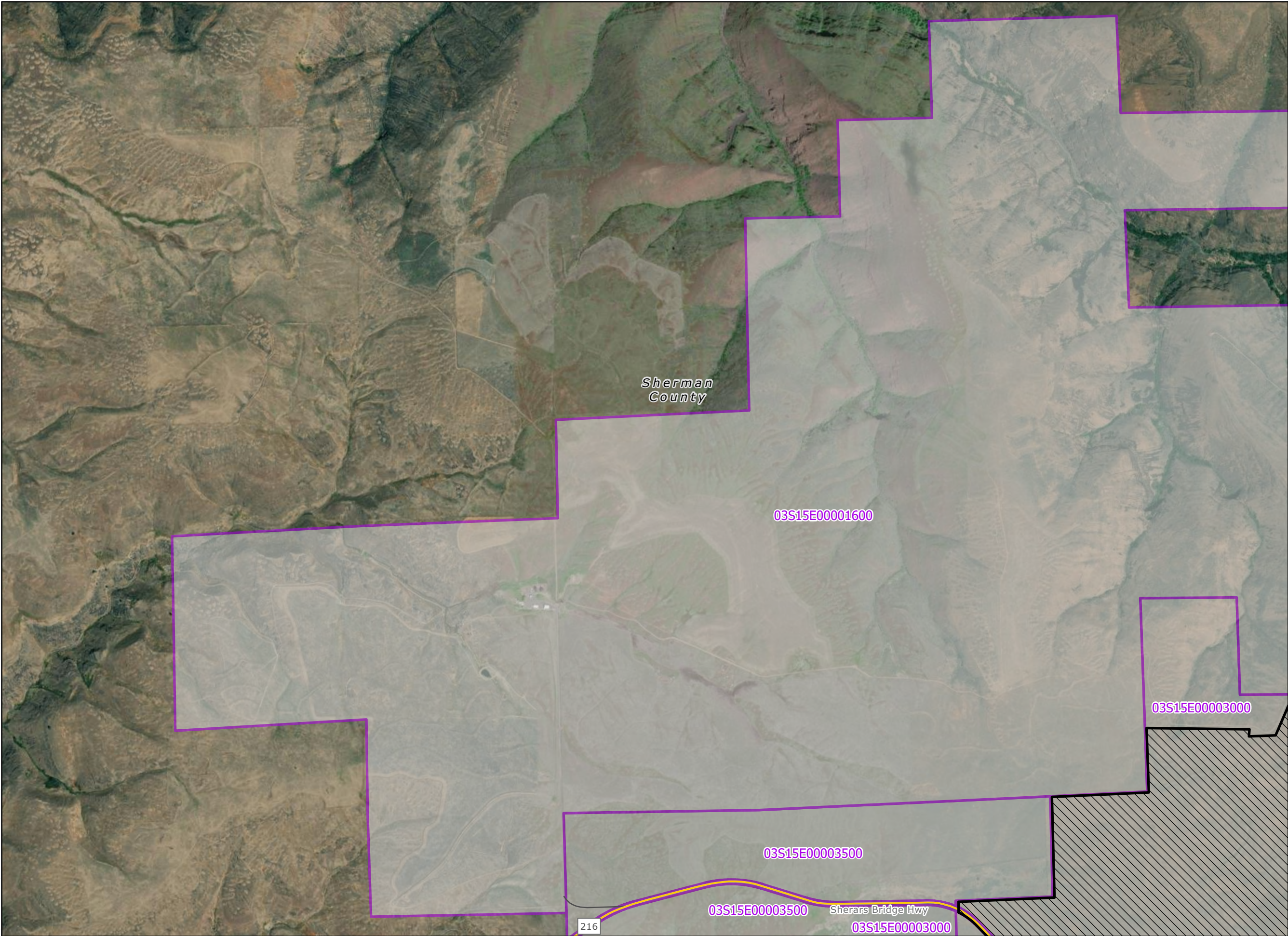
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Buckley Solar Facility

Attachment 2 Figure 1.1 Tax Lot Boundary Detail Map

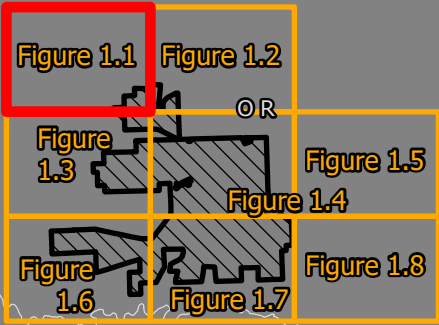
SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- County Boundary
- State Highway
- Local Roads

¹Data received from
Sherman County 08/01/2024

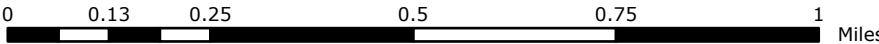


Reference Map



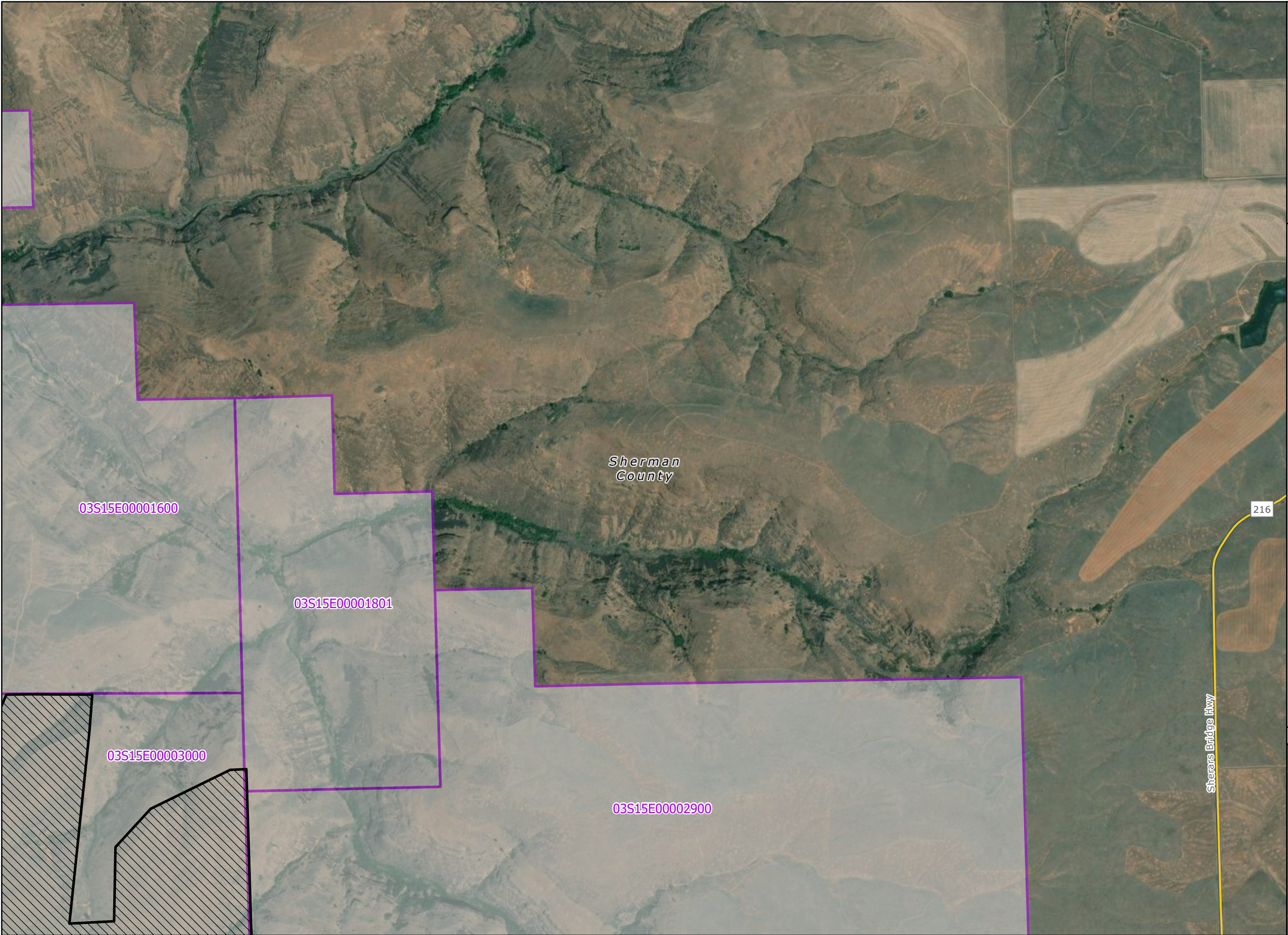
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Buckley Solar Facility

**Attachment 2
Figure 1.2
Tax Lot Boundary
Detail Map**

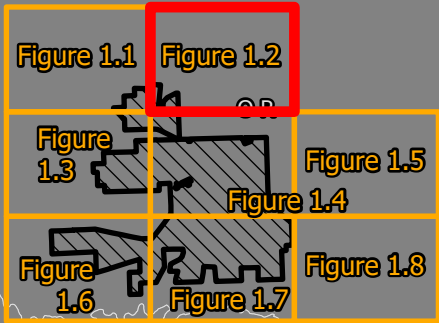
SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- County Boundary
- State Highway
- Local Roads

¹Data received from
Sherman County 08/01/2024

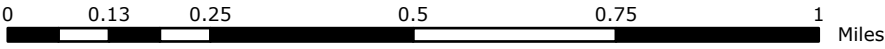


Reference Map



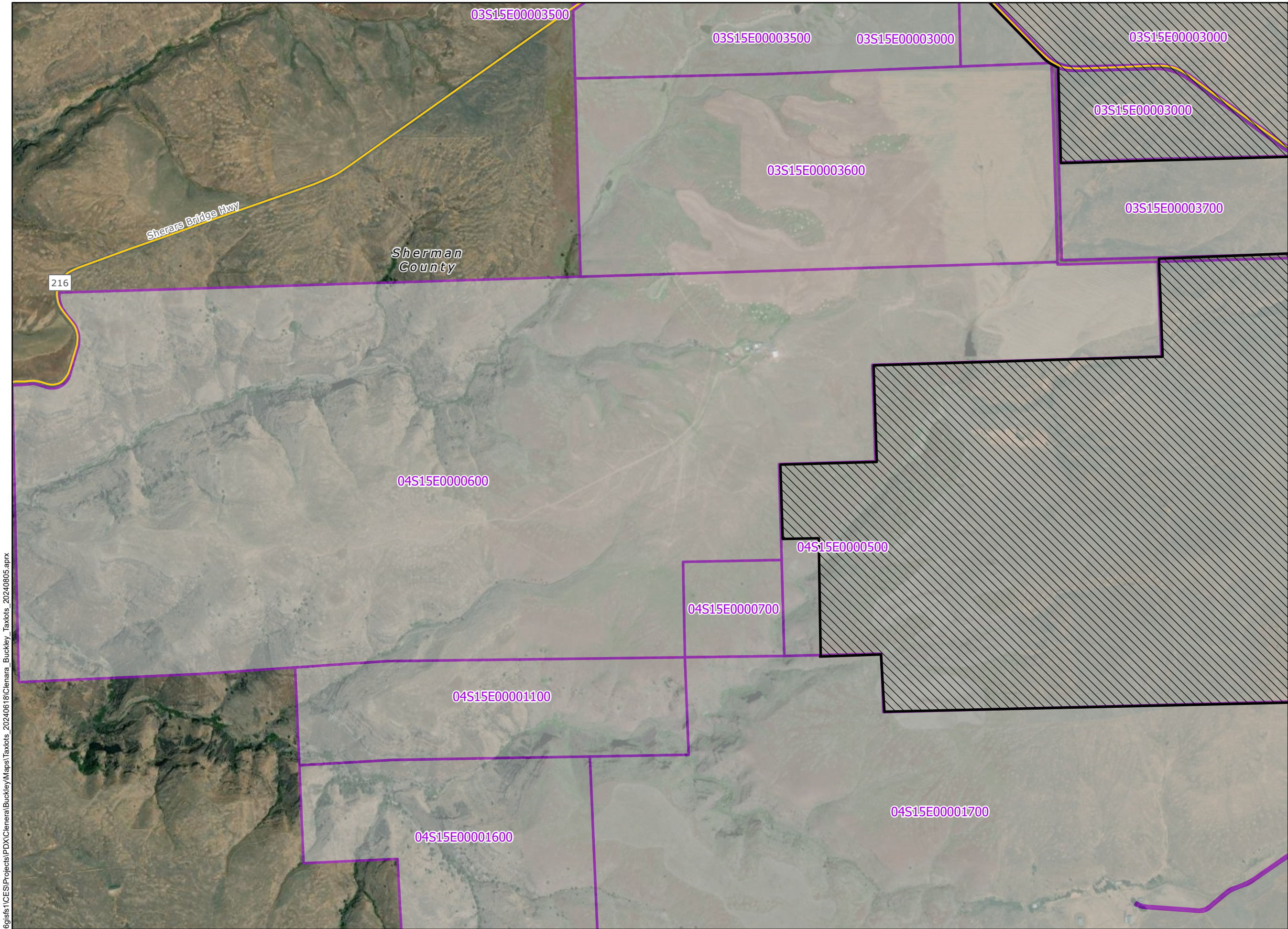
1:15,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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Buckley Solar Facility

Attachment 2 Figure 1.3 Tax Lot Boundary Detail Map

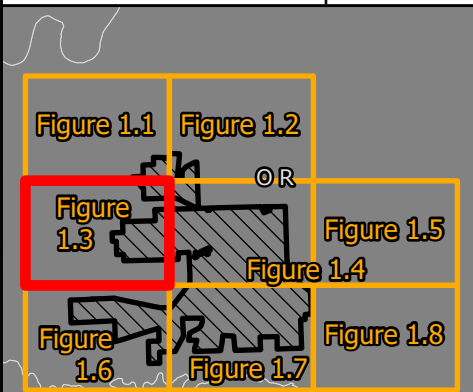
SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- County Boundary
- State Highway
- Local Roads

¹Data received from
Sherman County 08/01/2024

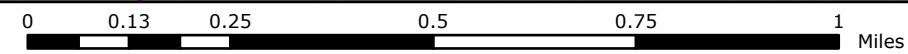


Reference Map








1:15,000

WGS 1984 UTM Zone 10N



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**Attachment 2
Figure 1.4
Tax Lot Boundary
Detail Map**

-  Site Boundary
-  Taxlot Boundary¹
-  County Boundary
-  State Highway
-  Local Roads



The grid contains the following figures:

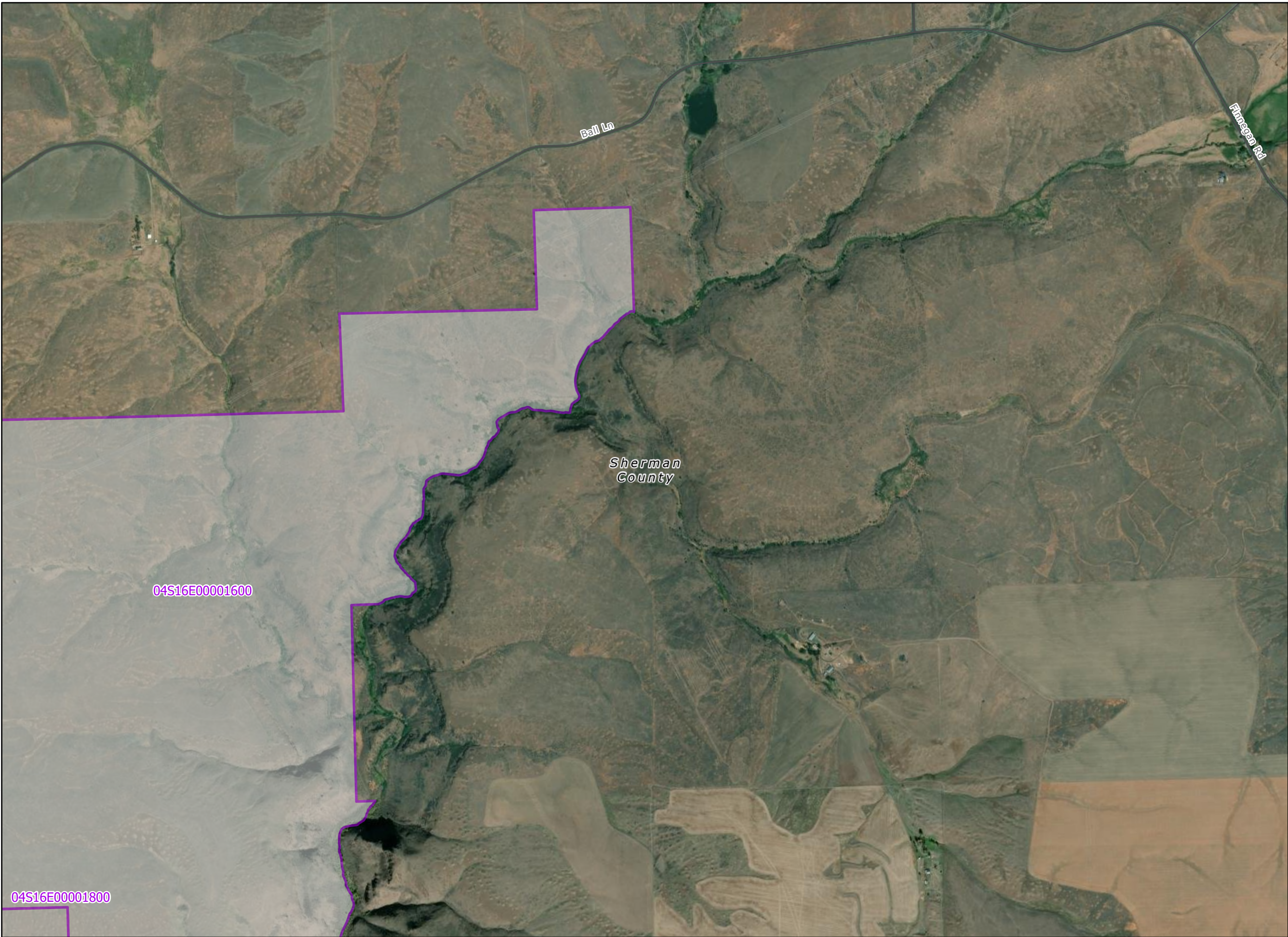
- Figure 1.1: A white shape on a gray background.
- Figure 1.2: A white shape on a gray background, slightly different from Figure 1.1.
- Figure 1.3: A white shape on a gray background, further modified.
- Figure 1.4: A white shape on a gray background, with the top half filled with diagonal lines. This figure is highlighted with a red border.
- Figure 1.5: A white shape on a gray background, with the top half filled with diagonal lines.
- Figure 1.6: A white shape on a gray background, with the top half filled with diagonal lines.
- Figure 1.7: A white shape on a gray background, with the top half filled with diagonal lines.
- Figure 1.8: A white shape on a gray background, with the top half filled with diagonal lines.

1:15,000

WGS 1984 UTM Zone 10N

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\\ces706g\gis\1\CES\Projects\PDX\Clenera\Buckley\Maps\Taxlots_2024\0805.aprx



Buckley Solar Facility

**Attachment 2
Figure 1.5
Tax Lot Boundary
Detail Map**

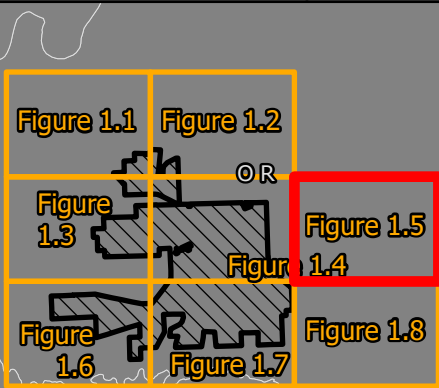
SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- County Boundary
- Local Roads

¹Data received from
Sherman County 08/01/2024

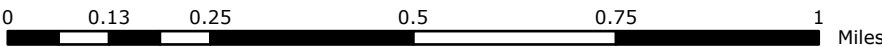


Reference Map



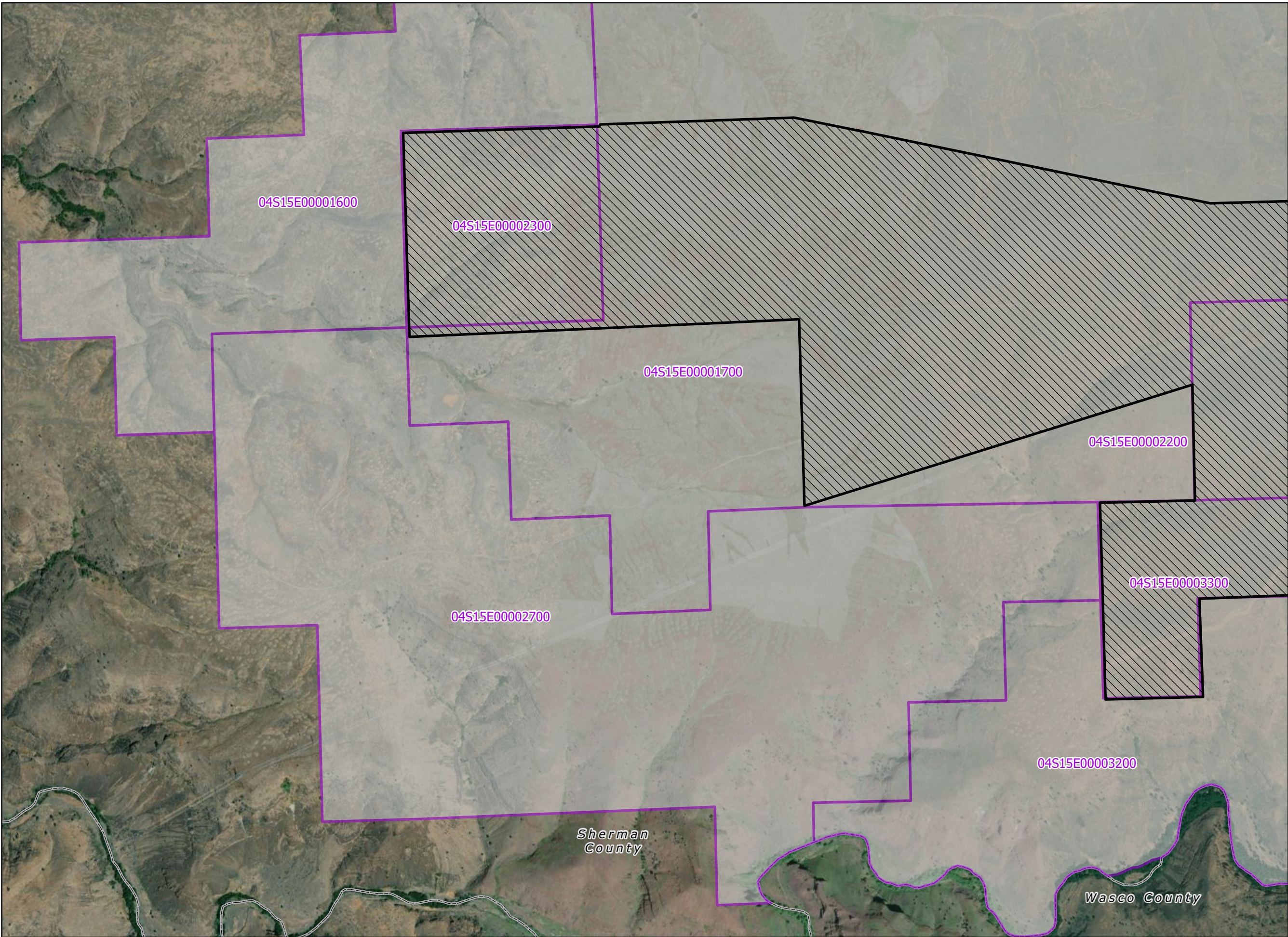
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WGS 1984 UTM Zone 10N



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Buckley Solar Facility

**Attachment 2
Figure 1.6
Tax Lot Boundary
Detail Map**

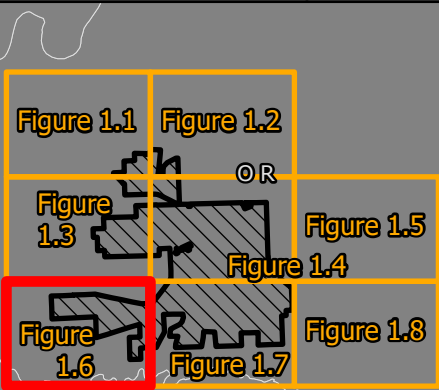
SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- County Boundary

¹Data received from
Sherman County 08/01/2024

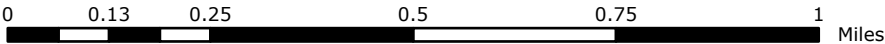


Reference Map



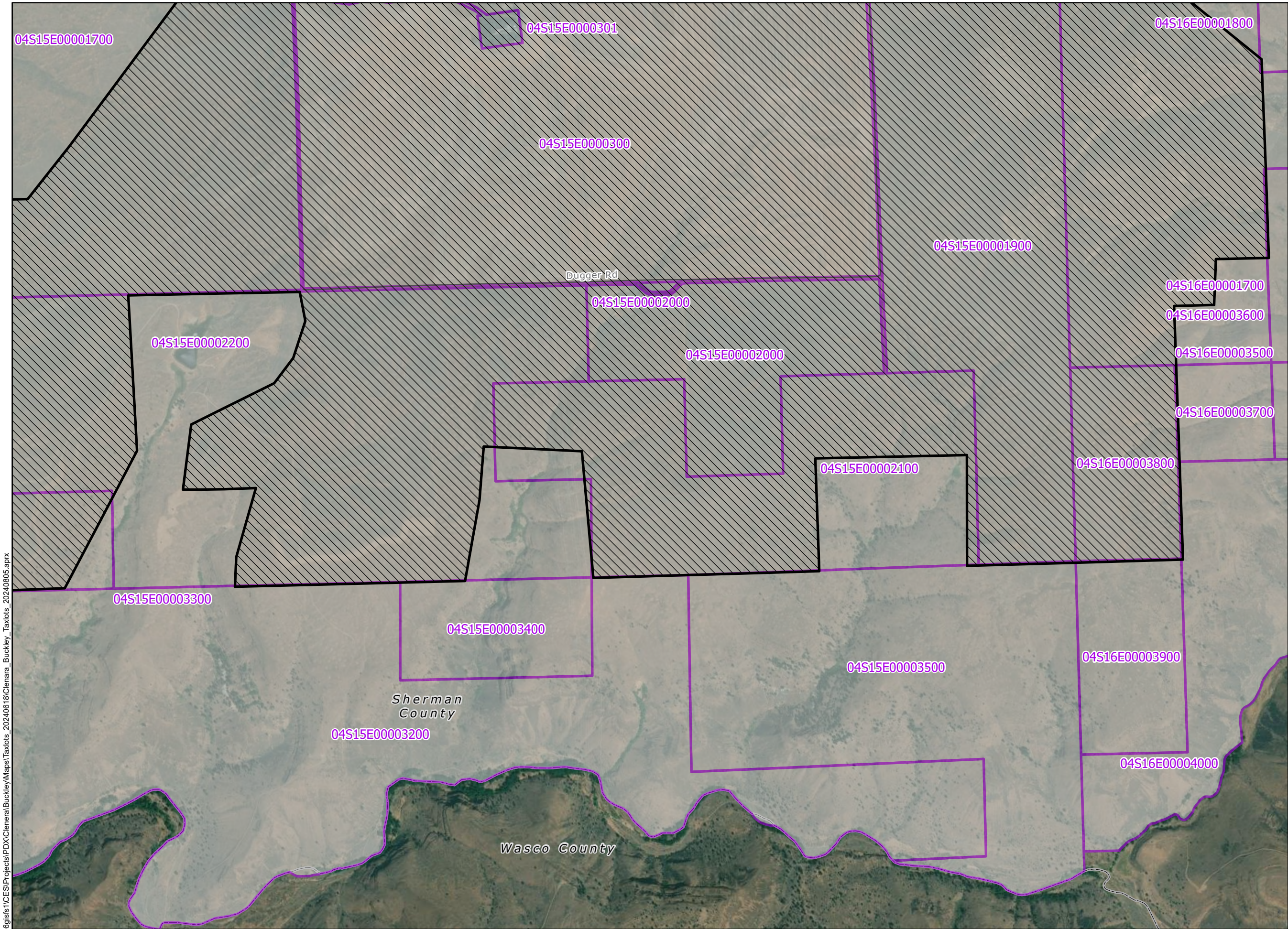
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WGS 1984 UTM Zone 10N



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Buckley Solar Facility

Attachment 2 Figure 1.7 Tax Lot Boundary Detail Map

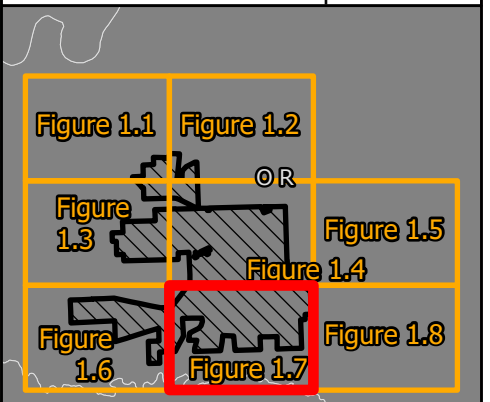
SHERMAN COUNTY, OR

- Site Boundary
- Taxlot Boundary¹
- County Boundary
- Local Roads

¹Data received from Sherman County 08/01/2024



Reference Map







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Buckley Solar Facility

Attachment 2 Figure 1.8 Tax Lot Boundary Detail Map

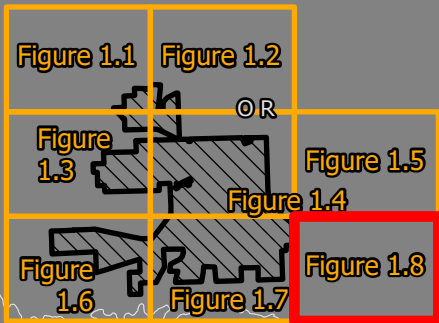
SHERMAN COUNTY, OR

-  Site Boundary
-  Taxlot Boundary¹
-  County Boundary
-  Local Roads

¹Data received from
Sherman County 08/01/2024



Reference Map



1:15,000

WGS 1984 UTM Zone 10N

0 0.13 0.25 0.5 0.75 1 Miles

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From: Jaime Solars <jaimes@co.wasco.or.us>

Sent: Thursday, August 1, 2024 2:14 PM

To: Dodson, Stephen1 <Stephen.Dodson@tetrattech.com>

Subject: Re: Sherman County/Wasco County Taxlots Intersecting Site Boundary

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

Hi Stephen,

Here is your data and invoice.

Jaime



Jaime Solars Rathmell, GISP | GIS Analyst

INFORMATION SERVICES

jaimes@co.wasco.or.us | www.co.wasco.or.us

541-506-2659 | Fax 541-506-2641

2705 E. 2nd St | The Dalles, OR 97058

On Wed, Jul 31, 2024 at 4:31 PM Dodson, Stephen1 <Stephen.Dodson@tetrattech.com> wrote:

Hello Jaime,

We would like to request the Taxlot data that intersects the attached Area of Interest. Also can you send along the invoice?

Thanks,

Stephen

Stephen Dodson | Senior GIS Analyst
Office +1 (503) 727-8074 | Stephen.dodson@tetrattech.com

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1750 SW Harbor Way, Portland, OR 97201 Suite 400 | tetrattech.com

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Please consider the environment before printing. [Read more](#)

Attachment 3. Correspondence with Legislative Commission on Indian Services

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Grace, Jordan

From: LCIS <LCIS@oregonlegislature.gov>
Sent: Monday, September 11, 2023 3:52 PM
To: Fergusson, Aaron
Subject: [EXTERNAL] RE: Request for information on area tribal contacts for the Cedar Island Solar Project, Sherman County, OR

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Aaron,

Thank you for reaching out. For the project location you describe, I recommend consultation with the following Tribes:

Burns Paiute Tribe
Confederated Tribes of Warm Springs Reservation of Oregon
Confederated Tribes of the Umatilla Indian Reservation

Best,
Elissa

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



From: Fergusson, Aaron <Aaron.Fergusson@jacobs.com>
Sent: Monday, September 11, 2023 3:17 PM
To: LCIS <LCIS@oregonlegislature.gov>
Subject: Request for information on area tribal contacts for the Cedar Island Solar Project, Sherman County, OR

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

Hello,
I am working for a client that is exploring development of a photovoltaic (PV) solar power generation project in Sherman County, Oregon. The ~9,000 project area is located one either side of Sherars Bdrge Highway (216) between Grass Valley and Tygh Valley. 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 through 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.

Regards,

Aaron Fergusson, RPA | [Jacobs](#) | Senior Archaeologist
M:+01.801.541.0366 | aaron.fergusson@jacobs.com

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