

Notice of Intent to

Apply for a Site Certificate

Heppner Wind Project
March 2025

Submitted to
Oregon Energy Facility Siting Council

Prepared for
Heppner Lena Wind, LLC c/o



Prepared by



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Acronyms and Abbreviations

Applicant	Heppner Lena Wind, LLC
ASC	Application for Site Certificate
EFSC	Energy Facility Siting Council
EFU	Exclusive Farm Use
FAA	Federal Aviation Administration
Facility	Heppner Wind Project
gen-tie	generational tie
kV	kilovolt
MW	megawatt
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 Rules
ODOE	Oregon Department of Energy
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
ODFW	Oregon Department of Fish and Wildlife
ORS	Oregon Revised Statutes
POI	point of interconnect
SCADA	Supervisory Control and Data Access

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:

Heppner Lena Wind, LLC
c/o David Lawlor
NextEra Energy Resources, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408

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

Ryan Hill
Development
NextEra Energy Resources, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408
Ryan.Hill@nexternaenergy.com
(561) 831-9425

(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:

NextEra Energy Resources, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408

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

Sara Twitchell
Environmental Services
NextEra Energy Resources, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408
Sara.Twitchell@nexteraenergy.com
(971) 373-0220

Contact persons other than the Applicant:

Carrie Andrews
Tetra Tech, Inc.
1750 S Harbor Way, Suite 400
Portland, OR 97201
(503) 721-7228
carrie.andrews@tetratech.com

Sarah Stauffer Curtiss
Stoel Rives LLP
760 SW Ninth Ave, Suite 3000
Portland, OR 97205
sarah.curtiss@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. Therefore, the criteria above are not applicable to the Facility.

(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 is a wholly owned subsidiary of its parent company:

NextEra Energy Resources, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408

(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; and

Response:

The Applicant is not an individual.

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

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

(ii) The date and place of its formation;

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

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

Response:

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

Ryan Hill
Development
NextEra Energy Resources, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408
Ryan.Hill@nexteraenergy.com
(561) 831-9425

The officer for Heppner Lena Wind, LLC is:

Christine Seal
Vice President
Heppner Lena Wind, LLC
A3A
700 Universe Blvd.
Juno Beach, FL 33408

Heppner Lena Wind, LLC was formed with the Secretary of State of the State of Delaware on February 4, 2025 and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State on February 14, 2025, in Salem, Oregon. The articles of organization and registration to do business in Oregon are provided in Attachment 1.

Heppner Lena Wind, LLC is registered in Oregon; therefore, information for the resident attorney-in-fact is not required.

Exhibit B. Facility Description – OAR 345-020-0011(1)(b)

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

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

Response:

The Applicant proposes to construct and operate the Heppner Wind Project (Facility), a wind energy generation facility located in unincorporated Morrow County, Oregon (Figure 1). As described in more detail below, the Facility is anticipated to consist of up to 190 megawatts (MW) of wind generation. The Facility's site boundary encompasses 31,477 acres of privately owned land, over six miles east of the town of Heppner, Oregon. The Applicant has proposed to interconnect the Facility to the Wheatridge Renewable Energy Facility East Substation (under construction), planned to be located north of the Facility 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).

(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 is anticipated to have up to 190 MW of nominal and average generating capacity at the point of interconnection (POI), as defined in Oregon Revised Statutes (ORS) 469.300(4)(a).

(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:

Major components, structures, and systems associated with the proposed Facility are listed below and summarized in this Exhibit:

- Turbines, including the nacelle, blades, rotor, and tower;
- Turbine foundations; and
- Generator Step-Up transformers and transformer foundations.

Note that the description of major components is preliminary and conceptual and based on the best available design information at this time and may be modified in the ASC and at final design. The analysis presented in the forthcoming ASC will present a worst-case scenario with respect to each

impact analyzed. For any given impact, the turbine model that causes the greatest impact to the resource under consideration will be evaluated and presented in the respective exhibit. For example, for scenic resources, an analysis will be conducted using the tallest turbine and the layout with the greatest number of turbines. In this manner, the ASC will ensure that the Facility meets all of the EFSC standards for a Site Certificate, and will allow the Applicant flexibility in micrositing turbines within the EFSC-approved development areas.

- **Wind Turbines.** A wind turbine generator consists of a three-bladed rotor, attached to a nacelle that is mounted on a tubular tower. In operating mode, the rotor is located on the upwind side of the tower. The Applicant is considering the following wind turbine model:
 - a) Nominal power of 2 MW to 4.2 MW;
 - b) Rotor diameter of 380 to 493 feet; and
 - c) Tower height (i.e., hub height) of 262 to 394 feet. Thus, the combined tower and rotor height will not exceed 640 feet.

Up to 67 turbines are proposed, with both proposed and alternate turbine locations being considered (Figure 2). Turbines will be spaced 1,490 to 2,980 feet apart within a row, and 1 to 1.3 miles apart between rows of turbines, with some rows as close as 3,400 feet apart. Turbines will be connected via electrical collection and fiber-optic communication lines, feeding turbine output into one on-site substation. The collection and communications lines will be primarily placed underground, but may include some overhead segments where avoidance of sensitive features is necessary, or where underground cabling is not feasible. At the on-site substation, power will then be “stepped up” and fed into the proposed 230-kilovolt (kV) transmission line. Aviation lighting will be mounted on turbines as per Federal Aviation Administration (FAA) requirements.

- **Nacelles.** The nacelle sits atop the turbine tower. It houses the gearbox, generator, power converter and control systems for the turbine, and is where the turbine blades attach. Access to the nacelle is via a ladder inside the turbine tower, which is accessible by a locked doorway at the base of the tower. The nacelle is mounted to the turbine tower on a geared plate that allows the turbine to rotate horizontally, orienting the nacelle such that the rotor faces into the wind to maximize capture of the available wind resource.
- **Blades and Rotors.** Turbine blades are attached to the rotor hub, which is mounted to the front of the nacelle. A rotor blade is made of lightweight wood, metal, laminated fiberglass and carbon fiber, and typically is constructed as a single piece (although it is possible that blades may be fabricated in two pieces for ease of transport and assembly at the Facility). The rotor diameters under consideration by the Applicant range from 380 to 493 feet. When operating, the rotor turns at a rate between 6 and 16 revolutions per minute. The area covered by the rotating blades is referred to as the rotor swept area. The turbine begins generating electricity at wind speeds of approximately 8 miles per hour, although this wind speed varies by turbine size and manufacturer. At wind speeds greater than about

55 miles per hour, the turbines will shut down and the rotor will be automatically locked to prevent damage to the machine.

- **Turbine Towers.** A turbine tower is a cylindrical steel structure tapered from the base to the top. The nacelle is mounted on top. Tower heights vary by turbine model and manufacturer, with that under consideration by the Applicant ranging from 262 to 394 feet. A self-diagnosing controller is located inside the base within the tower. Each tower is hollow, and will feature a locked entry door at ground level, with an internal access ladder with safety platforms for access to the nacelle. Towers will be fabricated in sections and assembled on-site. Towers will be uniformly painted an FAA-approved color suitable for daytime marking and air navigation.
- **Turbine Foundations.** A turbine tower is secured to a reinforced concrete foundation. The actual foundation type and design for each tower will be determined after on-site geotechnical studies are completed, but are often either spread-footing (most common) or caisson-type concrete foundations. Typical spread-footing foundations reach a depth of 8 to 10 feet below grade, and can be as large as 82 feet in diameter. At some locations, foundation subbase may require to be improved to raise the bearing capacity. During construction, a temporary staging area will be cleared beside each turbine tower base, where turbine components will be offloaded and staged prior to assembly. An engineered, graveled pad may be installed adjacent to the foundation. During construction, this or temporary rig matting will serve as a pad for the construction crane, and following construction, a parking area for maintenance vehicles.
- **Pad-mount Transformer and Transformer Foundations.** For wind turbines that do not have a step-up transformer in the nacelle, a pad-mounted transformer is installed at each turbine to step up the output voltage from the turbine (575 – 900 volts) to the collector system voltage (34.5 kV). Typically, the pad-mount transformer is a rectangular box with a footprint approximately 7.5 by 8.5 feet located adjacent to the base of the turbine tower. Support for the transformer will be provided by a concrete pad or foundation approximately 8 inches thick, placed over approximately 2 feet of weak concrete fill. The thickness and extent of the generator step-up transformer foundation is dependent upon soil conditions at the site, and will be determined after the geotechnical study is conducted. The entire support structure will typically be above 3 feet below grade.

(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 wind 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 is anticipated to have a new collector substation located within the Facility site boundary. The collector substation will collect generation output from the 34.5-kV collector lines and step voltage up to an expected 230-kV generational tie transmission line (gen-tie) for delivery to the Facility's POI at the under construction Wheatridge Renewable Energy Facility East Substation.

(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 collection system, collector substation, operations and maintenance (O&M) building, generation-tie transmission line, meteorological towers, communication and Supervisory Control and Data Access (SCADA) system, site access and service roads, perimeter fencing, gates, and temporary construction areas. The following descriptions are preliminary and conceptual and based on the best available information at this time and may be modified in the ASC and at final design prior to construction:

- **Collection System.** The inverters and transformers will connect the generation output of the wind array to 34.5-kV collector lines which may be underground. If they are underground, alternating current 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.
- **Collector Substation.** One collector substation is anticipated to be used for the proposed Facility and will be located within the Facility site boundary. This new substation will collect generation output from the 34.5-kV collection system and step it up for delivery to the POI. Prior to construction, the collector substation site will be cleared and graded, with a bed of crushed rock applied for a durable surface. The collector substation is 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.** The Facility will utilize the existing Wheatridge Renewable Energy Facility's O&M building, located next to the Blueridge Substation. The O&M building includes an office, utility room, kitchen, breakroom, lavatory with a shower, covered vehicle parking, storage for maintenance supplies and equipment, and a supervisory control and data acquisition system. Parking for employees, visitors, and

Facility equipment is located adjacent to the O&M building. The building has an on-site well and septic system. Electricity and telephone services is supplied by local service providers using overhead and/or underground lines.

- **Generation-tie Transmission Lines.** A new, approximately 11-mile overhead 230-kV transmission line will connect the Facility to the POI. The overhead transmission line either will be supported by H-frame wooden structures with two steel or wood poles or by a steel or wood monopole structure. The structures will rise to a height of 60 to 150 feet above grade, depending on the terrain.

The Applicant is in the process of identifying the 230-kV transmission line route, and requests flexibility in siting this structure, including locating the structure within a micrositing corridor of sufficient dimension to address natural resource constraints and property owner considerations.

- **Meteorological Towers.** As many as two permanent met towers will be located throughout the Facility site boundary, location to be determined. Each permanent met tower will be an un-guyed (free-standing) structure, with total height corresponding to the hub height of the associated turbines. The foundation of each permanent met tower will be a concrete pad approximately 25 feet in diameter and 10 feet deep, within a total disturbance area of approximately 2 acres. Each tower will be fitted with aviation lighting according to FAA requirements.
- **Communication and SCADA System.** A communication system consisting of fiber optic and copper communication lines will connect the turbines and collector substation to the O&M building. These communication lines will run with the collector lines, either buried or overhead, depending on site-specific conditions. Where buried, the communication lines are placed above the collector lines in the trench, and where overhead, run alongside the collector lines. This communication system allows each turbine and substation to be monitored by a SCADA system, installed in the O&M building. This system monitors each turbine for variables such as meteorological conditions, critical operating parameters, and power output. The turbines are controlled via the SCADA system, and can be controlled remotely. SCADA software is tuned specifically to the needs of each wind project by the turbine manufacturer or a third-party SCADA vendor.

Site Access and Service Roads. The Facility is anticipated to utilize existing access roads to the extent practicable. Primary transportation corridors to the Facility include I-84 and OR-74. The bulk of the site is accessible via OR-74. New service roads will be constructed within the Facility site boundary to provide access to Facility infrastructure. Roads are anticipated to 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. During construction, some roads may need an additional shoulder for turnaround areas for larger vehicles; These areas will be reclaimed upon completion of construction. All existing public roads used to access the Facility will be left in

“as good or better” condition than that which existed prior to the start of construction. Upgrades to existing roads or the construction of new roads will be done according to applicable state and county road standards, and after consultation with Morrow County staff members.

At this time, an exact layout of proposed new roads and transportation routes are not final. It is the Applicant's intent to use existing roads wherever possible, and to minimize impacts to the agricultural and grazing effectiveness of the land by working in conjunction with the landowners on new road construction. All newly constructed roads will be graded and graveled to meet load requirements for all equipment. Each road will be as much as 24 feet wide. An additional 40 feet may be temporarily disturbed for crane paths during construction. Use of the roads may continue after construction, or new roads may be removed and the land reclaimed to pre-construction conditions.

- **Perimeter Fencing and Gates.** Chain-link or security fabric metal perimeter fencing, a minimum of 8 feet in height and topped with security wire, is anticipated to enclose the substation and temporary construction areas. The perimeter fencing will have lockable vehicle and pedestrian access gates.
- **Temporary Laydown Yard.** A temporary laydown yard is anticipated to 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 laydown yard. The temporary laydown yard will be within the Facility site boundary.

(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:

- **Wind Turbines.** The up to 67 wind turbines will have a maximum height of 640 feet, 394-foot hub height, 493-foot rotor blade diameter, and 246.5-foot rotor blade length.
- **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 monopole structures. Specific locations and dimensions of overhead collector lines, if necessary, will not be known until site geotechnical work has been completed during preconstruction activities and prior to final design.

- **Collector Substation.** A collector substation located within an approximately 5-acre area within the Facility site boundary will be used for the proposed Facility and will be enclosed by its own security fence.
- **O&M Building.** The existing Wheatridge Renewable Energy Facility O&M building is a one-story building, located within a 1.1-acre area. A permanent, fenced, parking area for employees, visitors, and Facility equipment is located adjacent to the O&M building.
- **Generation-tie Transmission Line.** A 230-kV gen-tie is expected between the collector substation and the Facility POI, approximately 11 miles long. The gen-tie line 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 60 to 150 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 the Applicant during micrositing at final design.
- **Meteorological Towers.** The two temporary meteorological towers will have a maximum height of 493 feet and 25-foot-diameter foundations.

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 31,477 acres of privately owned land in Morrow County, Oregon. The Facility is bisected by OR-74, located over 6 miles east of the town of Heppner, Oregon. The site boundary is composed of the townships, ranges, and sections listed in Table C-1.

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

Township and Range	Section
1S 28E	017, 020, 021, 028, 029, 032, 033, 034
2S 27E	001, 002, 011, 012, 013, 014
2S 28E	002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 026, 027, 028, 029, 030, 031, 032, 033, 034, 035, 036
3S 28E	001, 002, 003, 004, 005, 008, 009, 010, 011, 012, 013, 014, 023, 024

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		
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Michael Neal, Morrow County Contact PO Box 2946 Portland, OR 97208-2946 (503) 808-4380 Michael.t.neal@usace.army.mil	Clean Water Act, Section 404 (33 United States Code [USC] § 1344); 33 Code of Federal Regulations (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 or governed by the site certificate.
Notice of Proposed Construction or Alteration (Form 7460-1)	Federal Aviation Administration 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 structures greater than 200 feet above ground surface or for construction of structures within specified distances of runways or helipads, and may be required to file this notice. This federal process is not within the jurisdiction of EFSC and therefore should not be included in or governed by the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	FAA Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77 Description: If a Notice of Proposed Construction or Alteration with the FAA is required, then submission of the Supplemental Notice of Actual Construction or Alteration form must be filed within 5 days after construction reaches its greatest height as specified in the No Hazard Determination. This federal process is not within the jurisdiction of EFSC and therefore should not be included in or governed by 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 or governed by the site certificate.
State Permits		
Energy Facility Site Certificate	Oregon Department of Energy (ODOE) and EFSC 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 Rules (OAR) Chapter 345, Divisions 1, 21-24 Description: This site certificate is the subject of this NOI.
Airspace Review	Oregon Department of Aviation Attn: Alex Thomas, Planning, Policy, and Programs Manager 3040 25th Street, SE Salem, OR 97302 (503) 375-2357 Alex.R.THOMAS@odav.oregon.gov	14 CFR § 77; ORS 836.530 and 836.535; OAR Chapter 738, Division 70 Description: The Oregon Department of Aviation provides an airspace review and determination letter following review of Form 7460-1 for structures greater than 200 feet above ground surface or within the distances from airports listed in OAR 738-070-0110. No permit is issued by the Oregon Department of Aviation. The airspace review is useful in understanding the 7460-1 process but is outside EFSC jurisdiction. Therefore, this permit should not be included in or governed by the site certificate.

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Permit	Agency	Authority/Description
Removal/Fill Permit (including Individual Permit, General Removal-Fill Permit, and General Authorization)	Oregon Department of State Lands Attn: Richard Fitzgerald, Aquatic Resource Coordinator 951 SW Simpson Avenue, Suite 104 Bend, OR 97702 (503) 910-4565 Richard.W.Fitzgerald@dsl.oregon.gov	Oregon Removal-Fill Law (ORS 196.795 - 196.990); OAR Chapter 141, Divisions 85, 89, 90, 93, 100. Description: A person or utility is required to have a permit if an activity will involve filling or removing 50 cubic yards or more of material in a wetland or waterway. For sites within a state designated Essential Indigenous Anadromous Salmonid Habitat (ESH), State Scenic Waterway, or compensatory mitigation site, a permit is required for any amount of removal or fill. If this is proposed or needed, this 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 for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	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 required, the Applicant's construction 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 for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES permit is required for construction activities that will disturb one or more acres of land. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
401 Water Quality Certification	ODEQ Attn: Amber Clark, Individual Certifications for Western and Eastern Regions 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (503) 229-5051 Amber.Clark@deq.oregon.gov	Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48 Description: Water quality certification is required for projects that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Applicant will obtain this permit, 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.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
WPCF Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	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 construction contractor will obtain a WPCF-1000 permit from the ODEQ, which would therefore not be included in or governed by the site certificate.
Air Contaminant Discharge Permit (ACDP)	ODEQ, Eastern Region Attn: Eastern Region Air Quality Permit Coordinator 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (503) 633-2021 eraqpermits@deq.oregon.gov	OAR Chapter 340, Division 216 Description: Each mobile concrete batch plant used will require an associated ACDP. Depending on the anticipated volume of concrete to be made by each plant, either a Basic or General Air Contaminant Discharge Permit would be required. If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant or its construction contractor will obtain the appropriate permit from ODEQ for concrete batch plants used during construction. 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: Ken Patterson, Region 5 Manager Region 5 Headquarters 3012 Island Avenue La Grande, OR 97850 (541) 963-1365 kenneth.e.patterson@odot.oregon.gov	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 construction 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.
Access Management Permit	ODOT Attn: Ken Patterson, Region 5 Manager Region 5 Headquarters 3012 Island Avenue La Grande, OR 97850 (541) 963-1365 kenneth.e.patterson@odot.oregon.gov	OAR Chapter 734, Division 51 Description: Access from Oregon state highways will require an access permit, which may be issued by the local ODOT District Offices. If needed, the Applicant's construction contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Permit to Occupy or Perform Operations Upon a State Highway	ODOT Attn: Ken Patterson, Region 5 Manager Region 5 Headquarters 3012 Island Avenue La Grande, OR 97850 (541) 963-1365 kenneth.e.patterson@odot.oregon.gov	OAR Chapter 734, Division 55 Description: Utility installations within the right-of-way of a state highway in Oregon require a permit issued by the ODOT. If needed, the Applicant's construction contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Water Right Permit or Water Use Authorization	Oregon Water Resources Department Water Rights Section, District 5 Attn: Greg Silbernagel, Watermaster 116 SE Dorion Avenue Pendleton, OR 97801 (541) 278-5456 Greg.M.Silbernagel@water.oregon.gov	ORS 537; OAR 690 Divisions 310, 340, and 410 Description: If water for construction is not available from permitted sources, the Applicant's construction contractor 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.
Archaeological Excavation Permit	Oregon Parks and Recreation Department, State Historic Preservation Office Attn: John Pouley, State Archaeologist 725 Summer Street NE, Suite C Salem, OR 97301 (503) 480-9164 arch.permits@opr.d.oregon.gov	ORS Chapter 97, 358, and 390; OAR Chapter 736, Division 51 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.
Electrical Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR 918, Division 309 Description: 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.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Building Permit	<p>State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov</p>	<p>OAR 734, Division 51; Chapter 918, Divisions 309 & 780; Oregon Structural Specialty Code</p> <p>Description: In Morrow 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. A building permit will be obtained by the construction contractor prior to construction of each component for which a building permit would be required; therefore, this permit should not be included in or governed by the site certificate.</p>
Local Permits		
Conditional Use Permit and Zoning Permit	<p>Morrow County Planning Department Attn: Tamra Mabbott, Planning Director P.O. Box 40 215 NE Main Avenue Irrigon, OR 97844 (541) 922-4624 tmabbott@co.morrow.or.us</p>	<p>Morrow County Comprehensive Plan; Morrow County Zoning Ordinance Article 1, Section 1.050; Article 3, Section 3.010(C)-(D) and 3.010(K)(3); Article 6</p> <p>Description: The Applicant elects to obtain an EFSC determination under ORS Chapter 469.504(1)(b). Under ORS 469.401(3), following issuance of the site certificate, the County, upon the applicant's submission of 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. Because the Council will make the land use determination, this permit should be included in and governed by the site certificate.</p>
Floodplain Development Permit	<p>Morrow County Planning Department Attn: Tamra Mabbott, Planning Director P.O. Box 40 215 NE Main Avenue Irrigon, OR 97844 (541) 922-4624 tmabbott@co.morrow.or.us</p>	<p>Morrow County Comprehensive Plan; Morrow County Zoning Ordinance, Article 3, Section 3.100</p> <p>Description: A Floodplain Development Permit is required prior to construction or development within any special flood hazard area, within the overlay zone. If required, this permit will be obtained by the construction contractor prior to construction. 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
Utility and Approach Permits	Morrow County Public Works Attn: Eric Imes, Public Works Director P.O. Box 428 Lexington, OR 97839 (541) 989-9500 eimes@co.morrow.or.us	ORS 374.305 to 374.325; Morrow County Zoning Ordinance Article 4, Section 4.010(B) Description: A Utility Permit is required to install a utility within or across a county road right-of-way. An Approach Permit will be required for new project access points with county roads, or for upgrades to existing county roads. If required, these permits will be obtained by the construction contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.
Temporary Access/Work in Road Right-of-Way Permits	Morrow County Public Works Attn: Eric Imes, Public Works Director P.O. Box 428 Lexington, OR 97839 (541) 989-9500 eimes@co.morrow.or.us	Morrow County Zoning Ordinance Article 4, Section 4.010(B) Description: A Work In Road Right-of-Way Permit is required to make improvements to access roads that intersect with county road rights-of-way or to make improvements to existing public roads. If required, this permit will be obtained by the construction contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.
Oversize Load Movement Permit	Morrow County Public Works Attn: Eric Imes, Public Works Director P.O. Box 428 Lexington, OR 97839 (541) 989-9500 eimes@co.morrow.or.us	Morrow County Zoning Ordinance Section 4.010(B) Description: An Oversize Load Movement Permit will be required to transport loads that exceed standard size and/or weight limits on county roads. If required, this permit will be obtained by the construction contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.

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 Morrow County Exclusive Farm Use (EFU) zoning district (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). Tax lot boundaries and assessor information for Morrow County were obtained from the Morrow County Assessor on March 6, 2025.

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 location 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 components and their layout in relation to the surrounding area.
- **Figure 3** shows the underlying zoning designation for the Facility. The site boundary is within Morrow County's EFU zoning district.
- **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.
- **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 flood hazard areas within the vicinity of the Facility from the Federal Emergency Management Agency (FEMA) dataset.
- **Figure 9** 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 20-mile protected areas study area; a 10-mile scenic resources and public services study area; a 5-mile study area for recreational opportunities and threatened and endangered plant and animal species; and a 0.5-mile study area for land use, wildfire risk, and fish and wildlife habitat.

(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. Figure 8 displays flood hazard areas using data from FEMA.

(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:

Several energy generation facilities permitted under EFSC are within 10 miles of the proposed site boundary including the Sunstone Solar Project, Wheatridge Renewable Energy Facility II and East, Nolin Hills Wind Power Project, and Boardman to Hemingway (see Figure 9). Existing transmission lines and substations are also within 10 miles of the Facility (see Figure 9). 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 Morrow County's EFU 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 Morrow 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:

Potential significant environmental impacts of the Facility on air quality, surface and groundwater quality, fish and wildlife habitats, threatened and endangered plant and animal species, historic, cultural and archeological resources, scenic and protected resources, recreation, land use, and wildfire risk are identified in this exhibit. The applicable study areas for these resources are shown below 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)
Recreational Opportunities	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. The wind turbines 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 the Oregon Department of Transportation (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 2025). 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 the Oregon Department of Environmental Quality (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 existing O&M building are served by a septic system.

Surface and Groundwater Availability

During construction, water will primarily be required for dust suppression and access road and earthwork compaction. Actual daily water use will vary depending on weather and the final construction schedule. For example, water usage for dust control will be greater during the dry, windy conditions of summer than at other times of year.

Water is anticipated to come from nearby private sources permitted for Facility use (e.g., the permitted private Kilkenny Well) or municipal sources 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. Additionally, the Applicant will confirm with the appropriate private or municipality source that the anticipated amount of water needed for construction of the Facility will be available and that all necessary water right authorizations have been secured.

During operations, water will be provided by the existing well at the Wheatridge Renewable Energy Facility's O&M building. Generally, water during operations will be used for washing Facility vehicles. The average amount of water used at the existing O&M building will be less than 5,000 gallons per day during operations.

Wetlands and Waters of the State of Oregon

Potential wetlands, waters, and flood hazard areas have been identified in Figures 7 and 8 using data from the NWI, and NHD. Several springs/seeps, as well as intermittent and perennial streams cross through and around the proposed site boundary according to the NHD; wetlands are also present in the proposed site boundary according to the NWI. FEMA-designated Zone A floodplains are also present in the proposed site boundary along the eastern and western boundaries. 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, according to the National Land Cover Database, land cover within the Facility site boundary is primarily herbaceous, shrub/scrub, developed, open space, cultivated crops, and emergent herbaceous wetlands (MRLC 2023).

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

Land Cover Type	Area (acres) ¹	Percent of Total Area ¹
Herbaceous	28,439	90
Shrub/Scrub	1,788	6
Developed, Open Space	497	2
Cultivated Crops	422	1
Emergent Herbaceous Wetlands	280	1
Hay/Pasture	15	0.05
Developed, Low Intensity	11	0.04
Deciduous Forest	8	0.02
Woody Wetlands	8	0.02
Evergreen Forest	6	0.02
Developed, Medium Intensity	4	0.01
Total	31,477	100.00

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

The Applicant will consider a variety of publicly available resources to determine the threatened, endangered, and sensitive species that may occur within the site boundary and surrounding area. The Applicant will conduct habitat and general wildlife pedestrian surveys (see above), as well as raptor nest surveys within the Facility site boundary and a 0.5-mile buffer. Wildlife observations and wildlife sign (e.g., scat, tracks, burrows, stick nests, etc.) of both special status wildlife and all wildlife in general (e.g., big game) will be documented. An analysis of potential impacts to sensitive, endangered, and threatened species will be provided in the ASC including minimization and mitigation measures developed as necessary in coordination with the ODFW.

Historic, Cultural, and Archaeological Resources

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 eligible 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 study 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 management plans to be considered include the Morrow County Comprehensive 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, and biking (Morrow County 2025a). 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, including rareness and irreplaceability, as required by OAR 345-022-0100(2).

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 Morrow County's EFU zoning district. Applicable development standards for this zone will be addressed in Exhibit K of the ASC. Land within the site boundary is primarily vacant, but some of it is used for agricultural uses. Impacts to agricultural land will also be further discussed in Exhibit K of the ASC.

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 burn probability. Additionally, average flame lengths for the area generally range from 0 to 12 feet (ODF 2025). 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 Heppner Volunteer Fire Department (RFPD) and continue to do so through all stage of Facility development. The Applicant will develop and implement Wildfire Mitigation Plans 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 345-020-0011(1)(k) 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, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. The Applicant is proposing to utilize the existing Wheatridge Renewable Energy Facility's O&M building during operations that includes an office, utility room, kitchen, breakroom, lavatory with a shower, covered vehicle parking, storage for maintenance supplies and equipment, and a supervisory control and data acquisition system. The O&M building has an existing septic system. The septic system does not rely on community services and thus will not cause significant adverse impacts to community sewer systems.

Water

During construction, water will primarily be required 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, water will be provided by the existing well at the Wheatridge Renewable Energy Facility's O&M building. Water could be used for a kitchen, drinking, showers, and toilets. 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 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).

Morrow County provides solid waste disposal and recycling services through franchise agreements with various private providers. The public landfill closest to the Facility is the Finley Buttes Regional Landfill, located approximately 10 miles south of Boardman, Oregon and 18 miles northwest of the site boundary. Solid waste generated at the Facility during construction activities will be non-hazardous. Waste materials generated through the construction of the wind turbines, 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 local commercial haulers. Further, the Applicant will coordinate with waste and recycling franchisees servicing the Facility to maintain required records, as mandated by Morrow County's Solid Waste Management Ordinance.

The existing 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, and other materials.

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 200 construction personnel 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 turbine 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 wind 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 Hermiston, Boardman, and Pendleton. 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 study 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.

Operations

It is estimated that if the full capacity is built, 5 to 10 full-time employees will work on-site for the 50-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 and OR-74. 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 Morrow County to minimize impacts to traffic safety. In addition, the Applicant will enter into road use agreements with Morrow County to ensure that public roads impacted by construction will be left in "as good or better" condition than that which existed prior to the start of construction.

During operation, significant traffic impacts from the Facility are not anticipated. Facility equipment will be continuously monitored remotely. O&M will include periodic inspection and a scheduled maintenance program, along with a minimal number of seasonal vegetation maintenance personnel. Specialized personnel responsible for occasional inspections of the turbines 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 Morrow County Sheriff's Office and Oregon State Police Department provide police services for Morrow County (Morrow County 2025b). The Applicant will provide on-site security during construction and operations, and effective communications will be established between on-site security personnel and the Morrow 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 Heppner Volunteer Fire Department coverage area (OOSFM 2025). The Applicant will work with the appropriate fire department to address any potential needs for a fire prevention and management plan during construction and operations. 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 fire department 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 closest hospital is the Pioneer Memorial Hospital located five miles west in Heppner. The next nearest hospital to the Facility is the Good Shepherd Medical Center, located approximately 25 miles northeast in Hermiston; this hospital is also considered a Level III trauma center (Oregon Health Authority 2025). Ambulance service in the area is provided by the Morrow County Health District's Emergency Medical Services (Morrow County Health District 2025). Some of the nearby fire districts also have First Response Vehicles, with equipment and crew trained to stabilize a patient until the arrival of an ambulance for transport. In the event of a serious injury during construction or operation of the Facility, the patient may be flown by helicopter (operated by Life Flight) to one of the two Level I trauma centers located in Portland: Oregon Health & Science University Hospital or Legacy Emanuel Medical Center.

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

The site boundary falls within the Morrow County School District No. 1. The schools closest to the Facility are the Heppner Elementary School and Heppner Junior/High School, both located approximately 5 miles west of the Facility. Other nearby school districts (most of which are outside

of the study area) that may experience an increase in enrollment due to the Facility include the Umatilla, Hermiston, Stanfield, Echo, Pilot Rock, Ukiah, and Pendleton school districts in Umatilla County; and the Richland, Kennewick, Prosser, Kiona-Benton City, and Finley school districts in Benton County, Washington. 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 5 to 10 permanent employees. Some employees may be hired locally, and others may relocate from outside the region with their families. Conservatively estimating that all 10 employees are hired from outside the region and on average, each brings two school-age children, up to approximately 20 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 (i.e., intact, high-potential sites and segments)	17.2	Northeast	National Park Service, National Trails Office - Regions 6, 7, 8 Oregon National Historic Trail 1100 Old Santa Fe Trail Santa Fe, NM 87505 No phone listed No email listed	Google Earth 2024, NPS 1999, NPS 2025a, USGS 2024
National Monument OAR 345-001-0010(26)(b)	None	N/A	N/A	N/A	Google Earth 2024, NPS 2025a, USGS 2024
Wilderness Area OAR 345-001-0010(26)(c)	None	N/A	N/A	N/A	Google Earth 2024, USFS 2024, USFS 2025a, USFS 2025b, USGS 2024, Wilderness Connect 2025
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	None	N/A	N/A	N/A	Google Earth 2024, NPS 2025b, National Wild and Scenic Rivers System 2025, USGS 2024
National Wildlife Refuge included in the National Wildlife Refuge System OAR 345-001-0010(26)(e)	None	N/A	N/A	N/A	Google Earth 2024, USFWS 2025a, USGS 2024
National Fish Hatcheries OAR 345-001-0010(26)(f)	None	N/A	N/A	N/A	Google Earth 2024, USFWS 2025b
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	None	N/A	N/A	N/A	Google Earth 2024, USFS 2024, USFS 2025a, USFS 2025b, USGS 2024
Wilderness Study Area OAR 345-001-0010(26)(h)	None	N/A	N/A	N/A	BLM 2025a, Google Earth 2024, USGS 2024
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	North Fork John Day River Area of Critical Environmental Concern (ACEC)	18.5	Southeast	Bureau of Land Management (BLM), Prineville District Office 3050 NE 3 rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	BLM 2025b, BLM 2025c, BLM 2025d, BLM 2025e, Google Earth 2024, OPRD 2020, USFS 2025a, USGS 2024
	Oregon Trail ACEC, Echo Meadows Interpretive Site (also a high-potential site of the Oregon National Historic Trail)	17.2	Northeast	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	

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					
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	N/A	N/A	N/A	Google Earth 2024, OPRD 2025a, USGS 2024	
Research Natural Area OAR 345-001-0010(26)(i)(C)	Boardman Research Natural Area	19.7	Northwest	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov		
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	None	N/A	N/A	N/A		
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		
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)	Ukiah-Dale Forest State Scenic Corridor	19.0	Southeast	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301 (541) 983-2277 No email listed		
	Battle Mountain Forest State Scenic Corridor	15.3	Southeast			
Willamette River Greenway OAR 345-001-0010(26)(k)	None	N/A	N/A	N/A	Google Earth 2024, OPRD 2025b	
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(L)	Lindsay Prairie Preserve	15.8	Northwest	The Nature Conservancy 821 SE 14th Avenue Portland, OR 97214 (503) 802-8100 oregon@tnc.org	Google Earth 2024, OPRD 2020, USGS 2024	
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	None	N/A	N/A	N/A	Google Earth 2024, NOAA 2025	
State Scenic Waterway OAR 345-001-0010(26)(n)	None	N/A	N/A	N/A	Google Earth 2024, OPRD 2025c, OPRD 2025d, USGS 2024	
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	Bridge Creek Wildlife Area	19.9	Southeast	Oregon Department of Fish and Wildlife Bridge Creek Wildlife Area 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Google Earth 2024, ODFW 2025a, USGS 2024	

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				
Fish hatchery operated by ODFW OAR 345-001-0010(26)(p)	None	N/A	N/A	N/A	Google Earth 2024, ODFW 2025b
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	Google Earth 2024, OSU 2022
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	None	N/A	N/A	N/A	Google Earth 2024, OSU 2025

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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, water will primarily be required 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, water will be provided by the existing well at the Wheatridge Renewable Energy Facility's O&M building. Water may be used for a kitchen, drinking, showers, and toilets. 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 wind 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	Oregon Department of Agriculture 635 Capitol Street NE Salem, OR 97301 (503) 986-4550
Oregon Department of Aviation	OAR 345-022-0000 General Standard of Review ORS 836.530 and 836.535; OAR Chapter 738, Division 70	Oregon Department of Aviation 3040 25th Street SE Salem, OR 97302 (503) 378-4880
ODFW – Habitat Conservation Division	OAR 345-022-0060 Fish and Wildlife Habitat and OAR 345-022-0070 Threatened and Endangered Species Habitat Conservation ORS 496-497; ORS 506, Divisions 109 and 119; OAR Chapter 635, Divisions 100 (Wildlife Management Plan) and 415 (Fish and Wildlife Habitat Mitigation Policy)	Oregon Department of Fish and Wildlife 2042 SE Paulina Highway Prineville, OR 97754 (541) 447-5111

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Department	Legal Citation	Agency Address
Oregon Water Resources Department – Water Rights Division	OAR 345-022-0020 General Standard of Review ORS Chapter 537 (Appropriation of Water Generally); ORS Chapter 540 (Distribution and Storage of Water); OAR Chapter 690 (Water Resources Department)	Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301 (503) 986-0900
Oregon Department of State Lands	OAR 345-022-0000 General Standard of Review OAR Chapter 141	Oregon Department of Land Conservation and Development 635 Capital Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
ODEQ—Water Quality & Stormwater Control	OAR 345-022-0022 Soil Protection ORS 468 and 468B; OAR Chapter 340, Divisions 41, 45, and 55	Oregon Department of Environmental Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 (541) 633-2024
ODEQ—Noise	OAR 345-022-0000 General Standard of Review ORS 467 (Noise Control) and OAR Chapter 340, Division 35 (Noise Control Regulations)	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Hazardous Waste Management	OAR 345-022-0120 Waste Minimization ORS Chapters 465 and 466 (Hazardous Waste and Hazardous Materials I and II); and OAR Chapter 340, Divisions 100 through 122 (Hazardous Waste Management)	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Solid Waste	OAR 345-022-0120 Waste Minimization ORS Chapter 459 (Solid Waste Management) and OAR Chapter 340, Division 93 (Solid Waste General Provisions)	Oregon Department of Environmental Quality 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

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Department	Legal Citation	Agency Address
Oregon Parks and Recreation Department, State Historic Preservation Office —Archaeological	OAR 345-022-0090 Historic, Cultural and Archaeological Resources ORS 97.740-97.760 (Indian Graves and Protected Objects); ORS 358.920-358.955 (Archaeological Objects and Sites); ORS 390.010 (Outdoor Recreation); ORS 390.235 (Archaeological Sites and Historical Material); and OAR 736-051-0090 (Archaeological Permits)	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	Office of State Fire Marshal 3565 Trelstad Avenue SE Salem, OR 97317 (503) 378-3473
Oregon Office of State Fire Marshal	OAR 345-022-0115 Wildfire Prevention and Risk Mitigation 2022 Oregon Fire Code; OAR Chapter 837, Division 40	Office of State Fire Marshal 3565 Trelstad Avenue SE Salem, OR 97317 (503) 378-3473
Oregon Department of Land Conservation and Development	OAR 345-022-0030(2) and (3) Land Use Oregon Statewide Planning Goals ORS Chapter 195 (Local Government Planning Coordination); ORS Chapter 197 (Comprehensive Land Use Planning Coordination); ORS Chapter 215 (County Planning, Zoning, Housing Codes); ORS Chapter 469 (Energy, Conservation Program, Energy Facilities); OAR Chapter 660 (Department of Land Conservation and Development Administrative Rules)	Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
Morrow County Planning Department	OAR 345-022-0030(2)(a) Land Use Morrow County Zoning Ordinance	Morrow County Planning Department P.O. Box 40 215 NE Main Avenue Irrigon, OR 97844 (541) 922-4624

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 Preliminary Application for Site Certificate Submittal

Activity	Anticipated Date
Applicant submits the NOI to ODOE	March 2025
EFSC reviews the NOI, distributes public notice, conducts public information meeting as needed, facilitates comment period, and issues Project Order	March – May 2025
Applicant submits Preliminary ASC to ODOE	December 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 May 16, 2024, the Legislative Commission provided a letter identifying the Burns Paiute Tribe, Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of Warm Springs Reservation of Oregon as Tribal governments that should be notified (Attachment 3).

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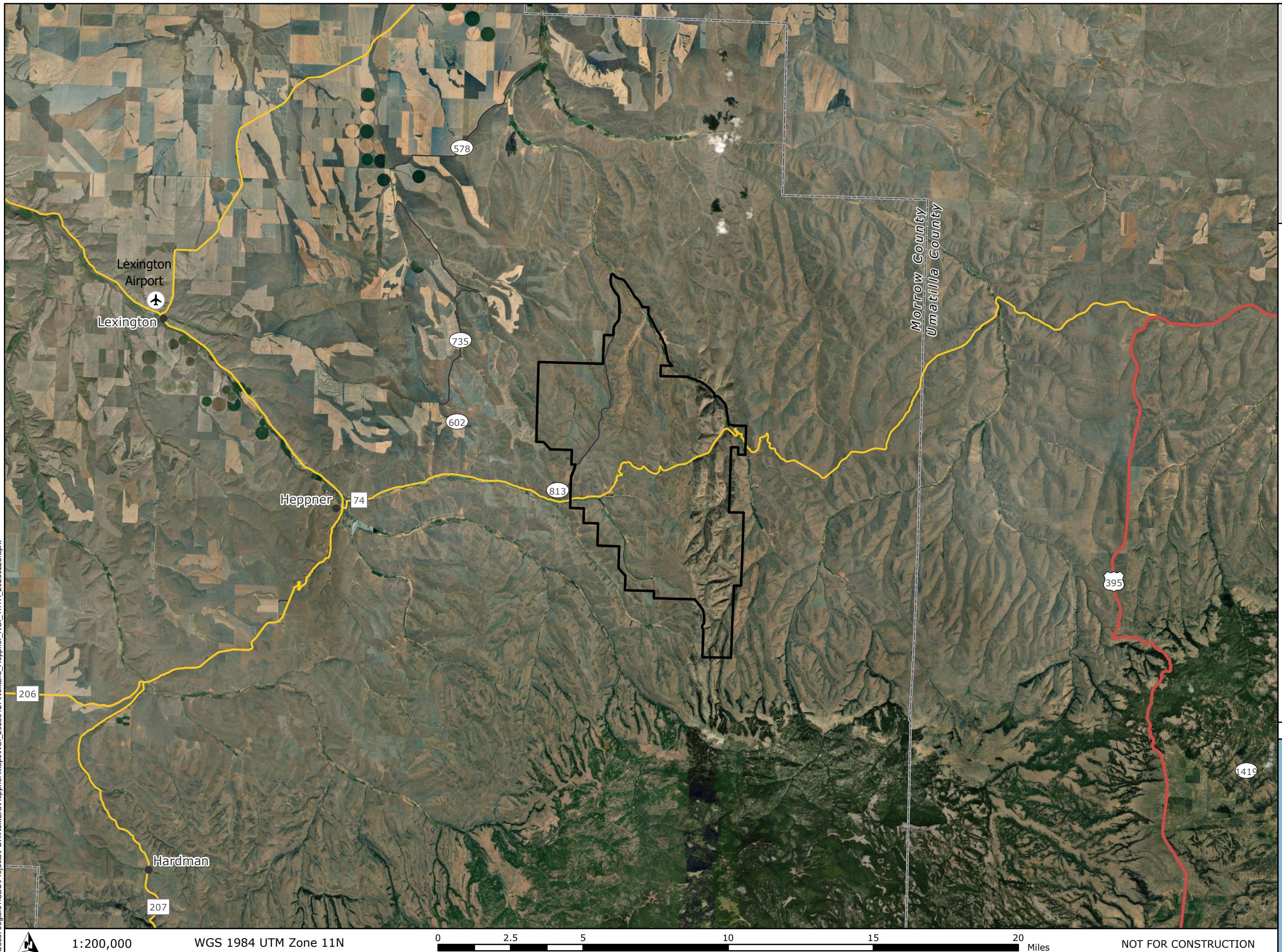
Figures

Heppner Wind Project

Figure 1
Site Vicinity

MORROW COUNTY, OR

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



TETRA TECH  NEXTera ENERGY  RESOURCES

Reference Map



Heppner Wind Project

Figure 2
Facility Site Overview

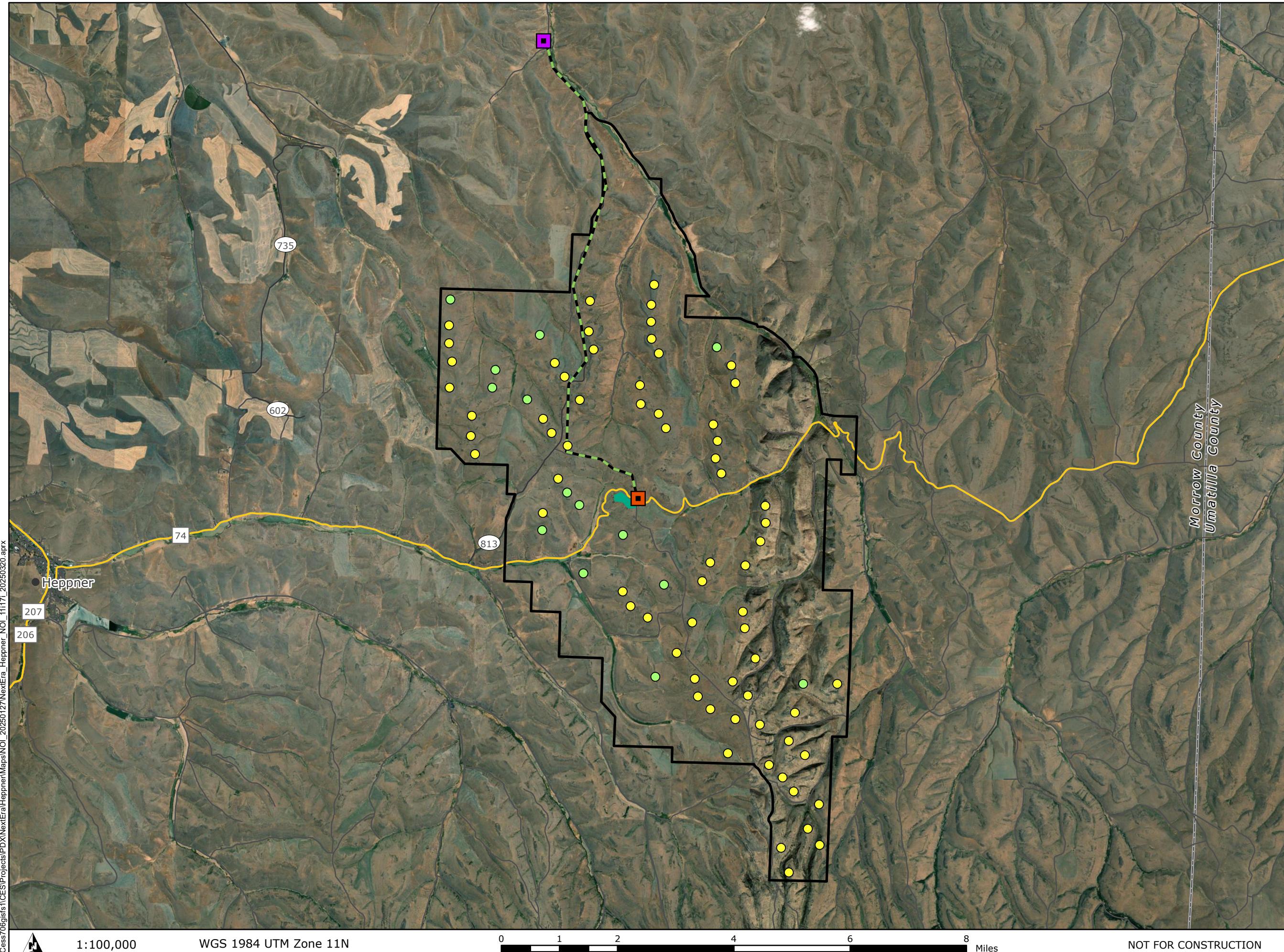
MORROW COUNTY, OR

- Facility Site Boundary
- Turbines
- Alternate Turbines
- Substation
- WREFE Substation
- Transmission Line
- Laydown Yard
- City/Town
- County Boundary
- State Highway
- County Highway
- Local Roads

Morrow County
Umatilla County

TETRA TECH  NEXTera ENERGY  RESOURCES

Reference Map



Heppner Wind Project

Figure 3
Zoning

MORROW COUNTY, OR

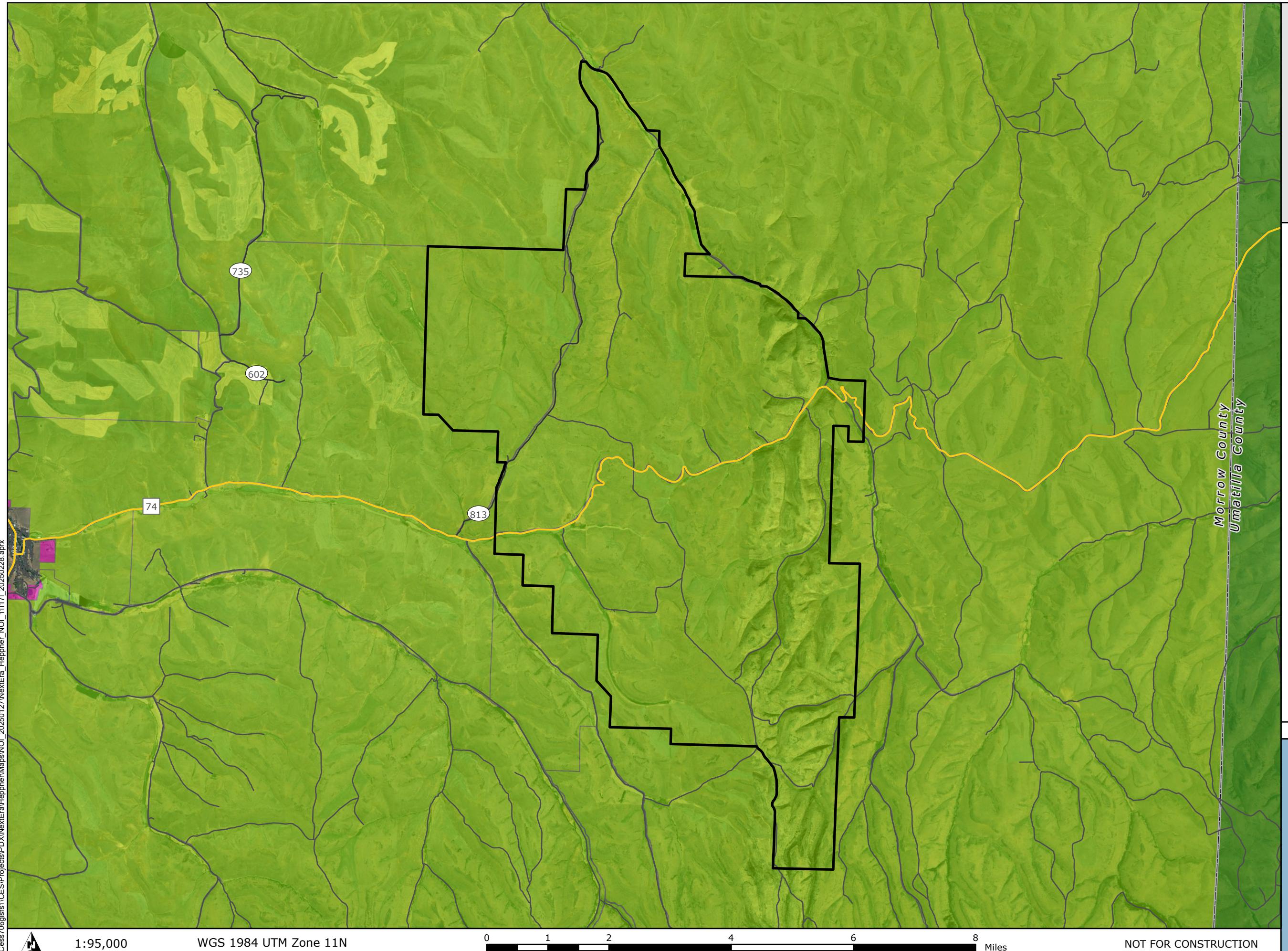
- Facility Site Boundary
 - City/Town
 - County Boundary
 - State Highway
 - County Highway
 - Local Roads
- Morrow County Zoning
- Exclusive Farm Use
 - Suburban Residential
- Umatilla County Zoning
- Exclusive Farm Use

Morrow County
Umatilla County

TETRA TECH

NEXTERA ENERGY
RESOURCES

Reference Map



Heppner Wind Project

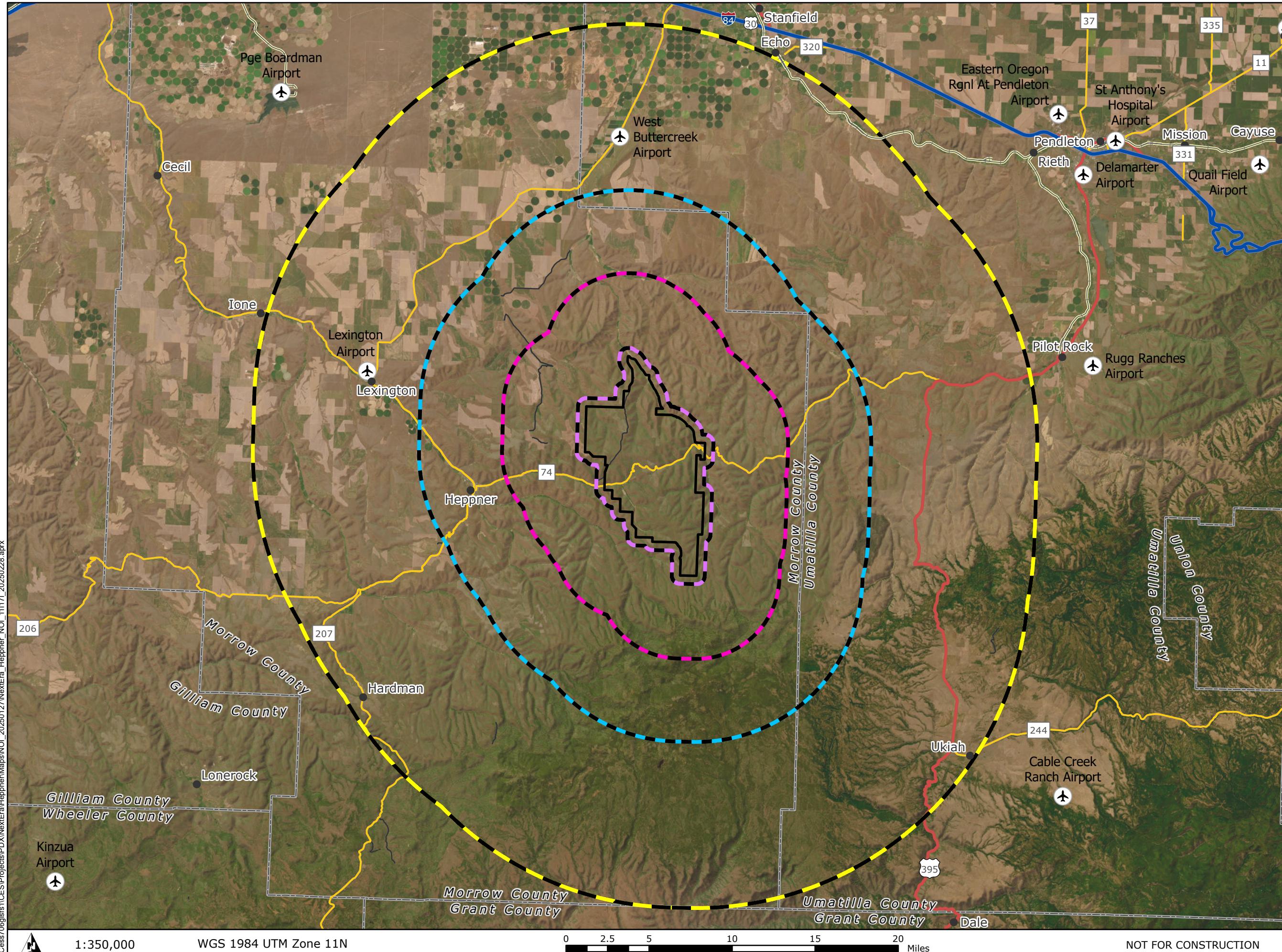
Figure 4
Study Area Boundaries

MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Airports
- Railroad
- Study Areas
- 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 **NEXTERA ENERGY**
RESOURCES

Reference Map

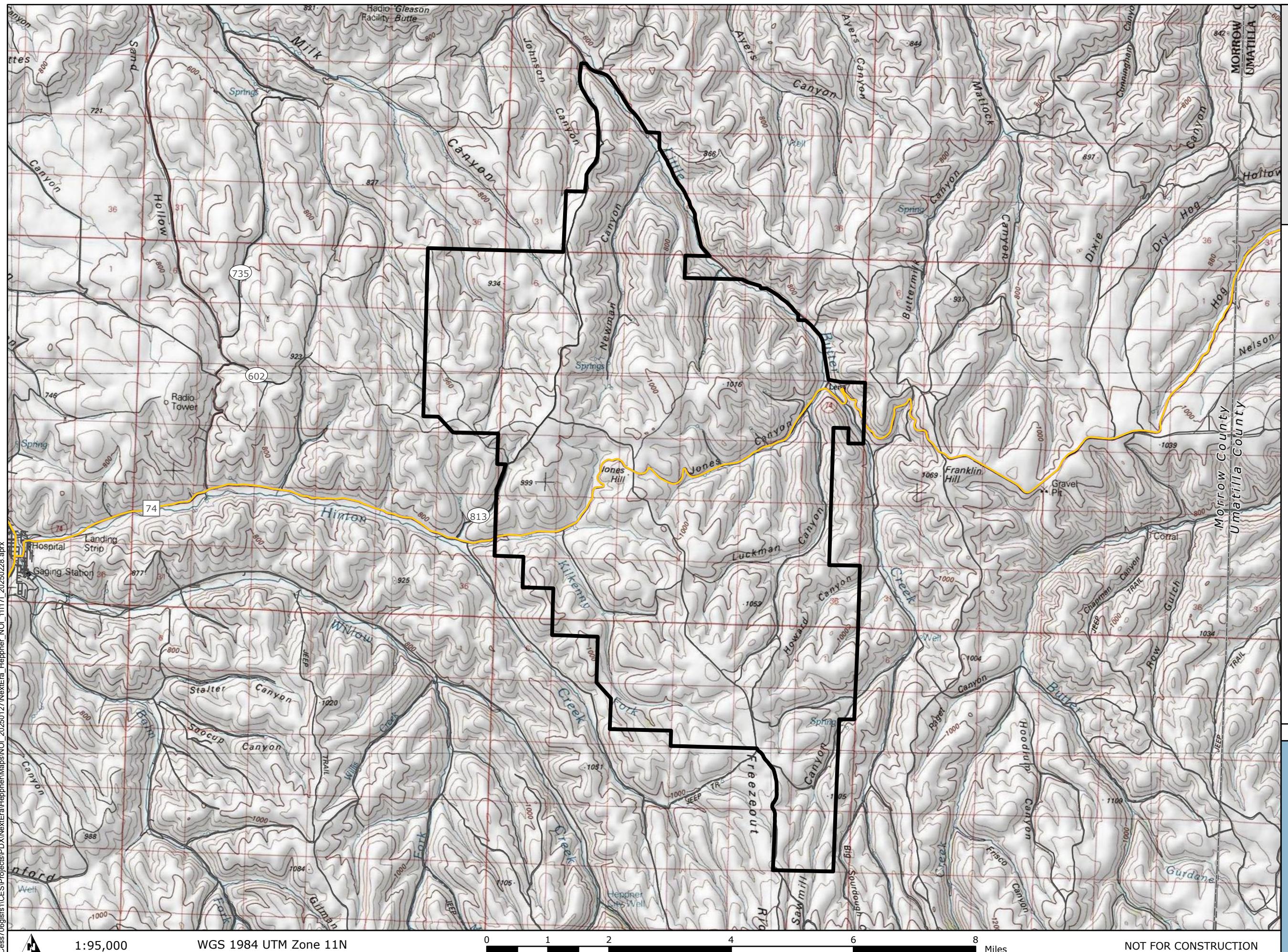


Heppner Wind Project

Figure 5
Topography

MORROW COUNTY, OR

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



TETRA TECH **NEXTERA ENERGY** RESOURCES

Reference Map



Heppner Wind Project

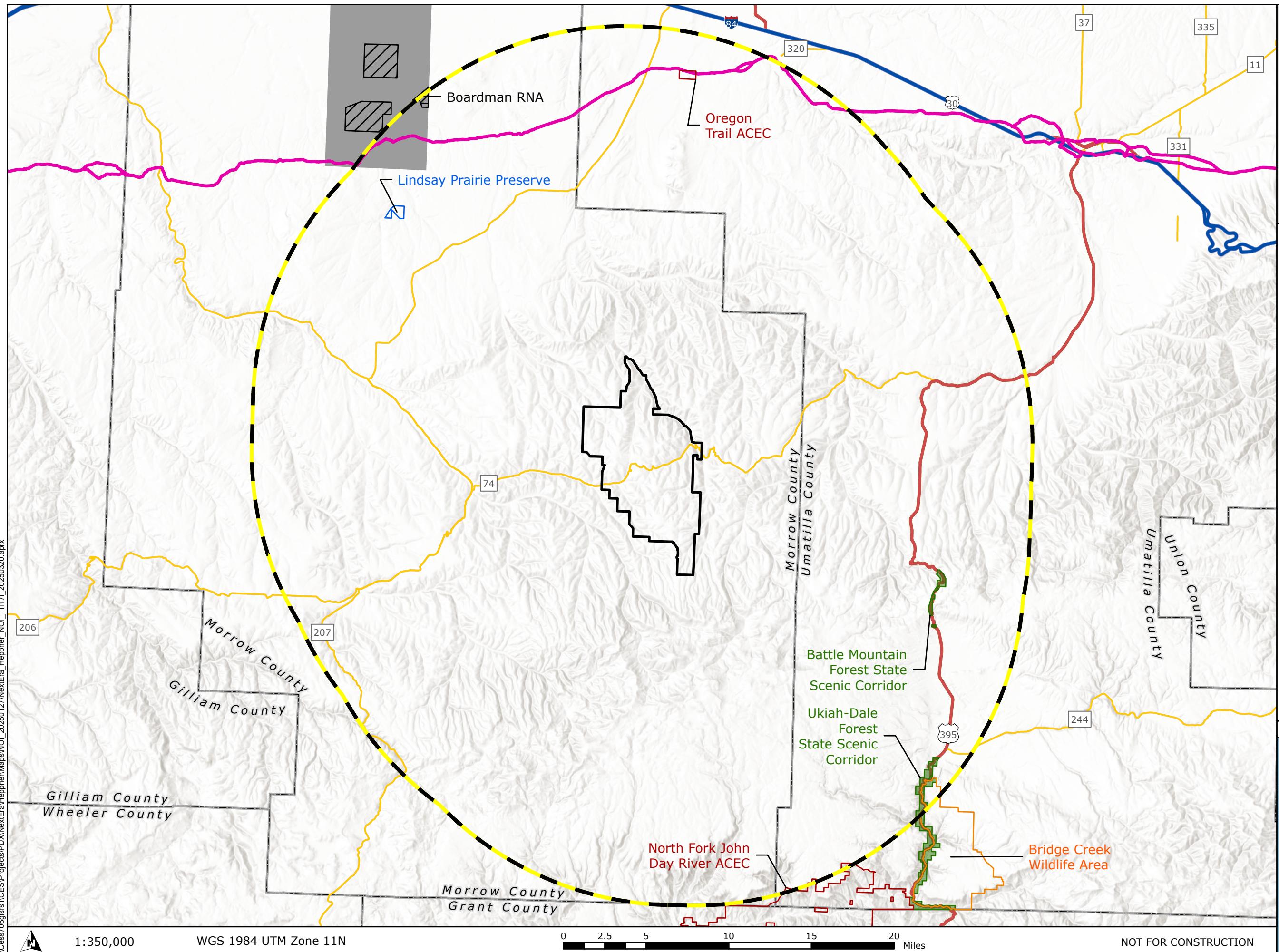
Figure 6
Protected Areas

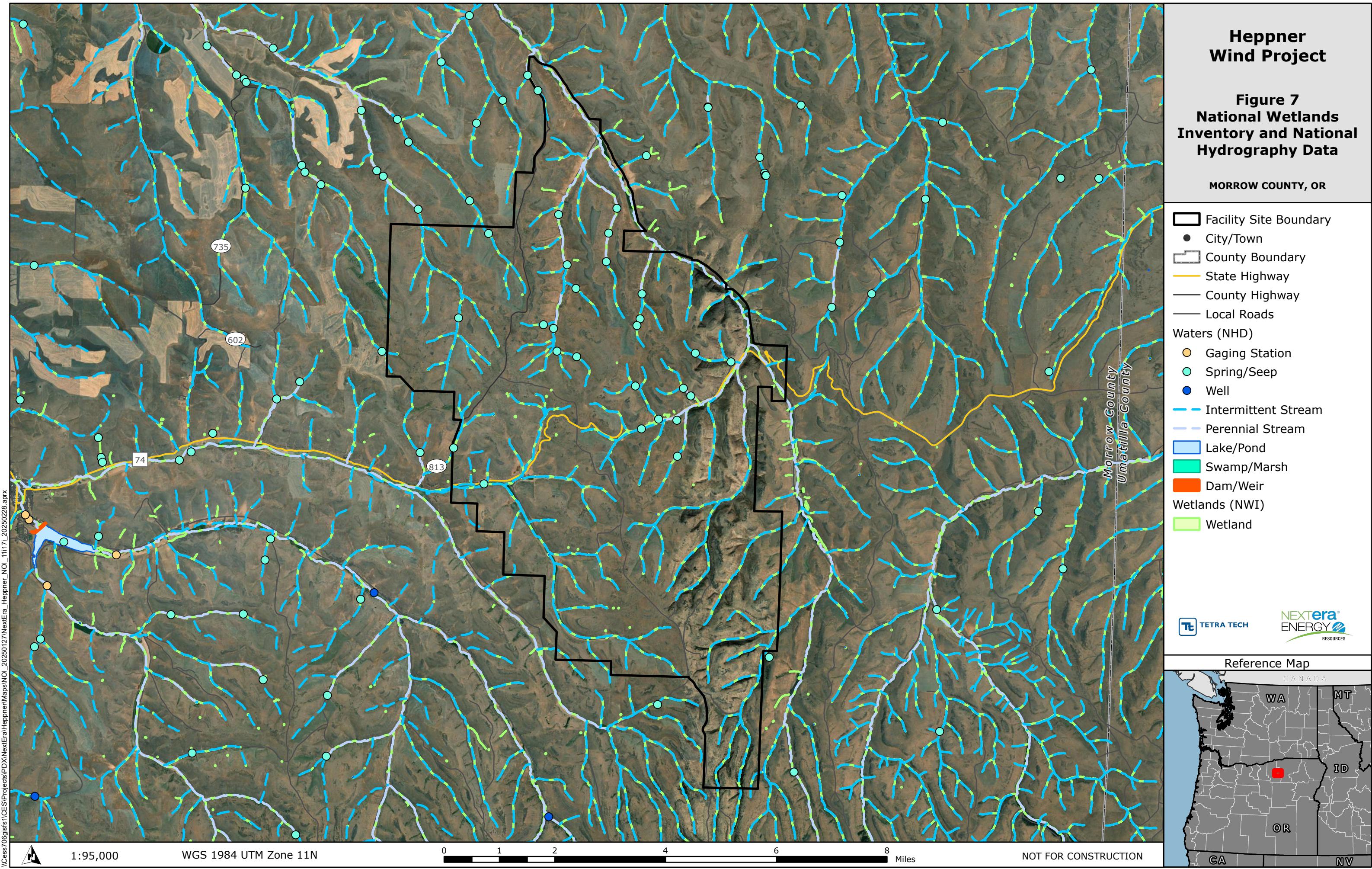
MORROW COUNTY, OR

- Facility Site Boundary
- Study Area (20-mile Buffer for Protected Areas)
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- Boardman Bombing Range
- Protected Areas
 - Oregon National Historic Trail
 - BLM Area of Critical Environmental Concern
 - BLM Research Natural Areas
 - State Natural Heritage Area
 - State Wildlife Area
 - State Park

 **TETRA TECH**  **NextEra ENERGY** RESOURCES

Reference Map

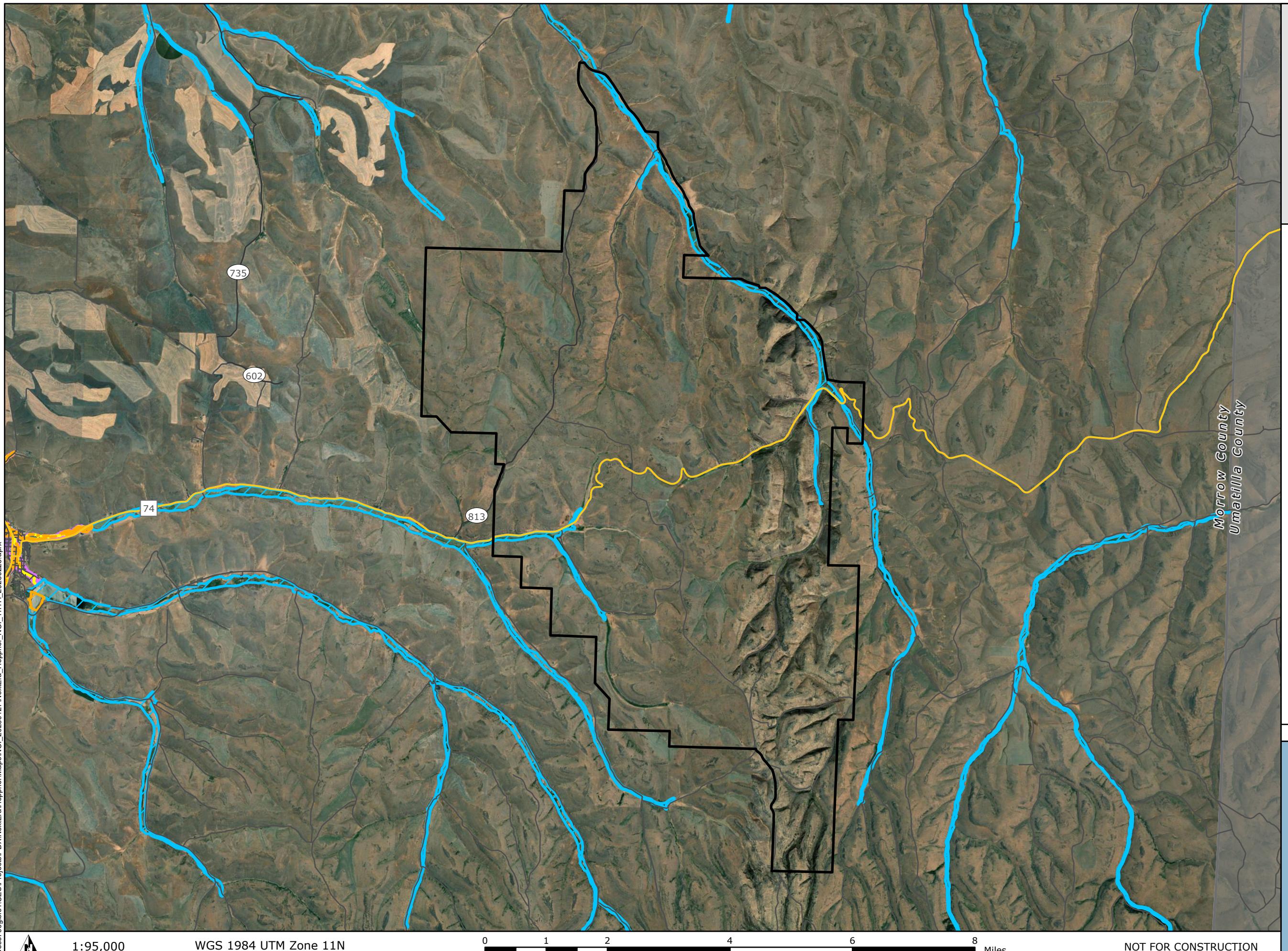




Heppner Wind Project

Figure 8
Special Flood Hazard Areas

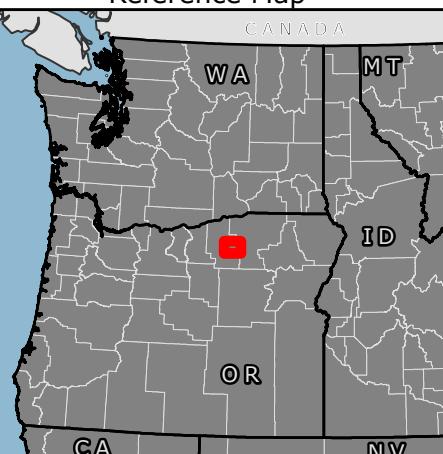
MORROW COUNTY, OR



- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- County Highway
- Local Roads
- Flood Hazard Areas (FEMA)
 - Zone A - 100-year Floodplain (1% Annual Chance Flood Hazard)
 - Zone AE - 100-year Floodplain (1% Annual Chance Flood Hazard)
 - Zone AE - Regulatory Floodway (1% Annual Chance Flood Hazard)
 - Zone X - 0.2% Annual Chance Flood Hazard
 - Zone X - Area of Minimal Flood Hazard
 - Area of Undetermined Flood Hazard

TETRA TECH **NEXTERA ENERGY**
RESOURCES

Reference Map



Heppner Wind Project

Figure 9
Energy Facilities

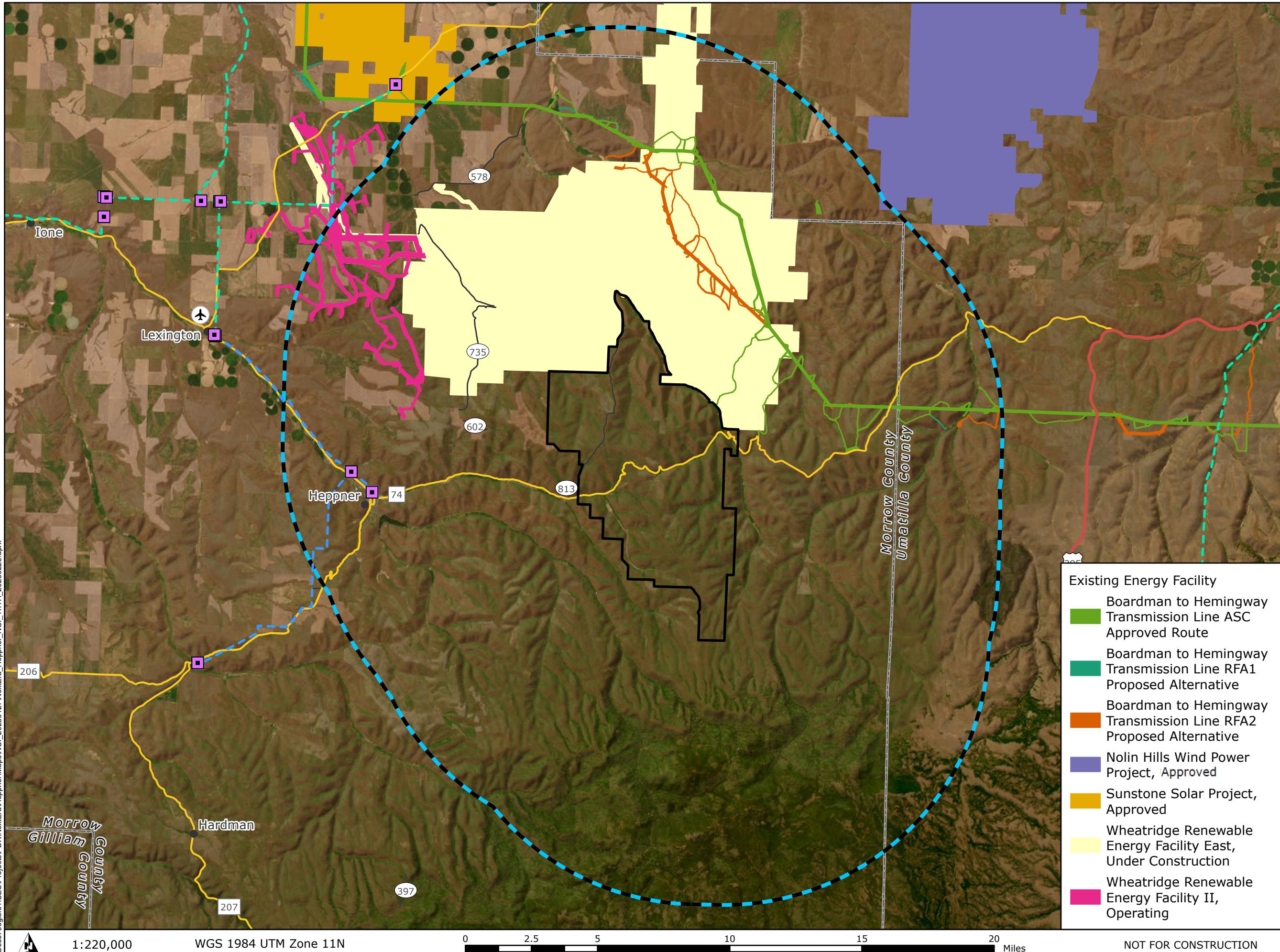
MORROW COUNTY, OR

- Facility Site Boundary
- Study Area (10-mile Buffer for Public Facilities)
- City/Town
- County Boundary
- US Highway
- State Highway
- County Highway
- Airports
- Existing Substations
- 69 kV Transmission Line
- 115 kV Transmission Line

- Existing Energy Facility**
- Boardman to Hemingway Transmission Line ASC Approved Route
 - Boardman to Hemingway Transmission Line RFA1 Proposed Alternative
 - Boardman to Hemingway Transmission Line RFA2 Proposed Alternative
 - Nolin Hills Wind Power Project, Approved
 - Sunstone Solar Project, Approved
 - Wheatridge Renewable Energy Facility East, Under Construction
 - Wheatridge Renewable Energy Facility II, Operating

 **TETRA TECH**  **NextEra ENERGY**
RESOURCES

Reference Map



Notice of Intent to Apply for a Site Certificate

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Attachment 1. Articles of Organization

APPLICATION FOR AUTHORITY



Corporation Division
sos.oregon.gov/business

E-FILED
Feb 18, 2025
OREGON SECRETARY OF STATE

REGISTRY NUMBER

236667093

TYPE

FOREIGN LIMITED LIABILITY COMPANY

1. ENTITY NAME

HEPPNER LENA WIND, LLC

2. MAILING ADDRESS

700 UNIVERSE BLVD LAW/JB
JUNO BEACH FL 33408 USA

3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY ST NE STE 310
SALEM OR 97301 USA

4. MANAGEMENT

This Limited Liability Company will be member-managed by one or more members

5. DATE OF ORGANIZATION

02-04-2025

6. DURATION

PERPETUAL

7. JURISDICTION

DE

8. PRIMARY PHYSICAL LOCATION

700 UNIVERSE BLVD
JUNO BEACH FL 33408 USA



I declare, 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 officers, managers, members or agents of the limited liability company on behalf of which the person signs. 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.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

ELECTRONIC SIGNATURE

NAME

JASON B. PEAR

TITLE

ATTORNEY IN FACT

DATE

02-14-2025

Delaware

Page 1

The First State

*I, CHARUNI P. SANCHEZ, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "HEPPNER LENA WIND,
LLC", FILED IN THIS OFFICE ON THE FOURTH DAY OF FEBRUARY, A.D.
2025, AT 5:46 O'CLOCK P.M.*



Charuni P. Sanchez, Secretary of State



10089620 8100
SR# 20250388358

Authentication: 202869189
Date: 02-05-25

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

STATE OF DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE OF FORMATION
OF
HEPPNER LENA WIND, LLC

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

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

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

NextEra Registered Agency, LLC
1100 N. Market Street, 4th Floor
Wilmington, Delaware 19890

Executed this day, February 4, 2025.



By: Jason B. Pear
An Authorized Person

Notice of Intent to Apply for a Site Certificate

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Attachment 2. Tax Lots and Property Owner Information

Notice of Intent to Apply for a Site Certificate for the Heppner Wind Project
 Property Owner List and Tax Lot Map - Morrow County Assessor Data (Obtained March 6, 2025)

Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
01S27E000001100	KNOWLES, MARY & KNOWLES, BRIAN	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S27E000000900	KNOWLES, MARY & KNOWLES, BRIAN	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S27E00000200	FLYNN, JOHN F	55549 HWY 207 SPRAY	HEPPNER	OR	97836	55549 HWY 207 SPRAY, HEPPNER, OR, 97836
01S28E000002200	HUGHES RANCHES & RESOURCE MNGMT, LLC	60458 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60458 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S28E000002100	KNOWLES, MARY & KNOWLES, BRIAN	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S28E000001600	LAZY K LAND, LLC, 2/3 ETAL	60732 LITTLE BUTTERCREEK RD	HEPPNER	OR	97836	60732 LITTLE BUTTERCREEK RD, HEPPNER, OR, 97836
01S28E000002300	HUGHES RANCHES & RESOURCE MNGMT, LLC	60458 LITTLE BUTTERCREEK RD	HEPPNER	OR	97836	60458 LITTLE BUTTERCREEK RD, HEPPNER, OR, 97836
01S28E000001601	HEPPNER CEMETERY (MAIN DIST)	PO BOX 1047	HEPPNER	OR	97836	PO BOX 1047, HEPPNER, OR, 97836
01S28E000002000	KNOWLES, MARY LYNN & KNOWLES, BRIAN D	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S28E000001002	KNOWLES, MARY LYNN & KNOWLES, BRIAN D	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S28E000001900	JMH RANCH, LLC	PO BOX 724	HEPPNER	OR	97836	PO BOX 724, HEPPNER, OR, 97836
01S28E000001800	JMH RANCH, LLC	PO BOX 724	HEPPNER	OR	97836	PO BOX 724, HEPPNER, OR, 97836
01S28E000001200	JMH RANCH, LLC	PO BOX 724	HEPPNER	OR	97836	PO BOX 724, HEPPNER, OR, 97836
01S28E000001400	SCHILLER, MARILYN	69958 SCHILLER DR	ECHO	OR	97826	69958 SCHILLER DR, ECHO, OR, 97826
01S28E000001401	SCHILLER, MARILYN	69958 SCHILLER DR	ECHO	OR	97826	69958 SCHILLER DR, ECHO, OR, 97826
01S28E000001001	KNOWLES, MARY LYNN & KNOWLES, BRIAN D	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
01S28E000001000	JMH RANCH, LLC	PO BOX 724	HEPPNER	OR	97836	PO BOX 724, HEPPNER, OR, 97836
01S28E000001100	FLYNN, JOHN F	55549 HWY 207 SPRAY	HEPPNER	OR	97836	55549 HWY 207 SPRAY, HEPPNER, OR, 97836
01S28E000001300	SCHILLER, MARILYN	69958 SCHILLER DR	ECHO	OR	97826	69958 SCHILLER DR, ECHO, OR, 97826
01S28E00000600	FLYNN, JOHN F	55549 HWY 207 SPRAY	HEPPNER	OR	97836	55549 HWY 207 SPRAY, HEPPNER, OR, 97836
01S28E000002000	SCHILLER, MARILYN	69958 SCHILLER SHL	ECHO	OR	97826	69958 SCHILLER SHL, ECHO, OR, 97826
01S29E000002100	HUGHES RANCHES & RESOURCE MNGMT, LLC	60458 LITTLE BUTTERCREEK RD	HEPPNER	OR	97836	60458 LITTLE BUTTERCREEK RD, HEPPNER, OR, 97836
01S28E000001700	HUGHES RANCHES & RESOURCE MNGMT, LLC	60458 LITTLE BUTTERCREEK RD	HEPPNER	OR	97836	60458 LITTLE BUTTERCREEK RD, HEPPNER, OR, 97836
02S29E000002600	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
02S29E000002500	ASPEN PROPERTIES LIMITED PARTNERSHIP	1320 N 16TH AVE STE A	YAKIMA	WA	98902	1320 N 16TH AVE STE A, YAKIMA, WA, 98902
02S29E000001500	BROSAN RANCH, INC	950 QUAIL RIDGE LN	BAKER CITY	OR	97814	950 QUAIL RIDGE LN, BAKER CITY, OR, 97814
02S29E000000700	HUGHES RANCHES & RESOURCE MNGMT, LLC	60458 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60458 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000002001	ASHBECK, MITCHELL & TERRYL	69359 LITTLE BUTTER CREEK RD	ECHO	OR	97826	69359 LITTLE BUTTER CREEK RD, ECHO, OR, 97826
02S28E000001300	KILKENNY, JOHN O & KILKENNY, DIANE L	79074 HIGHWAY 74	HEPPNER	OR	97836	79074 HIGHWAY 74, HEPPNER, OR, 97836
02S28E000002100	KILKENNY, JOHN O & DIANE	79074 HIW 74 LENA	HEPPNER	OR	97836	79074 HIW 74 LENA, HEPPNER, OR, 97836
02S28E000001301	KILKENNY, JOHN O & KILKENNY, DIANE L	79074 HIW 74 LENA	HEPPNER	OR	97836	79074 HIW 74 LENA, HEPPNER, OR, 97836
02S27E000003400	ASHBECK, MITCHELL & TERRYL	69359 LITTLE BUTTER CREEK RD	ECHO	OR	97826	69359 LITTLE BUTTER CREEK RD, ECHO, OR, 97826
02S27E000002300	BARBER, JUDITH JEAN ETAL	60071 HANNA-ARBUCKLE RD	HEPPNER	OR	97836	60071 HANNA-ARBUCKLE RD, HEPPNER, OR, 97836
02S28E000001900	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
02S28E000001302	KILKENNY, JOHN O & DIANE	79074 HIW 74 LENA	HEPPNER	OR	97836	79074 HIW 74 LENA, HEPPNER, OR, 97836
02S28E000001400	PRICE, THOMAS D, TRUSTEE ETAL	PO BOX 487	PENDLETON	OR	97801	PO BOX 487, PENDLETON, OR, 97801
02S28E000001600	G HUGHES PROPERTY, LLC	280 S COURT ST	HEPPNER	OR	97836	280 S COURT ST, HEPPNER, OR, 97836
02S28E000001500	G HUGHES PROPERTY, LLC	280 S COURT ST	HEPPNER	OR	97836	280 S COURT ST, HEPPNER, OR, 97836
02S28E000000901	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
02S28E000001200	BROSAN RANCH, INC	950 QUAIL RIDGE LN	BAKER CITY	OR	97814	950 QUAIL RIDGE LN, BAKER CITY, OR, 97814
02S28E000001100	HAGGARD RANCH, LLC	60077 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60077 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000001000	STATE OF OREGON	417 TRANSPORTATION BLDG	SALEM	OR	97310	417 TRANSPORTATION BLDG, SALEM, OR, 97310
02S28E000000900	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
02S28E000000401	CURRIN, STEPHEN J & CURRIN, LISANNE K	60732 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60732 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000000402	CURRIN, STEVE & CURRIN, LISANNE	60732 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60732 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000000300	HOMER W PETERSON FAMILY TRUST ET AL	PO BOX 550	PENDLETON	OR	97801	PO BOX 550, PENDLETON, OR, 97801
02S28E000000400	LAZY K LAND, LLC	60732 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60732 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000000200	HOMER W PETERSON FAMILY TRUST ET AL	PO BOX 550	PENDLETON	OR	97801	PO BOX 550, PENDLETON, OR, 97801
02S27E000000200	PRICE, THOMAS D, TRUSTEE ETAL	PO BOX 487	PENDLETON	OR	97801	PO BOX 487, PENDLETON, OR, 97801
02S27E000000100	LAZY K LAND, LLC, 2/3 ETAL	60732 LITTLE BUTTERCREEK RD	HEPPNER	OR	97836	60732 LITTLE BUTTERCREEK RD, HEPPNER, OR, 97836
02S28E000000700	KNOWLES, MARY & KNOWLES, BRIAN	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000000600	KNOWLES, MARY & KNOWLES, BRIAN	67207 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	67207 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S28E000000500	LAZY K LAND, LLC, 2/3 ETAL	60732 LITTLE BUTTERCREEK RD	HEPPNER	OR	97836	60732 LITTLE BUTTERCREEK RD, HEPPNER, OR, 97836
02S28E000001403	KILKENNY, JOHN & KILKENNY, DIANE L	79074 HIW 74 LENA	HEPPNER	OR	97836	79074 HIW 74 LENA, HEPPNER, OR, 97836
03S28E000000300	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
03S28E000000500	KILKENNY, JOHN O & KILKENNY, DIANE L	79074 HIW 74 LENA	HEPPNER	OR	97836	79074 HIW 74 LENA, HEPPNER, OR, 97836
03S28E000001200	HISLER, PAUL, JR	56504 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	56504 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
03S29E000000500	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
03S28E000000700	BARBER, DONALD W & JUDITH J ETAL	60071 HANNA-ARBUCKLE RD	HEPPNER	OR	97836	60071 HANNA-ARBUCKLE RD, HEPPNER, OR, 97836
03S29E000000600	HISLER, PAUL, JR	56504 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	56504 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
03S29E000000400	ASPEN PROPERTIES LIMITED PARTNERSHIP	1320 N 16TH AVE STE A	YAKIMA	WA	98902	1320 N 16TH AVE STE A, YAKIMA, WA, 98902
03S28E000000800	ASHBECK, MITCHELL & TERRYL	69359 LITTLE BUTTER CREEK RD	ECHO	OR	97826	69359 LITTLE BUTTER CREEK RD, ECHO, OR, 97826
03S28E000000600	GERBER, KELLY M	650 SLED PARK DR	BILLINGS	MT	59101	650 SLED PARK DR, BILLINGS, MT, 59101
03S28E000000400	KILKENNY, JOHN & DIANE	79074 HIW 74 LENA	HEPPNER	OR	97836	79074 HIW 74 LENA, HEPPNER, OR, 97836
03S28E000000100	ASPEN PROPERTIES LIMITED PARTNERSHIP	1320 N 16TH AVE STE A	YAKIMA	WA	98902	1320 N 16TH AVE STE A, YAKIMA, WA, 98902

Notice of Intent to Apply for a Site Certificate for the Heppner Wind Project
Property Owner List and Tax Lot Map - Morrow County Assessor Data (Obtained March 6, 2025)

Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
02S28E000001700	STATE OF OREGON	417 TRANSPORTATION BLDG	SALEM	OR	97310	417 TRANSPORTATION BLDG, SALEM, OR, 97310
02S28E000000800	G HUGHES PROPERTY, LLC	280 S COURT ST	HEPPNER	OR	97836	280 S COURT ST, HEPPNER, OR, 97836
03S28E000000302	FREEZEOUT RANCH, LLC	81476 HWY 74 LENA	HEPPNER	OR	97836	81476 HWY 74 LENA, HEPPNER, OR, 97836
03S28E000001100	DOUBLE W RANCH, LLC	PO BOX 787	HEPPNER	OR	97836	PO BOX 787, HEPPNER, OR, 97836
02S28E00000100	HUGHES RANCHES & RESOURCE MNGMT, LLC	60458 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60458 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836
02S29E000001600	HAGGARD RANCH, LLC	60077 LITTLE BUTTER CREEK RD	HEPPNER	OR	97836	60077 LITTLE BUTTER CREEK RD, HEPPNER, OR, 97836

Heppner Wind Project

Attachment 2 Figure 1 Tax lots Boundary Index Map

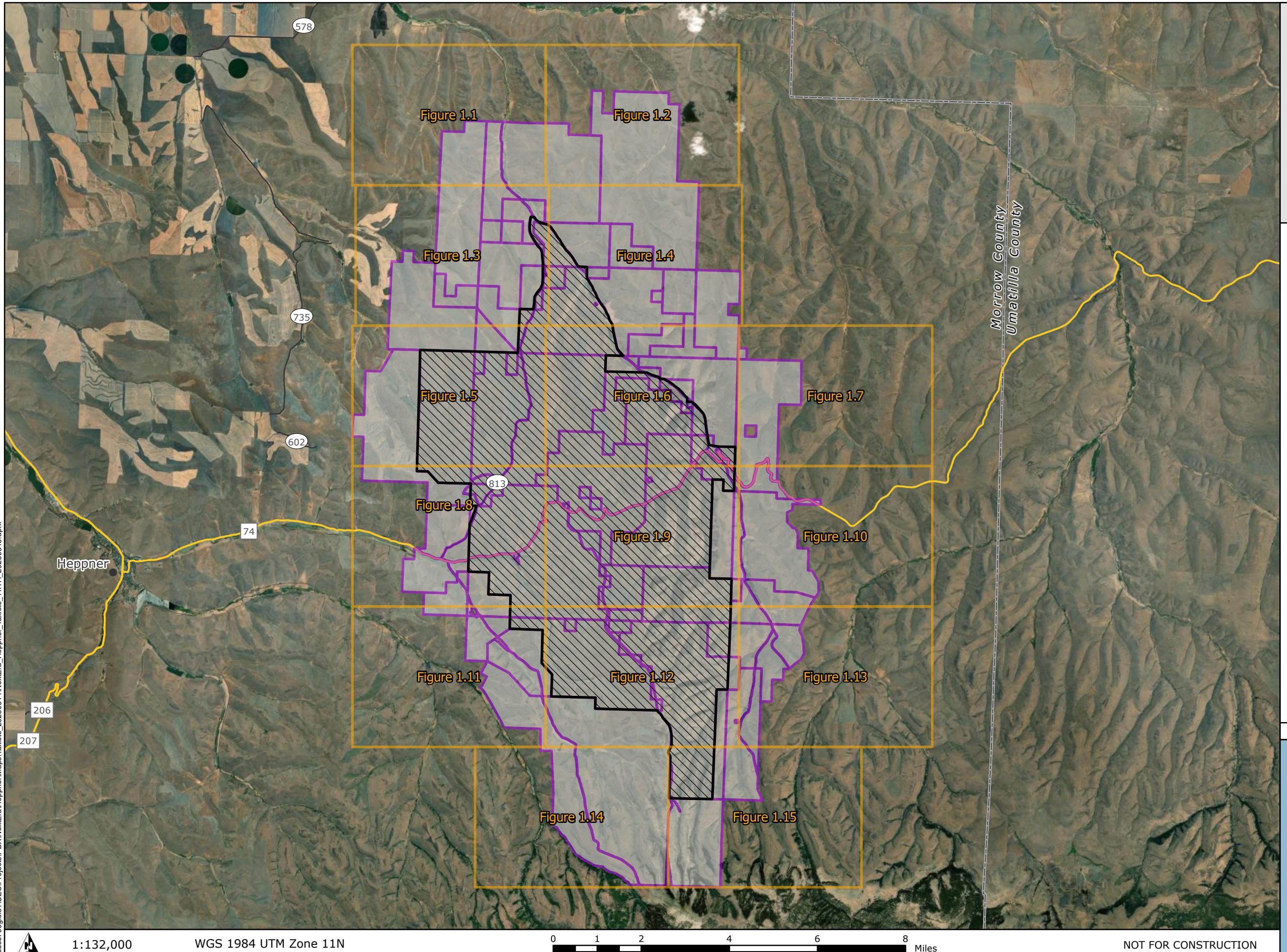
MORROW COUNTY, OR

- Map Grid
- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- County Highway
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



Heppner Wind Project

Attachment 2 Figure 1.1 Tax lots Boundary Detail Map

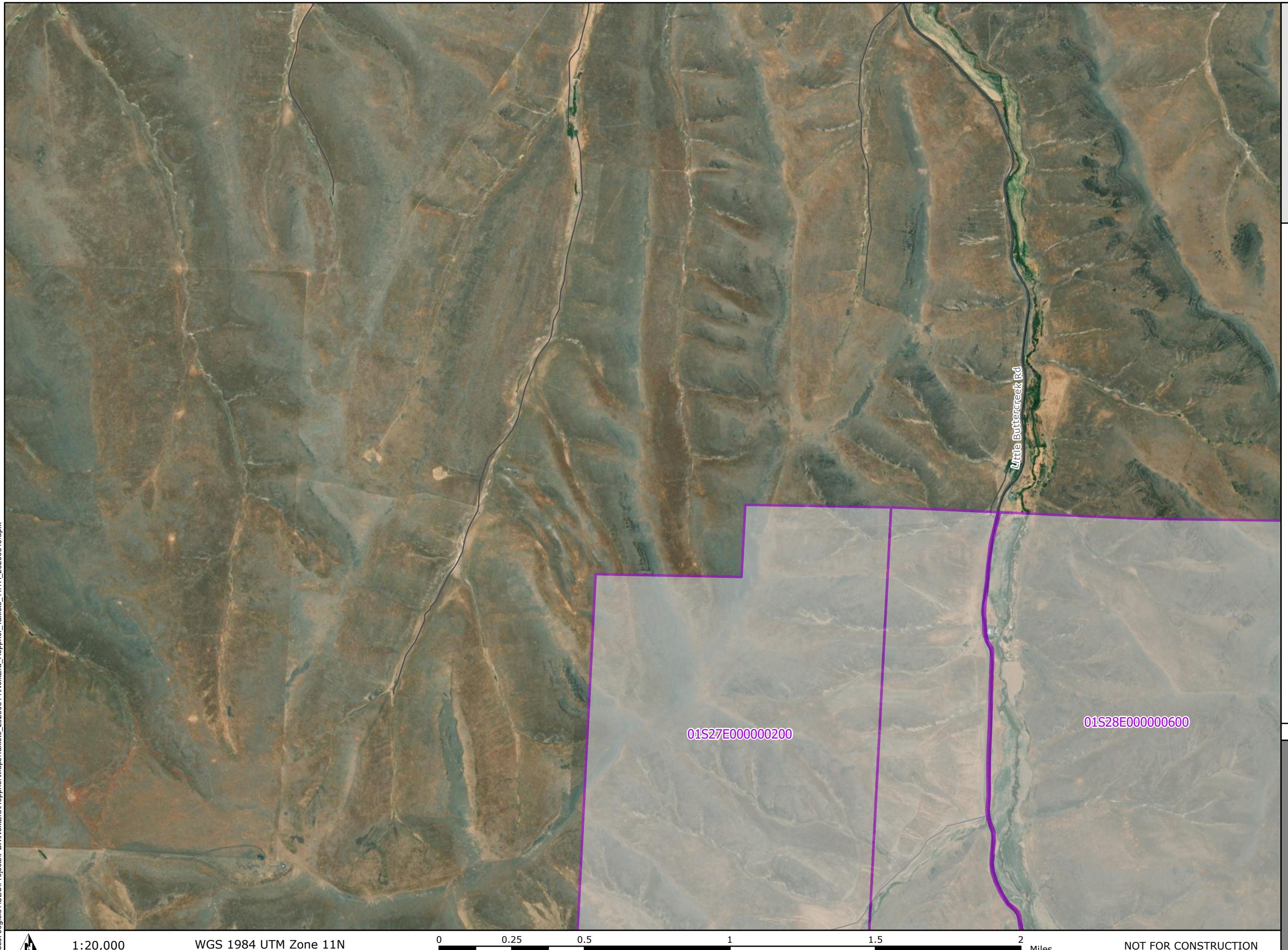
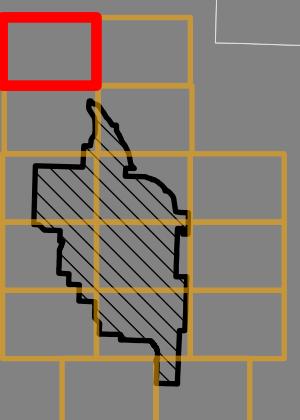
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



**Heppner
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**Attachment 2
Figure 1.2
Tax lots Boundary
Detail Map**

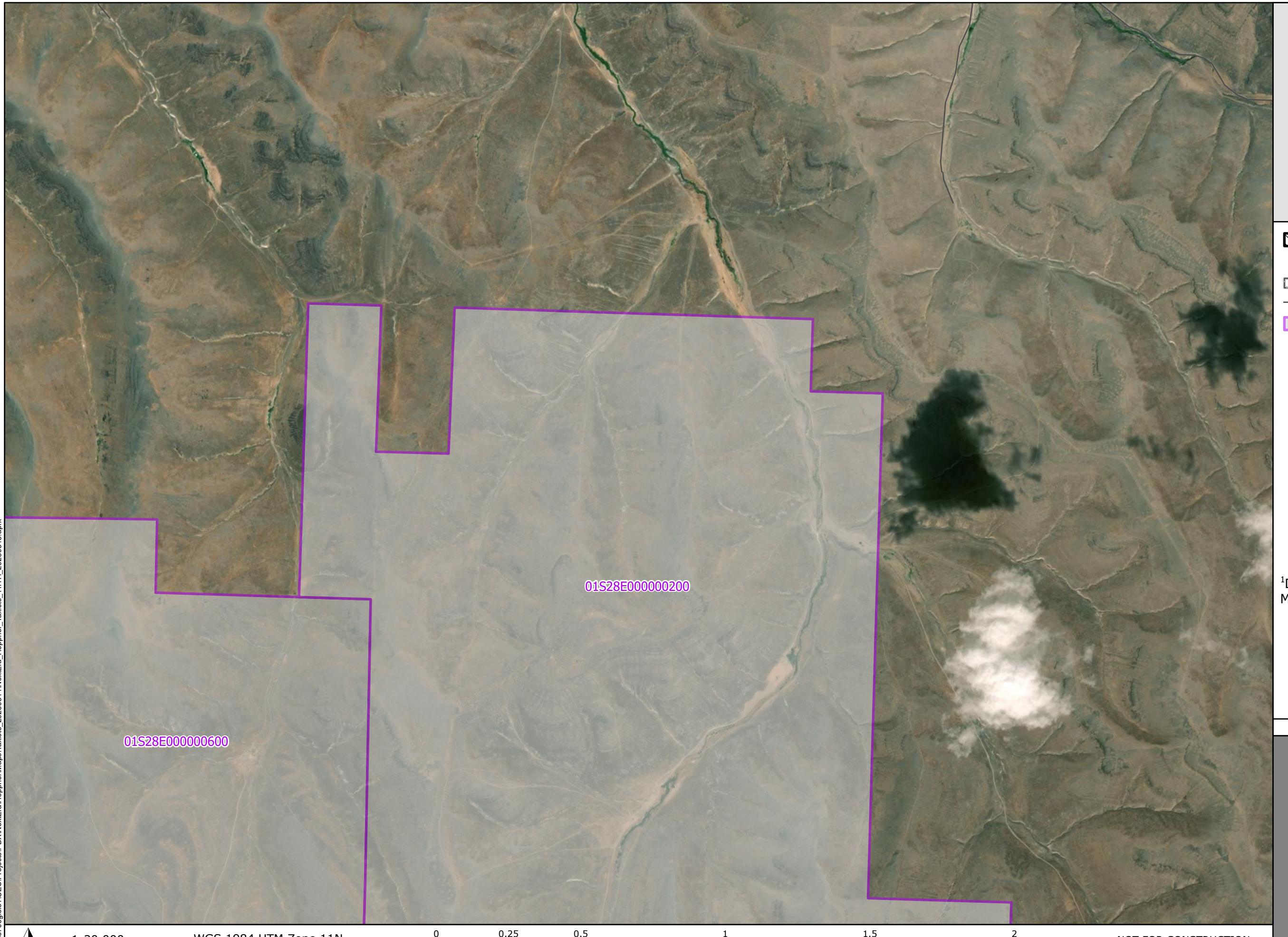
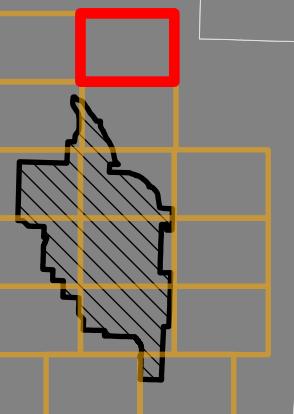
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



Heppner Wind Project

Attachment 2 Figure 1.3 Tax lots Boundary Detail Map

MORROW COUNTY, OR

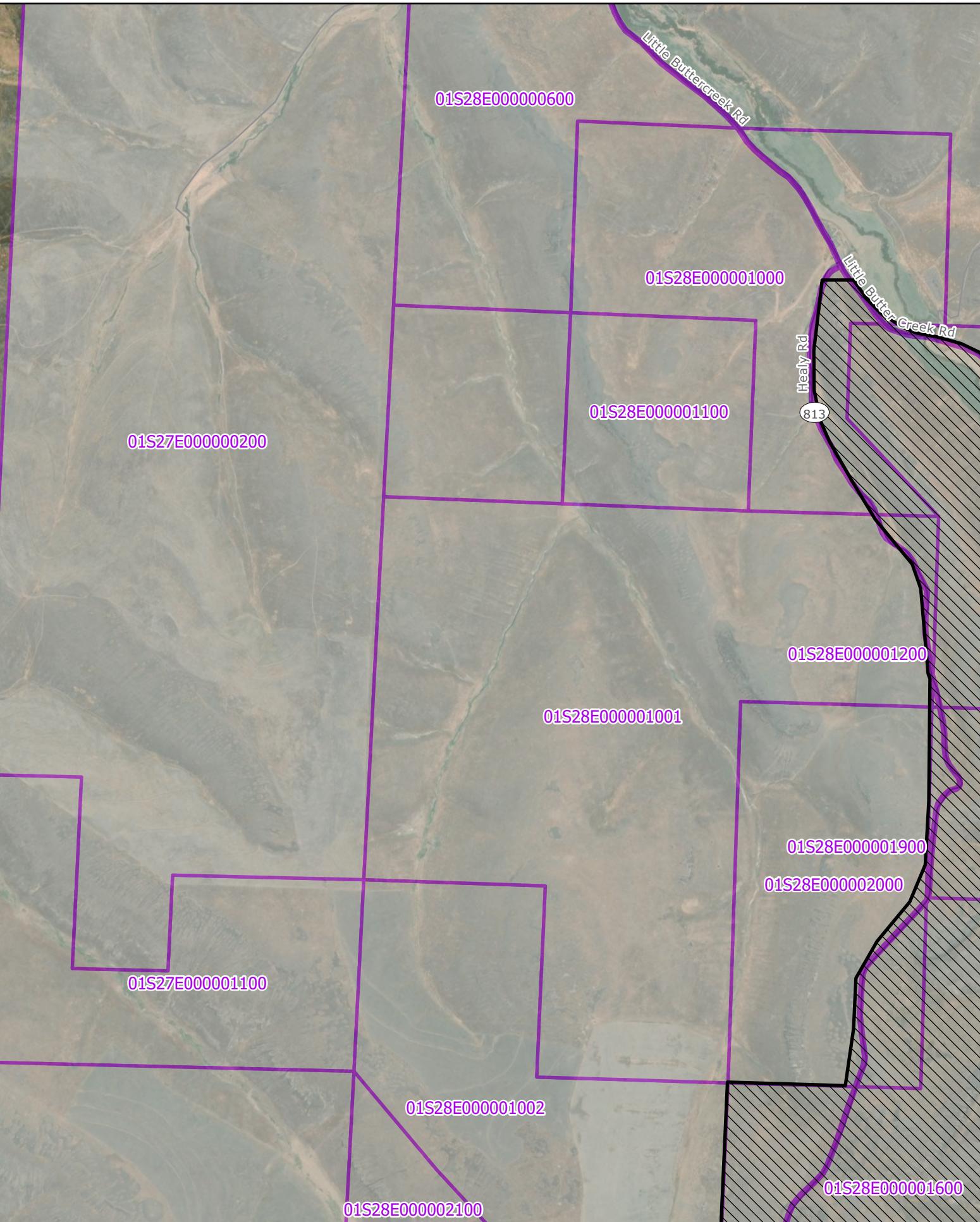
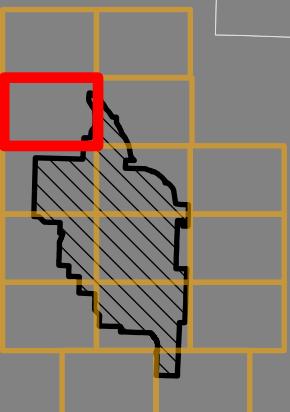
- Facility Site Boundary
- City/Town
- County Boundary
- County Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025

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NOT FOR CONSTRUCTION

**Heppner
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**Attachment 2
Figure 1.4
Tax lots Boundary
Detail Map**

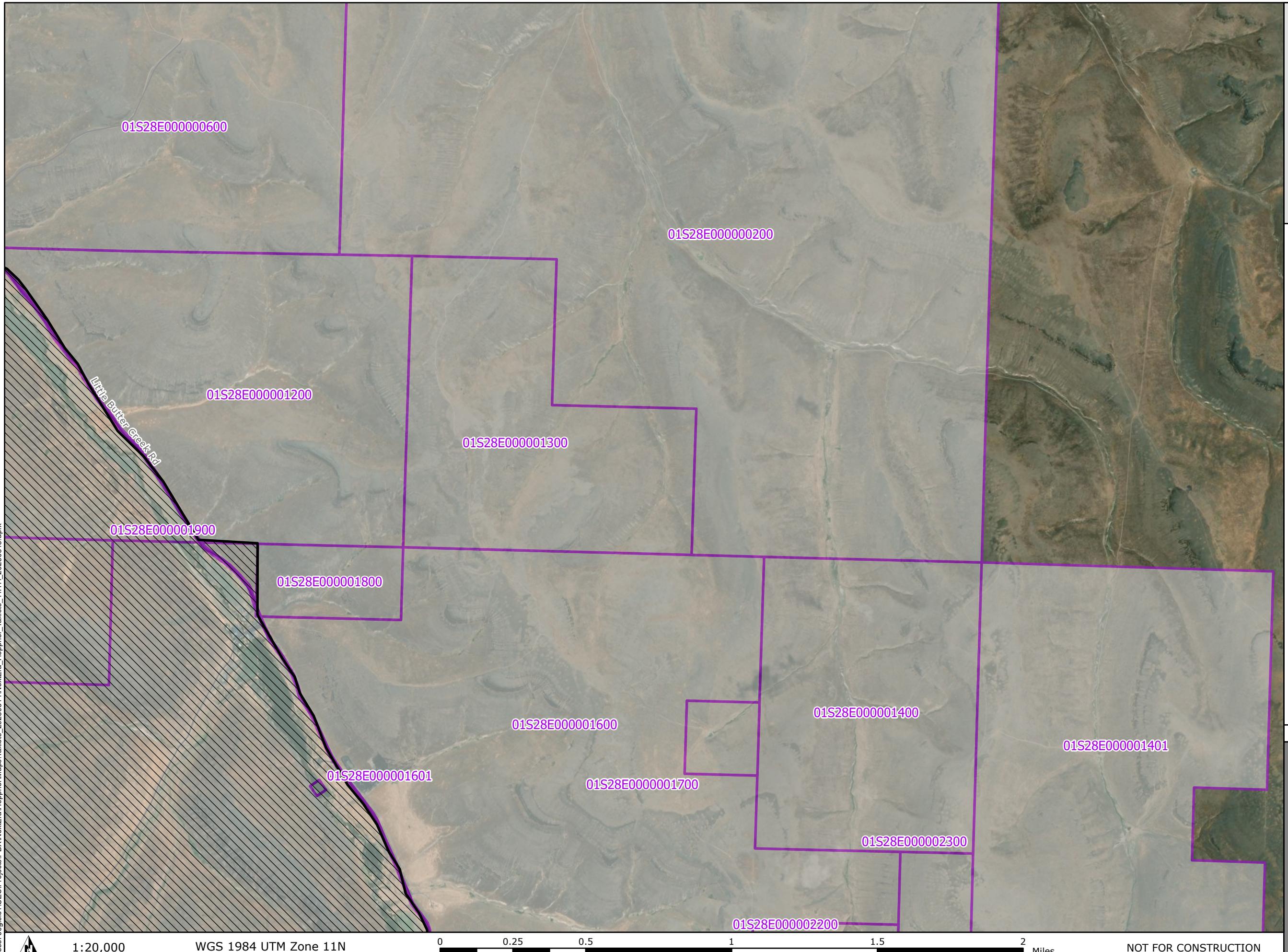
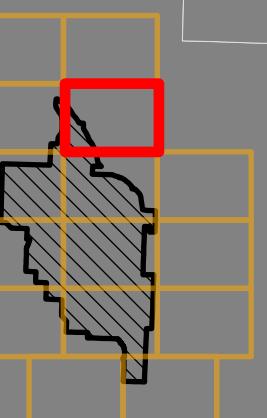
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



1:20,000

WGS 1984 UTM Zone 11N

0 0.25 0.5

1 1.5

2 Miles

NOT FOR CONSTRUCTION

Heppner Wind Project

Attachment 2 Figure 1.5 Tax lots Boundary Detail Map

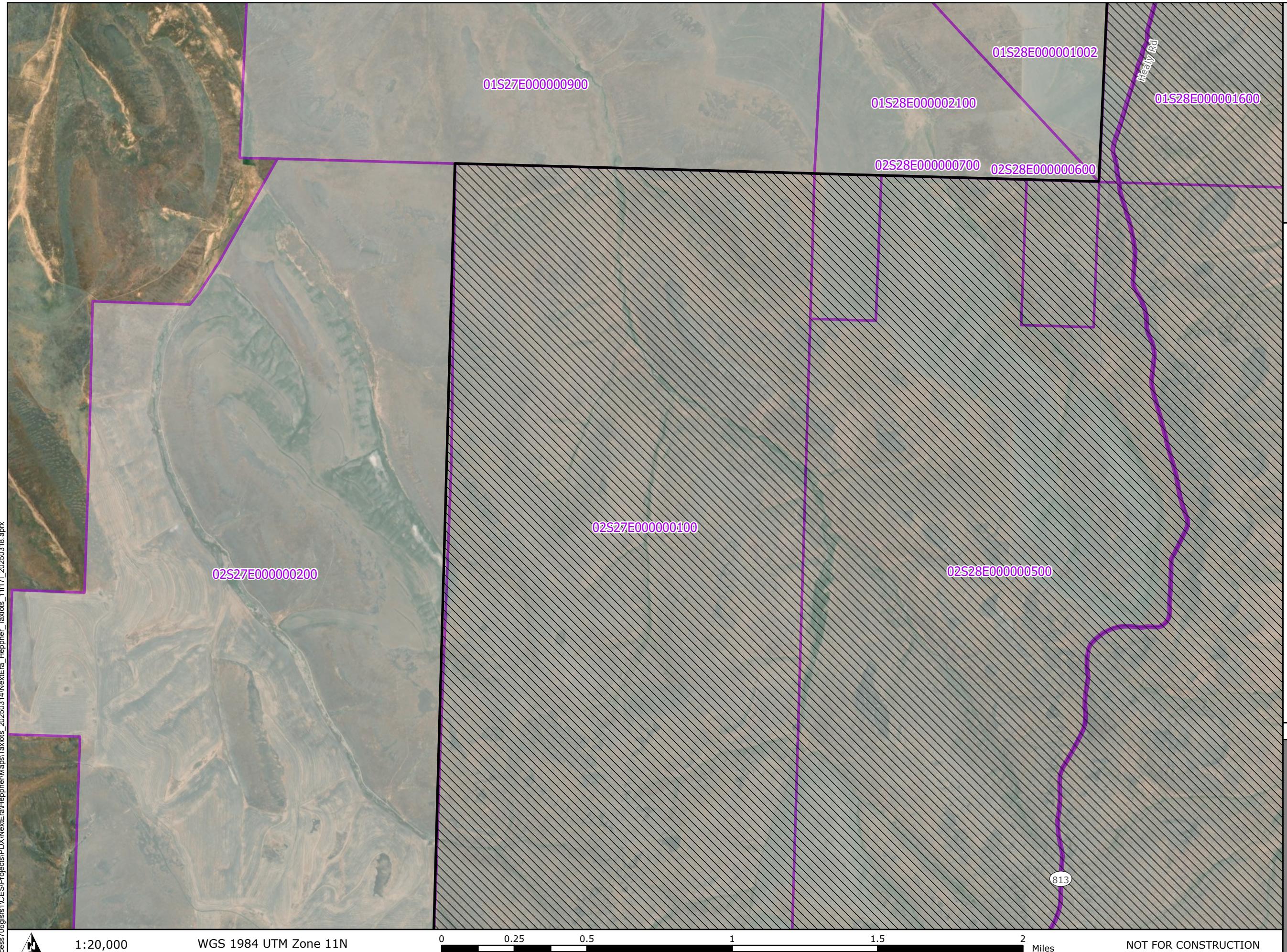
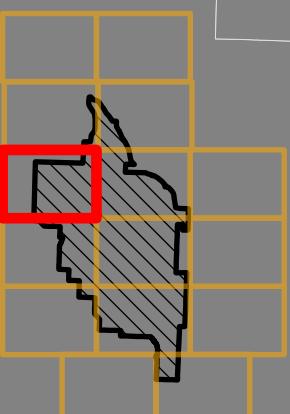
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- County Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



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Attachment 2 Figure 1.6 Tax lots Boundary Detail Map

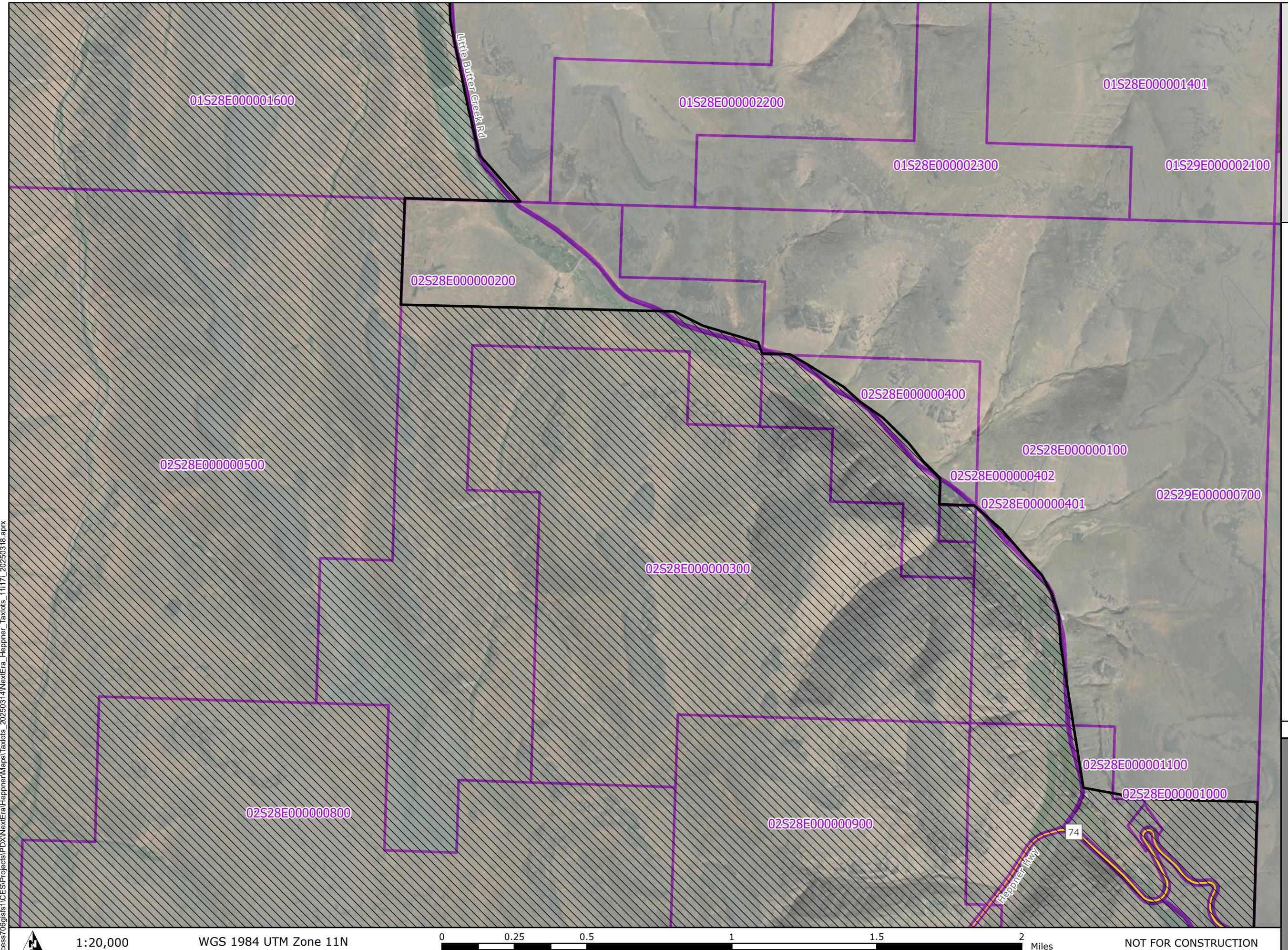
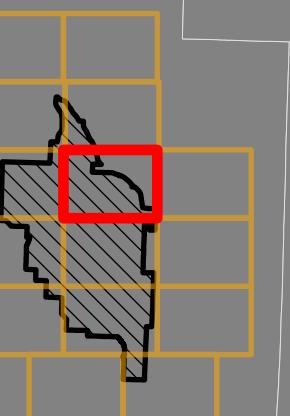
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



**Heppner
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**Attachment 2
Figure 1.7
Tax lots Boundary
Detail Map**

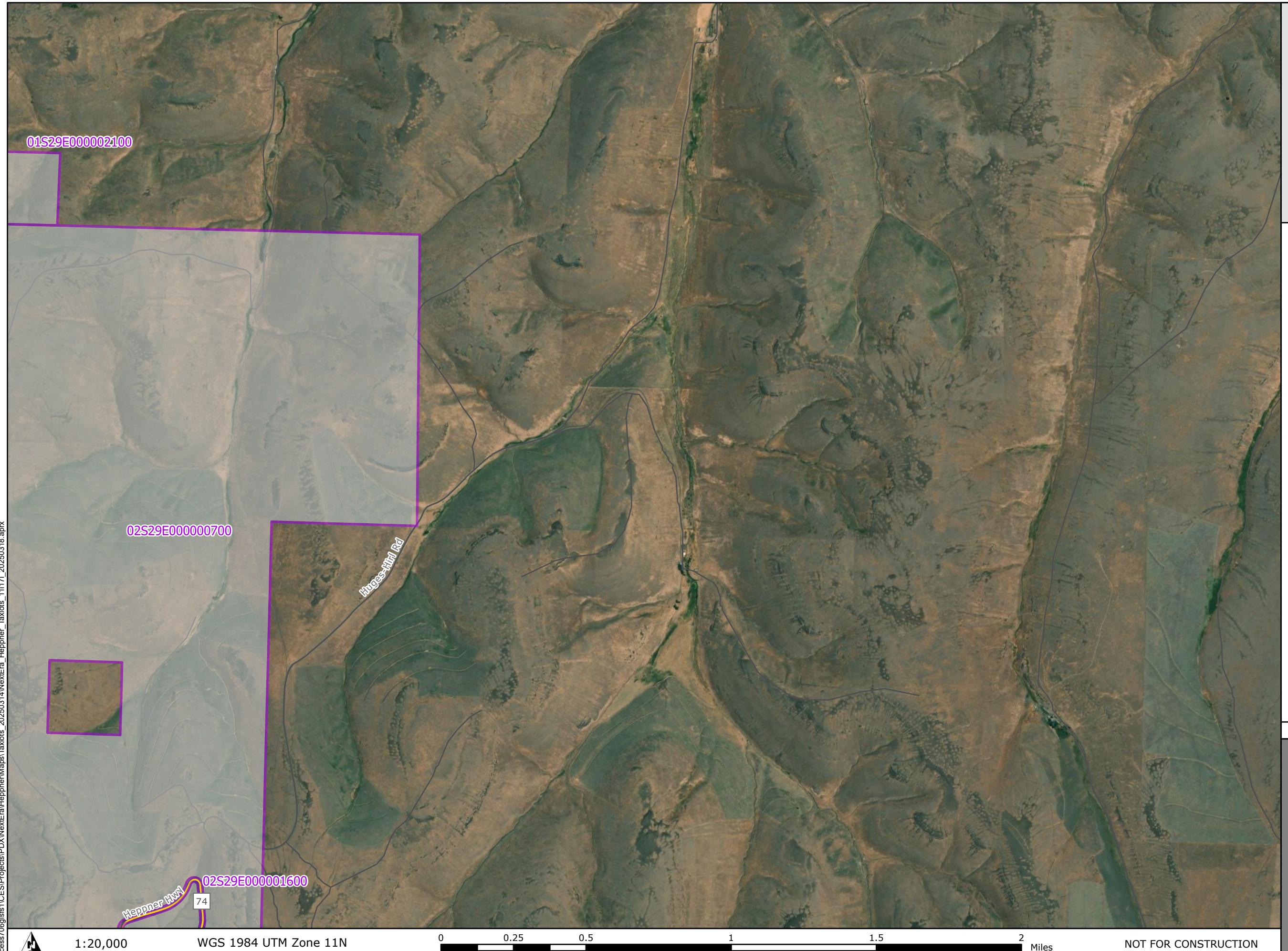
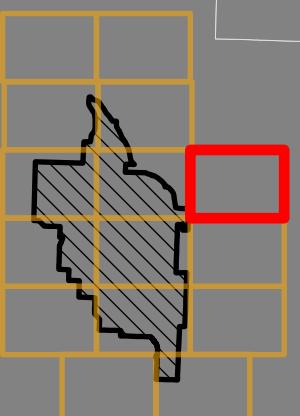
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025

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Heppner Wind Project

Attachment 2 Figure 1.8 Tax lots Boundary Detail Map

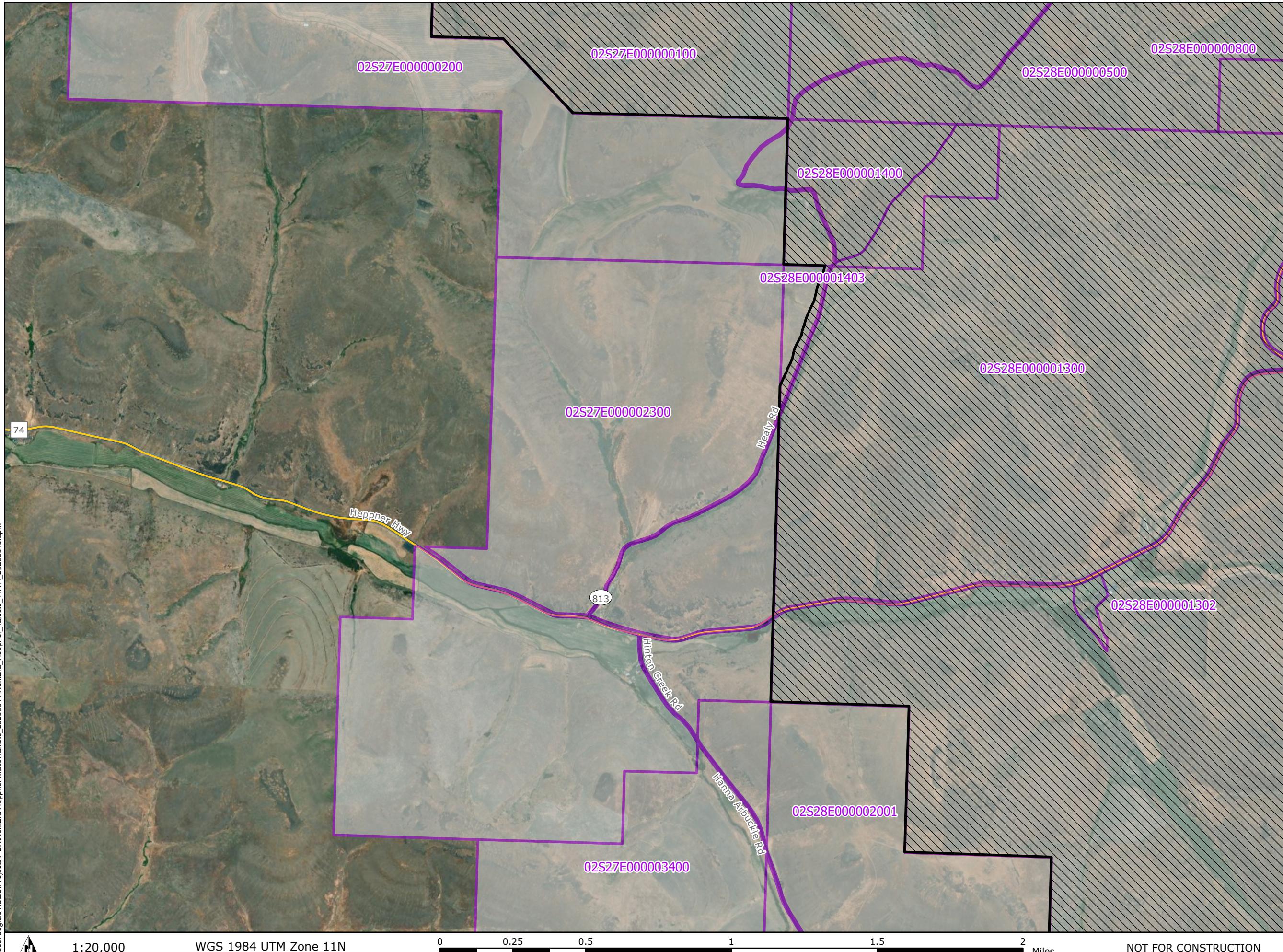
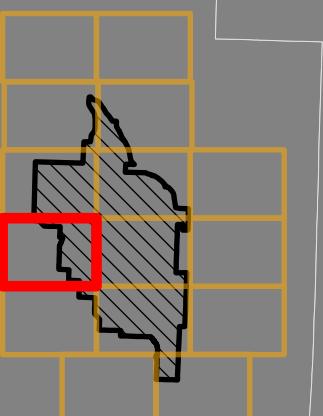
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- County Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



Heppner Wind Project

Attachment 2 Figure 1.9 Tax lots Boundary Detail Map

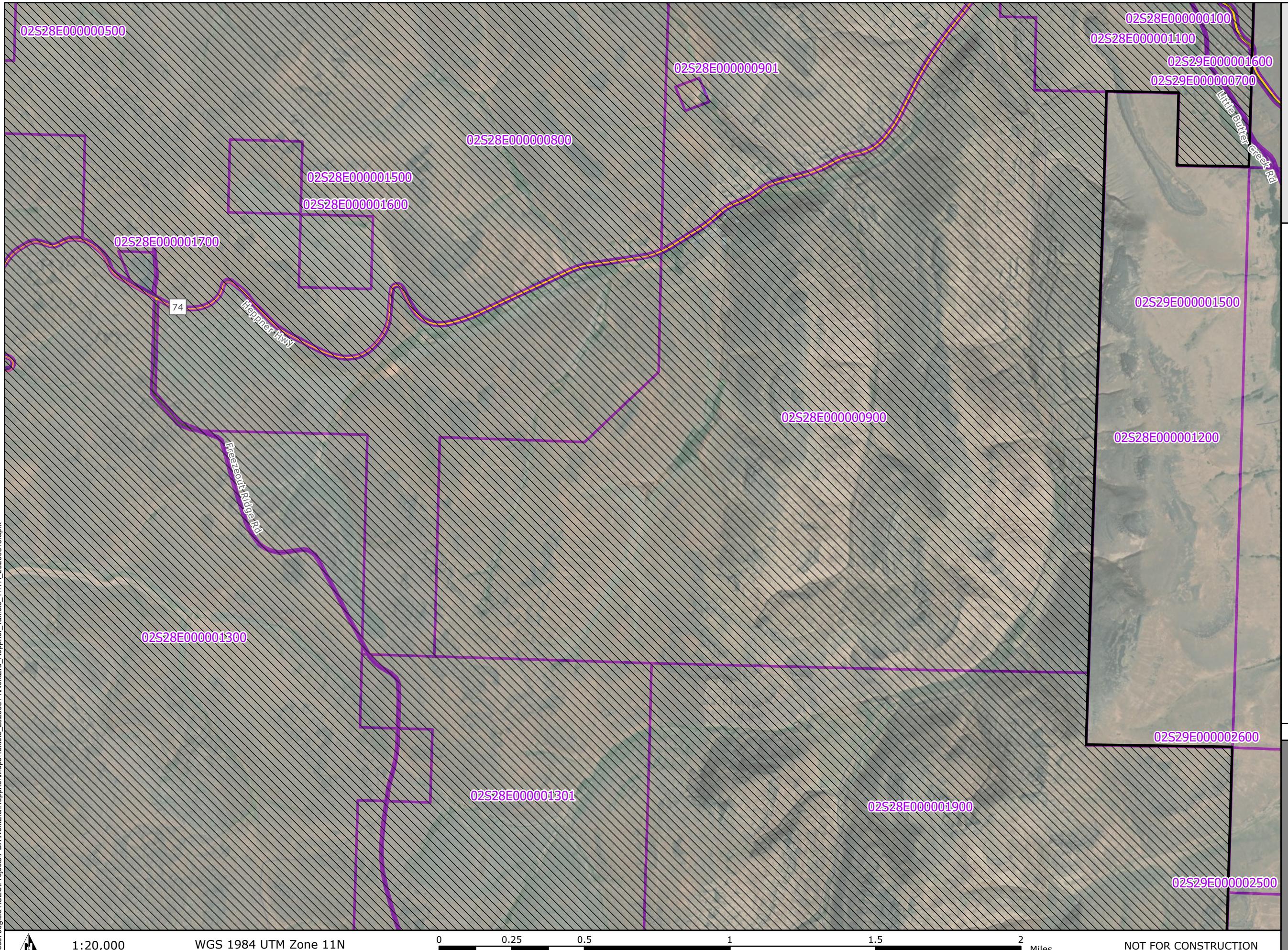
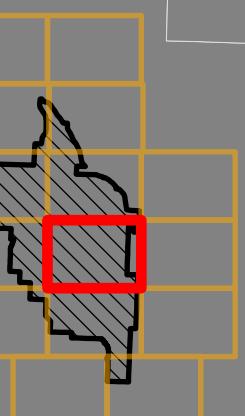
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025



Reference Map



Heppner Wind Project

Attachment 2 Figure 1.10 Tax lots Boundary Detail Map

MORROW COUNTY, OR

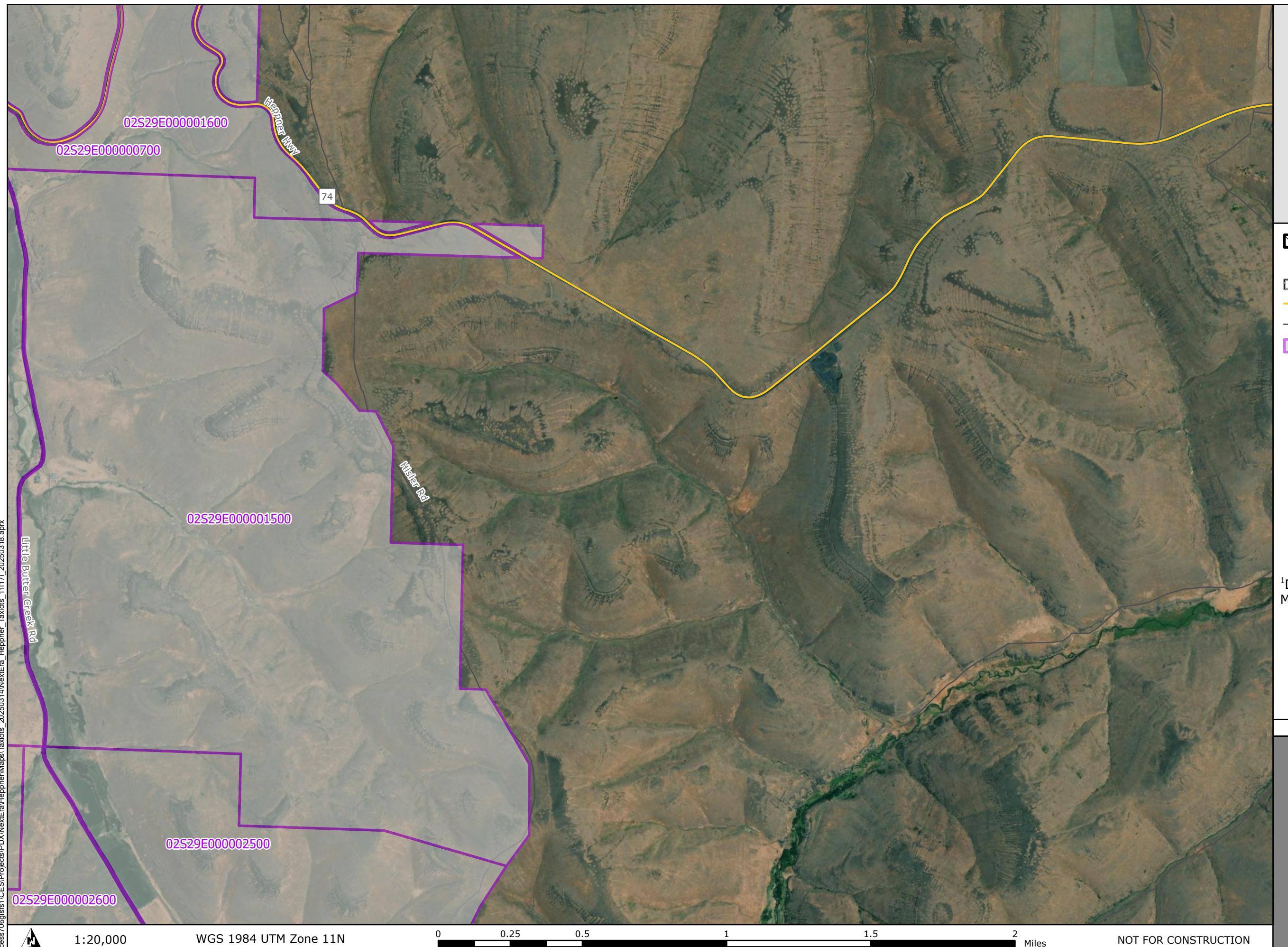
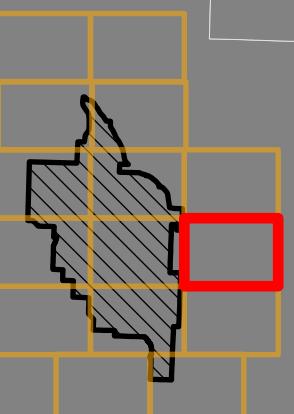
- Facility Site Boundary
- City/Town
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025

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Heppner Wind Project

Attachment 2 Figure 1.11 Tax lots Boundary Detail Map

MORROW COUNTY, OR

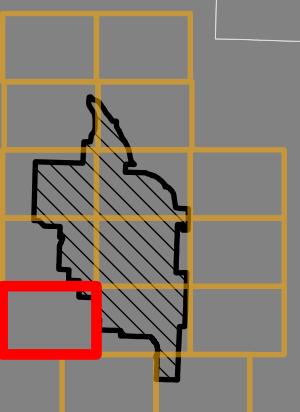
- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
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Attachment 2 Figure 1.13 Tax lots Boundary Detail Map

MORROW COUNTY, OR

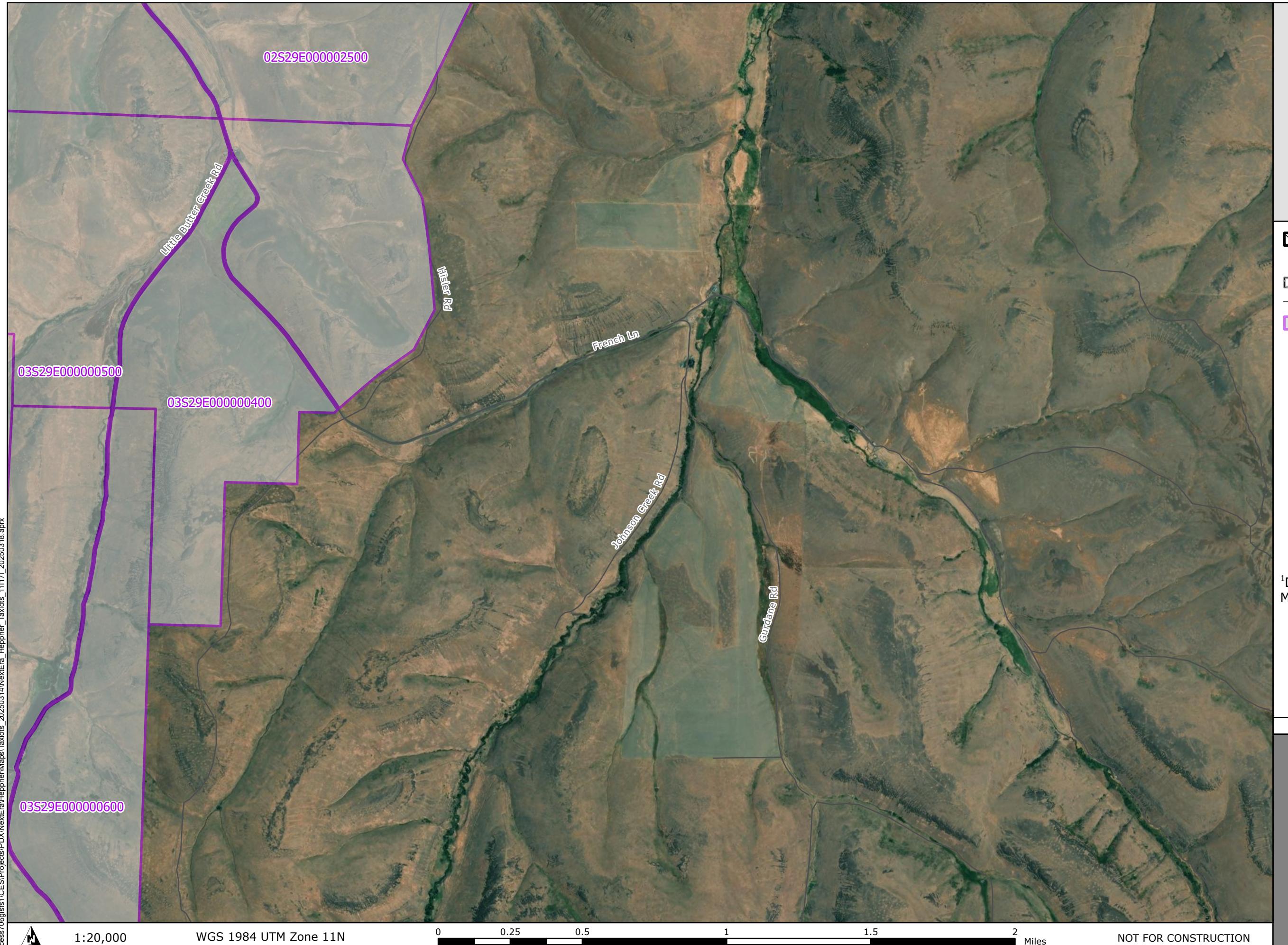
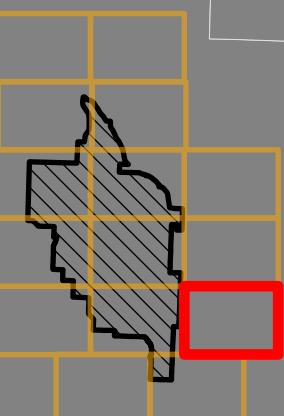
- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025

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Heppner Wind Project

Attachment 2 Figure 1.14 Tax lots Boundary Detail Map

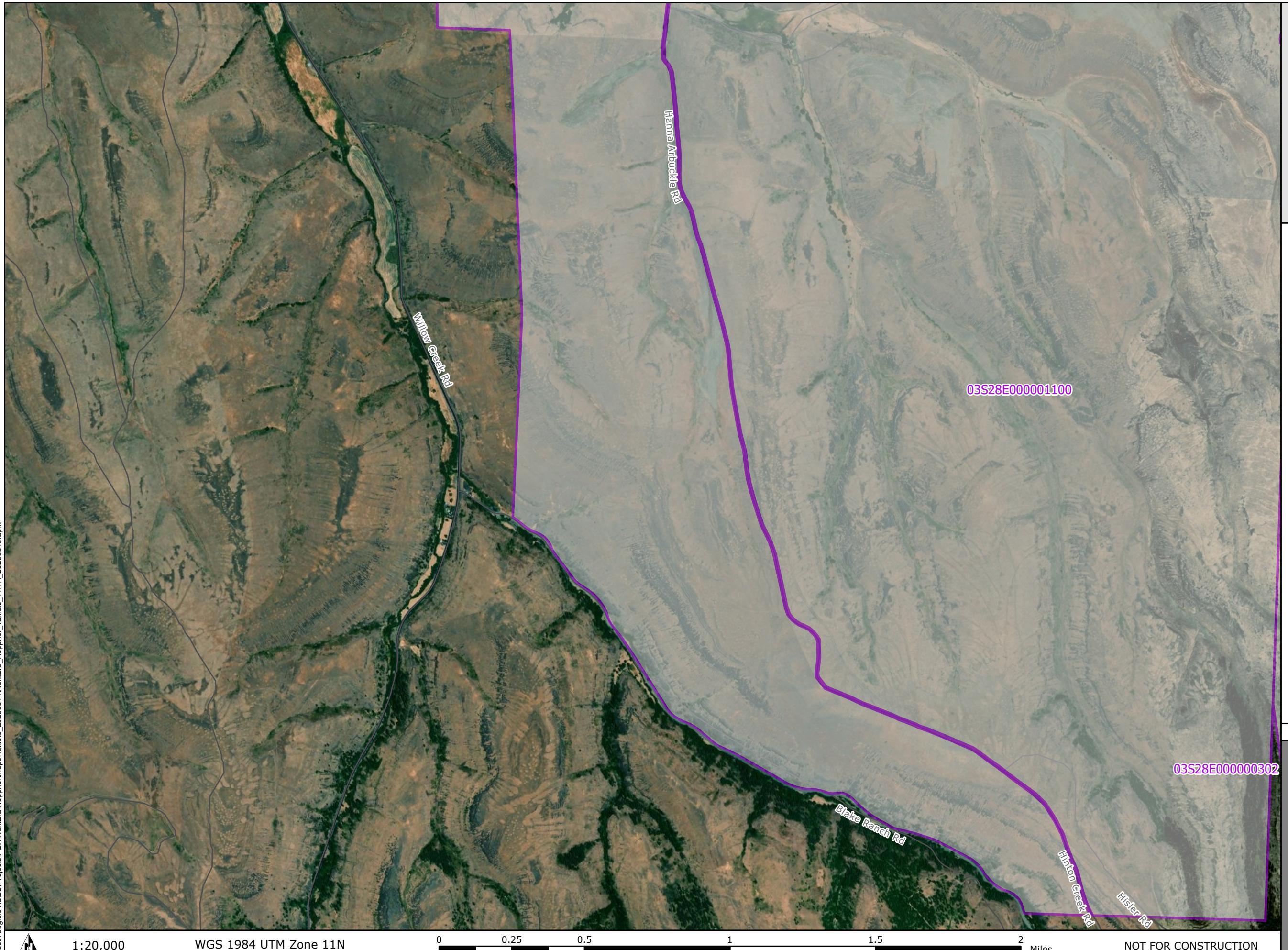
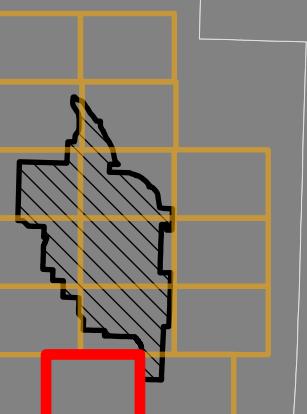
MORROW COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025

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Heppner Wind Project

Attachment 2 Figure 1.15 Tax lots Boundary Detail Map

MORROW COUNTY, OR

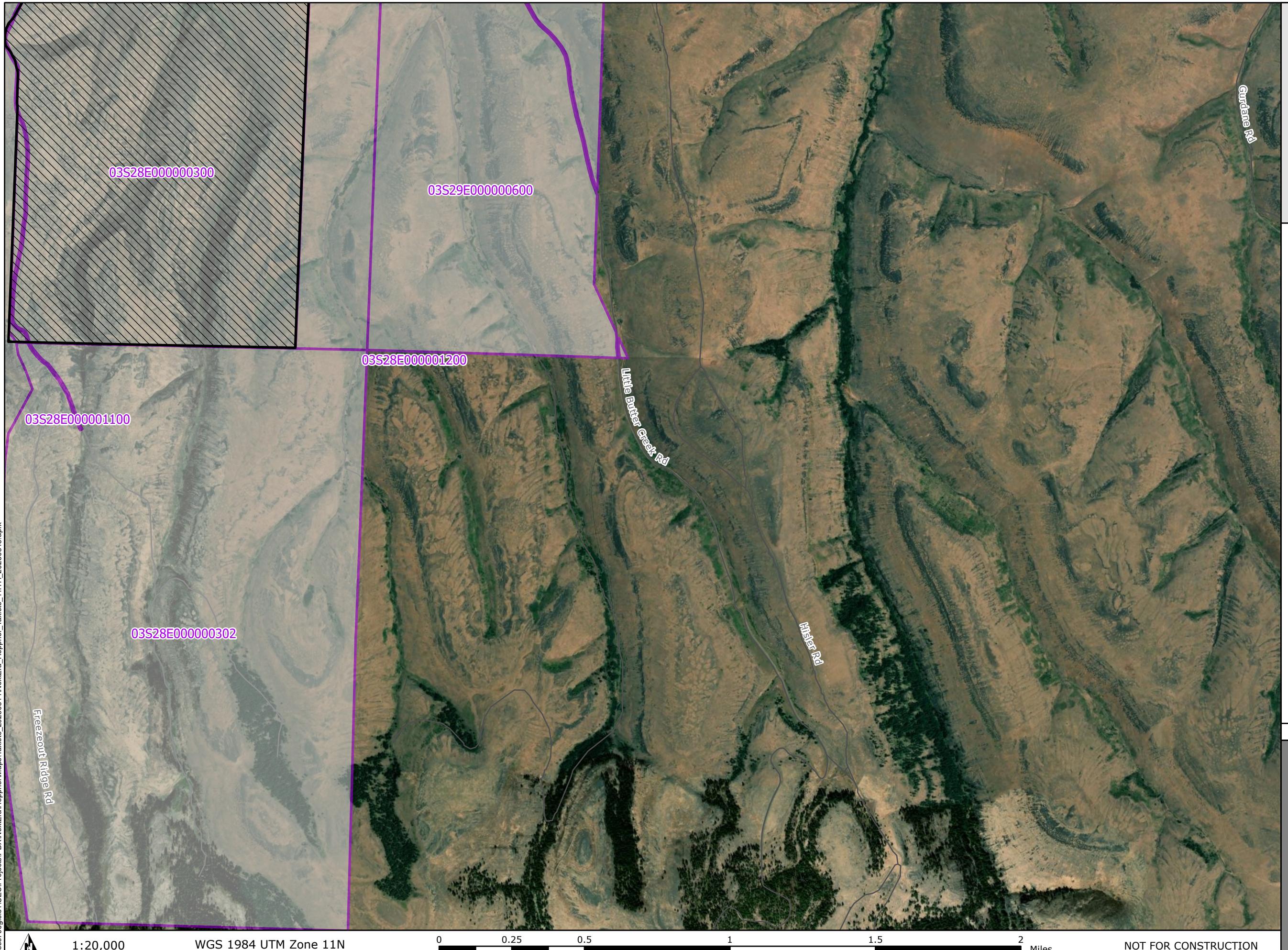
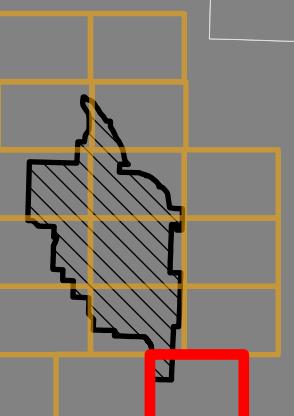
- Facility Site Boundary
- City/Town
- County Boundary
- Local Roads
- Taxlot Boundary¹

¹Data received from
Morrow County 03/06/2025

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Notice of Intent to Apply for a Site Certificate

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Attachment 3. Correspondence with Legislative Commission on Indian Services

From: [Bullion Elissa](#)
To: [King, Erin](#)
Cc: [Frayler, Katie](#)
Subject: RE: Request for Tribal Contact List - Proposed Heppner Wind Project
Date: Thursday, May 16, 2024 10:34:18 AM
Attachments: [image005.jpg](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

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

Good morning Erin,

Thanks for reaching out. For this project area in Morrow Co., I recommend contacting the following Tribes:

Burns Paiute Tribe

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of Warm Springs Reservation of Oregon

Contact information for culture and heritage Tribal staff can be found on our website: [Commission on Indian Services archaeology \(oregonlegislature.gov\)](#).

Please let me know if you have any questions.

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: King, Erin <Erin.King@tetrtech.com>
Sent: Thursday, May 16, 2024 9:59 AM
To: Bullion Elissa <Elissa.Bullion@oregonlegislature.gov>; LCIS <LCIS@oregonlegislature.gov>

Cc: Frayler, Katie <Katie.Frayler@nexteraenergy.com>

Subject: Request for Tribal Contact List - Proposed Heppner Wind Project

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

Hello –

This email is to request from LCIS a list of tribes to contact regarding the proposed Heppner Wind Project in Morrow County, Oregon. The project is in the planning phases ahead of field surveys and is anticipated to require a Site Certificate from the Oregon Energy Facility Siting Council. The proposed area of the project is located on private lands east of Heppner in the legal locations listed below. A location map is attached.

- Township 1 South/Range 28 East: Sections 17, 20-21, 28-29, and 32-24
- Township 2 South/Range 27 East: Sections 1-2 and 11-14
- Township 2 South/Range 28 East: Sections 2-36
- Township 3 South/Range 28 East: Sections 1-5, 9-14, and 23-24

Thank you for your time.

Erin King

Erin King, MA, RPA | Principal Archaeologist – Pacific Northwest

Direct **+1 (612) 643-2227** | Mobile **+1 (916) 502-6044** | erin.king@tetrtech.com

Pronouns: she, her, hers

PLEASE NOTE: My working hours may be different than yours. Please do not feel obligated to respond outside of your normal work schedule. (Minneapolis Based | Time Zone: Central)

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2001 Killebrew Drive, Suite 141 | Bloomington, Minnesota 55425 | tetrtech.com | GSA Contract: 47QRRAA18D00H0

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Notice of Intent to Apply for a Site Certificate

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