



Oregon

Tina Kotek, Governor



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To: Oregon Energy Facility Siting Council

From: Sarah Esterson, Senior Policy Advisor

Date: July 18, 2025

Subject: Leaning Juniper IIB Wind Power Facility – Annual Monitoring for Wildlife Monitoring and Mitigation Plan (Condition 87)

Attachments: Amended Wildlife Monitoring and Mitigation Plan (March 8, 2024)
2024 Annual Wildlife Monitoring Results Extracted from April 30, 2025 Annual Report

Purpose

The Oregon Department of Energy (Department) prepared this staff report for the Energy Facility Siting Council to summarize the results of ongoing wildlife monitoring and results at Leaning Juniper IIA Wind Power Facility. The Department is required to make available the actual results and allow for public comment. This staff report supports both Council and the public's understanding of the results and of their opportunity to review and comment.

Wildlife Monitoring and Mitigation Plan Overview

Leaning Juniper IIB Wind Power Facility is a wind energy generation facility consisting of 74 wind turbines, with a peak generating capacity of 111 megawatts (MW). The facility is in Gilliam County. The Council issued a site certificate for the facility in 2007.

Condition 87 of the site certificate states that, "The certificate shall conduct wildlife monitoring as described in the Wildlife Monitoring and Mitigation Plan (WMMP) that is incorporated in the Final Order on Amendment #3 for LJF as Attachment I and as amended from time to time."

The WMMP requires that the certificate holder implement short- and long-term wildlife monitoring during facility operation. Short-term wildlife monitoring requirements included a 2-year post construction Bird and Bat Fatality Monitoring Program and a Grassland Bird Study; these wildlife monitoring activities were completed in 2012-13. On-going long-term wildlife monitoring requirements include:

- Washington Ground Squirrel Surveys (Every 3-years for operational life of facility; 2014, 2017, 2020, 2023, etc.)
- Long-Term Raptor Nesting and Burrowing Owl Surveys (Every 5-years for operational life of facility; 2015, 2020, 2025, etc.)

- Wildlife Monitoring and Reporting System (Ongoing)

Washington Ground Squirrel Surveys

The WMMP establishes that the certificate holder conduct long-term monitoring for areas of previous use by Washington Ground Squirrel (WGS). Washington ground squirrel monitoring occurs every 3 years after project operation and surveys were completed in 2014, 2017, 2021 and 2023.¹ In 2017, WGS activity was detected at two of the ten survey areas. In 2021, 76 WGS borrows were documented within two of the ten survey areas. In 2023, the monitoring was conducted from April through June. Approximately 34 ground squirrel burrows were documented within the Survey Area including 20 burrows at sites 16–17 and approximately 14 burrows at sites 22a–b and 24. The location and extent of WGS activity documented at LJIB in 2023 was like that recorded in 2017 but represents a 26% increase in area of use compared with the most recent 2021 surveys.

No additional WGS surveys were conducted in 2024. The next WGS survey will occur in 2026.

Raptor Nest Monitoring

The objectives of long-term raptor nest monitoring are to determine the size of breeding populations of raptor species in the vicinity of the facility, with a focus on Swainson’s hawk, golden eagle, ferruginous hawk and burrowing owl; and, to determine whether facility operations have resulted in a reduction in nest use or nest success on local populations of these species. Results of the long-term raptor nest monitoring are presented in Table 1b below.

Table 1b. Results of 2011, 2015, 2020, and 2021 raptor nest surveys at the Leaning Juniper IIB Wind Project, Gilliam County, Oregon. Results provided at two spatial scales: 0.5 miles (mi) and 2.0 mi from permit boundary.

| Species | 2011 | | 2015 | | 2020 | | 2021 | |
|----------------------------------|---------------|-------------|---------------|-------------|---------------|-------------|---------------|-------------|
| | Within 0.5 mi | Within 2 mi | Within 0.5 mi | Within 2 mi | Within 0.5 mi | Within 2 mi | Within 0.5 mi | Within 2 mi |
| Golden eagle | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ferruginous hawk | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| Swainson’s hawk | 9 | 20 | 7 | 14 | 7 | 21 | 8 | 25 |
| Red-tailed hawk | 6 | 14 | 4 | 6 | 3 | 7 | 5 | 15 |
| Burrowing owl | 0 | 1 | 0 | 0 | - | - | 0 | 0 |
| Peregrine falcon | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Prairie falcon | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Great horned owl | 2 | 3 | 0 | 0 | 1 | 5 | 2 | 6 |
| Barn owl | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Active Raptor Nests | 18 | 41 | 12 | 21 | 12 | 34 | 16 | 47 |
| Common raven | 2 | 7 | 6 | 13 | 7 | 23 | 10 | 33 |
| Inactive nest | 1 | 2 | 4 | 6 | 7 | 28 | 5 | 19 |
| Total Nests | 21 | 50 | 22 | 40 | 26 | 85 | 31 | 99 |

¹ Surveys did not occur in 2020 due to survey disruptions related to COVID-19 travel restrictions in the spring of 2020.

As presented above, during the 2021 aerial raptor nest survey, 99 total nest sites were recorded, 47 of which were active raptor nests including ferruginous hawk and Swainson's hawk.

The overall number of raptor nests increased between 2011 to 2021, from 41 to 47. Results indicate generally stable numbers of active nests for all raptor species, both at the 0.5-mile and 2-mile spatial scales. No real pattern has developed thus far among raptor species. Common raven nesting has increased over time. The next raptor nest and burrowing owl surveys will occur in 2025.

Wildlife Monitoring and Reporting System

Monitoring requirements for this facility include the ongoing Wildlife Monitoring and Reporting System, a program for responding to and handling avian and bat casualties found by personnel at the site during routine maintenance operations. The certificate holder is obligated to notify USFWS and ODFW if federal or state endangered or threatened species are killed or injured onsite.

During operations in 2024, operations recorded an incidental observation of wildlife fatality of a common raven near one of the facility's power poles.

Public Comments on Wildlife Monitoring Results

Section 5 of the WMMP, Data Reporting, establishes an opportunity for the public to review and comment on monitoring results. Specifically, the WMMP states, "The public will have an opportunity to receive information about monitoring results and to offer comment. Within 30 days after receiving the annual report of monitoring results, the Department will make the report available to the public on its website and will specify a time in which the public may submit comments to the Department."

The Department received the annual monitoring results for the facility on April 30, 2025. In accordance with the terms of the WMMP, the Department provides a copy of the 2024 monitoring results for the Leaning Juniper IIB Wind Power Facility to the Council for review (attached) and posted a copy to the Department's project website at: <http://www.oregon.gov/energy/facilities-safety/facilities/Pages/LJB.aspx> and has established 30-day timeframe to accept public comments.

Comments are due within 30-days of posting, or **August 18, 2025 at 5:00 p.m.** and may be submitted to Sarah Esterson at sarah.esterson@energy.oregon.gov

Attachment 1:

**Amended Wildlife Monitoring and Mitigation Plan
(March 8, 2024)**

Leaning Juniper IIA and IIB Wind Projects: Ongoing Wildlife Monitoring and Mitigation Plan

[NOVEMBER 6, 2015] AMENDED MARCH 2024

This Ongoing Wildlife Monitoring and Mitigation Plan (the Plan) describes wildlife monitoring that the certificate holders shall conduct during operation of the Leaning Juniper IIA and IIB Wind Power Facilities.¹ The ongoing monitoring objectives are to determine whether the facility causes significant fatalities of birds and bats and to determine whether the facility results in a loss of habitat quality.

Following Amendment 2 of the original Leaning Juniper II Wind Power Facility site certificate, the single facility was divided into two separate facilities, with LJIIA and LJIIB each receiving its own site certificate. However, the site certificate holders agreed to share mitigation and environmental responsibilities. Therefore, the requirements for the facility as a whole, including both LJIIA and LJIIB, remain in this Wildlife Monitoring and Mitigation Plan (WMMP) and each individual site certificate holder remains bound by its terms.

Collectively, LJIIA and LJIIB ('the Facilities' or 'LJIIA/B') consists of 117 wind turbines, four non-guyed meteorological (met) towers and other related or supporting facilities as described in the site certificate. The permanent facility components occupy approximately 111 acres, of which up to 52 acres is Category 5 wildlife habitat or better, based on the Oregon Department of Fish and Wildlife (ODFW) standards (OAR 635-415-0025).²

Each certificate holder shall use experienced personnel to implement the ongoing monitoring required under this plan and properly trained personnel to conduct the monitoring, subject to approval by the Oregon Department of Energy (Department) as to professional qualifications. For all components of this plan except the Wildlife Monitoring and Reporting System (WMRS), each certificate holder shall hire an independent third party (not employees of the certificate holder) to perform monitoring tasks.

The Wildlife Monitoring and Mitigation Plan for the Facilities originally included the following components:

- 1) Fatality monitoring program including: (completed, Downes et al. 2013)
 - a) Removal trials
 - b) Searcher efficiency trials
 - c) Fatality search protocol
 - d) Statistical analysis
- 2) Raptor nesting surveys (ongoing)
- 3) Washington ground squirrel surveys (ongoing)
- 4) Grassland bird study (completed, Downes and Gritski 2014)

¹ This plan is incorporated by reference in the site certificate for the LJI and must be understood in that context. It is not a "stand-alone" document. This plan does not contain all mitigation required of the certificate holders.

² A more complete description of the habitat areas affected by the Facilities, LJIIA and LJIIB, is provided in the Final Order on Amendment #1, Section IV.4(b), which expanded the site boundary to include LJIIB.

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5) Wildlife Monitoring and Reporting System (ongoing)

Since the original Wildlife Monitoring and Mitigation Plan was adopted on November 20, 2009 (and updated in June 21, 2013), the requirements of (1) and (4) and the initial requirements of (2), (3), (5), and (6) above have been completed, as reflected and described in this Plan. This Plan reflects the ongoing, long-term monitoring and mitigation requirements for raptor nesting surveys (Section 2), Washington ground squirrel surveys (Section 3), and the Wildlife Monitoring and Reporting System (Sections 5 and 6). Section 8, Literature Cited, was added to provide references and sources for completed requirements of the Plan.

Based on the results of the monitoring programs, mitigation of significant impacts may be required. The selection of the mitigation actions should allow for flexibility in creating appropriate responses to monitoring results that cannot be known in advance. If the Department determines that mitigation is needed, the certificate holders shall propose appropriate mitigation actions to the Department and shall carry out mitigation actions approved by the Department, subject to review by the Oregon Energy Facility Council (Council).

1. Fatality Monitoring

The certificate holders conducted two years of post-construction fatality monitoring following substantial completion or commercial operations date (COD) of the Facilities reflecting operating impacts on wildlife. The results of the post-construction fatality monitoring are presented in Downes et al. (2013).

2. Raptor Nest Surveys

The objectives of raptor nest surveys are: (1) to estimate the size of the local breeding populations of raptor species that nest on the ground or aboveground in trees or other aboveground nest locations in the vicinity of the facility; and (2) to determine whether operation of the facility results in a reduction of nesting occupancy in the local populations of the following raptor species: Swainson's hawk, golden eagle, ferruginous hawk and burrowing owl. For each phase of LJIIA/B, the certificate holder conducted the first year of post-construction raptor nest surveys in 2011 (Downes et al. 2012), the first raptor nesting season after construction of that phase was completed. The second year of surveys was done in 2015 with results presented in Gerhardt and Kronner (2015). Hereafter, the certificate holders shall conduct long-term raptor nest surveys as described below and summarized in Section 2(d). The certificate holder will share the data with state and federal biologists

(a) Survey Protocol

- *For Raptor Species that Nest Aboveground*

During long-term survey years, each certificate holder shall use aerial and ground surveys to evaluate nest occupancy by gathering data on active nests. Each certificate holder will conduct aerial surveys to determine nest occupancy in late-

May or early June within the site and a 2-mile buffer around the site (as identified in Downes et. al., 2012, Leaning Juniper II Wildlife Monitoring Report for 2011–2012). Two helicopter visits to each nest may be required to determine occupancy. These surveys may be coordinated with adjacent wind facilities. All nests discovered during pre-construction surveys and any nests discovered during post-construction surveys, whether active or inactive, will be given identification numbers. Nest locations will be recorded on U.S. Geological Survey 7.5-minute

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quadrangle maps. Global positioning system coordinates will be recorded for each nest. Locations of inactive nests will be recorded because they could become occupied during future years. Nests that cannot be monitored due to the landowner denying aerial or ground access will be checked from a distance where feasible.

For Burrowing Owls The certificate holders monitored burrowing owl nests in 2011 and in 2015 (Downes et al. 2012, Gerhardt and Kronner 2015). Hereafter, each certificate holder will survey burrowing owl nest sites discovered during pre- and post-construction surveys (as identified in Downes et al., 2012, Leaning Juniper II Wildlife Monitoring Report for 2011–2012) as a part of the long-term raptor nest monitoring program described above and in Section 2(d). Any nests discovered during future post-construction surveys, whether active or showing signs of intermittent use by the species will be given identification numbers and monitored. Nest locations will be recorded on U.S. Geological Survey 7.5-minute quadrangle maps. Global positioning system coordinates will be recorded for each nest site. Coordinates for ancillary burrows used by one nesting pair or a group of nesting pairs will also be recorded. Locations of inactive nests will be recorded because they could become occupied during future years.

(b) Analysis

For each phase of the facility, the certificate holders analyzed the raptor nesting data collected after two survey years to determine whether a reduction in nest occupancy has occurred in the vicinity of the facility (see Gerhardt and Kronner 2015).~~–~~The number of nests and raptor species composition demonstrated natural variation within the typical range of the various species, between 2011 and 2015. The Swainson’s hawk nesting density continued to be high for a landscape dominated by natural habitats. Much of this variability can be attributed to natural conditions associated with precipitation levels, available prey base (voles, ground squirrels, and invertebrates), and interspecies (common raven) competition.

(c) Mitigation

The certificate holders shall propose mitigation for the affected species in consultation with the Department and ODFW and shall implement mitigation as approved by the Council (see Section 2(d)).

(d) Long-term Raptor Nest Monitoring and Mitigation Plan

In addition to the two years of post-construction raptor nest surveys described in Section 2(a), each certificate holder shall conduct long-term raptor nest surveys at five-year intervals for the life of the facility.³ The certificate holders shall conduct the first long-term raptor nest survey in 2020. In conducting long-term surveys, the certificate holders shall follow the same survey protocols as described above in Section 2(a) and in Gerhardt and Kronner (2015) unless the certificate holders propose an alternative protocol that is approved by the Department. In developing an alternative protocol, the certificate holders shall consult with ODFW.

³ As used in this plan, “life of the facility” means continuously until the facility site is restored and the site certificate is terminated in accordance with OAR 345-027-0110.

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Each certificate holder shall analyze the raptor nesting data collected after each year of long-term raptor nest surveys to determine whether a reduction in nest occupancy has occurred in the vicinity of the facility. If the analysis indicates a reduction in nest occupancy by Swainson's hawks, golden eagles, ferruginous hawks or burrowing owls within the facility site or within 2 miles of the facility site, then the certificate holders shall propose appropriate mitigation for the affected species as described in Section 2(a) and shall implement mitigation as approved by the Council. At a minimum, if the analysis shows that any raptors of these species have abandoned a nest territory within the facility site or within ½ mile of the facility site, the certificate holders shall assume the abandonment is due to operation of the facility unless another cause can be demonstrated convincingly.

Any reduction in nest occupancy could be due to operation of the facility, operation of another wind facility in the vicinity or some other cause, including changes in land use patterns after construction of the facility. The certificate holders shall attribute the reduction to operation of LJIIA/B if the wind turbine closest to the affected nest site is an LJIIA/B turbine unless the certificate holder demonstrates, and the Department agrees, that the reduction was due to a different cause.

Given the low raptor nesting densities in the area and the presence of other wind energy facilities nearby, statistical power to detect a relationship between distances from a wind turbine and nesting parameters (e.g., occupancy) will be very low. Therefore, impacts may have to be judged based on trends in the data, results from other wind energy facility monitoring studies and literature on what is known regarding the populations in the region.

3. Washington Ground Squirrel Surveys

For the LJIIA/B area, the certificate holders conducted surveys in 2011, the year following construction, and 2014 to collect data on Washington ground squirrel (WGS) activity within the lease boundary (Downes et al. 2012, 2014). A qualified professional biologist monitored the WGS sites in the facility identified during the pre-construction surveys (2005 through 2007) and the buffer area within 500 feet in all directions from the identified WGS sites in suitable habitat. The sites include the historic areas at LJIIA/B (as identified in Downes et al. 2012). Overall, WGS are active in the area but have shifted areas of occupancy from pre-construction boundaries.

Hereafter, the certificate holders shall conduct long-term WGS use surveys at LJII-A/B) every three years for the life of the facility (2017, 2020, 2023...). Post-construction WGS monitoring for the LJIIA/B areas will assess the status (occurrence) and use (extent) of colonies. Surveyors will conduct standard recording protocols (level of use, notes on natal sites and physical extent of the sites) during meandering pedestrian (40-60 m spacing) surveys of the identified sites and suitable habitat within 500 ft. buffer twice between late March and late May, during the active WGS periods. The biologist will also record incidental observations (including mapping and dates of observation) during other survey activities on the facility sites. These observations shall also include current land use and any land use or project-caused conditions (erosion, declines in vegetation quality) that may adversely affect WGS sites. This monitoring will be consistent with the Incidental Take Permit (ITP) application for LJIIA as set forth in Attachment E of the Final Order on the Application. These surveys may be coordinated

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with adjacent wind facilities to enhance data collection and analysis of WGS activity in the area.

4. Grassland Bird Study

The grassland bird study was a 2-year, post-construction evaluation of grassland bird use in the Facility area. Parts of the Facility occupy native habitat suitable for various ground-nesting bird species that nest in grassland or open low shrub habitat. The objective of the post-construction grassland bird study is to determine if there are noticeable changes in the presence and overall use by special status grassland bird species compared to pre-construction data collected in 2006.

(a) Study Area

The study areas were located within the LJIIA/B area and covered approximately 1,362 acres. The study areas were selected because they are somewhat removed from human activity (except low traffic use on facility access roads and one county road) and contain a large area of grassland/shrub-steppe habitat (mapped as habitat sub-type “SSB”) that is not proposed to be altered during project construction or operations.

(b) Survey Protocol

The certificate holders conducted the first year of post-construction grassland surveys in 2011, the first spring following the beginning of commercial operation of the facility (Downes et al. 2012). The certificate holders conducted a second year of grassland surveys in 2014. Findings of the grassland bird study were presented Downes and Gritski (2014).

(c) Data Analysis and Reporting

After the first survey year (2011), the certificate holders submitted a preliminary summary report to the Department (Downes et al. 2012). After the second survey year (2014), the certificate holders submitted a more comprehensive final report (Downes and Gritski 2014). Overall, no noticeable change in presence and overall use by special status grassland birds was observed when compared to pre-construction findings.

5. Wildlife Monitoring and Reporting System

The Wildlife Monitoring and Reporting System (WMRS) is an on-going monitoring program to report avian and bat casualties found by maintenance personnel during operation of the facility. It consists of weekly Environmental Coordinator (EC) Inspections of selected turbines conducted during both spring and fall migration seasons, monthly SPCC Turbine Checks of every turbine, and Incidental Observations with discovery of bird and bat carcasses and injured wildlife incidental to operations and maintenance. The certificate holders’ maintenance personnel will be trained in the methods needed to carry out this program.

All avian and bat carcasses discovered by the certificate holders’ maintenance personnel will be reported to the on-site EC for same day data recording (species, location, date, conditions) and for photo documentation. This information will be processed within WRMS and reviewed by the certificate holders biologists for confirmation of information and identification. If the carcass is suspected to be an eagle or a state or federally- listed endangered or threatened

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species, the certificate holders will contact ODFW and US Fish and Wildlife Service (USFWS) to report and coordinate collection. The certificate holder will secure the carcass (e.g., cover with a container) until, if appropriate, collection is completed. The certificate holders will not handle or transport any bat or bat carcass without a state or federal scientific collection or special use permit (SPUT).

6. Data Reporting

Each certificate holder will report wildlife monitoring data and analysis to the Department. Monitoring data include fatality monitoring program data; raptor nest survey data; WGS survey data, incidental observation, and assessment reports; grassland bird study data; and WMRS (specifically eagles or state and federally-listed endangered or threatened species) data. The certificate holders may include the reporting of wildlife monitoring data and analysis in the annual report required under OAR 345-026-0080 or submit this information as a separate document at the same time the annual report is submitted. In addition, the certificate holder shall provide to the Department any data or record generated in carrying out this monitoring plan upon request by the Department.

The certificate holders shall notify USFWS and ODFW immediately if any federal or state endangered or threatened species are killed or injured on the facility site.

The public will have an opportunity to receive information about monitoring results and to offer comment. Within 30 days after receiving the final versions of reports that are required under this plan, the Department will make the reports available to the public on its website and will specify a time in which the public may submit comments to the Department.⁴

7. Amendment of the Plan

This Wildlife Monitoring and Mitigation Plan may be amended from time to time by agreement of the certificate holders and the Council. Such amendments may be made without amendment of the site certificate. The Council authorizes the Department to agree to amendments to this Plan and to mitigation actions that may be required under this Plan. The Department shall notify the Council of all amendments and mitigation actions, and the Council retains the authority to approve, reject, or modify any amendment of this Plan or mitigation action agreed to by the Department.

8. Literature Cited (Documents cited are available on the Oregon Department of Energy web site)

Downes, S., B. Gritski, B. Anderson, and S. Zielin. 2012. Leaning Juniper II Wind Power Facility Wildlife Monitoring Study Annual Report, March 2011—July 2012. Prepared for Leaning Juniper II, LLC, Portland, Oregon. Prepared by Northwest Wildlife Consultants, Inc. dated October 23, 2012.

Downes, S., B. Gritski, and S. Woods. 2013. Leaning Juniper II Wind Power Facility Wildlife Fatality Monitoring Study January 2011-July 2013. Prepared for Iberdrola Renewables, Portland, Oregon. Prepared by Northwest Wildlife Consultants, Inc., Pendleton, Oregon dated November 27, 2013.

⁴ The certificate holders may establish a Technical Advisor Committee (TAC) but are not required to do so. If the certificate holders establish a TAC, the TAC may offer comments to the Council about the results of the monitoring required under this plan.

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- 1 Downes, S. and B. Gritski. 2014. Leaning Juniper II Wind Power Facility 2014 Wildlife
2 Monitoring. Prepared for Iberdrola Renewables, Portland, Oregon. Prepared by
3 Northwest Wildlife Consultants, Inc., Pendleton, Oregon dated October 6, 2014.
- 4 Gerhardt R. and K. Kronner. 2015. Leaning Juniper II Wind Power Facility Raptor Nest
5 Survey 2015. Report prepared by Northwest Wildlife Consultants, Inc. dated September 6
6 15, 2015 Leaning Juniper Wind Power II (LJWP II), LLC. 2013. Leaning Juniper IIA and
7 IIB Wind Project: Wildlife Monitoring and Mitigation Plan. June 21, 2013. Oregon
8 Energy Facility Siting Council of the State of Oregon, Final Order on Amendment #2-
9 Attachment D. Second Amended Site Certificate for the Leaning Juniper II Wind Power
10 Facilities.

Attachment 2:

**2024 Annual Wildlife Monitoring Results Extracted
from April 30, 2025 Annual Report**

**Leaning Juniper IIB**

2701 NW Vaughn St, Suite 300
Portland, Oregon 97210

April 29, 2025

Duane Kilsdonk
Senior Compliance Officer
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Re: 2024 Annual Report for Leaning Juniper IIB Wind

Dear Mr. Kilsdonk:

Leaning Juniper II, LLC ("LJIB"), a wholly owned subsidiary of Avangrid Power, LLC is providing this package for its yearly reporting requirement. Enclosed with this submittal is supporting material.

Condition 21 (b) (i) Facility Status Report

Facility remains in excellent working condition and has had no material changes in site conditions or impacts on production.

Condition 21 (b) (vii) Facility Modification Report

No modifications were made to the facility in 2024.

Condition 21(b) (v) - Monitoring Report:

Monitoring for LJIB includes the Revegetation Plan (Condition 74), Weed Control Plan (Condition 82), Wildlife - WMMP (Condition 87), and Habitat Mitigation Plan (Condition 89).

Condition 21(b)(vi) - Compliance Report:

No Instances of non-compliance to report.

Condition 74: Revegetation Plan

Conditions for revegetation monitoring were satisfied in 2015. No revegetation was required, nor was any monitoring conducted in 2024.

Condition 82: Weed Control Plan

Weed control continues to be implemented as per the Weed Control Plan. See *Condition 60 - LJII - 2024 Veg Management* for dates and areas treated.

Condition 87: Wildlife Monitoring

As outlined in the Wildlife Monitoring and Mitigation Plan ("WMMP"), LJII completed avian and bat fatality monitoring from 2011 to 2013. Washington ground squirrel monitoring occurs every 3 years after project operation and surveys were completed in 2014, 2017, and 2023, with the next survey year planned for 2026. Burrowing owl surveys are required every 5 years, and the initial survey occurred in 2015. Short-term raptor nest monitoring was completed in 2011 and 2015. ODFW conducted Raptor nest surveys of the area in 2020 and 2021 and shared that data. In 2022, a report summarizing the ODFW raptor data in relation to LJIIA and LJIIB was completed. The next long-term raptor nest and burrowing owl surveys will occur in 2025. The WMMP was amended in 2024 to change the language in the raptor nest survey section to assess nest occupancy rather than nesting success (see *Condition 87 - LJIIA-B WMMP_March 2024*). In addition, LJIIB obtained a U.S. Fish and Wildlife Service Eagle Incidental Take General Permit in 2024 (see *Condition 28 - LJIIB - Eagle Rule 3-200-71 - PER13434784*).

Wildlife Monitoring and Reporting System

During operation in 2024, operations staff recorded incidental observations of wildlife (injuries/fatalities) for LJIIB, listed below.

LJIIB

| Date | Location of Discovery | Species |
|------------|-----------------------|--------------|
| 06/20/2024 | Power Pole | Common Raven |

Condition 89: Habitat Mitigation Plan

To mitigate project impacts to wildlife habitat, a Habitat Mitigation Plan (HMP) was prepared in 2009 and incorporated into the Final Order for the project. The Certificate Holder's consultant Mason, Bruce, and Gerard (MB&G) conducted year-14 of HMA monitoring on April 30, 2024. The 2024 monitoring results indicated that the HMA continues to exhibit increases in cover and diversity of the shrub-steppe and bunchgrass communities. The native bunchgrasses and desirable shrub components were achieving the goals of the HMP during the 2024 monitoring visit, and the site will continue to do so, barring any land use changes, disturbances, or significant changes in climatic variables (see *Condition 89 - LJIIA-B - 2024_HMA_Monitoring_Report_082924*). The HMP was amended in 2024 to reflect previously approved changes, including removing the requirement for juniper plantings, changing the requirement for shrub planting to only be necessary if the growth of sagebrush recruits is not adequate to mitigate Project impacts, changing the requirement for avian surveys to incidental observations, changing requirement for a fire control plan to fire control best management practices, and changing monitoring frequency to every other year to align with adjacent

projects (see *Condition 89 - LJIIA-B - HMP_Amended_20240731*). The next monitoring year is planned for 2026.

Please feel free to contact me at (503) 894-3074 with any questions or requests for additional information.

Regards,

Carlton Steele
Asset Manager