

# **Notice of Intent to Apply for a Site Certificate**

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**Speedway Energy Facility  
October 2025**

**Submitted to  
Oregon Energy Facility Siting Council**

**Prepared for  
BGTF Speedway Project LLC**

**Prepared by**



## Table of Contents

<b>Exhibit A. Applicant Information – OAR 345-020-0011(1)(a)</b>	<b>1</b>
<b>Exhibit B. Facility Description – OAR 345-020-0011(1)(b)</b>	<b>6</b>
<b>Exhibit C. Facility Location – OAR 345-020-0011(1)(c)</b>	<b>16</b>
<b>Exhibit D. Alternative Locations – OAR 345-020-0011(1)(d)</b>	<b>17</b>
<b>Exhibit E. Permits Needed for Construction and Operation – OAR 345-020-0011(1)(e)</b>	<b>18</b>
<b>Exhibit F. Property Ownership – OAR 345-020-0011(1)(f)</b>	<b>25</b>
<b>Exhibit G. Facility Maps – OAR 345-020-0011(1)(g)</b>	<b>26</b>
<b>Exhibit H. Non-generating Energy Facility – OAR 345-020-0011(1)(h)</b>	<b>29</b>
<b>Exhibit I. Land Use – OAR 345-020-0011(1)(i)</b>	<b>30</b>
<b>Exhibit J. Environmental Impacts – OAR 345-020-0011(1)(j)</b>	<b>31</b>
Air Quality	31
Surface and Groundwater	32
Wetlands and Waters of the State of Oregon	33
Wildlife and Wildlife Habitat	33
Sensitive, Threatened, and Endangered Species	34
Historic, Cultural, and Archaeological Resources	34
Scenic Resources	35
Recreational Opportunities	35
Land Use	35
Wildfire Risk	35
<b>Exhibit K. Community Service Impacts – OAR 345-020-0011(1)(k)</b>	<b>37</b>
Sewers and Sewage Treatment	37
Water	37
Stormwater Drainage	38
Solid Waste Management	38
Housing	39
Construction	39
Operation	39
Traffic Safety	40
Police and Fire Protection	40

Health Care .....	41
Schools .....	41
<b>Exhibit L. Protected Areas – OAR 345-020-0011(1)(l) .....</b>	<b>42</b>
<b>Exhibit M. Water Sources and Use – OAR 345-020-0011(1)(m) .....</b>	<b>47</b>
Construction .....	47
Operation .....	47
<b>Exhibit N. Carbon Dioxide Emissions – OAR 345-020-0011(1)(n) .....</b>	<b>49</b>
<b>Exhibit O. Evaluation of Statutes, Rules, and Ordinances – OAR 345-020-0011(1)(o) .....</b>	<b>50</b>
<b>Exhibit P. Schedule for Application for Site Certificate – OAR 345-020-0011(1)(p) .....</b>	<b>53</b>
<b>Exhibit Q. Evidence of Consultation with State Commission on Indian Services – OAR 345-020-0011(1)(q) .....</b>	<b>54</b>
<b>References .....</b>	<b>55</b>

### List of Tables

Table C-1. Township, Range, and Sections within the Facility Site Boundary .....	16
Table E-1. Permits or Other Approvals Required for Construction and Operation of the Facility .....	18
Table J-1. Study Areas for Environmental Impacts .....	31
Table J-2. Land Cover within the Facility Site Boundary .....	33
Table L-1. Protected Areas Inventory .....	44
Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria .....	50
Table P-1. Proposed Schedule for Application for Site Certificate Submittal .....	53

## **Figures**

Figure 1. Site Vicinity

Figure 2. Facility Site Overview

Figure 3. Zoning

Figure 4. Study Area Boundaries

Figure 5. Topography

Figure 6. Protected Areas

Figure 7. National Wetlands Inventory and National Hydrography Dataset

Figure 8. Energy Facilities

## **List of Attachments**

Attachment 1. Articles of Organization

Attachment 2. Tax Lots and Property Owner Information

Attachment 3. Correspondence with Legislative Commission on Indian Services



## Acronyms and Abbreviations

AC	alternating current
ACDP	Air Contaminant Discharge Permit
Applicant	Brookfield Speedway Solar Holdings LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
BPA	Bonneville Power Administration
CFR	Code of Federal Regulations
DC	direct current
EFSC	Oregon Energy Facility Siting Council
FAA	Federal Aviation Administration
Facility	Speedway Solar Facility
gen-tie	generation tie
kV	kilovolt
LLC	limited liability company
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
OR-#	Oregon Route [designation]
ORBIC	Oregon Biodiversity Information Center
ORS	Oregon Revised Statutes
POI	point of interconnection
PV	photovoltaic
RFPD	Rural Fire Protection District
ROW	right of way

SCZO	Sherman County Zoning Ordinance
US-#	U.S. Route [designation]
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WPCF	Water Pollution Control Facilities

# 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:**

BGTF Speedway Project LLC  
c/o Brookfield Renewable U.S.  
200 Liberty St., 14th Floor  
New York, NY 10281

**Applicant contact person for the NOI with mailing address and telephone number:**

Vincent Esposito; Sr. Manager, Asset Development  
Brookfield Renewable U.S.  
200 Liberty St., 14th Floor  
New York, NY 10281  
(646) 992-9316  
vincent.esposito@brookfieldrenewable.com

*(B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and persons upon whom the applicant will rely in meeting any facility standard adopted by the Council;*

**Response:**

**Parent Company:**

Brookfield Renewable U.S.  
200 Liberty St., 14<sup>th</sup> Floor  
New York, NY 10281

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

Vincent Esposito; Sr. Manager, Asset Development  
Brookfield Renewable U.S.  
200 Liberty St., 14th Floor  
New York, NY 10281  
(646) 992-9316  
vincent.esposito@brookfieldrenewable.com

**Contact persons other than the Applicant:**

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Portland, OR 97213  
(503) 721-7228  
carrie.andrews@tetrattech.com

Timothy McMahan  
Stoel Rives LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
(503) 504-8693  
tim.mcmahan@stoel.com

*(C) If the applicant is a corporation:*

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

*(ii) The date and place of its incorporation;*

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

*(iv) In the case of a corporation not incorporated in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.*

**Response:** The Applicant is not a corporation.

*(D) If the applicant is a wholly owned subsidiary of a company, corporation or other business entity, in addition to the information required by paragraph (C), the full name and business address of each of the applicant's full or partial owners.*

**Response:** The Applicant, BGTF Speedway Project LLC, is a subsidiary of their parent company:

Brookfield Renewable U.S.

200 Liberty St., 14th Floor

New York, NY 10281

*(E) If the person submitting the NOI is an association of citizens, a joint venture or a partnership:*

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

*(ii) The name, business address and telephone number of each person participating in the association, joint venture or partnership and the percentage interest held by each;*

*(iii) Proof of registration to do business in Oregon;*

*(iv) A copy of its articles of association, joint venture agreement or partnership agreement and a list of its members and their cities of residence; and*

*(v) If there are no articles of association, joint venture agreement or partnership agreement, the applicant must state that fact over the signature of each member.*

**Response:**

The Applicant is not an association of citizens, a joint venture, or partnership.

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

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

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

**Response:**

The Applicant is not a public or governmental entity.

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

**Response:**

The Applicant is not an individual.

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

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

*(ii) The date and place of its formation;*

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

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

**Response:**

The Applicant is a limited liability company (LLC). The Applicant contact submitting this Notice of Intent (NOI) is:

Vincent Esposito; Sr. Manager, Asset Development

Brookfield Renewable U.S.

200 Liberty St., 14<sup>th</sup> Floor

New York, NY 10281

(646) 992-9316

Vincent.esposito@brookfieldrenewable.com

The officer for BGTF Speedway Project LLC is:

John M. Soininen; Vice President, Asset Development

200 Liberty St., 14<sup>th</sup> Floor

New York, NY 10281

(646) 992-2427

john.soininen@brookfieldrenewable.com

BGTF Speedway Project LLC was formed with the Secretary of State of the State of Delaware on August 1, 2025, and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State on August 20, 2025, in Salem, Oregon. The articles of organization and registration to do business in Oregon are provided in Attachment 1.

BGTF Speedway Project 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 construction and operation of the Speedway Energy Project (Facility), a renewable energy facility incorporating wind, solar and battery energy storage, located in unincorporated Sherman County, Oregon (Figure 1). The Facility will have a maximum injection capacity of 1400 megawatts (MW) of alternating current (AC) electricity. The exact composition of wind and solar generation and battery storage within this capacity will be determined during later stages of project design. The Facility's site boundary encompasses approximately 25,000 acres of privately owned land and is bisected by U.S. Route 97 (US-97). Within the ~25,000 acres, discrete areas will be developed for solar arrays and wind turbines while avoiding sensitive areas and reserving areas for continued agricultural production. The northernmost portion of the site boundary is 3.3 miles southeast of the city of Moro, and a small segment of the middle portion abuts the city of Grass Valley. The Facility's proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary (Figure 2).

The Applicant is currently conducting studies that will be included in the Application for Site Certificate (ASC) to Oregon's Energy Facility Siting Council (EFSC). The Applicant intends to begin on-site construction in the first quarter of 2027, pending issuance of a Site Certificate from EFSC, with a commercial operation target date in the fourth quarter of 2029.

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

**Response:**

The Facility will have up to 1400 MW of nominal and average generating capacity, as defined in Oregon Revised Statutes (ORS) 469.300.

*(ii) Major components, structures and systems, including a description of the size, type and configuration of equipment used to generate, store, transmit, or transport electricity, useful thermal energy, or fuels;*

**Response:**



The Facility's major components are the solar arrays, wind turbines, BESS and related electrical collector and substation equipment. The ASC will analyze potential impacts associated with the worst-case scenario layout (i.e., largest project layout) within the approximately 25,000-acre Facility site boundary. The actual solar equipment and layout selected at final design will not exceed the potential impacts analyzed in the Facility site boundary. For wind turbines, 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 and protected areas, an analysis will be conducted using the tallest turbine and the layout with the greatest number of turbines. Thus, the ASC will ensure the Facility meets the various EFSC standards, while providing the Applicant with flexibility siting components within EFSC-approved development areas (e.g., micro-siting wind turbines).

During pre-construction and final design engineering, the Applicant will specify the Facility components, equipment, and layout in accordance with the reporting requirements of the Oregon Department of Energy (ODOE). The Applicant seeks to be able to accommodate market changes, evolving technology, and to preserve design and layout flexibility.

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

- **Solar Components**

- **Solar Modules:** Solar modules use mono- or poly-crystalline cells to generate electricity by converting sunlight energy into direct current (DC) electrical energy. The electrical generation from a single solar module will vary by module size and the number of cells per module. The modules used in the preliminary site design have a nameplate rating up to 700 watts, and the dimensions of each module will be approximately 6 to 8 feet long and 3 to 5 feet wide. Solar modules consist of antireflective glass, a metal frame, and wire connectors. The solar modules will be connected in strings. The module strings are connected via cables and combiner boxes. The configuration of strings (the solar array) can vary depending on the equipment type and topography. The actual number of modules used will vary depending on the module technology, spacing, mounting equipment, and other design criteria, which are subject to change during final design.
- **Tracker Systems and Posts:** Strings of solar modules will be mounted on fixed-tilt or single-axis tracker systems. The single-axis trackers optimize electricity production by rotating the solar modules to follow the path of the sun. The length of each tracker string may vary by topography and the number of modules that the tracker can hold. The drive unit for the single axis tracking system can control a single string or multiple strings of modules through a series of mechanical linkages and gearboxes. As the sun moves throughout the day, the trackers will adjust accordingly, optimizing solar energy production. The tracker system, and associated posts, will be specifically designed to withstand wind, snow, and seismic loads anticipated at the site. Each tracker will be supported by multiple driven steel posts,

which could be round hollow posts, or pile-type posts (i.e., H-pile, C-pile, S-pile). Post depth may vary depending on soil conditions, but the posts are typically installed 4 to 10 feet below the surface and protrude approximately 4 to 10 feet above grade. Post locations will be determined by the final layout of the tracker system and geotechnical investigations of the solar array area within the Facility site boundary prior to final design.

- **Inverters:** DC power collected from solar modules will be converted into AC power before connecting to the Facility's collector substations. Low-voltage cabling will link each solar module to the inverters and transformers. Inverters serve the function of converting DC power supply to an AC power supply in accordance with electrical requirements. The number of inverters will vary depending on the final solar array layout. The inverter specifications will comply with applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.
- **Transformers:** The AC power from the inverters is routed to transformers that will increase the output voltage from the inverter to the desired Facility collector substation feed voltage of 34.5 kV. The transformers will be collocated with the inverters, dispersed throughout the solar array. The number of transformers will vary depending on the final solar array layout and transformer specifications will comply with applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.
- **Cabling:** Solar modules generate DC electricity. Cables collect and aggregate the DC before it is converted to AC and sent to the Facility collector substations. Low-voltage cables will connect the solar modules of each tracker string in series. Multiple strings of modules are then combined in parallel in a combiner box. Cabling from multiple combiner boxes will then connect to a single inverter, which will convert the DC to AC and connect to the buried collection system. Cabling can be mounted to the tracker system, placed in cable trays, or buried. Cable associated with the solar array will be located within the solar perimeter fence line, within the Facility site boundary.
- **Collection System.** The inverters and transformers will connect the generation output of the solar array to 34.5-kV medium-voltage collector lines which may be underground or on poles. If underground, the medium-voltage collector lines will be buried to a minimum depth of 2 feet. If overhead, the collector lines will be supported by wooden or steel pole structures. Locations and dimensions of medium-voltage collector lines will be determined as the project design is advanced. The 34.5-kV collector lines will connect the 34.5 kV transformers to collector substations where transformers will again step the power up to 230kV for more efficient delivery within the project area and ultimately to the BPA system at the POI. From these collector substations, 230 kV collector lines will transmit the power

to the Facility's central substation where transformers will step up the voltage to 500 kV and ultimately connect to BPA's 500 kV transmission system. Since BPA's 500 kV transmission lines are running through the project area, the substation will be built adjacent to the BPA transmission lines and no 500 kV gen-tie construction will be needed to connect the project to the BPA network.

- **Wind Components**

- **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:
    - Nominal power of up to 8 MW;
    - Rotor diameter of up to 575 feet; and
    - Rotor blade length of up to 288 feet; and
    - Tower height (i.e., hub height) of up to 410 feet. Thus, the combined tower and rotor height will not exceed 698 feet.
  - Up to 100 wind turbine locations are being assessed in early design and will be included in the ASC. 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 7 miles per hour, although this wind speed varies by turbine size and manufacturer. At wind speeds greater than about 60 miles per hour, the turbines will shut down and the rotor will be automatically locked to prevent damage to the machine.
- **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 will be up to 575 feet.
- **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 a height up to 410 feet. 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. The spread-footing foundations typically reach a depth of 16 – 20 feet below grade and 85 – 100 feet in diameter while exact design dimensions depend on turbine model and soil conditions. 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:** 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).
- **Collection System:** The wind 34.5 kV transformers will connect the generation output of the wind turbines to 34.5-kV collector lines which may be underground or overhead. Where underground, the collector lines will be buried to a minimum depth of 2 feet, overhead, collector lines will be supported by wooden or steel pole structures. Locations and dimensions of the collector lines will be determined as the project design advances. The 34.5-kV collector lines will connect the 34.5 kV transformers to collector substations where transformers will again step the power up to 230kV for more efficient delivery within the project area and ultimately to the BPA system at the POI. From these collector substations, 230 kV collector lines will transmit the power to the Facility's central substation where transformers will step up the voltage to 500 kV and ultimately connect to BPA's 500 kV transmission system. Since BPA's 500 kV transmission lines are running through the project area, the substation will be built adjacent to the BPA transmission lines and no 500 kV gen-tie construction will be needed to connect the project to the BPA network.
- **Collector Substations:** Four to six collector substations will be constructed to support the proposed Facility and will be located within the Facility site boundary. Prior to construction, the collector substation sites will be cleared and graded, with a bed of crushed rock applied for a durable surface. The collector substations will consist of 230-kV transformers, switchgear and other equipment (e.g. protection & controls, metering, communications) as will be determined at final design.

- **Central Substation:** One central substation will be located adjacent to the POI, which will be at the new BPA switchyard (Figure 2). Prior to construction, the central substation site will be cleared and graded, with a bed of crushed rock applied for a durable surface. The central substation will consist of 500-kV transformers, switchgear and other equipment (e.g. protection & controls, metering, communications) as will be determined at final design.
- **Battery Energy Storage System Components**
  - **Battery Energy Storage System:** The Facility includes a BESS of up to 500 MW, with a 4-hour duration. The BESS can be configured as a single facility near the Facility's POI or multiple facilities near the collector substations. The BESS is capable of storing and later deploying energy generated by the Facility and/or charging and discharging directly from and to the grid. The Applicant anticipates using lithium-ion technology for the BESS. The batteries will be housed in a series of self-contained enclosures located on concrete pads within a centralized fenced area.

*(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 or produce wastewater for disposal. The Facility will not generate significant quantities of solid waste. Waste and recyclable products will be hauled offsite and disposed of at licensed waste management facilities. The proposed operations and maintenance (O&M) building will contain a kitchen and bathroom, with a septic system to support the building. Required permits to construct the septic system will be obtained from Sherman County and the Oregon Department of Environmental Quality (ODEQ). Further details of stormwater drainage and wastewater disposal during construction and operations are provided in Exhibit K.

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

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

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

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

**Response:**

The Facility is not a thermal power plant, combustion turbine power plant, or other facility designed to generate electricity from any gas, liquid, or solid fuels. The Facility will generate solar and 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 include a transmission line that, by itself, is an energy facility under the definition in ORS 469.300(11)(a)(C). The Facility will include various collector lines that will transport power to the central switchyard/substation (where the power will be stepped up to interconnection voltage) located at the POI. Additional details about the internal collection line system is provided below.

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

**Response:**

The Facility is not a pipeline.

*(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.

*(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.

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

**Response:**

The Facility's related or supporting facilities will consist of the O&M building; site access, service roads, perimeter fencing, and gates; temporary construction areas; and temporary workforce housing. The following descriptions are based on the best available information at this time and may be modified in the ASC and at final design prior to construction:

- **O&M Building:** The Facility will include one O&M building and O&M storage containers. The O&M building may include bathrooms, a kitchen, offices, and meeting rooms. The O&M storage containers will be Connex structures. Graveled parking and a storage area for employees, visitors, and equipment will be located adjacent to the O&M building. The building will have bathrooms and a kitchen, with water supplied by on-site wells or nearby municipal facilities with existing water rights. It will also have a septic system, and power will be supplied by a local service provider using overhead and/or underground distribution lines.
- **Site Access and Service Roads:** The Facility will utilize existing access roads to the extent practicable. Primary transportation corridors to the Facility include Interstate 84, US-97, and Sherman County local roads. The bulk of the site is accessible from Oregon Route (OR-) 97 via North Street/Blagg Lane and OR-216.

Some new road construction will be required to access site features. Roads will be compacted gravel and as much as 20 feet wide. Vegetation will be maintained along solar array interior roads. 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 Sherman County.

At this time, an exact layout of proposed new roads and transportation routes is not final. It is the Applicant's intent to use existing roads wherever possible, and to minimize impacts to the agricultural and grazing effectiveness of the land by working in conjunction with the landowners on new road construction. All newly constructed roads will be graded and graveled to meet load requirements for all equipment. Each road will be as much as 20 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:** Corridors between solar module racking will be at least 10 feet wide and racking will be at least 10 feet from perimeter fencing or more where necessary to comply with setback requirements. Perimeter fencing will enclose the solar array as well as substations and BESS. The perimeter fencing will be 7 feet in height and have lockable vehicle access gates.
- **Temporary Construction Areas:** Temporary construction areas will be needed 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. The temporary construction areas will be within the Facility site boundary.

- **Temporary Workforce Housing:** The Applicant is considering options for incorporating temporary workforce housing. If the Applicant determines that the provision of temporary housing may be needed and it would be feasible to provide temporary housing at the Facility site, this will be described in the ASC.

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

**Response:**

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. The ASC will assess the maximum anticipated impacts of Facility structures and visible features.

- **Solar Array:** The solar modules will be connected in strings. The top edge of the solar module when fully tilted will be approximately 12 feet off the ground. The exact number and size of modules, layout, and associated equipment specifications will be determined as part of final design.
- **Wind Turbines:** The proposed quantity and location of wind turbines are still being assessed in early design and will be included in the ASC. The combined tower and rotor height of the wind turbines will not exceed 698 feet. This includes a hub height of 410 feet and a rotor diameter of 575 feet, with individual rotor blades measuring approximately 163 feet in length.
- **BESS:** The lithium-ion batteries are anticipated to be housed in a series of self-contained enclosures measuring approximately 8 to 10 feet wide, 40 feet long, and 7 to 10 feet tall, and located on a concrete pad within an approximately 50-acre centralized area, likely near the Facility's POI or configured as multiple smaller facilities near each collector substation. Each container holds the batteries, a supervisory and power management system, and a fire prevention system. Cooling units will be placed either on top of the containers or along the side, depending on the equipment selected at final design.
- **Collector Substations:** Up to six collector substations will be used for the proposed Facility and will be located within the Facility site boundary. Each collector substation will be located on an approximately 2 to 5-acre area and will be enclosed by a locked chain-link fence.
- **Collector Lines (Overhead):** Each 230-kV collector substation will have 34.5-kV underground or overhead collector lines connecting the Facility's solar and wind 34.5-kV transformers to the 230-kV collector substation. Each 230-kV collector substation will then have a 230-kV overhead collector line connecting it to the central 500-kV



switchyard/substation within a corridor up to 150 feet wide. The specific quantity, locations, and dimensions of the collector lines will be determined as the Facility design progresses. These lines will be within the Facility site boundary and connect the collector substations to the central substation.

- **Collector Lines (Underground):** Some of the 34.5-kV collector lines may run underground for improved reliability. These underground collector lines would be directly buried to a minimum depth of 3 feet.
- **Central Substation:** The Facility will include one 500-kV central substation that will include 500-kV and 230-kV transformers and associated switchgear and other equipment. This central substation will be built adjacent to the new BPA switchyard that will be constructed along the existing BPA 500-kV Ashe-Marion Transmission Line. The central substation will be located in an approximately 50-acre area and will be enclosed by a locked chain-link fence.
- **O&M Building:** The O&M building is expected to be a one-story structure approximately 2,000 – 5000 square feet in size and house operation and maintenance crews, equipment and spare parts. Details of the O&M building will be determined in later stages of design. A permanent graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building.
- **Meteorological Towers:** The seven temporary meteorological towers will have a maximum height of 197 feet and will be anchored by four guy wires.
- **Temporary Construction Areas:** Temporary construction areas will occur within the Facility site boundary and further described in the ASC. If a temporary concrete batch plant is needed, it will be located within a temporary construction area.

## 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 25,000 acres of privately owned land in Sherman County, Oregon. The Facility is generally bound by the John Day River to the east; the Deschutes River to the west Finnegan Creek, Ruggles Road, Von Borstel Road, and Rolfe Lane to the south; and Crites Road to the north. The site boundary encompasses the Township, Range, and Sections listed in Table C-1.

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

Township and Range	Section
T02S R16E	36
T02S R17E	3, 4, 5, 9, 10, 11, 14, 15, 16, 21, 22, 23, 26, 27, 28, 29, 31, 32, 34, 35
T03S R15E	25, 26
T03S R16E	1, 2, 3, 7, 8, 9, 10, 11, 14, 16, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34 35, 36
T03S R17E	2, 31, 32, 33
T04S 16E	5, 6

## 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(a)(C). The Facility also does not include a related or supporting facility a pipeline or transmission line that alone 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.

**TableE-1. Permits or Other Approvals Required for Construction and Operation of the Facility**

Permit	Agency	Authority/Description
<b>Federal Permits</b>		
Notice of Proposed Construction or Alteration (Form 7460-1)	Federal Aviation Administration (FAA) Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 Code of Federal Regulations (CFR) § 77 Description: The Applicant proposes construction or alterations that may affect navigable airspace pertaining to structures greater than 200 feet above ground surface, potential glare from the Facility's solar arrays, or for construction of structures within specified distances of runways or helipads and may be required to file this notice. No permit is issued by the FAA. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.

Permit	Agency	Authority/Description
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	FAA Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77  Description: If a Notice of Proposed Construction or Alteration with the FAA is required, then submission of the Supplemental Notice of Actual Construction or Alteration form must be filed within 5 days after construction reaches its greatest height as specified in the No Hazard Determination. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Danielle Erb, Sherman County Contact PO Box 2946 Portland, OR 97208-2946 (503) 808-4368 danielle.h.erb@usace.army.mil	Clean Water Act, Section 404 (33 USC § 1344); 33 CFR §§ 320, 323, 325-28, and 330  Description: A Section 404 permit will be required if dredge or fill occurs in waters of the United States. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Record of Decision/ National Environmental Policy Act Compliance	BPA Attn: Laura Green, Manager PO Box 3621 Portland, OR 97208-3621 (360) 418-8633 legreen@bpa.gov	National Environmental Policy Act (NEPA), Section 102 (42 United States Code [USC] § 4332); 40 CFR § 1500  Description: Interconnection to BPA's transmission system is subject to review under NEPA. BPA will lead this process as a separate action from the solar facility site certificate process. This federal process is not within the jurisdiction of the Oregon Energy Facility Siting Council (EFSC) and therefore should not be included within the site certificate.
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	Description: The Facility is not anticipated to impact eagles. However, if impacts to federally protected eagles are determined not to be avoidable based on the results of field surveys and ongoing coordination with USFWS, the Applicant may pursue an 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.
<b>State Permits</b>		

Permit	Agency	Authority/Description
Energy Facility Site Certificate	Oregon Department of Energy and Energy Facility Siting Council (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.
State Electrical Permit	Oregon Department of Consumer & Business Services, Building Codes Division Attn: Chrys Wernlund, Katherine Denight Pendleton Field Office 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 building.department@dcbs.oregon.gov	OAR 918, Division 309 A state electrical permit is required prior to the installation of electric, phone, or cable service to any Facility infrastructure. Electrical permits may be obtained in person at the Building Codes Division Pendleton office, or online through the state's e-permitting system (available at: <a href="https://aca-oregon.accela.com/oregon/Default.aspx">https://aca-oregon.accela.com/oregon/Default.aspx</a> ). 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.
Archaeological Excavation Permit	Oregon Parks and Recreation Department, State Historic Preservation Office Attn: Koren Tippet, Archaeology Inventory & Survey Coordinator 725 Summer Street NE, Suite C Salem, OR 97301 (971) 304-4737 arch.permits@opr.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 this permit from the State Historic Preservation Office and therefore this permit should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
Water Right Permit or Water Use Authorization	Oregon Water Resources Department Water Rights Section, District 3 Attn: Robert Wood, Watermaster 2705 E 2 <sup>nd</sup> Street The Dalles, OR 97058 (541) 506-2652	ORS 537; OAR 690 Divisions 310, 340, and 410 Description: If water for construction is not available from permitted sources, the Applicant will obtain the necessary water right permit or use authorization directly from the Oregon Water Resources Department. It is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Permit to Occupy or Perform Operations Upon a State Highway	Oregon Department of Transportation (ODOT) Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 9 3313 Bret Clodfelter Way The Dalles, OR 97058 (541) 296-2215	OAR Chapter 734, Division 55 (Pole Lines, Buried Cables, and Miscellaneous Operations) Description: Utility installations within the right-of-way of a state highway in Oregon require a permit issued by the ODOT. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Access Management Permit	ODOT Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 9 3313 Bret Clodfelter Way The Dalles, OR 97058 (541) 296-2215	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 third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Oversize Load Movement Permit/Load Registration	ODOT Attn: Gary Farnsworth, Region 4 Manager Region 4 Headquarters 63055 N Highway 97 Bend, OR 97703 (541) 388-6071	ORS 818.030; OAR Chapter 734, Division 82 Description: Authorization for oversized loads. Movement of construction cranes and other equipment and materials may require this permit. If needed, the Applicant's third-party contractor will obtain this permit and load registration from ODOT and therefore this permit should not be included in or governed by the site certificate.
Air Contaminant Discharge Permit (ACDP)	Oregon Department of Environmental Quality (ODEQ), Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	OAR Chapter 340, Division 216 Description: A Basic ACDP authorizes the operation of a stationary or portable concrete manufacturing plant that produces more than 5,000 but less than 25,000 cubic yards per year output. If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant's third-party contractor will obtain a Basic ACDP from ODEQ. This permit is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
Water Pollution Control Facilities (WPCF) Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	OAR Chapter 340, Division 45 Description: A WPCF-1000 authorizes the permittee to operate a wastewater collection, treatment, control, and disposal system for sand, gravel, and other nonmetallic mineral quarrying and mining operations, including asphalt-mix batch plants, concrete batch plants, and other related activities. If a temporary batch plant is needed for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from ODEQ, which would therefore not be included in or governed by the site certificate.
General Water Pollution Control Facilities Permit, WPCF-1700-B	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	ORS 468B; OAR Chapter 340, Division 45 Description: If solar panel washing is determined to be needed, the Applicant or a third-party contractor who will conduct the solar panel washing activities may seek coverage under the WPCF-1700-B permit from ODEQ following completion of construction and before initiating washing activities. Therefore, this permit should not be included in or governed by the site certificate.
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	Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48 Description: Water quality certification is required for facilities that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the United States. The Applicant will obtain this permit, if needed, directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit 1200-C	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-C permit is required for construction activities that will disturb one or more acres of land. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.



Permit	Agency	Authority/Description
NPDES Stormwater Discharge Permit 1200-A	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45  Description: The NPDES 1200-A permit is required for concrete and asphalt mix batch plants which discharge stormwater to surface water. If needed, the Applicant or a third-party contractor will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
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.
Removal-Fill Permit	Oregon Department of State Lands Attn: Richard Fitzgerald, Removal Fill 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112 richard.w.fitzgerald@dsl.oregon.gov	ORS 196; OAR Chapter 141, Division 85  Description: A Removal-Fill permit is required if 50 cubic yards or more of material is removed, filled, or altered within a jurisdictional water of the state. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the state. If this is proposed or needed, the Removal-Fill Permit should be included in and governed by the EFSC site certificate under ORS 469.401(3).

Permit	Agency	Authority/Description
<b>Local Permits</b>		
Conditional Use Permit (CUP), Goal 3 Comprehensive Plan Amendment	Sherman County Planning Department Attn: Amy Phelps, Planning Director Sherman County Planning Department P.O. Box 381 Moro, OR 97039 (541) 565-3601 aphelps@shermancountyor.gov	Sherman County Zoning Ordinance (SCZO) Section 3.1, Exclusive Farm Use, F-1 Zone; SCZO Section 5.2, General Criteria; SCZO Section 5.4, Application for Conditional Use; SCZO Section 5.8, Standards Governing Specific Conditional Uses; SCZO Section 11.2, Zoning or Other Land Development Permit or Approval.  Description: The Applicant elects to obtain an EFSC determination under ORS Chapter 469.504(1)(b). Under ORS 469.401(3), following issuance of the site certificate, the County, upon the Applicant's submission or the proper application and fee, shall issue the permits addressed in the site certificate, subject only to the conditions set forth in the site certificate and without hearings or other proceedings.
Road Approach Permit	Sherman County Road Department Attn: Mark Coles, Road Master P.O. Box 365 Moro, OR 97039 (541) 565-3271 mcoles@co.sherman.or.us	SCZO Article 5 Conditional Uses  Description: New driveways and increases or changes of use for existing driveways which access a public road shall obtain a Road Approach Permit from Sherman County Road Department or ODOT.
Site Evaluation Application & New Construction Permit (Septic)	North Central Public Health District Onsite Wastewater Program 419 E 7th St, The Dalles, OR 97058 (541) 506-2600 publichealth@ncphd.org	ORS 454 and 468B; OAR Chapter 340, Division 71 (340-071-0120(1) allows ODEQ to delegate authority to local governmental units)  Facilities with an on-site sewage disposal system must obtain a Site Evaluation & New Construction Permit before construction. The Facility will have a daily sewage flow of fewer than 2,500 gallons and the Applicant's third-party contractor will obtain the permit from North Central Public Health District and Wasco County for the O&M building. Therefore, this permit should not be included in or governed by the site certificate.
Building Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Ave, Ste. 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR Chapter 918, Divisions 309 & 780; Oregon Structural Specialty Code  Description: In Sherman County building permits are administered by the State of Oregon Building Codes Pendleton Field Office. A building permit is required for review and approval prior to commencement of construction of energy facilities. Again, these are applied for an issued by the State of Oregon Building Codes Pendleton Field Office.

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

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

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

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

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

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

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

### **Response:**

In accordance with OAR 345-020-0011(1)(f), Attachment 2 is a list of the names and mailing addresses of property owners within 500 feet of the Facility's site boundary. The Facility is located in the Sherman County Exclusive Farm Use, F-1 zone (Figure 3). Therefore, OAR 345-020-0011(1)(f)(A)(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 Sherman County was obtained from the Sherman County Assessor on September 10, 2025.

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

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

*(A) The proposed locations of the energy facility site, all related or supporting facility sites and all areas that might be temporarily disturbed during construction of the facility in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;*

**Response:**

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

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

*(B) The proposed locations of the corridors the applicant has identified under subsection (d) in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;*

**Response:**

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

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

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

**Response:**

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

Figure 5 depicts topographic features, local roads, and contour lines for areas within and adjacent to the proposed site boundary.

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

**Response:**

Figure 6 shows protected areas defined under OAR 345-001-0010.

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

**Response:**

Figure 7 shows potential waters of the state and potential waters of the United States using data from the NWI and NHD. Intermittent streams cross through and around the proposed site boundary as indicated by NHD; the site boundary also contains several small areas categorized as lake/pond. The NWI identified a few small freshwater ponds and emergent wetlands within the Facility site boundary, and several small areas of freshwater emergent wetland were identified outside the Facility site boundary.

*(G) For energy generation facilities, the approximate locations of any other energy generation facilities that are known to the applicant to be permitted at the state or local level within the study area as defined in OAR 345-001-0010 for impacts to public services.*

**Response:**

The Golden Hills, Klondike III, Daybreak, Bakeoven, and Summit Ridge energy generation facilities are permitted under EFSC and located within 10 miles of the proposed site boundary. The Hay Canyon energy generation facility was permitted by Sherman County and is located within 10 miles of the proposed site boundary. Buckley, Sunset, and Yellow Rosebush energy generation facilities are proposed/under review by EFSC and are located within 10 miles of the proposed site boundary, as shown on Figure 8. Existing transmission lines and substations are also within 10 miles of the Facility. No other existing energy generation facilities have been identified within 10 miles of the Facility.

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

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

**Response:**

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

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

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

**Response:**

The proposed Facility site boundary is within Sherman County's F-1 zone (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). The Applicant seeks a determination by EFSC of compliance with Sherman County's land use standards for the Facility.



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

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

## **Response:**

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)
Recreation	5 miles from Facility site boundary	OAR 345-001-0010(35)(d)
Land Use	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Wildfire Risk	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)

## **Air Quality**

The primary sources of air pollution during construction and operation of the Facility are pollutants from vehicle emissions and fugitive dust. Due to the clean energy nature of the Facility, the wind turbines, solar modules, collector lines, BESS, and related and supporting components will not produce air contaminants and therefore will not have a negative impact on air quality in the area. Vehicles traveling to and from the site during construction will include trucks carrying various

materials and employees commuting to the site, which can generate fugitive dust as they travel across unpaved gravel roads. Best management practices for dust control will be discussed in the ASC, and will be implemented during construction to minimize potential impacts from dust.

Due to the mobile, temporary, and non-point sources of dust generated by vehicles, this type of emission does not require air quality permitting. Facility-related vehicles, workers' vehicles, and delivery vehicles are subject to registration and emissions regulations administered by ODOT and the U.S. Department of Transportation. Additionally, Facility construction equipment is subject to the federal non-road engine standards in 40 CFR Part 1039 (National Archives 2025), which establish maximum emission rates for compression ignition non-road engines by model year.

## **Surface and Groundwater**

### *Surface and Groundwater Quality*

Pollutants will not be discharged from the Facility to surface water or groundwater. The Applicant will obtain a NPDES 1200-C permit from ODEQ to address potential impacts from construction stormwater runoff. The NPDES 1200-C permit will include an Erosion and Sediment Control Plan to minimize impacts from stormwater runoff. If a temporary concrete batch plant is needed for construction, the Facility will also obtain NPDES 1200-A and WPCF-1000 permits from ODEQ to address potential discharges.

During construction, employees will use on-site portable toilets; waste will be disposed of off-site by a licensed contractor. During operation, the O&M building will be served by a septic system and water is anticipated to be provided by on-site wells or nearby municipalities with existing water rights.

### *Surface and Groundwater Availability*

During construction water will be required over the course of construction, mostly for access road and earthwork compaction and dust suppression. 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 wells on-site or from nearby municipalities with existing water rights. The expected water amounts used for construction of the Facility will be further refined and discussed in the ASC. Additionally, the Applicant will confirm with the appropriate municipality that the anticipated amount of water needed for construction of the Facility will be available. Water use during construction is not expected to injure any existing surface or groundwater availability or exceed the amount of water available for beneficial use within the watersheds on which the Project is located. During operations, the Applicant anticipates water to be obtained from on-site wells in amounts exempted under ORS 537.545 or from nearby municipalities with existing water rights. Generally, water during operation will be used for washing solar panels and Facility vehicles, and

within the O&M building. The average amount of water used for the Facility will be less than 5,000 gallons per day during operations and, therefore, will not require a new water right.

## Wetlands and Waters of the State of Oregon

Figure 7 identifies potential wetlands and waters of the United States using data from the NWI and NHD. Intermittent streams cross through and around the proposed site boundary as indicated by NHD. However, many of the streams mapped as intermittent were field verified to be ephemeral. The site boundary also contains several small areas categorized by the NHD as lakes/ponds. The NWI identified a few small freshwater ponds and emergent wetlands within the site boundary. An in-depth analysis of waters of the state, wetlands, and waters of the United States will be provided in the ASC. If any impacts may occur, they will be mitigated in accordance with state and federal law.

## 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 cultivated crops, shrub/scrub, and grassland/herbaceous (MRLC 2021). The site boundary also contains areas of emergent herbaceous wetlands, evergreen forest, pasture/hay, and developed land and open space.

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

Land Cover Type	Area (acres) <sup>1</sup>	Percent of Total Area <sup>1</sup>
Barren Land	0.4	0
Cultivated Crops	11,010.5	43.4
Developed High Intensity	0.8	0
Developed, Low Intensity	43	0.17
Developed, Medium Intensity	23.6	0.09
Developed, Open Space	529.6	2.08
Emergent Herbaceous Wetlands	33.6	0.13
Evergreen Forest	7	0.03
Grassland/Herbaceous	4,696.3	18.5
Open Water	44.5	0.18
Pasture/Hay	0.4	0
Shrub/Scrub	8996.6	35.4
Wood Wetlands	5.6	0.02
<b>Total</b>	<b>25,392</b>	<b>100</b>
1. Values may not add up to the total due to rounding.		

The Applicant will complete wildlife surveys to determine what species are present within the site boundary. These surveys will assess habitat functions and values present to support wildlife within the Facility site boundary. Habitat surveys will be guided 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). The ASC will provide a more in-depth analysis of specific species and their habitats.

### **Sensitive, Threatened, and Endangered Species**

Biological surveys for special status wildlife and plant species will be conducted within the Facility site boundary in coordination with ODFW. A raptor and eagle nest survey will be conducted within the Facility site boundary and within a 0.5-mile buffer around the Facility site boundary. According to the Applicant's review of desktop resources, there is potential for two federally listed wildlife species to occur within or near the Facility site boundary: steelhead trout (*Oncorhynchus mykiss*, Middle Columbia distinct population segment, summer run; federally threatened), and bull trout (*Salvelinus confluentus*, Coastal Recovery Unit; federally threatened) (NMFS 2025). No state-listed wildlife species were documented within the Facility site boundary (USFWS 2025, ORBIC 2025). The southwest portion of area within the Facility site boundary is mapped by ODFW as winter range habitat for the mule deer (*Odocoileus hemionus*), (ODFW 2013). In addition, ODFW's recently modeled Priority Wildlife Connectivity Areas (OCAMP 2023) overlap with the Facility site boundary, generally associated with drainages.

Two state-listed and candidate plant species were identified to potentially occur within the vicinity of the Facility site boundary: Henderson's ricegrass (*Eriocoma [Achnatherum] hendersonii*, state candidate) and Lawrence's milkvetch (*Astragalus collinus* var. *laurentii*, state threatened) (ODA 2025). This information will help inform the wildlife, plant, and habitat surveys for the Facility.

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

### **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 of 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). The ASC will contain a detailed discussion of the potential impacts to potentially eligible resources and outreach and coordination with potentially affected Tribes.

## Scenic Resources

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

Local land use plans to be considered include the Sherman County Comprehensive Plan, Sherman County Zoning Ordinance, City of Grass Valley Comprehensive Plan, and any other local comprehensive plans and development codes for jurisdictions within 10 miles of the Facility site boundary. The Applicant will conduct a visual assessment of potentially significant visual impacts associated with construction and operation of the Facility. This assessment will be included in the ASC, and will contain proposed mitigation measures, if needed.

## 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 hunting, hiking, fishing, bicycling, and camping (County 2024a). Exhibit K in the ASC will provide a specific analysis of the impacts to recreational opportunities within the study area, including an evaluation for uniqueness and irreplaceability required by OAR 345-022-0100(2).

## Land Use

In accordance with OAR 345-001-0010(35)(c), the study area for land use consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer. The area within the Facility’s site boundary is exclusively within Sherman County’s F-1 zone, as shown on Figure 3. The Applicant will address applicable review criteria for this zone and applicable overlay zones in Exhibit D of the ASC. Generally, land within the site boundary is used for crop cultivation and rangeland. The Facility is compatible with agricultural uses, and there are no significant impacts on surrounding land uses. Impacts to agricultural land will also be further discussed in Exhibit D 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). The Oregon Wildlife Risk Explorer shows the study area has a high to very high burn probability. Additionally, average flame lengths for the area generally range from 4 to 8 feet (ODF 2025). In addition to other fire management practices to be further specified in the ASC, water trucks will be on-site for dust

management and can provide water to support fire control if needed. Exhibit M of the 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. The Applicant will coordinate with the South Sherman Rural Fire Protection District (RFPD) during ASC development and continue to do so through all stages of Facility development. If needed, the Applicant will develop and implement a Wildfire Mitigation Plan in compliance with OAR 345-022-0115(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 as follows:

- 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 an O&M building that will contain a kitchen and bathroom. A septic system will be necessary to support the building. Required permits to construct the system will be obtained from Sherman County and ODEQ. The septic system will not rely on community services and will not cause significant adverse impacts to community sewer systems.

## **Water**

Water will be required, over the course of construction, mostly for access road and earthwork compaction and dust suppression. 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 used during construction is anticipated to come from wells on-site or from nearby municipalities with existing water rights.

During operations, the Applicant anticipates water to be obtained from on-site wells in amounts exempted under ORS 537.545 or from nearby municipalities with existing water rights. Generally, water during operation will be used for washing solar panels and Facility vehicles, and within the O&M building. The average amount of water used for the Facility will be less than 5,000 gallons per day during operations and therefore, will not require a new water right. 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

Therefore, public water systems will not be adversely affected by construction or operation of the Facility.

## **Stormwater Drainage**

Due to the rural nature of the proposed Facility, there is minimal existing stormwater infrastructure in the area except for existing drainage ditches alongside public roads. Thus, the proposed Facility will not have significant adverse impacts on stormwater drainage services or infrastructure. Stormwater from access roads and solar panels is expected to be minimal and will flow to the adjacent ground and infiltrate on-site.

For construction, the Applicant will obtain an NPDES 1200-C Permit and will handle stormwater according to the terms of the permit and accompanying Erosion and Sediment Control Plan. Construction stormwater will be handled in accordance with the terms of the permit. During operation, stormwater runoff from the Facility will be managed on site, typically using retention and infiltration systems. 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. Thus, the Facility will have no impact on stormwater drainage services provided in more urban communities in the area.

## **Solid Waste Management**

The Dalles Disposal and Waste Connections provide solid waste management and recycling services to Sherman County through a franchise agreement (County 2024b). Solid waste generated at the Facility will be non-hazardous and generated through construction-related activities. Waste materials generated through the construction of the wind turbines, solar array, BESS, and associated infrastructure will consist of scrap metal, concrete waste, and packaging materials. Disposal of this waste will be privately contracted with commercial haulers. The Dalles Disposal/Waste Connections collects non-hazardous solid waste including trash, cardboard,



organics, recycling, construction, and demolition debris. Waste that cannot be recycled or sold for reuse will be disposed of at a collection facility operated by the Tri-County Hazardous Waste & Recycling Program located in The Dalles.

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

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

## **Housing**

### ***Construction***

The Applicant anticipates an average of 300 employees will be present on-site during construction. This number will fluctuate during periods when multiple teams of contractors perform their work simultaneously. The Applicant estimates that a maximum of 600 employees will be on-site at one time, during periods of the highest activity.

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

### ***Operation***

It is estimated that fewer than 20 full-time employees will work on-site for the 35-to-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 operation.

## **Traffic Safety**

Primary transportation corridors for the Facility include Interstate 84, US-97, and Sherman County local roads. Heavy-duty and light-duty delivery vehicles and workforce traffic will utilize these routes during construction. Generally, heavy-duty trucks will transport gravel, concrete, water, solar modules, steel, and larger materials. Light-duty trucks will carry people and electrical equipment. During construction of the Facility, traffic through the identified transportation corridors may increase due to the number of trucks and workers needed. The Applicant will enter into a road use agreement with Sherman County, as needed, to ensure public roads utilized during construction are left in as good or better condition than prior to construction. Additionally, the Applicant will develop a traffic management plan in coordination with Sherman County to minimize traffic safety impacts.

During operation, the Applicant does not anticipate the Facility will affect transportation corridors in Sherman County. It is estimated that fewer than 20 full-time employees will work on-site. Preference will be given to hiring local candidates, but some outside contractors who specialize in maintenance tasks may need to be hired. Delivery trucks may also access the Facility during operation on an infrequent basis. Due to the small number of permanent employees, there will not be significant increases in traffic in the surrounding areas. 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**

In Sherman County, the Oregon State Police Department and Sherman County Sheriff's Office provide police services (County 2025c). During construction, the Applicant will provide on-site security, and effective communications will be established between on-site security personnel and the Sherman County Sheriff's Office. The Applicant does not anticipate that the Facility will generate a significant long-term increase in demand for police services, as there are a relatively small number of new permanent residents anticipated to enter the area during operations.

The Facility is located within the South Sherman RFPD coverage area (OOSFM 2025). Prior to construction, the Applicant will work with the South Sherman RFPD and other relevant fire protection agencies to address potential needs for a fire prevention and management plan during construction. The Applicant will also develop first aid and emergency response procedures for the construction and operation of the Facility. Development of these plans will involve consultation with local emergency response agencies. The Applicant will notify the relevant fire protection agencies 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 fire-fighting equipment and water supplies on hand during

operations that carry a high fire risk, conducting welding within a cleared or graveled area, preventing parking of vehicles in areas with high, dry grass, and through implementation of a construction and operations Wildfire Mitigation Plan, if applicable. 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 in the area where the Facility is located, hospital and medical centers are regional. The nearest hospitals are Adventist Health Columbia Gorge in The Dalles (approximately 24 miles northwest of the Facility) and St. Charles in Madras (approximately 52 miles southwest of the Facility). Both hospitals provide emergency and surgical services (St. Charles 2025, Adventist 2025).

The Sherman County Ambulance Service Area Plan (SCASAP) indicates that Sherman County has one Ambulance Service Area serviced by Sherman County Ambulance (County 2024d). The local ambulance services are provided by on-call licensed EMTs who provide basic and intermediate life support services. This service would also transport patients to the closest hospital in the event of an emergency.

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

## Schools

Sherman County School (a grade school, junior/senior high school, and athletic complex) and Sherman Preschool service all of Sherman County (Sherman County 2025e). The student population may increase slightly during construction of the Facility, depending on the number of non-locally hired employees; however, the Applicant does not expect permanent student increases from construction of the Facility. Operation of the Facility will require fewer than 20 permanent employees. Some employees may be hired locally, and others may relocate from outside the region with their families. Conservatively estimating that all 20 employees are hired from outside the region, all settle near the Facility rather than commuting from larger nearby communities, and on average, each brings two school-age children, up to approximately 40 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. Therefore, construction and operation of the Facility are not anticipated to have a significant or negative impact on the school system in Sherman County.

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

*(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 E 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)	None	N/A	N/A	N/A	Google Earth 2024, 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 2025a, USFS 2025b, USFS 2025c, 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)	White Wild and Scenic River	8.4	Southwest	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Google Earth 2024, NPS 2025b, National Wild and Scenic Rivers System 2025, USGS 2024
	Deschutes Wild and Scenic River	2.4	West		
	John Day Wild and Scenic River	5.2	East		
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 2025b, USGS 2024
National Fish Hatcheries OAR 345-001-0010(26)(f)	None	N/A	N/A	N/A	Google Earth 2024, USFWS 2025c
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	Columbia River Gorge National Scenic Area	15.5	Northwest	Columbia River Gorge National Scenic Area Supervisor’s Office 902 Wasco Street Suite 200 Hood River, OR 97031 (541) 308-1700	Google Earth 2024, USFS 2025a, USFS 2025b, USFS 2025c, USGS 2024
Wilderness Study Area OAR 345-001-0010(26)(h)	Lower John Day Wilderness Study Area	3.2	East	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	BLM 2025a, Google Earth 2024, USGS 2024
	North Pole Ridge Wilderness Study Area	11.7	Southeast		
	Thirtymile Wilderness Study Area	6.5	Southeast		
Land designated in a federal land management plan or by an act of Congress as (includes Areas of Critical Environmental Concern, Outstanding Natural Areas, Research Natural Areas, Experimental Forests or Ranges, and Special Interest Areas)					
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	Armstrong Canyon Area of Critical Environmental Concern (ACEC)	12.8	Southeast	BLM - Prineville District Office 3050 NE 3rd Street	BLM 2025b, BLM 2025c, BLM 2025d, BLM 2025e, Google Earth 2024, OPRD 2020, USFS 2025b, 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				
	Ferry Canyon ACEC	7.3	East	Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	N/A	N/A	N/A	
Research Natural Area OAR 345-001-0010(26)(i)(C)	None	N/A	N/A	N/A	
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)	Deschutes River State Recreation Area	14.8	Northwest	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (800) 551-6949 park.info@oregon.gov	Google Earth 2024, OPRD 2025a, USGS 2024
	Cottonwood Canyon State Park	8.5	Northeast		
	White River Falls State Park	8.8	West		
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)	Tygh Valley State Natural Area	9.2	West	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707 park.info@oregon.gov	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

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
State Scenic Waterway OAR 345-001-0010(26)(n)	Deschutes River State Scenic Waterway	3.6	West	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707 park.info@oregon.gov	Google Earth 2024, OPRD 2025c, OPRD 2025d, USGS 2024
	John Day State Scenic Waterway	6.8	East		
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	Lower Deschutes Wildlife Area	4.9	Northwest	ODFW Lower Deschutes Wildlife Area 78430 Dodson Road Tygh Valley, OR 97063 (541) 296-4628 odfw.info@odfw.oregon.gov	Google Earth 2024, ODFW 2025a, USGS 2024
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	Oak Springs Hatchery	17.5	Southwest	ODFW Oak Springs Hatchery 85001 Oak Springs Road Maupin, OR 97037 (541) 395-2546 odfw.info@odfw.oregon.gov	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 2025a
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	None	N/A	N/A	N/A	Google Earth 2024, OSU 2025b



# 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**

Water will be required over the course of construction, mostly for access road and earthwork compaction and dust suppression. 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 used during construction is anticipated to come from wells on-site or from nearby municipalities with existing water rights. 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.

## **Operation**

During operations, the Applicant anticipates water to be obtained from on-site wells in amounts exempted under ORS 537.545 or from nearby municipalities with existing water rights. Generally, water during operation will be used for washing solar panels and Facility vehicles, and within the O&M building. The average amount of water used for the Facility will be less than 5,000 gallons per day during operations and therefore, will not require a new water right.

*(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 the present 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 and solar photovoltaic power generation facility, and 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 A of the ASC. 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
Sherman County Planning Department	Sherman County Zoning Ordinance; Sherman County Comprehensive Plan	Sherman County Planning Department 66365 Lonerock Road Moro, OR 97039 (541) 565-3601
Oregon Department of Land Conservation and Development	Comprehensive Land Use Planning Coordination - ORS Chapter 197; Oregon Department of Land Conservation and Development Administrative Rules - OAR Chapter 660	Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
Oregon Office of State Fire Marshal	2019 Oregon Fire Code; OAR Chapter 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473
Oregon Office of State Fire Marshal— Emergency Planning and Community Right to Know Act	ORS 453; OAR Chapter 837, Divisions 85 and 95; Fire and Life Safety Regulations, OAR 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473

<b>Department</b>	<b>Legal Citation</b>	<b>Agency Address</b>
Oregon Parks and Recreation Department, State Historic Preservation Office —Archaeological	Native American Graves and Protected Objects—ORS 97.740-97.760 Archaeological Objects and Sites—ORS 358.90-358.955 Permit and Conditions for Excavation or Removal of Archaeological or Historical Materials on Private Lands (OAR 736-051-0090)	State Historic Preservation Office 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0690
Oregon Department of Geology and Mineral Industries	OAR Chapter 632, Division 1	Oregon Department of Geology and Mineral Industries 800 NE Oregon Street, Suite 965 Portland, OR 97232 (971) 673-1555
ODEQ—Solid Waste	ORS 459; OAR Chapter 340, Division 93	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (541) 298-7255 ext. 221 (Eastern Region)
ODEQ—Hazardous Waste Management	ORS 465 and 466; OAR Chapter 340, Divisions 100-122	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Noise	ORS 467; OAR Chapter 340, Division 35	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Water Quality & Stormwater Control	ORS 468 and 468B; OAR Chapter 340, Divisions 41, 45, and 55	Oregon Department of Environmental Quality 400 E. Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
Oregon Department of State Lands	OAR Chapter 141	Oregon Department of State Lands 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112
Oregon Water Resources Department – Water Rights Division	ORS Chapters 537, 540; OAR Chapter 690	Oregon Water Resources Department Water Rights Section, District 3 2705 E 2nd Street The Dalles, OR 97058 (541) 506-2652

Department	Legal Citation	Agency Address
ODFW	ORS 496-497; OAR Chapter 635, Divisions 100 and 415	ODFW The Dalles Fish Screens and Field Office 3561 Klindt Dr The Dalles, OR 97058 (541) 296-8026
Oregon Department of Agriculture	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

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

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

**Response:**

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

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

Activity	Anticipated Date
Applicant submits the NOI to ODOE	October 2025
EFSC reviews the NOI, distributes public notice, conducts public information meeting as needed, facilitates comment period, and issues Project Order	November 2025 – January 2026
Applicant submits Preliminary ASC to ODOE	February 2026

## **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 an email 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 April 30, 2024 and April 5, 2025, the Legislative Commission provided an email identifying the Burns Paiute Tribe, Confederated Tribes of the Umatilla Indian Reservation, and Confederated Tribes of the Warm Springs Reservation of Oregon as Tribal governments that should be notified (Attachment 3). The Applicant also used the U.S. Department of Housing and Urban Development's Tribal Directory Assessment Tool to identify two additional Tribal governments to be notified: the Nez Perce Tribe and the Confederated Tribes and Bands of the Yakama Nation.



# References

- Adventist (Adventist Health Columbia Gorge). 2024. "Our Services". Accessed August 2025. <https://mcmc.net/our-services/>.
- BLM (Bureau of Land Management). 2025a. Wilderness and Wildness Study Areas. Accessed September 2025. <https://www.blm.gov/programs/national-conservation-lands/wilderness>.
- BLM. 2025b. Areas of Critical Environmental Concern. Accessed September 2025. <https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/acec-s>.
- BLM. 2025c. Oregon and Washington National Conservation Lands. Accessed September 2025. <https://www.blm.gov/programs/national-conservation-lands/oregon-washington>.
- BLM. 2025d. Oregon Similarly Designated Areas. Accessed September 2025. <https://www.blm.gov/programs/national-conservation-lands/ncas-and-similar-designations/oregon-washington>.
- BLM. 2025e. BLM National Data. Accessed September 2025. <https://blm-egis.maps.arcgis.com/apps/webappviewer/index.html?id=6f0da4c7931440a8a80bfe20edd7550>.
- FAA (Federal Aviation Administration). 2025. "FAA OE/AAA Offices." Accessed August 2025. <https://oeaaa.faa.gov/oeaaa/external/content/oeaaaOffices.jsp>.
- Google Earth. 2024. Imagery Date: 10/6/2024.
- INR (Institute for Natural Resources). 2020. Oregon Biodiversity Information Center -> Natural Areas Plans. <https://inr.oregonstate.edu/natural-areas/natural-areas-plans>.
- MRLC (Multi-Resolution Land Characteristics Consortium). 2021. Continental U.S. NLCD 2021 Land Cover. Accessed August 2025. <https://www.mrlc.gov/data>.
- National Archives. 2025. "Code of Federal Regulations". 40 CFR part 103 <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-89>
- NMFS (National Marine Fisheries Service). 2022. Species Ranges- Salmon and Steelhead (all West Coast). Available online at: <https://www.fisheries.noaa.gov/resource/map/species-ranges-salmon-and-steelhead-west-coast-region>.
- NOAA (National Oceanic and Atmospheric Administration). 2025. South Slough National Estuarine Research Reserve. Accessed September 2025. <https://coast.noaa.gov/nerrs/reserves/south-slough.html>.
- NPS. 2025a. Oregon, Find a Park. Accessed September 2025. <https://www.nps.gov/state/or/index.htm>.

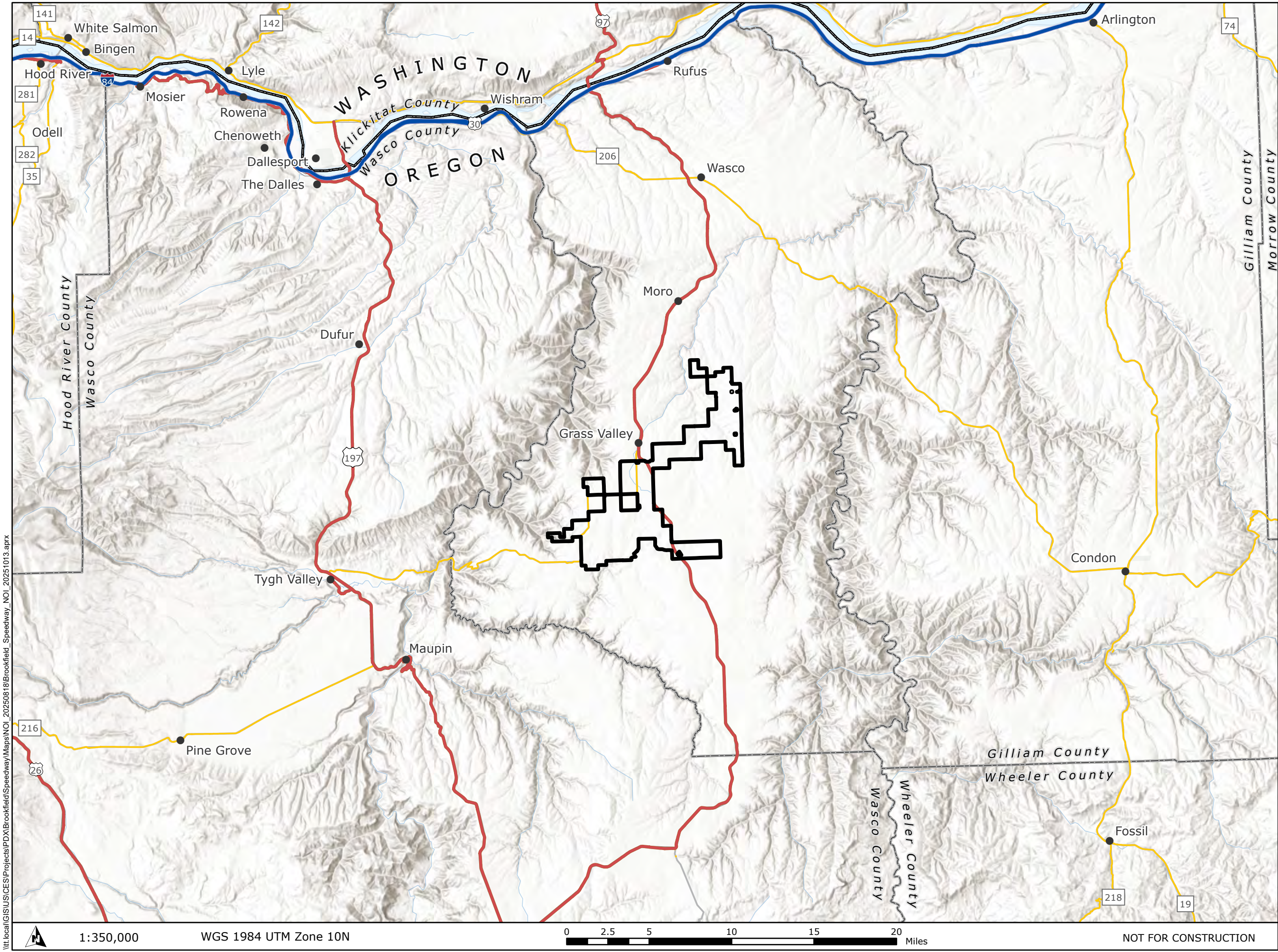
- NPS. 2025b. Wild and Scenic Rivers. Accessed September 2025.  
<https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88daee0e353142>.
- National Wild and Scenic Rivers System. 2025. Oregon. Accessed September 2025.  
<https://rivers.gov/>.
- OCAMP (Oregon Connectivity Assessment and Mapping Project). 2023. Technical Report. Oregon Department of Fish and Wildlife, Salem, OR. 61p.
- ODA (Oregon Department of Agriculture). 2025. Oregon Listed Plants by County, Interactive Map. Available online at: <https://data.oregon.gov/dataset/Oregon-listed-plants-by-county-mapview/5g2r-qwyf>.
- ODF (Oregon Department of Forestry). 2025. Oregon Wildfire Risk Explorer. Accessed August 2025.  
[https://tools.oregonexplorer.info/OE\\_HtmlViewer/index.html?viewer=wildfire](https://tools.oregonexplorer.info/OE_HtmlViewer/index.html?viewer=wildfire).
- ODFW (Oregon Department of Fish and Wildlife). 2013. ODFW Winter Range for Eastern Oregon. GIS dataset available online at:  
<https://nrimp.dfw.state.or.us/DataClearinghouse/default.aspx?p=202&XMLname=885.xml>.
- ODFW. 2014. "Oregon Hatchery Facilities" shapefile data. Accessed August 2025.  
<https://nrimp.dfw.state.or.us/DataClearinghouse/default.aspx?p=202&XMLname=1116.xml>.
- ODFW. 2021. "ODFW Wildlife Areas" shapefile data. Accessed August 2025.  
<https://nrimp.dfw.state.or.us/DataClearinghouse/default.aspx?p=202&XMLname=861.xml>.
- ODFW. 2025a. Visit ODFW Wildlife Areas. <https://myodfw.com/visit-odfw-wildlife-areas>.
- ODFW. 2025b. Visit ODFW Hatcheries. <https://myodfw.com/visit-odfw-hatcheries>.
- ODOT (Oregon Department of Transportation). 2025, Scenic Byways Program. Accessed September 2025, <https://www.oregon.gov/odot/programs/pages/scenic-byways.aspx>
- OOSFM (Oregon Office of State Fire Marshal). 2025. "Oregon Fire Stations & Fire Districts". Accessed September 2025.  
<https://geo.maps.arcgis.com/apps/webappviewer/index.html?id=d3cb788c24134dee9a9eaea7721d4bae>.
- OPRD (Oregon Parks and Recreation Department). 2020. Draft Oregon Natural Areas Plan.  
[https://inr.oregonstate.edu/sites/inr.oregonstate.edu/files/2020\\_nap\\_draft.pdf](https://inr.oregonstate.edu/sites/inr.oregonstate.edu/files/2020_nap_draft.pdf).
- OPRD. 2025a. Find a Park. <https://stateparks.oregon.gov/index.cfm?do=visit.find>.
- OPRD. 2025b. Willamette River Greenway and Water Trail.  
<https://stateparks.oregon.gov/index.cfm?do=park.profile&parkId=194>.
- OPRD. 2025c. List of Scenic Waterways. Accessed September 2025.  
<https://www.oregon.gov/oprd/bwt/pages/ssw-list.aspx>.

- OPRD. 2025d. Oregon State Scenic Waterway Water Courses. Accessed September 2025.  
[https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fmaps.prd.state.or.us%2Farcgis%2Frest%2Fservices%2FAdmin\\_boundaries%2FAD\\_SCENIC\\_WATERWAYS%2FFeatureServer%2F0&source=sd](https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fmaps.prd.state.or.us%2Farcgis%2Frest%2Fservices%2FAdmin_boundaries%2FAD_SCENIC_WATERWAYS%2FFeatureServer%2F0&source=sd).
- Oregon GeoHub. 2025. Oregon State Parks data. Last updated September 2024. Accessed August 2025. <https://geohub.oregon.gov/>
- ORBIC (Oregon Biodiversity Information Center). 2025. Element Occurrence Record Digital Data Set for rare, threatened, or endangered species for Project Area. ORBIC, Institute for Natural Resources, Portland State University. Portland, OR. Received February 2025.
- OSU (Oregon State University). 2025a. Research and Experiment Stations.  
<https://agsci.oregonstate.edu/home/outreach/research-experiment-stations#experiment>.
- OSU. 2025b. Welcome to the OSU Research Forests. <https://cf.forestry.oregonstate.edu/>.
- Sherman County. 2017. "Sherman County Zoning Ordinance". Accessed August 2025.  
<https://www.co.sherman.or.us/documents/sherman-county-zoning-ordinance/>.
- Sherman County. 2025a. "Visit Sherman County". Accessed August 2025.  
<https://www.co.sherman.or.us/visitors/#:~:text=Challenge%20yourself%20to%20world-class%20windsurfing%20on%20the%20Columbia,for%20upland%20game%20hunting%20in%20our%20wide-open%20spaces>.
- Sherman County. 2025b. "Recycling & Trash Collection". Accessed August 2025.  
<https://www.co.sherman.or.us/waste-management/>.
- Sherman County. 2025c. "Sheriff's Office". Accessed August 2025.  
<https://www.co.sherman.or.us/departments/sheriff/>.
- Sherman County. 2024d. "Sherman County Ambulance Service Area Plan". Accessed August 2025.  
<https://www.co.sherman.or.us/documents/sherman-county-ambulance-plan-asa-2024-pdf/>.
- Sherman County. 2025e. "Public Education". Accessed May 2025.  
<https://www.co.sherman.or.us/education/>.
- St. Charles. 2025. "St Charles Madras". Accessed August 2025.  
[https://www.stcharleshealthcare.org/locations/st-charles-madras?utm\\_source=local-listing&utm\\_medium=organic&utm\\_campaign=website-link](https://www.stcharleshealthcare.org/locations/st-charles-madras?utm_source=local-listing&utm_medium=organic&utm_campaign=website-link).
- USFS (U.S. Forest Service). 2025a. Experimental Forests and Ranges. April 30, 2025.  
<https://research.fs.usda.gov/forestsandranges>.
- USFS. 2025b. Interactive Visitor Map. Accessed September 2025.  
<https://www.fs.usda.gov/ivm/index.html?minx=-13645989&miny=5667056&maxx=-13467126&maxy=5768870&exploremenu=no>.

- USFS. 2025c. Wildernesses in the Pacific Northwest. Accessed September 2025.  
<https://www.fs.usda.gov/detail/r6/specialplaces/?cid=stelprdb5227694>.
- USFWS (U.S. Fish and Wildlife Service). 2024. Federally Listed, Proposed, Candidate, Delisted Species and Species of Concern Under the Jurisdiction of the Fish and Wildlife Service Which May Occur Within Oregon. Available online at:  
<https://www.fws.gov/media/oregonspeciesstatelistpdf>.
- USFWS. 2025b. Our Facilities. Accessed September 2025. <https://www.fws.gov/our-facilities?type=%5B%22National%20Wildlife%20Refuge%22%5D>.
- USFWS. 2025c. Visit National Fish Hatcheries. Accessed September 2025.  
<https://www.fws.gov/visit-us/hatcheries?type=%5B%22National%20Fish%20Hatchery%22%5D>.
- USGS (U.S. Geological Survey). 2024. Gap Analysis Project (GAP) 2024, Protected Areas Database of the United States (PAD-US) 4.0: U.S. Geological Survey data release,  
<https://doi.org/10.5066/P96WBCHS>.
- Water Resources Department. 2025a. “Regional Offices and Watermasters Directory”. August 2025.  
<https://www.oregon.gov/owrd/aboutus/contactus/Pages/RegionalOfficesandWatermastersDirectory.aspx?wp6750=se:%22District-03%22&wp6062=se:%22NC.+region%22>.
- Water Resources Department. 2025b. “Apply for a Water Use Permit”. Accessed September 2025.  
<https://www.oregon.gov/owrd/programs/waterrights/permits/pages/obtain.aspx>.
- Wilderness Connect. 2025. Wilderness Areas of the United States. Accessed August 2025.  
<https://umontana.maps.arcgis.com/apps/webappviewer/index.html?id=a415bca07f0a4bee9f0e894b0db5c3b6>.

## Figures





# Speedway Energy

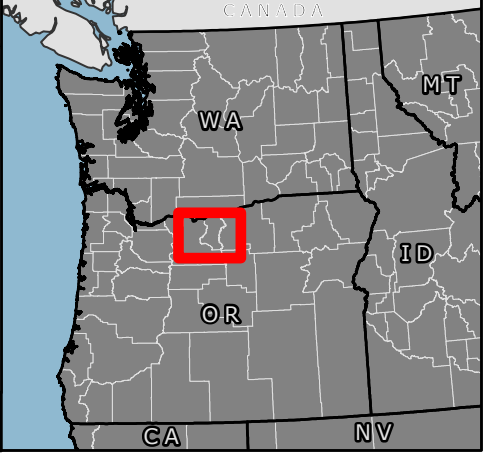
**Figure 1**  
**Site Vicinity**

**SHERMAN COUNTY, OR**

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



**Reference Map**



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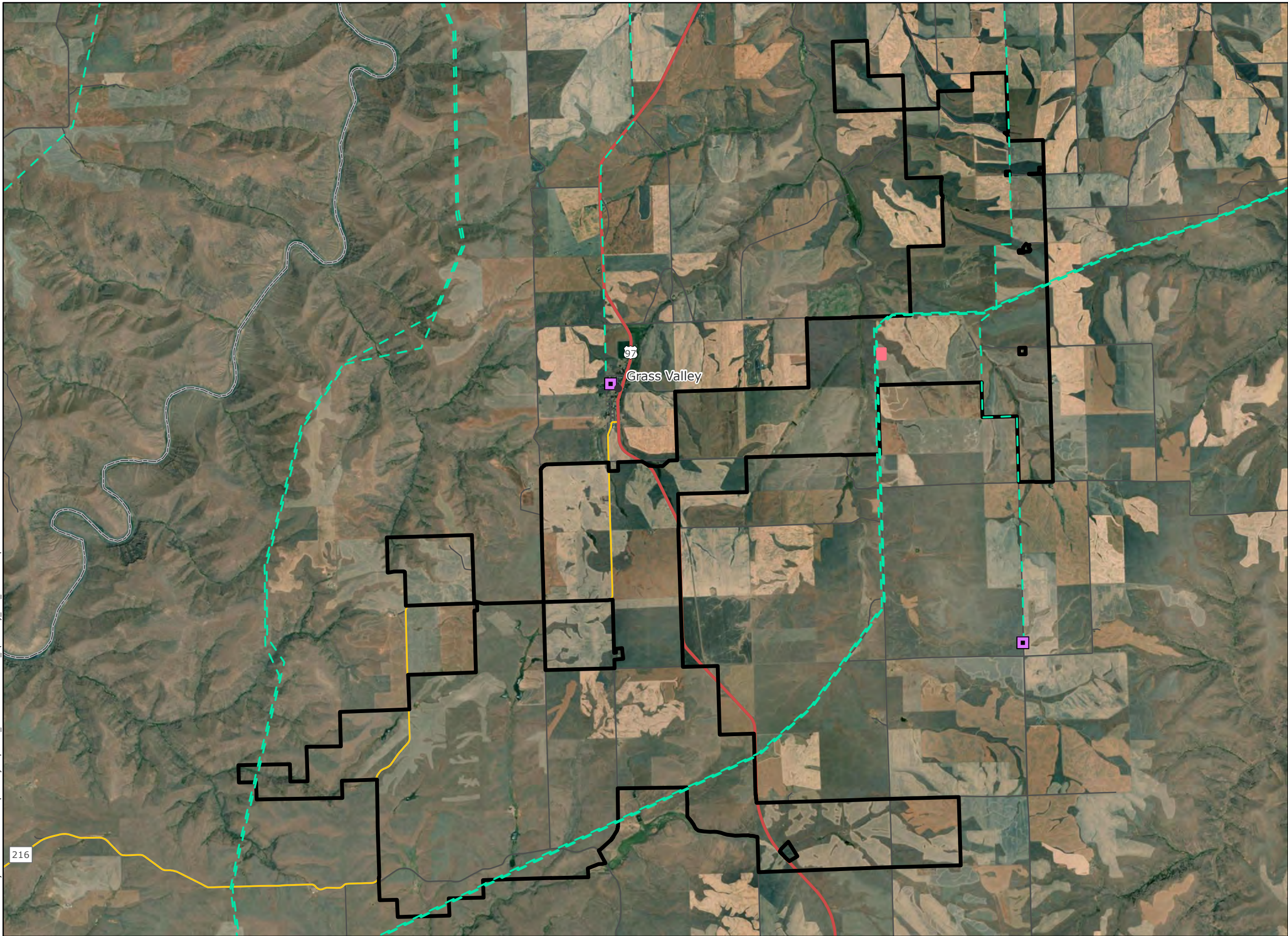
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# Speedway Energy

**Figure 2**  
**Facility Site Overview**

SHERMAN COUNTY, OR

- Site Boundary
- Approximate Location for Point of Interconnection
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Existing Substations
- Existing Transmission Lines

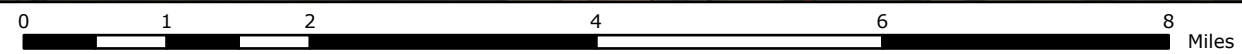


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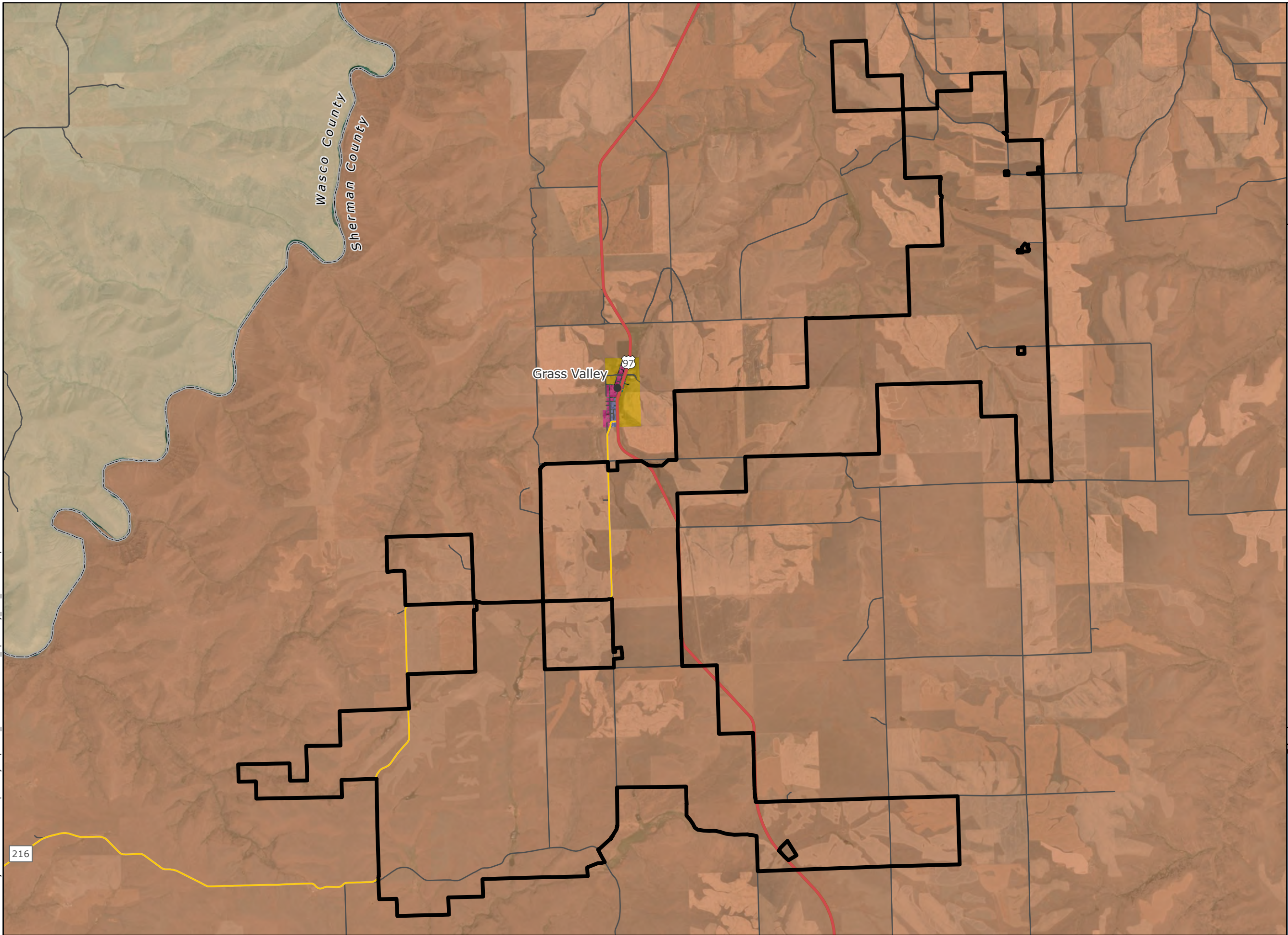
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# Speedway Energy

Figure 3  
Zoning

SHERMAN COUNTY, OR

- Site Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Sherman County Zoning
  - Exclusive Farm Use (F-1)
- City of Grass Valley Zoning
  - Commercial - General
  - Industrial - Light
  - Medium Low-density Residential
  - Very Low-density Residential
  - Parks & Open Space
- Wasco County Zoning
  - Exclusive Farm Use (A-1)



## Reference Map



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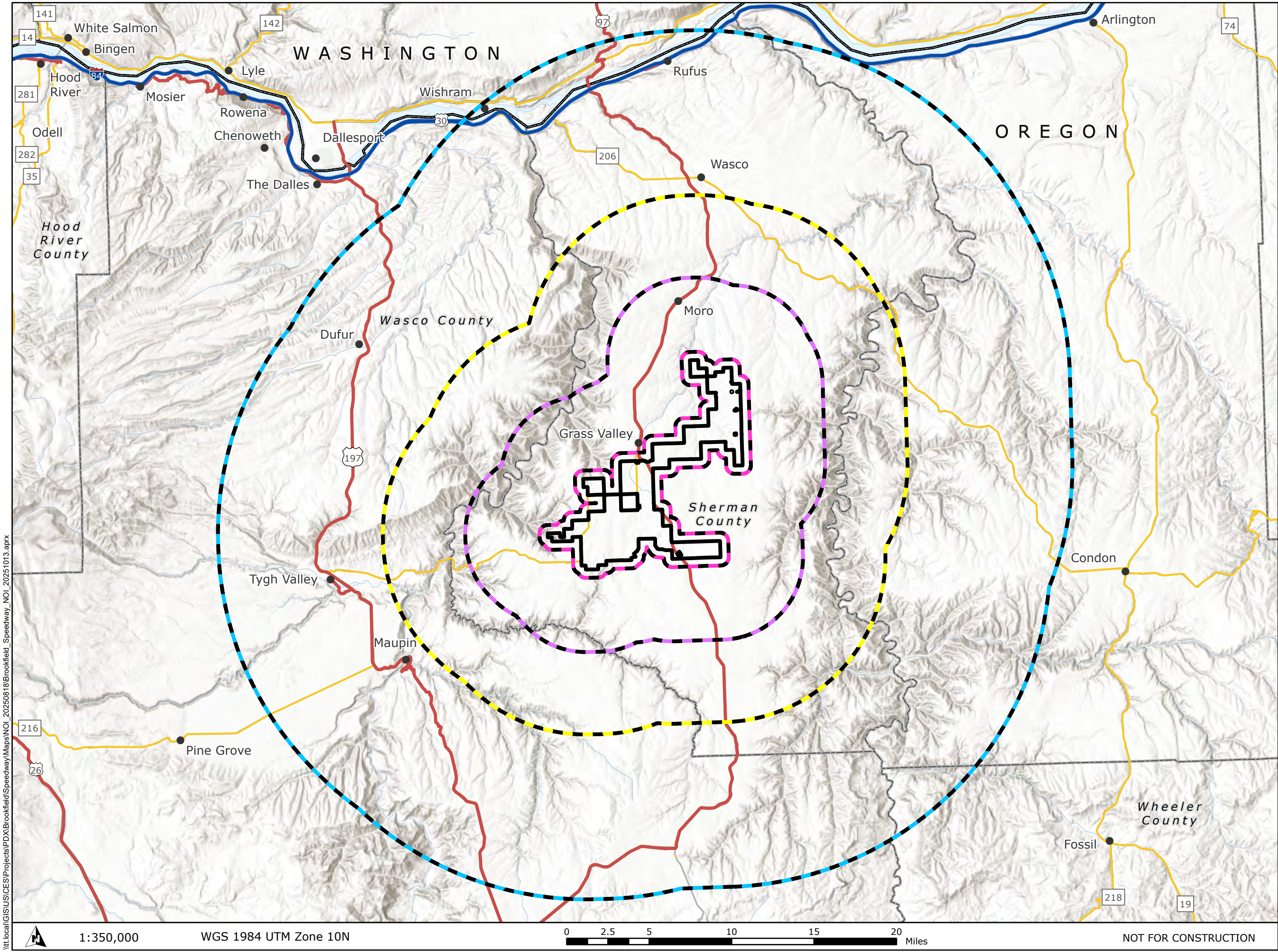
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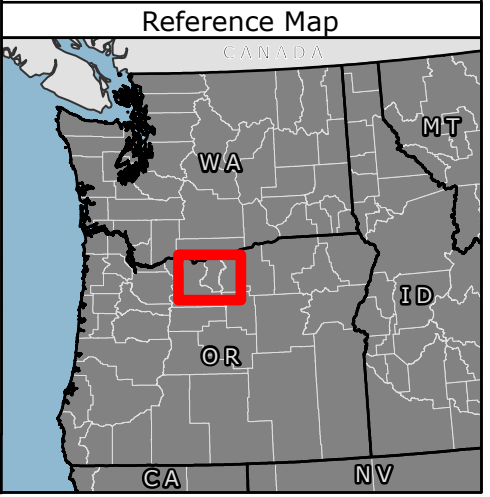


# Speedway Energy

## Figure 4 Study Areas

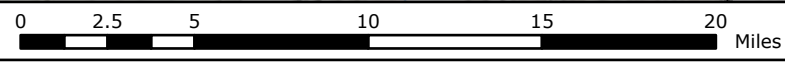
SHERMAN COUNTY, OR

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



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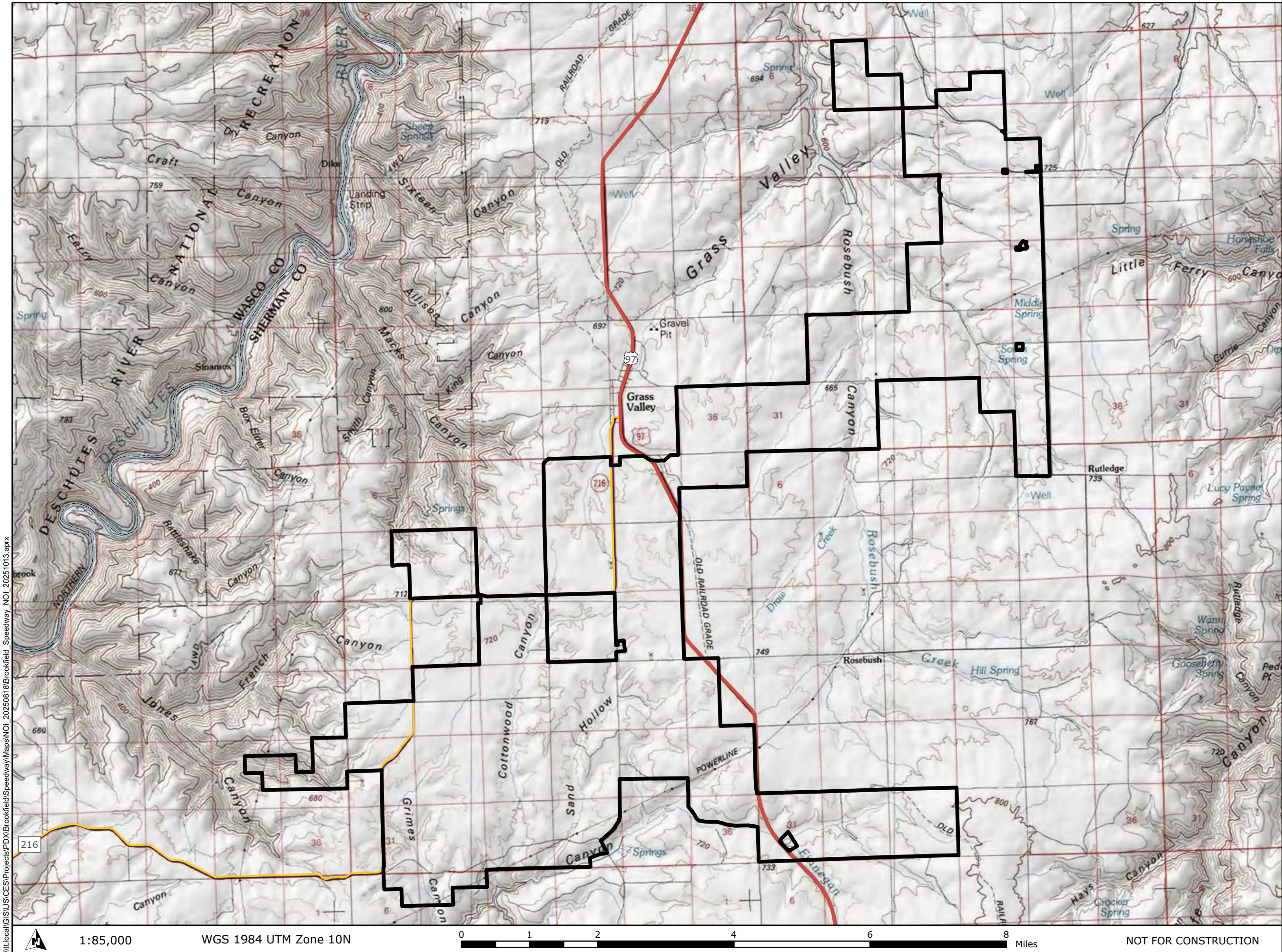
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Speedway Energy

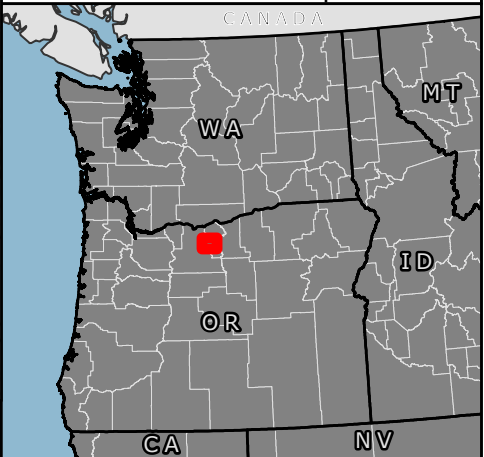
Figure 5  
Topography

SHERMAN COUNTY, OR

- Site Boundary
- County Boundary
- US Highway
- State Highway

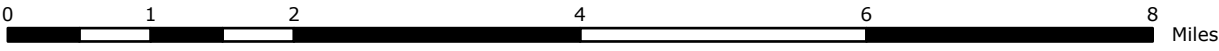


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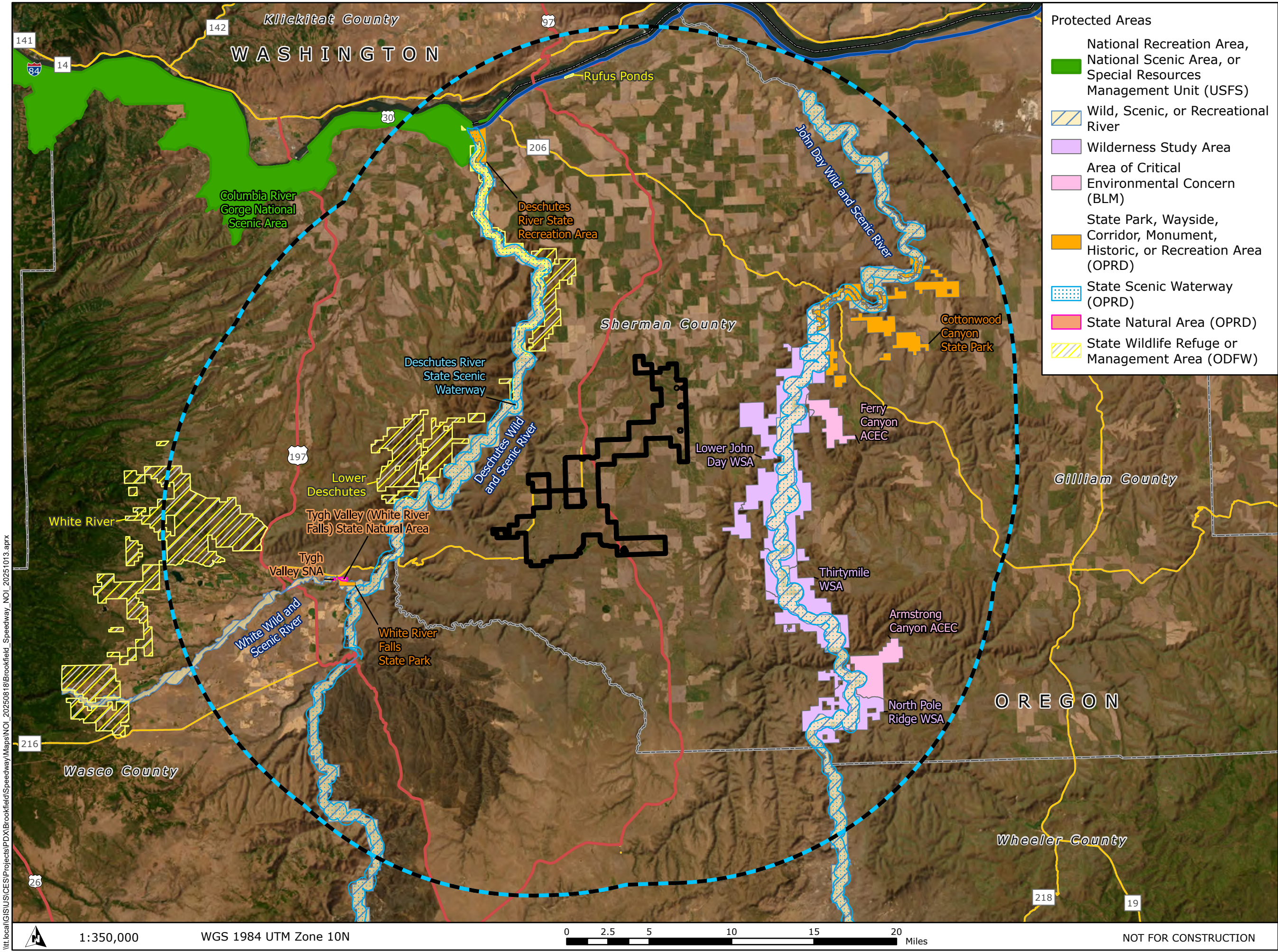
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**Speedway Energy**

**Figure 6  
Protected Areas**

SHERMAN COUNTY, OR

Site Boundary

Study Area (20-mile Buffer)

State Boundary

County Boundary

Interstate Highway

US Highway

State Highway

**TETRA TECH**

**Brookfield**  
Renewable Energy Partners

Reference Map

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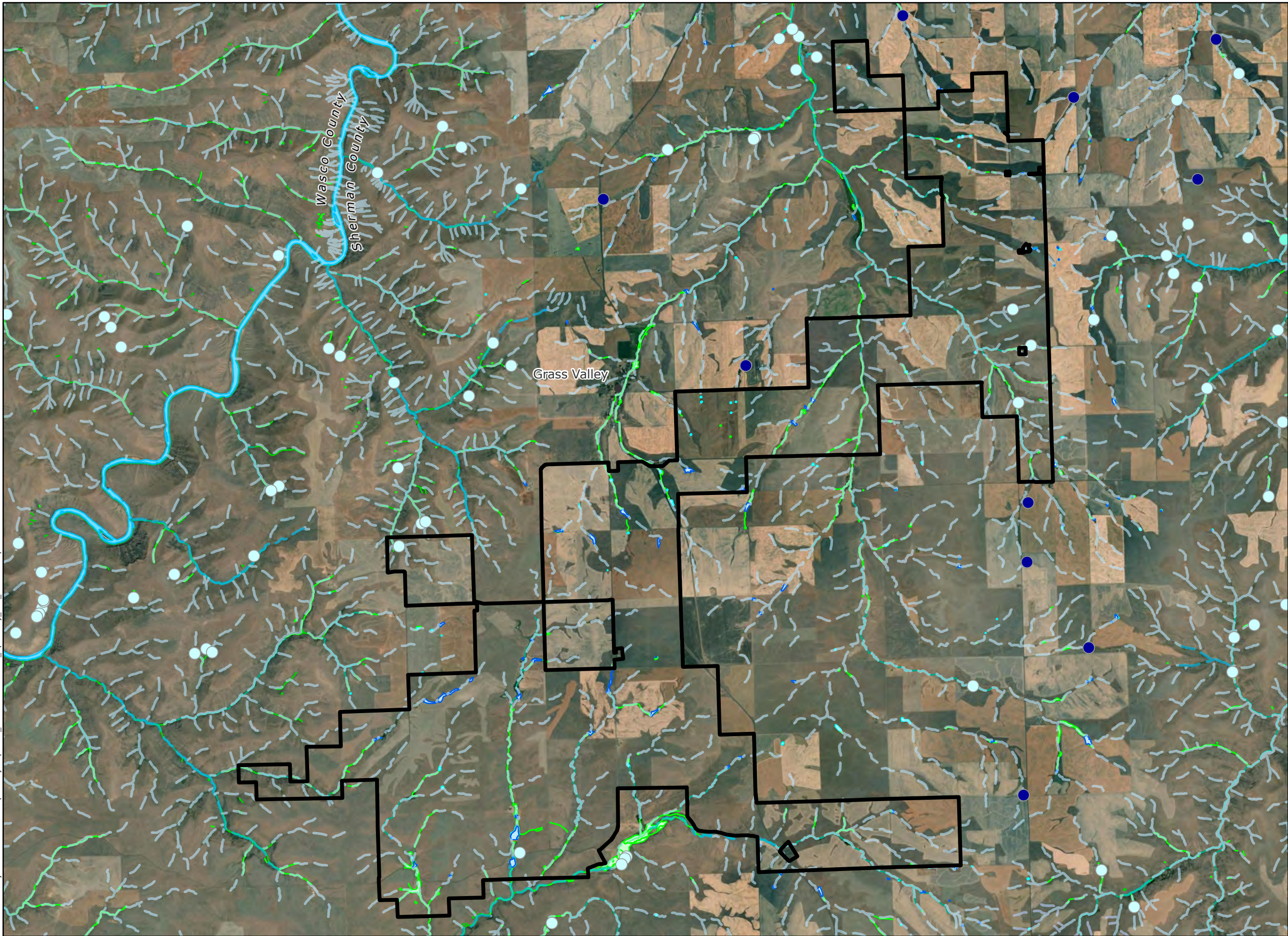
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# Speedway Energy

**Figure 7**  
**National Wetlands**  
**Inventory and National**  
**Hydrography Dataset**

SHERMAN COUNTY, OR

- Site Boundary
- City/Town
- County Boundary
- Waters (NHD)
  - Spring/Seep
  - Waterfall
  - Well
  - Intermittent Stream
  - Ephemeral Stream
  - Perennial Stream/River
  - Lake/Pond
  - Dam/Weir
  - River
- Wetlands (NWI)
  - Freshwater Emergent Wetland
  - Freshwater Forested/Shrub Wetlands
  - Freshwater Pond
  - Riverine

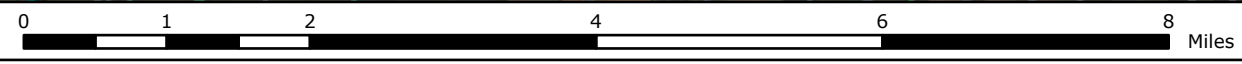


## Reference Map



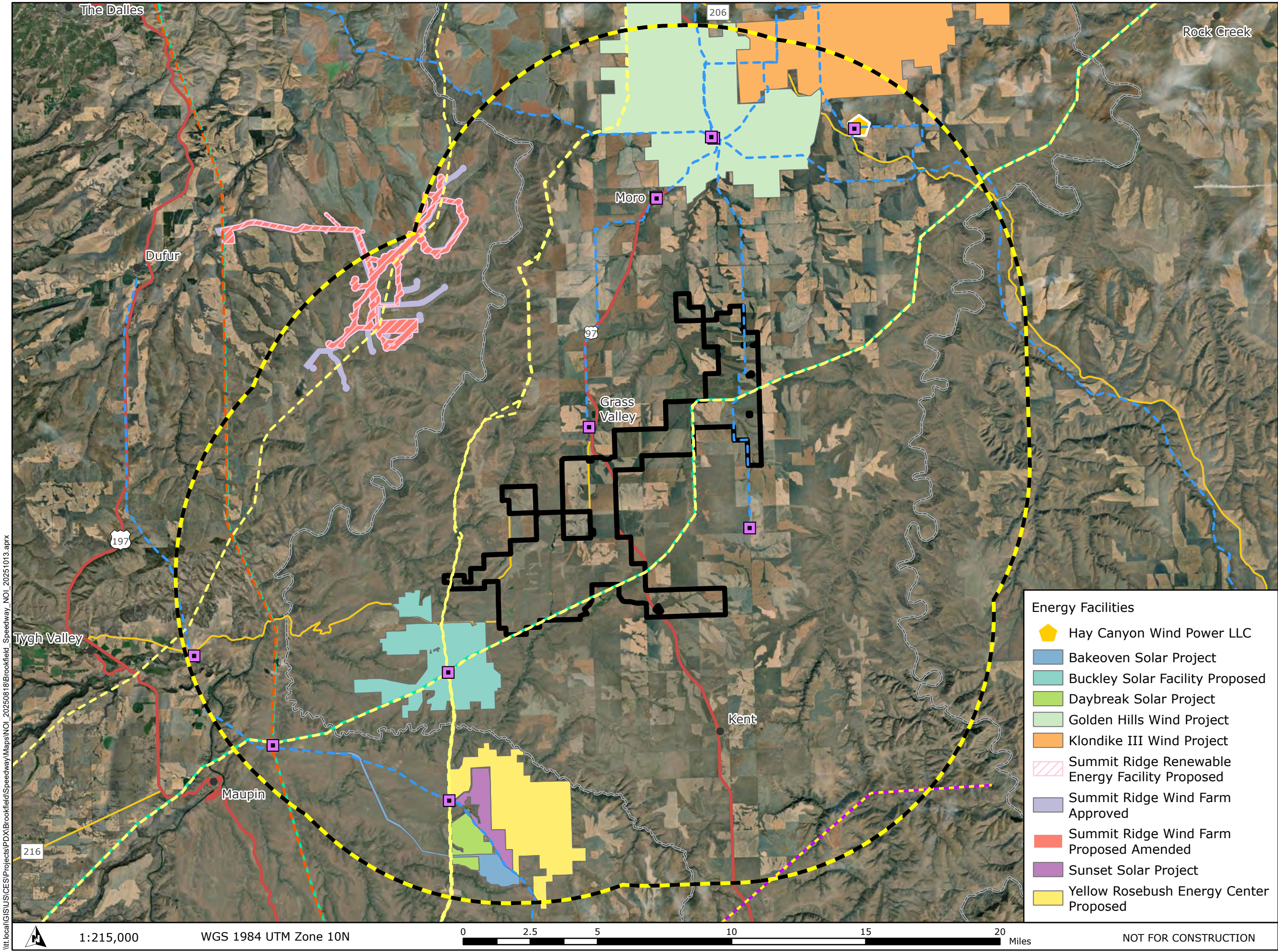
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# Speedway Energy

## Figure 8 Energy Facilities

SHERMAN COUNTY, OR

Site Boundary

Study Area (10-mile Buffer)

City/Town

County Boundary

US Highway

State Highway

Existing Energy Infrastructure

Substations

69-115 kV Transmission Line

230-345 kV Transmission Line

500 kV Transmission Line

1000 kV Transmission Line

Natural Gas Pipeline

Energy Facilities

Hay Canyon Wind Power LLC

Bakeoven Solar Project

Buckley Solar Facility Proposed

Daybreak Solar Project

Golden Hills Wind Project

Klondike III Wind Project

Summit Ridge Renewable Energy Facility Proposed

Summit Ridge Wind Farm Approved

Summit Ridge Wind Farm Proposed Amended

Sunset Solar Project

Yellow Rosebush Energy Center Proposed

TETRA TECH

Brookfield  
Renewable Energy Partners

Reference Map

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WGS 1984 UTM Zone 10N

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Miles

NOT FOR CONSTRUCTION

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## **Attachment 1. Articles of Organization**

# Delaware

The First State

Page 1

*I, CHARUNI PATIBANDA-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 "BGTF SPEEDWAY  
PROJECT LLC", FILED IN THIS OFFICE ON THE FIRST DAY OF AUGUST,  
A.D. 2025, AT 12:50 O`CLOCK P.M.*



*C. P. Sanchez*

Charuni Patibanda-Sanchez, Secretary of State

10282076 8100  
SR# 20253544609

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

Authentication: 204369272  
Date: 08-01-25

STATE OF DELAWARE  
CERTIFICATE OF FORMATION  
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is BGTF Speedway Project LLC

2. The Registered Office of the limited liability company in the State of Delaware is located at 251 Little Falls Drive (street),  
in the City of Wilmington, Zip Code 19808. The  
name of the Registered Agent at such address upon whom process against this limited  
liability company may be served is Corporation Service Company

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation  
this 1<sup>st</sup> day of August, 2025.

By: Nathalie Godard  
Authorized Person

Name: Nathalie Godard  
Print or Type



# APPLICATION FOR AUTHORITY



Corporation Division  
[sos.oregon.gov/business](https://sos.oregon.gov/business)

**E-FILED**  
Aug 20, 2025  
**OREGON SECRETARY OF STATE**

## REGISTRY NUMBER

245756697

## TYPE

FOREIGN LIMITED LIABILITY COMPANY

## 1. ENTITY NAME

BGTF SPEEDWAY PROJECT LLC

## 2. MAILING ADDRESS

200 LIBERTY STREET  
14TH FLOOR  
NEW YORK NY 10281 USA

## 3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY STREET NE SUITE 310  
SALEM OR 97301 USA

## 4. MANAGEMENT

This Limited Liability Company will be manager-managed by one or more managers

## 5. DATE OF ORGANIZATION

08-01-2025

## 6. DURATION

PERPETUAL

## 7. JURISDICTION

DE

## 8. PRIMARY PHYSICAL LOCATION

200 LIBERTY STREET  
14TH FLOOR  
NEW YORK NY 10281 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**

WILLIAM FYFE

**TITLE**

MANAGER / SECRETARY

**DATE**

08-20-2025

## **Attachment 2. Tax Lots and Property Owner Information**

**Notice of Intent to Apply for a Site Certificate for the Speedway Energy Project**  
Property Owner List and Tax Lot Map - ShermanCounty Assessor Data (Obtained Sep.10, 2025)

Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
03S15E00002300	CHRISTIANSEN, KATHERINE JANE	PO BOX 104	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S15E00002700	CHRISTIANSEN, KATHERINE J	PO BOX 104	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S15E00002500	WM PERRY LAND LLC	23397 S REID ROAD	ESTACADA	OR	97023	ESTACADA, OR 97023
03S15E00002400	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S15E00002800	JUSTESEN, FRED & JON	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S15E00002600	FEDERAL GOVERNMENT		UNKNOWN	OR		UNKNOWN, OR 00000
03S16E00003501	NOGLE, PAT	58558 HIGHWAY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00004300	EAKIN, BRAD T & STACY JO	59246 HORSESHOE BEND ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E0000601	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E0000600	PADGET, DARREN D & BRENDA J	95908 RUTLEDGE LANE	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003000	JUSTESEN, FRED & JON	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S15E00001801	RECKMANN, DOUGLAS	3850 SE 40TH	PORTLAND	OR	97202-1713	PORTLAND, OR 97202-1713
03S16E00003500	NOGLE, PAT & NOGLE, WHITNEY	59599 STARK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00003900	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00004100	GALLEY, JOHN & J DIANE TRUST	PO BOX 65	MORO	OR	97039	MORO, OR 97039
01S17E00008100	JOHNSON, JOHN	20450 ILLAHEE DR.	BEND	OR	97702	BEND, OR 97702
01S17E00008100	JOHNSON, JOHN	20450 ILLAHEE DR.	BEND	OR	97702	BEND, OR 97702
03S15E0000900	WM PERRY LAND LLC	23397 S REID ROAD	ESTACADA	OR	97023	ESTACADA, OR 97023
03S15E0000700	CHRISTIANSEN, KATHERINE J	PO BOX 104	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00001100	BIRD, STEVEN & LINDA	PO BOX 156	WASCO	OR	97065	WASCO, OR 97065
03S16E0000800	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
03S16E00001700	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00001600	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
03S16E00002500	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
03S16E00002400	HECTOR, ELLEN TRUSTEE	2529 SIERRA BERMEJA DRIVE	SIERRA VISTA	AZ	85650	SIERRA VISTA, AZ 85650
04S16E0000400	QUINLAN, EARL C TRUSTEE	77500 S 6TH STREET, LOT E5	COTTAGE GROVE	OR	97424	COTTAGE GROVE, OR 97424
04S16E0000800	FEDERAL GOVERNMENT		UNKNOWN	OR	0	UNKNOWN, OR 00000
04S16E0000300	D.L.L. TRUST	5142 ESTASI STREET	LAS VEGAS	NV	89135	LAS VEGAS, NV 89135
04S16E0000600	RUGGLES, JESSE DEAN	58030 FINNEGAN ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
04S16E00001500	FEDERAL GOVERNMENT		UNKNOWN	OR	0	UNKNOWN, OR 00000
03S17E00003600	PADGET, G DALE & DEANNA D TRST	60945 LONEROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000500	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000600	EAKIN, BRAD & STACY	59246 HORSESHOE BEND RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000200	BUCK HOLLOW RANCH INC	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0200401	BROWN KRISTINE, WEIS, NICHOLAS	PO BOX 62	MORO	OR	97039	MORO, OR 97039
03S16E0000400	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0200300	BUCK HOLLOW RANCH INC	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000100	TRIMBLE FARMS LLC	PO BOX 10	SANDY	OR	97055	SANDY, OR 97055
03S16E0000900	LEMLEY, RANDY	14130 SW 105TH AVE APT #3	TIGARD	OR	97224	TIGARD, OR 97224
03S16E00001200	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000800	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
03S16E00001000	BIRD, STEVEN & LINDA	PO BOX 156	WASCO	OR	97065	WASCO, OR 97065
03S16E00001300	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00001400	TRIMBLE FARMS LLC	PO BOX 10	SANDY	OR	97055	SANDY, OR 97055
03S16E00002300	MICHIGAN CEMETERY ASSN	UNKNOWN	UNKNOWN	OR	0	UNKNOWN, OR 00000
03S16E00002200	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002400	HECTOR, ELLEN TRUSTEE	2529 SIERRA BERMEJA DRIVE	SIERRA VISTA	AZ	85650	SIERRA VISTA, AZ 85650
03S16E00001800	SALOMON, PAULINE TRUSTEE	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00001900	SALOMON, PAULINE TRUSTEE	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00001600	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
03S16E00002000	STATE OF OREGON		UNKNOWN	OR	0	UNKNOWN, OR 00000
03S16E00002600	CHRISTIANSEN, KATHERINE J	PO BOX 104	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002700	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002800	JUSTESEN, FRED A & JONNIE L	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002800	JUSTESEN, FRED A & JONNIE L	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002900	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002900	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029

**Notice of Intent to Apply for a Site Certificate for the Speedway Energy Project**  
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Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
03S16E00003000	JUSTESEN, FRED & JON	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003100	JUSTESEN, FRED	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003300	ROLFE, JOHNATHAN	96485 MONKLAND LANE	MORO	OR	97039	MORO, OR 97039
03S16E00002700	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002700	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00002800	JUSTESEN, FRED A & JONNIE L	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003800	RUGGLES, JESSE	58030 FINNEGAN ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003900	SALOMON, PAULINE TRUSTEE	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003700	HULBERT, JAMES E	PO BOX 157	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003600	FINNEGAN RANCH LLC	PO BOX 157	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00004000	RICHARDS CORPORATION	2800 156TH AV SE SUITE 130	BELLEVUE	WA	98007	BELLEVUE, WA 98007
03S16E00004300	RUGGLES, JESSE DEAN	58030 FINNEGAN ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00004200	BERGE, JAMES C ETAL	PO BOX 147	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00001100	KOCK, JULIA O'HARA	1027 OLD HWY 8	ROOSEVELT	WA	99356-9717	ROOSEVELT, WA 99356-9717
03S17E00000600	PADGET, DARREN D & BRENDA J	95908 RUTLEDGE LANE	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00000600	PADGET, DARREN D & BRENDA J	95908 RUTLEDGE LANE	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00000500	WHEELER, MICK S.	60335 HORSESHOE BEND ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00001200	TRIMBLE FARMS LLC	PO BOX 10	SANDY	OR	97055	SANDY, OR 97055
03S17E00003800	ROLFE, JOHNATHAN	96485 MONKLAND LANE	MORO	OR	97039	MORO, OR 97039
03S17E00002700	JUSTESEN, TATE	2211 SW FIRST AVENUE UNIT 301	PORTLAND	OR	97201	PORTLAND, OR 97201
03S17E00003500	EAKIN, BRAD & STACY	59246 HORSESHOE BEND RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00003801	FRITTS, DAVID L & JULIE A	93889 BOURBON LANE	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00003900	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00004200	BOURBON ROAD RENEWABLES LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00004400	ROLFE, JOHNATHAN & KALIE	96485 MONKLAND LANE	MORO	OR	97039	MORO, OR 97039
03S17E00004000	STATE OF OREGON		UNKNOWN	OR	0	UNKNOWN, OR 00000
04S16E00001600	BROWN, JAMES E	2235 NW LARCHLEAF LANE	REDMOND	OR	97756	REDMOND, OR 97756
04S16E00001400	BERGE, JAMES C ETAL	PO BOX 147	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
04S16E00001300	SALOMON, PAULINE TRUSTEE	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
04S16E00000500	RUGGLES, JESSE DEAN	58030 FINNEGAN ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
04S17E00000600	HATTRUP, KENNETH P. TRUSTEE	535 OLD COURSE WAY	SHERIDAN	WY	82801	SHERIDAN, WY 82801
04S17E00000500	ROLFE, JOHNATHAN & KALIE	96845 MONKLAND LANE	MORO	OR	97039	MORO, OR 97039
04S17E00000700	VON BORSTEL, ALAN W	56712 VON BORSTEL ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E00004400	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E00004000	EAKIN, BRAD & STACY	59246 HORSESHOE BEND RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E00004300	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00004200	BERGE, JAMES C ETAL	PO BOX 147	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00000901	HANLON, GERARD A	64002 LONEROCK ROAD	MORO	OR	97039	MORO, OR 97039
01S17E000007900	COELSCH, LEO W	63711 COELSCH ROAD	MORO	OR	97039	MORO, OR 97039
01S17E000008000	COELSCH, LEO W	63711 COELSCH ROAD	MORO	OR	97039	MORO, OR 97039
01S17E000008100	JOHNSON, JOHN	20450 ILLAHEE DR.	BEND	OR	97702	BEND, OR 97702
02S17E000001101	COELSCH, LEO W & KRISTA	63711 COELSCH ROAD	MORO	OR	97039	MORO, OR 97039
02S17E00000400	CHRISTIANSON, CORA MAY TRUSTEE	10505 N SAGE HOLLOW WAY	BOISE	ID	83714-9575	BOISE, ID 83714-9575
03S17E00000901	VON BORSTEL, LEE A	56424 VON BORSTEL ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00000700	ZIEGLER FARMS LLC	201 J STREET	LEBANON	OR	97355	LEBANON, OR 97355
03S17E00000601	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E000005500	HELEN OLDS RANCH LLC	PO BOX 52	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E000005600	ZIEGLER FARMS LLC	201 J STREET	LEBANON	OR	97355	LEBANON, OR 97355
02S17E000002900	GREEN, VIVETTE LEE TRUST	2033 SW EASTWOOD AV	GRESHAM	OR	97080	GRESHAM, OR 97080
02S17E000002800	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E000005000	BARNETT, LEE	131 VALLEY VIEW LANE	BUTTE	MT	59701	BUTTE, MT 59701
02S17E000005200	PACIFIC MOTORSPORTS MGMT LLC	PO BOX 386	BEAVERTON	OR	97075	BEAVERTON, OR 97075
02S17E000003500	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E000005100	KOCK FARMS LLC	PO BOX 6	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E000003900	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
02S17E000001000	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065

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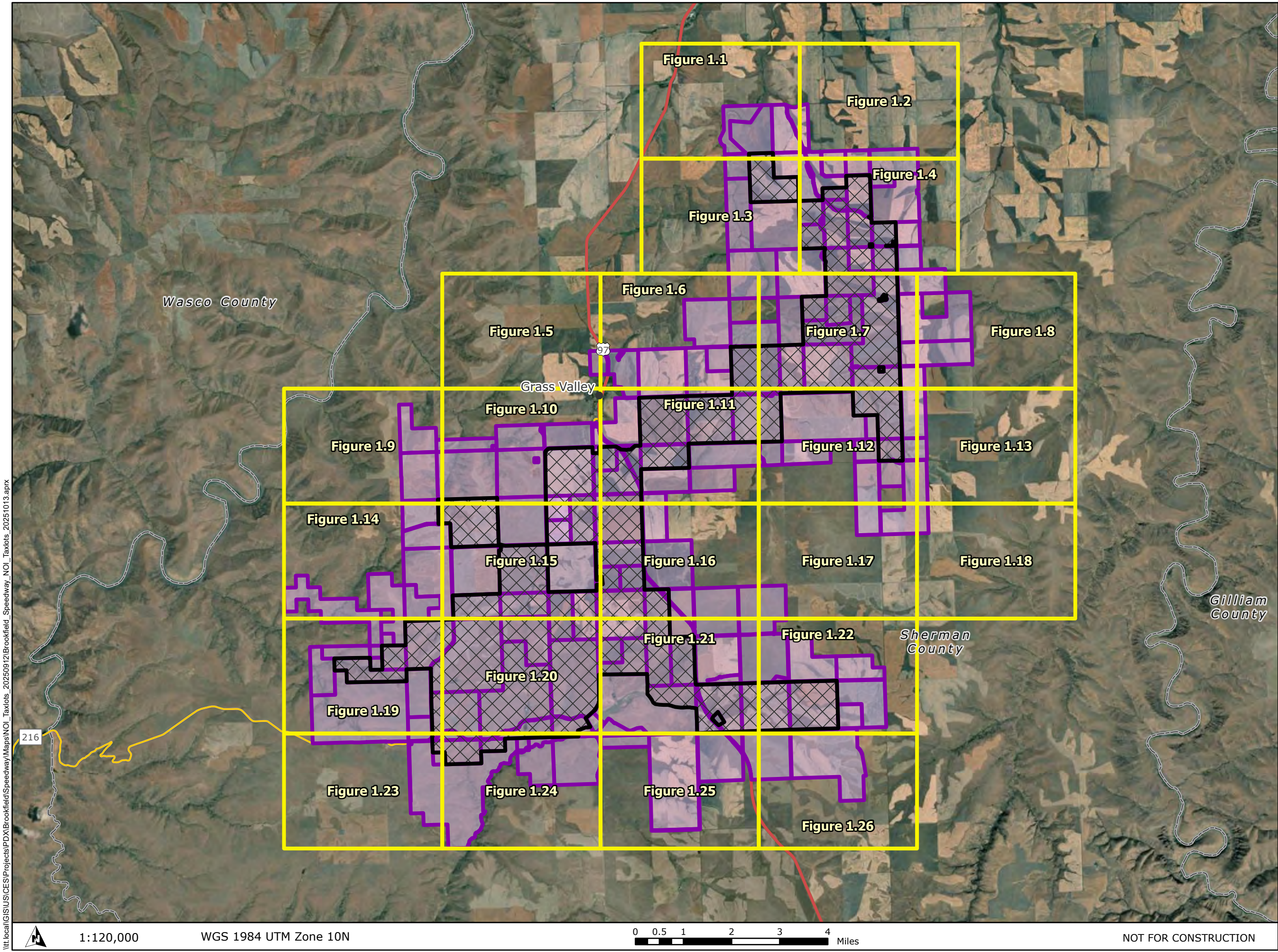
Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
02S17E00001100	COELSCH, LEO W	63711 COELSCH ROAD	MORO	OR	97039	MORO, OR 97039
02S17E0000301	HART, DARRYL & TERESA	63461 FRASER ROAD	MORO	OR	97039	MORO, OR 97039
02S17E0000600	HOCKS, BARBARA D	15130 S MAPLE LANE RD #36	OREGON CITY	OR	97045-8881	OREGON CITY, OR 97045-8881
02S17E0000700	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E0000700	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E00001500	MCKAY, ALEXIS	4248 GALEWOOD ST	LAKE OSWEGO	OR	97035	LAKE OSWEGO, OR 97035
02S17E00001600	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E00001700	POWELL, PATRICK, TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E00001700	POWELL, PATRICK, TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E0000601	MARTIN, AUSTEN	PO BOX 331	MORO	OR	97039	MORO, OR 97039
02S17E00001900	BLACKBURN, GARY L ETAL	25940 S JEWELL ROAD	BEAVERCREEK	OR	97004	BEAVERCREEK, OR 97004
02S17E00001800	BLAIR, PHILIP J & NETTIE L	35939 ABBIE LANE	ASTORIA	OR	97103	ASTORIA, OR 97103
02S17E00003100	MCKAY, ALEXIS	4248 GALEWOOD ST	LAKE OSWEGO	OR	97035	LAKE OSWEGO, OR 97035
02S17E00003000	MOORE, CHRISTOPHER & PATTI	65578 LONEROCK RD	MORO	OR	97039	MORO, OR 97039
02S17E00003000	MOORE, CHRISTOPHER & PATTI	65578 LONEROCK RD	MORO	OR	97039	MORO, OR 97039
02S17E00002900	GREEN, VIVETTE LEE TRUST	2033 SW EASTWOOD AV	GRESHAM	OR	97080	GRESHAM, OR 97080
02S17E00002701	DEGRANGE, MICHAEL & AMBER	WELLS FARGO REAL ESTATE TAX	DES MOINES	IA	50328	DES MOINES, IA 50328
02S17E00002600	HART, DARRYL R	63461 FRASER ROAD	MORO	OR	97039	MORO, OR 97039
02S17E00003400	BARNUM, RICHARD	3141 BUTTE STREET	KLAMATH FALLS	OR	97601	KLAMATH FALLS, OR 97601
02S17E00003600	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00003700	SHEPARD, DONNA KAY	3008 W GRACE STREET	BOISE	ID	83703	BOISE, ID 83703
02S17E00003801	SIMPSON, NANCY J & RICHARD C	PO BOX 165	MORO	OR	97039	MORO, OR 97039
02S17E00003800	CAMPBELL, STEPHEN FARM & CABIN TRUST	PO BOX 370	MORO	OR	97039	MORO, OR 97039
02S17E00004100	LONG, SUSAN K & WILFORD C TRST	4005 S W JERALD WAY	PORTLAND	OR	97221	PORTLAND, OR 97221
02S17E00004900	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00004800	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00004300	LONG, SUSAN K & WILFORD C TRST	4005 SW JERALD WAY	PORTLAND	OR	97221	PORTLAND, OR 97221
02S17E00002700	PINKERTON RANCH	PO BOX 343	MORO	OR	97039	MORO, OR 97039
02S17E00004601	BLAGG, KYLE J	2001 S FLINT ROAD	SPOKANE	WA	99224	SPOKANE, WA 99224
02S17E00004600	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00005000	BARNETT, LEE	131 VALLEY VIEW LANE	BUTTE	MT	59701	BUTTE, MT 59701
02S17E00005400	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000700	SCHILLING RANCH, LLC	1435 E 16 ST	THE DALLES	OR	97058	THE DALLES, OR 97058
02S16E00005100	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00001100	KOCK, JULIA O'HARA	1027 OLD HWY 8	ROOSEVELT	WA	99356-9717	ROOSEVELT, WA 99356-9717
02S17E00001900	BLACKBURN, GARY L ETAL	25940 S JEWELL ROAD	BEAVERCREEK	OR	97004	BEAVERCREEK, OR 97004
02S16E00003400	CHAFFIN, MARGARET RUTH	18714 S SPRINGWATER RD	ESTACADA	OR	97023	ESTACADA, OR 97023
03S16E00003200	JUSTESEN, FRED & JUSTESEN JON	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00004100	GALLEY, JOHN & J DIANE TRUST	PO BOX 65	MORO	OR	97039	MORO, OR 97039
03S16E00004100	GALLEY, JOHN & J DIANE TRUST	PO BOX 65	MORO	OR	97039	MORO, OR 97039
02S17E0000800	BELSHE, JAMES R & JERRINE A	PO BOX 327	WASCO	OR	97065	WASCO, OR 97065
02S17E0000900	WENDLICK, DARLENE	851 S MARINE HILLS WAY	FEDERAL WAY	WA	98003	FEDERAL WAY, WA 98003
02S17E0000800	BELSHE, JAMES R & JERRINE A	PO BOX 327	WASCO	OR	97065	WASCO, OR 97065
03S16E00003900	SALOMON, PAULINE TRUSTEE	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
04S16E0000200	RUGGLES, JESSE DEAN	58030 FINNEGAN ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
04S16E0000100	VON BORSTEL, STUART J & CAROL	93415 LIBERTY LANE	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E00004500	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00005300	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00005400	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E0000500	BELSHE, JAMES R & JERRINE A	PO BOX 327	WASCO	OR	97065	WASCO, OR 97065
03S16E00003300	ROLFE, JOHNATHAN	96485 MONKLAND LANE	MORO	OR	97039	MORO, OR 97039
04S17E0000700	VON BORSTEL, ALAN W	56712 VON BORSTEL ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003401	JUSTESEN, FRED & JON	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S15E00002900	RICHARDS CORPORATION	2800 156TH AV SE SUITE 130	BELLEVUE	WA	98007	BELLEVUE, WA 98007
03S16E00002100	VON BORSTEL, PATRICIA TRUST	PO BOX 1042	LAKE OSWEGO	OR	97034	LAKE OSWEGO, OR 97034
03S16E00002100	VON BORSTEL, PATRICIA TRUST	PO BOX 1042	LAKE OSWEGO	OR	97034	LAKE OSWEGO, OR 97034

**Notice of Intent to Apply for a Site Certificate for the Speedway Energy Project**  
Property Owner List and Tax Lot Map - ShermanCounty Assessor Data (Obtained Sep.10, 2025)

Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
03S16E00001200	JUSTESEN, FRED, JONNIE, EVELYN	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E0000400	PADGET, G DALE & DEANNA D TRST	60945 LONEROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00004500	PADGET, G DALE & DEANNA D TRST	60945 LONEROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0000400	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00001700	POWELL, PATRICK, TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
02S17E00001600	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	WASCO, OR 97065
04S16E00001300	SALOMON, PAULINE TRUSTEE	59720 TWIN LAKES RD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E00003801	RUGGLES, JESSE DEAN	58266 FINNEGAN ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E2600200	ROLFE, FRED M & NANCY	PO BOX 144	GRASS VALLEY	OR	97029-0144	GRASS VALLEY, OR 97029-0144
03S17E00002800	JUSTESEN, TATE	2211 SW FIRST AVENUE UNIT 301	PORTLAND	OR	97201	PORTLAND, OR 97201
03S16E0200100	BUCK HOLLOW RANCH INC	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S16E0200200	SUSI, SCOTT & TONYA	1220 WHITEFISH STAGE	KALISPELL	MT	59901	KALISPELL, MT 59901
02S17E00004600	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S16E00005000	CHAFFIN, MARGARET RUTH	18714 S SPRINGWATER RD	ESTACADA	OR	97023	ESTACADA, OR 97023
03S16E0200400	BUCK HOLLOW RANCH INC	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
02S17E00002700	PINKERTON RANCH	PO BOX 343	MORO	OR	97039	MORO, OR 97039
03S16E00003400	FINNEGAN RANCH LLC	PO BOX 157	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00004100	EARL RANCH LLC	60906 HWY 216	GRASS VALLEY	OR	97029	GRASS VALLEY, OR 97029
03S17E00003700	MILLER, JUSTIN D & CHARLES E	PO BOX 318	WASCO	OR	97065	WASCO, OR 97065
03S16E00001100	BIRD, STEVEN & LINDA	PO BOX 156	WASCO	OR	97065	WASCO, OR 97065
03S16E00001000	BIRD, STEVEN & LINDA	PO BOX 156	WASCO	OR	97065	WASCO, OR 97065



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# Speedway Energy

## Figure 1 Taxlots Index

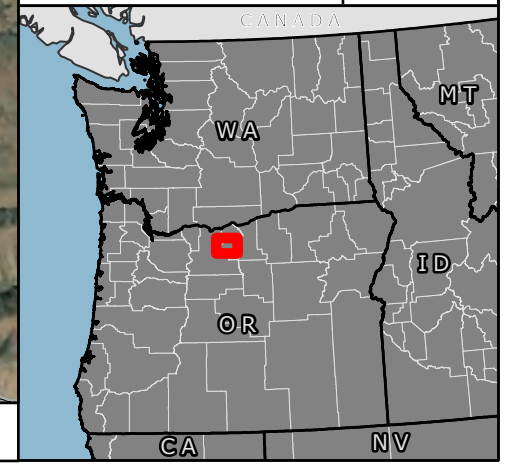
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- City/Town
- US Highway
- State Highway
- County Boundary
- Map Grid

<sup>1</sup>Data received from Sherman County  
09/10/2025

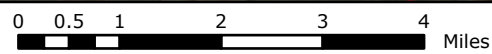


### Reference Map



1:120,000

WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.1  
Taxlots

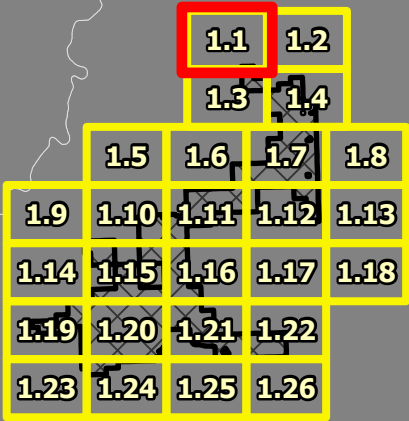
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



1:17,000

WGS 1984 UTM Zone 10N




0 0.5 1 Miles

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Figure 1.2  
Taxlots

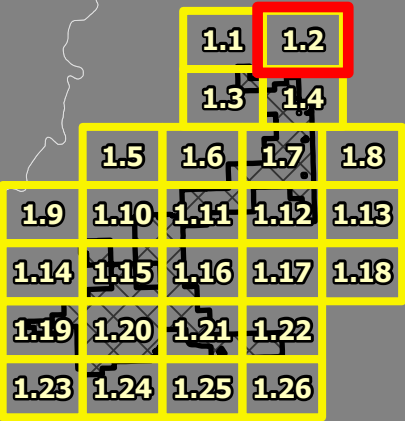
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary<sup>1</sup>
-  Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



\\tt.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\NOI\_Taxlots\_2025\013.aprx



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WGS 1984 UTM Zone 10N



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# Speedway Energy

**Figure 1.3  
Taxlots**

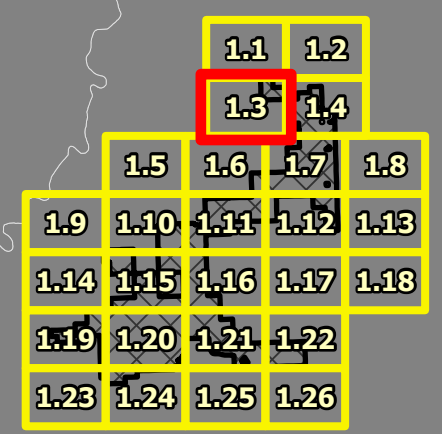
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

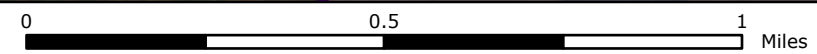


Reference Map



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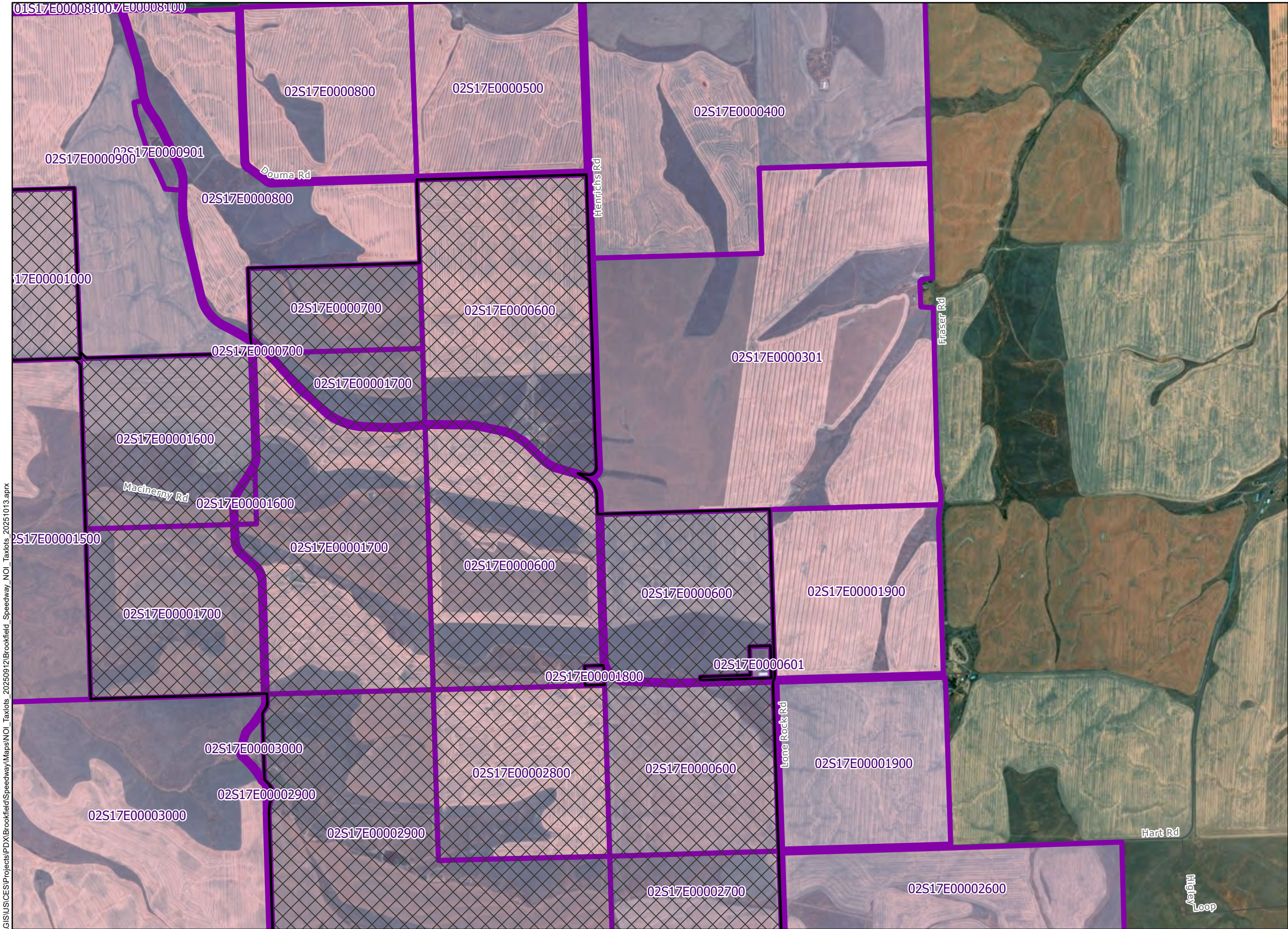
WGS 1984 UTM Zone 10N



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# Speedway Energy

## Figure 1.4 Taxlots

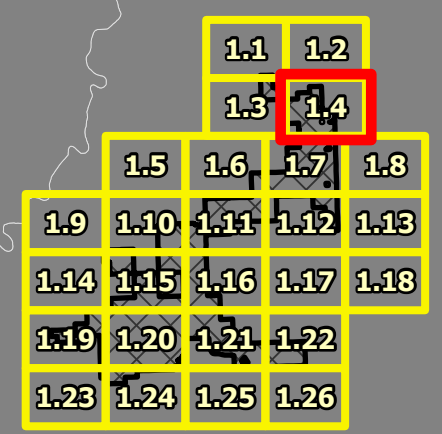
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

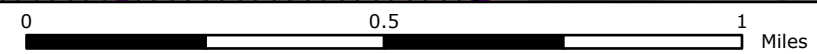


### Reference Map



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WGS 1984 UTM Zone 10N



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**Speedway Energy**

**Figure 1.5  
Taxlots**

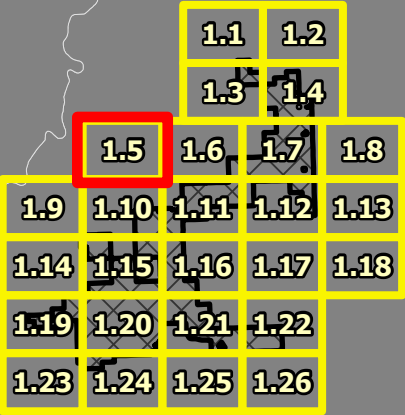
**SHERMAN COUNTY, OR**

-  Facility Site Boundary
-  Taxlot Boundary<sup>1</sup>
-  US Highway
-  Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



**Reference Map**



1:17,000

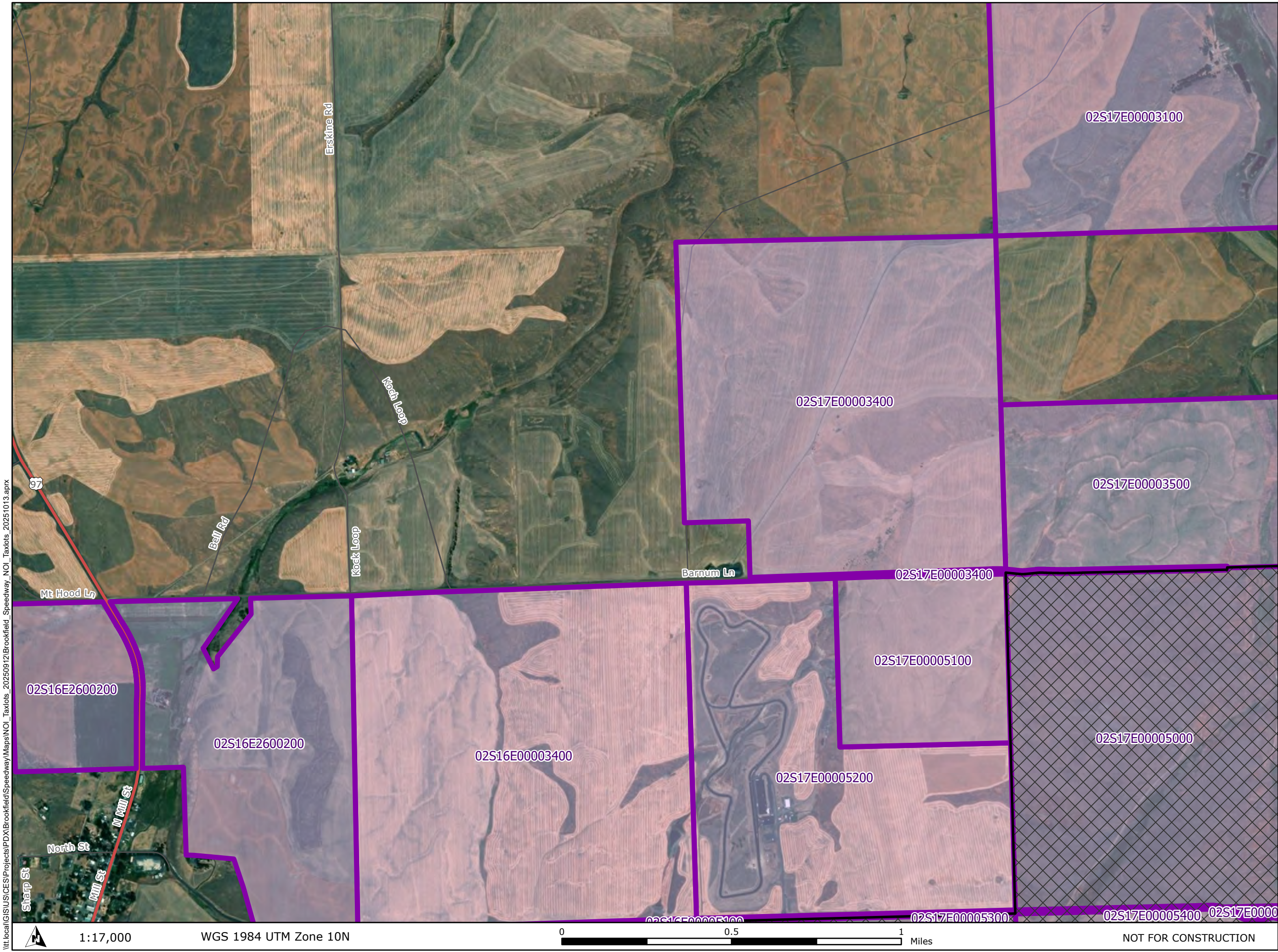
WGS 1984 UTM Zone 10N

0 0.5 1 Miles

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Speedway Energy

Figure 1.6  
Taxlots

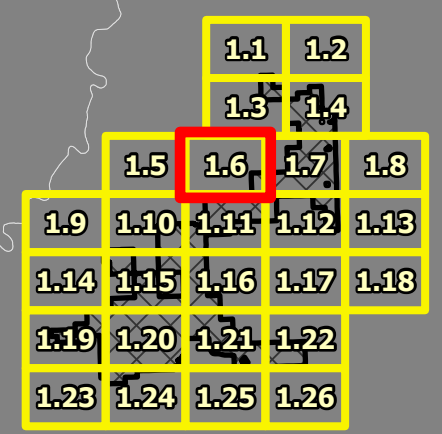
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

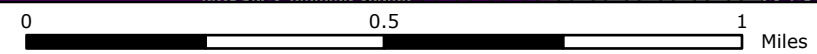


Reference Map



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WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.7  
Taxlots

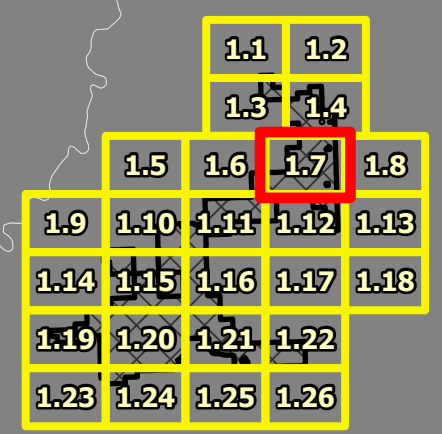
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

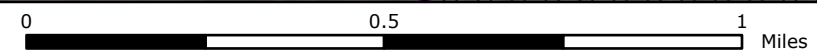


Reference Map



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WGS 1984 UTM Zone 10N



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**Speedway Energy**

**Figure 1.8  
Taxlots**

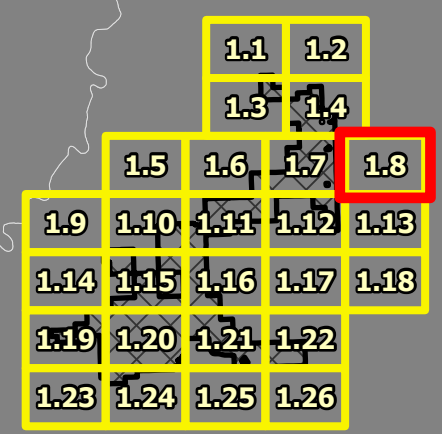
**SHERMAN COUNTY, OR**

-  Facility Site Boundary
-  Taxlot Boundary<sup>1</sup>
-  Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

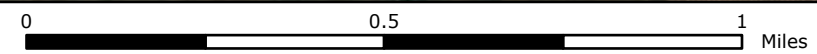


**Reference Map**



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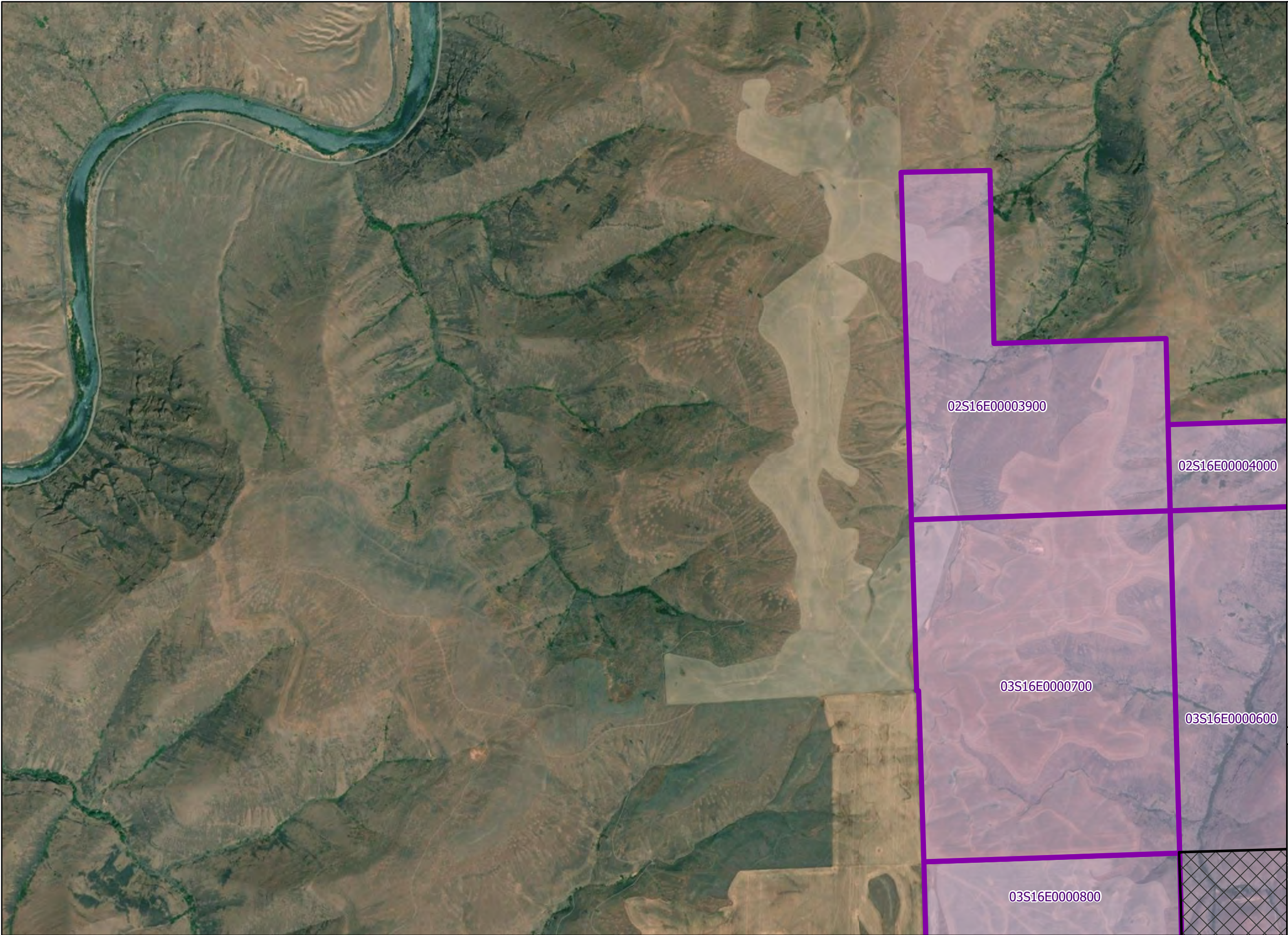
WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.9  
Taxlots

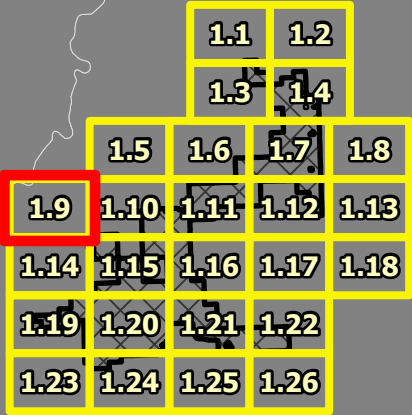
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



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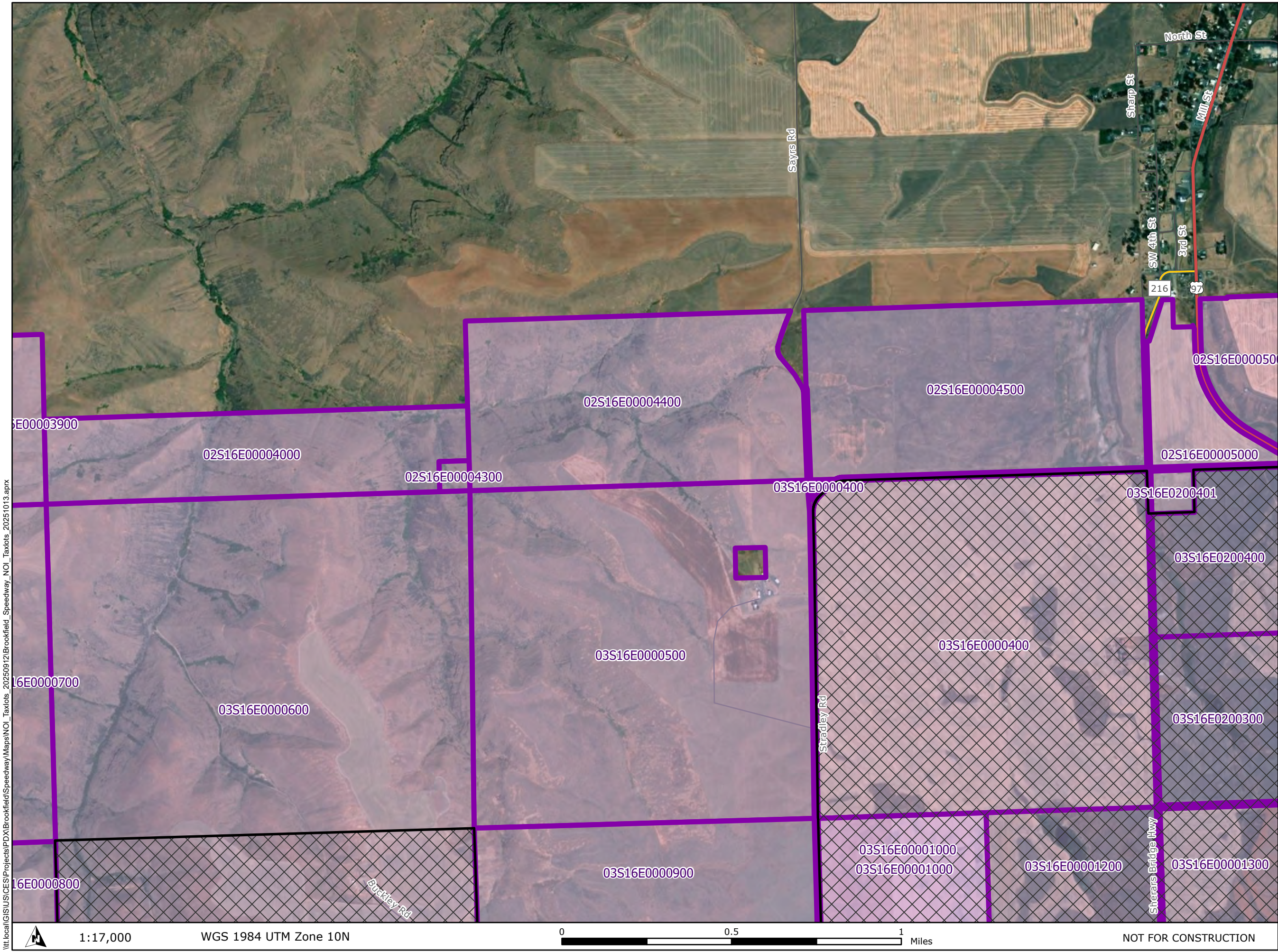
WGS 1984 UTM Zone 10N



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# Speedway Energy

## Figure 1.10 Taxlots

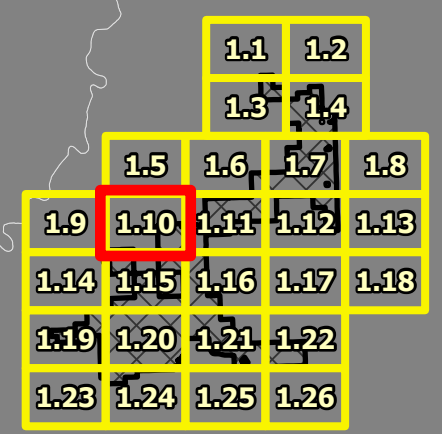
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

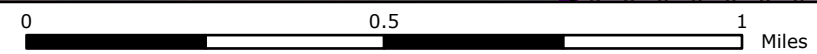


### Reference Map



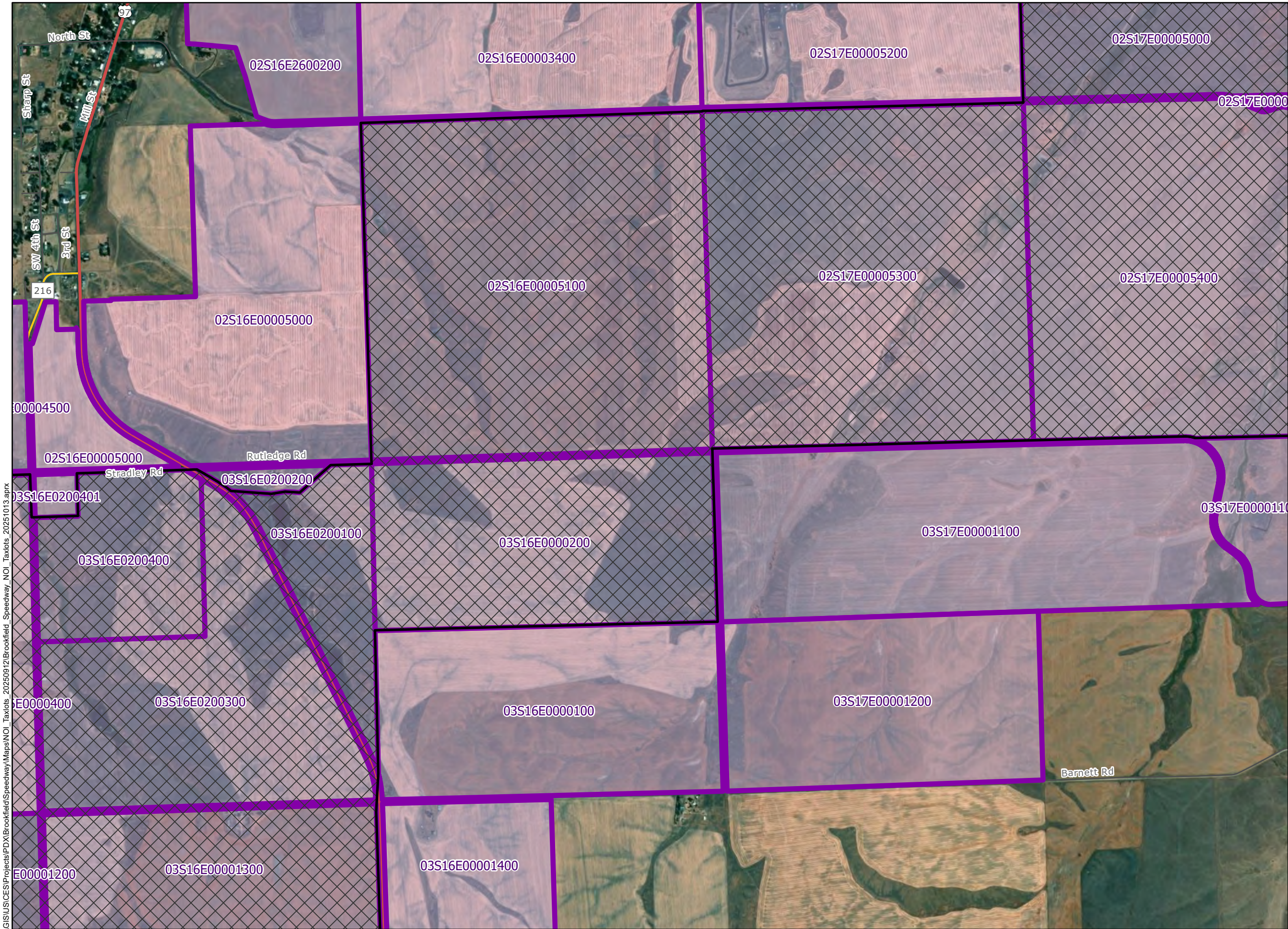
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# Speedway Energy

**Figure 1.11  
Taxlots**

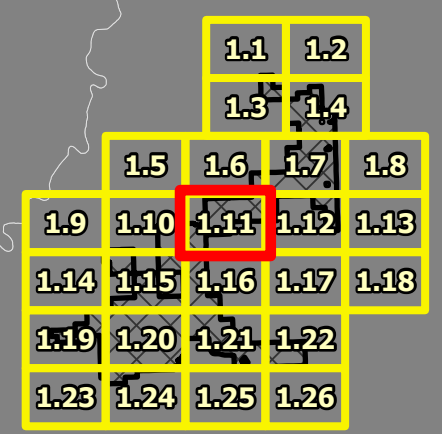
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
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Reference Map



\\tt.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\NOI\_Taxlots\_2025\013.aprx



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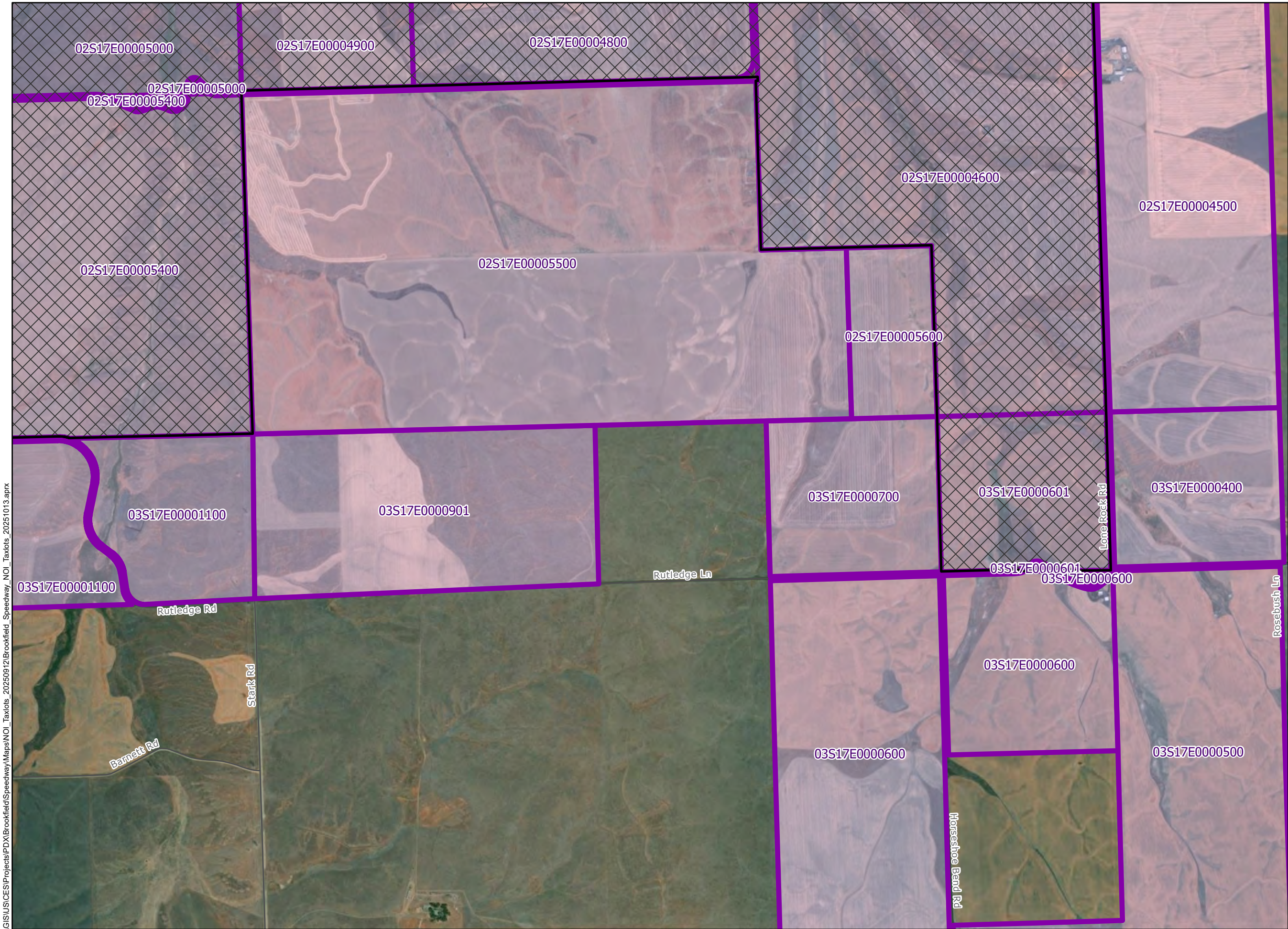
WGS 1984 UTM Zone 10N

0 0.5 1 Miles

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\\tlocal\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\NOI\_Taxlots\_2025\1013.aprx



**Speedway Energy**

**Figure 1.12  
Taxlots**

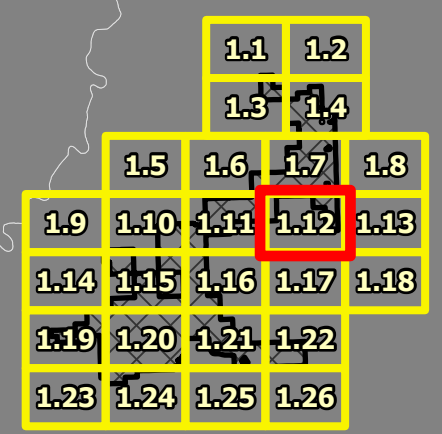
**SHERMAN COUNTY, OR**

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

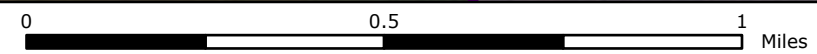


**Reference Map**



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WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.13  
Taxlots

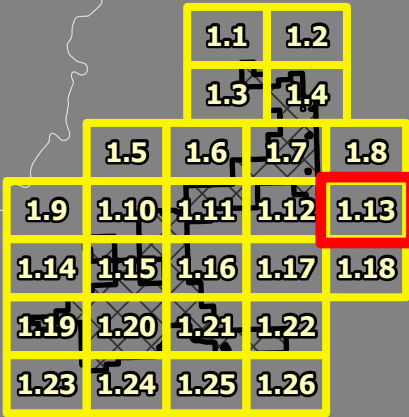
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



1:17,000

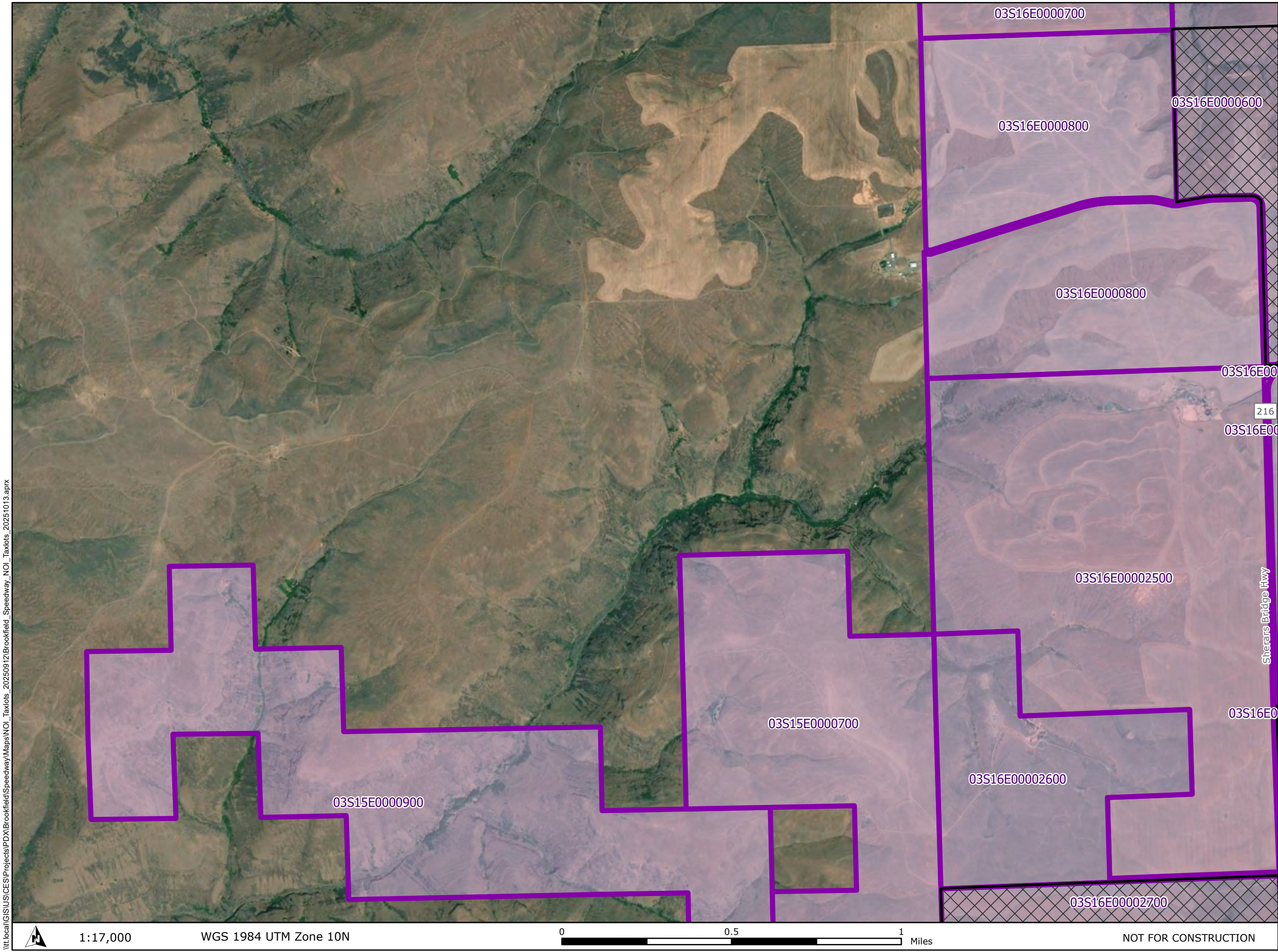
WGS 1984 UTM Zone 10N



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# Speedway Energy

**Figure 1.14  
Taxlots**

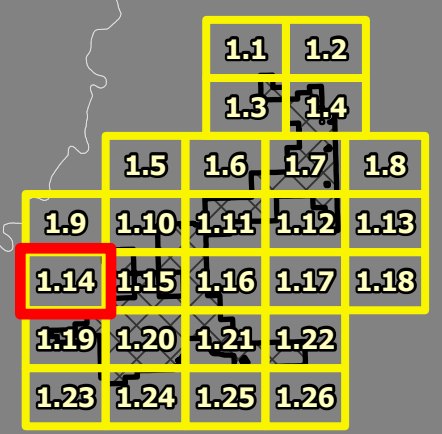
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



## Reference Map



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# Speedway Energy

**Figure 1.15  
Taxlots**

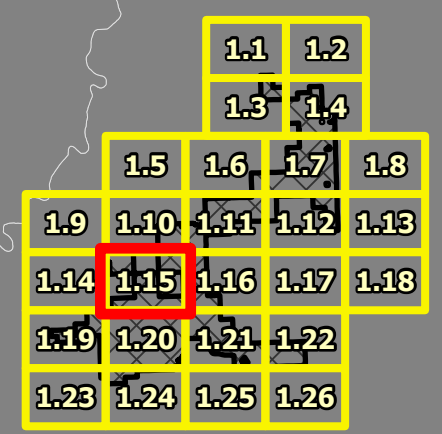
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



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Speedway Energy

Figure 1.16  
Taxlots

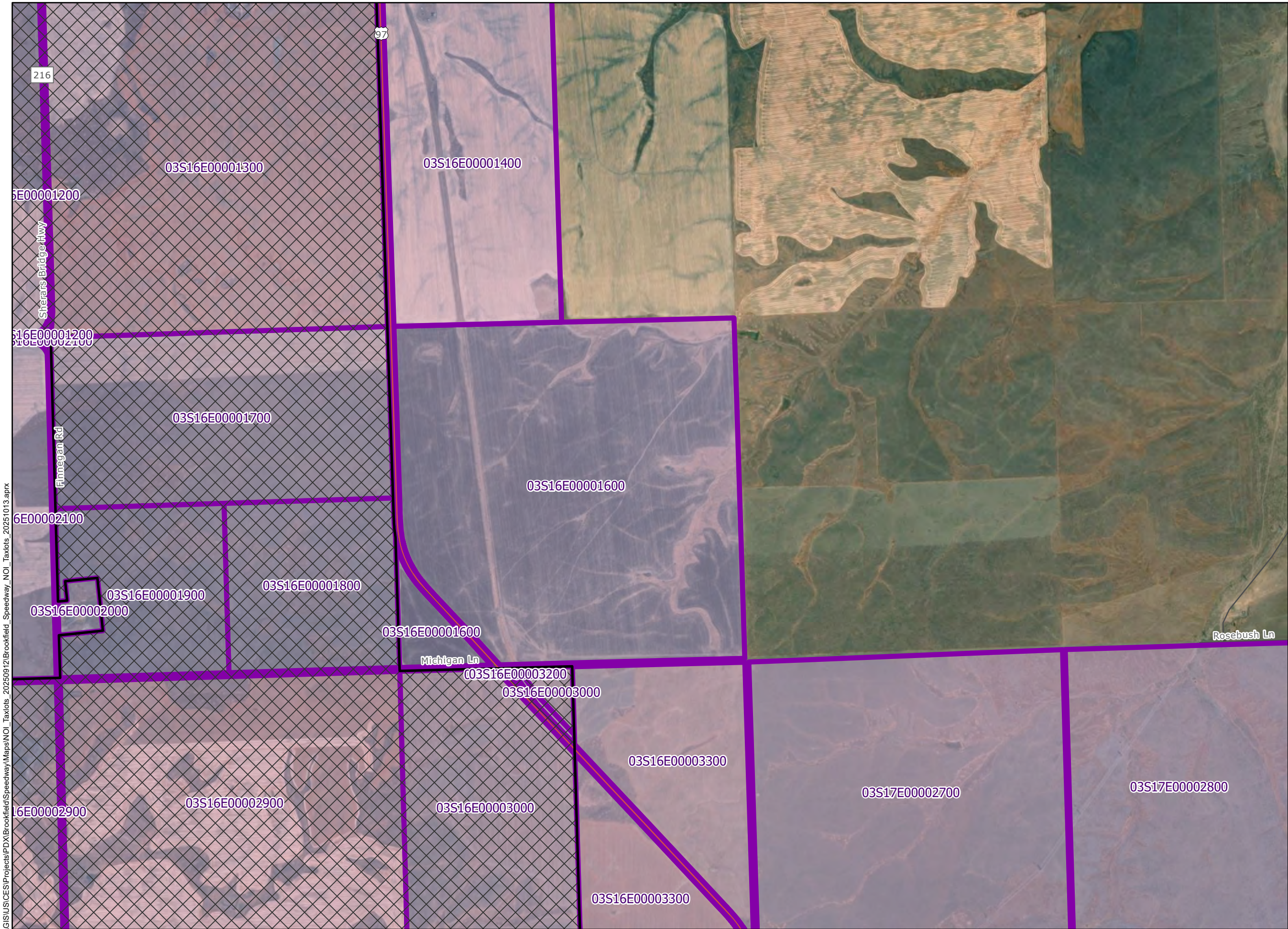
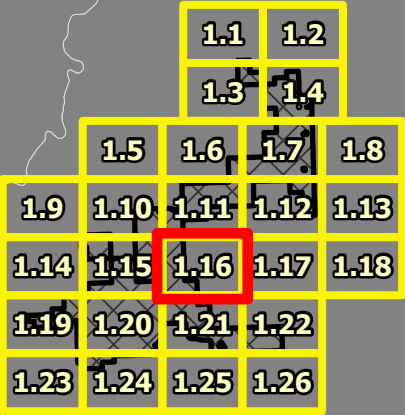
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary<sup>1</sup>
-  US Highway
-  State Highway
-  Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map

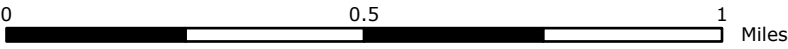


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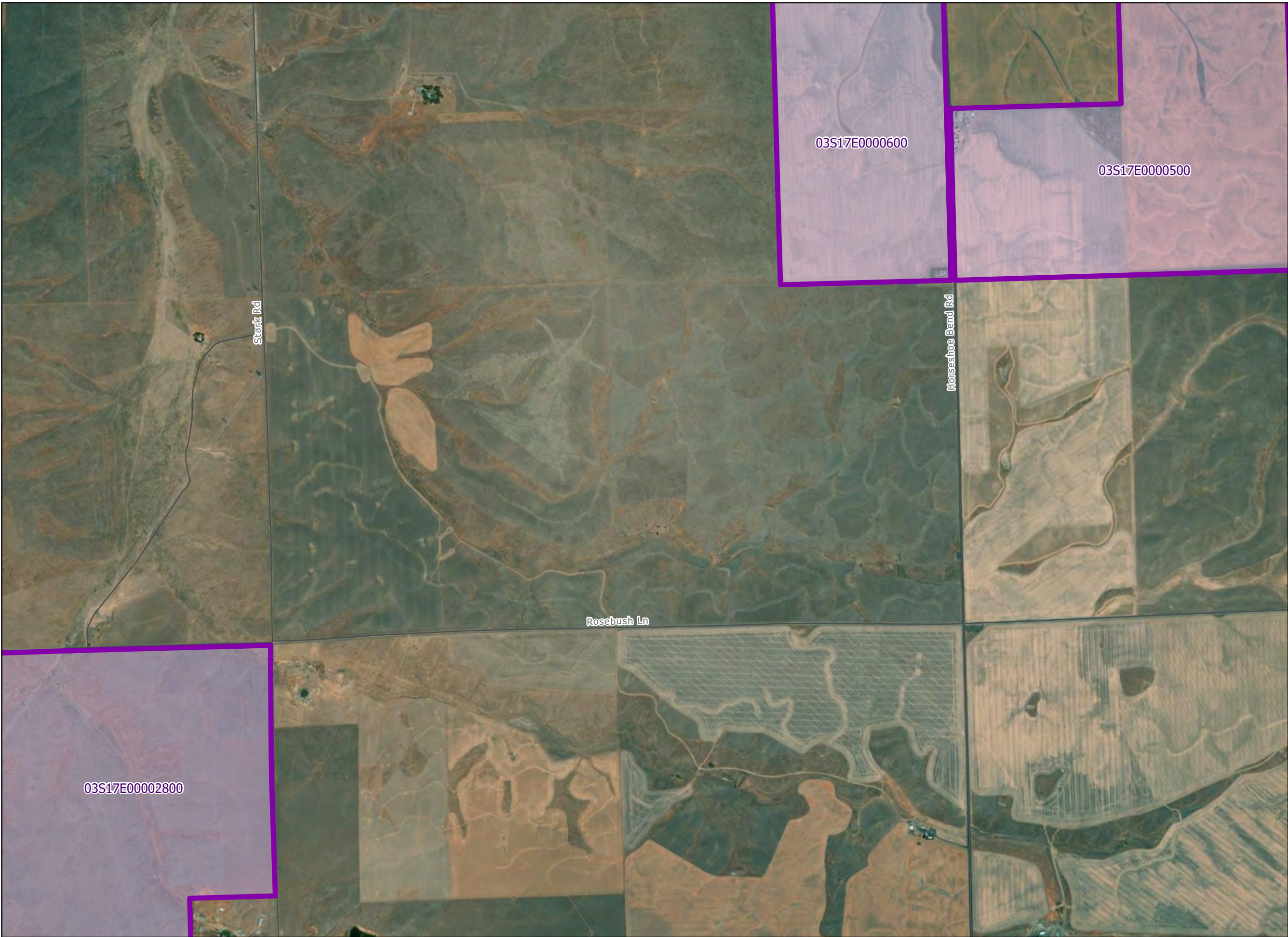
WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.17  
Taxlots

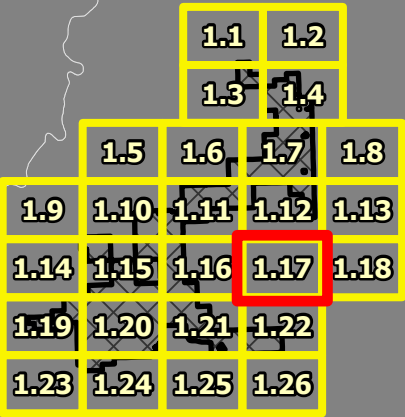
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

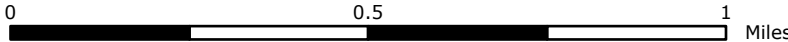


Reference Map



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WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.18  
Taxlots

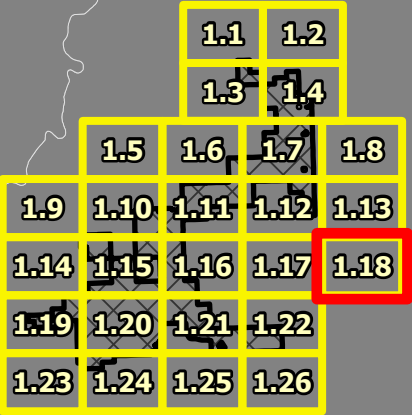
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



1:17,000

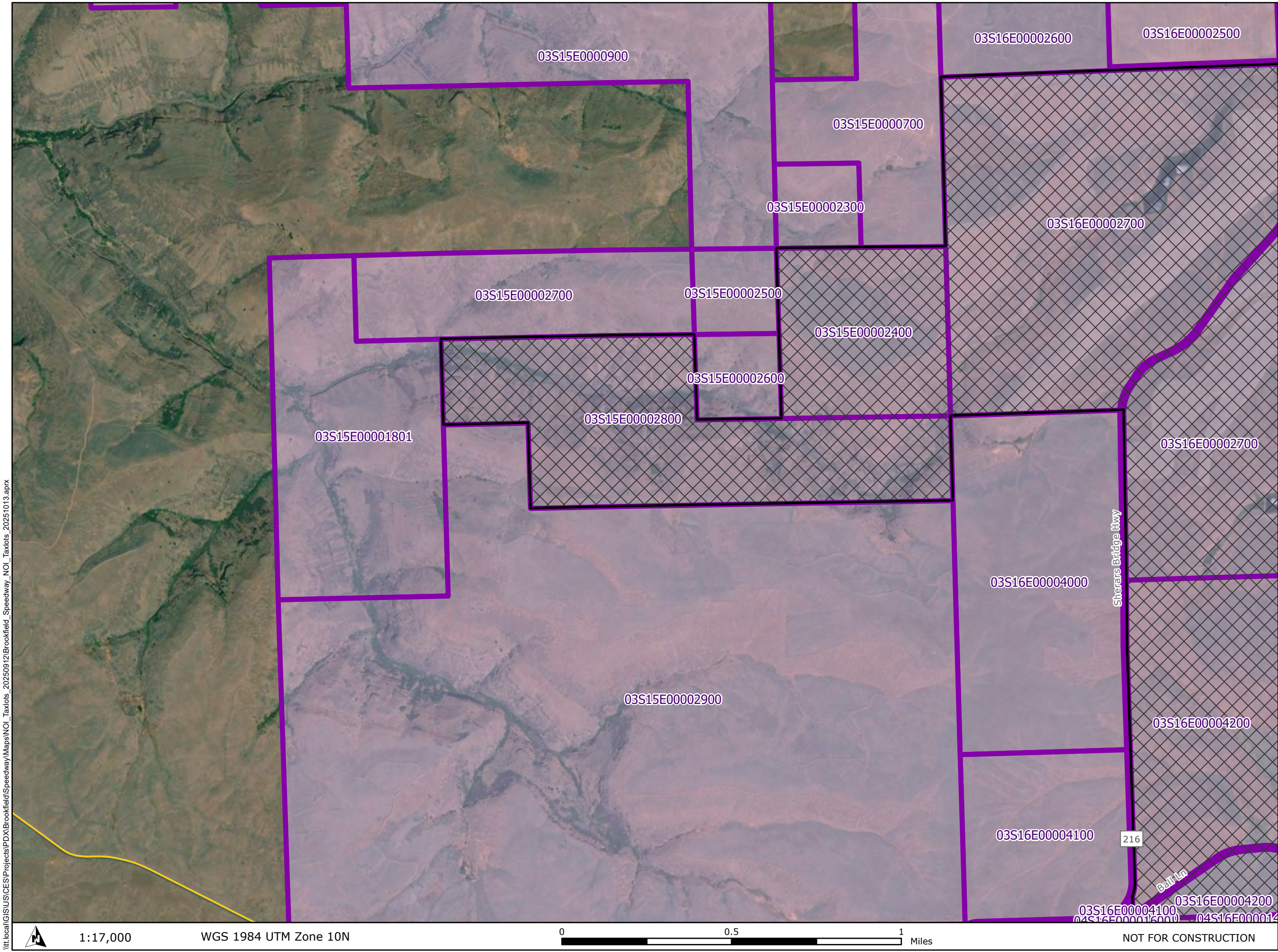
WGS 1984 UTM Zone 10N



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**Speedway Energy**

**Figure 1.19  
Taxlots**

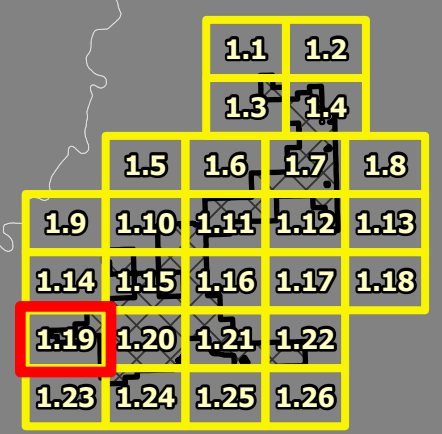
**SHERMAN COUNTY, OR**

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

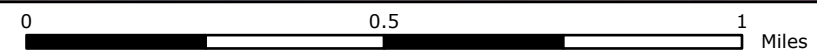


**Reference Map**



1:17,000

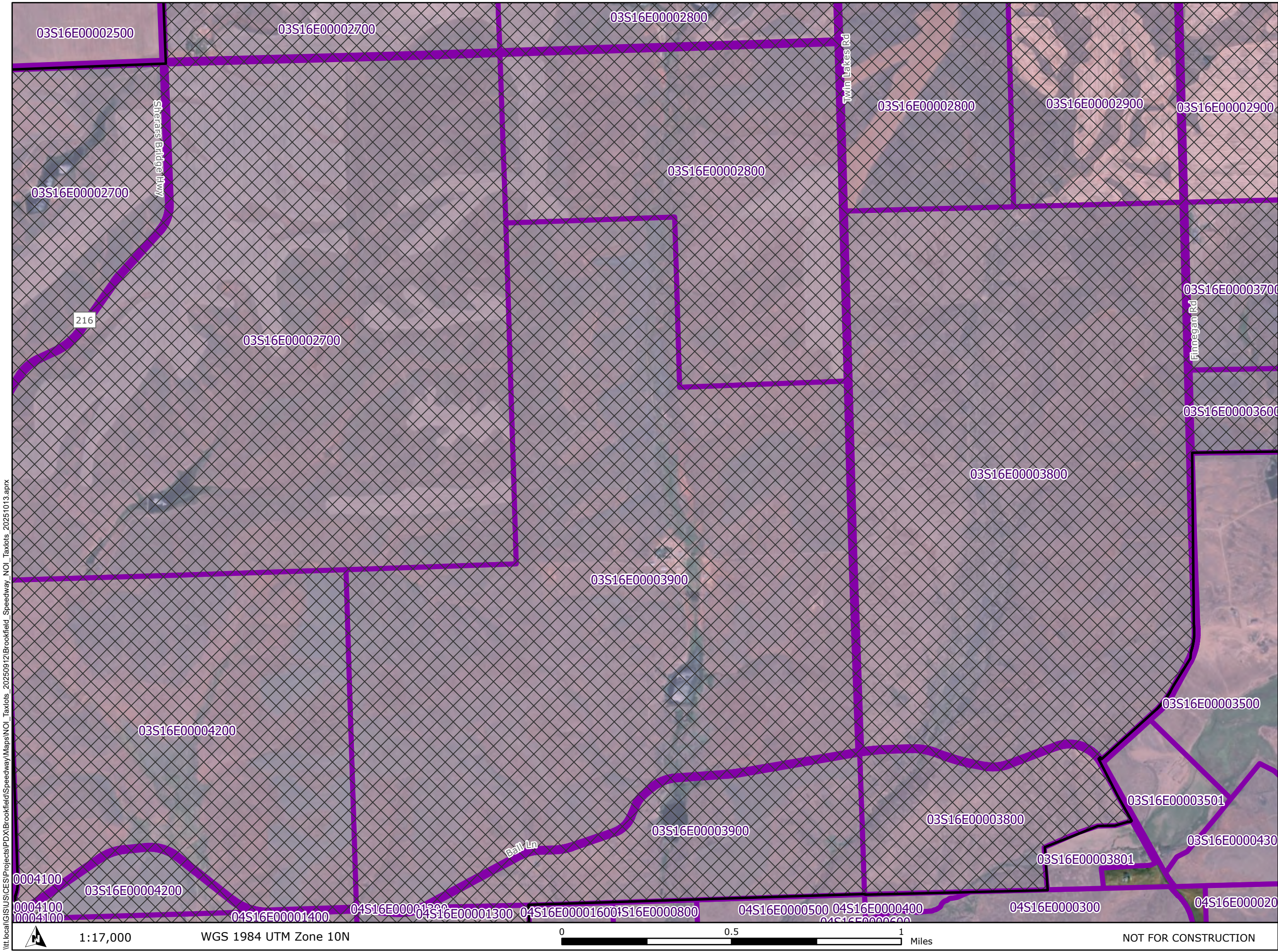
WGS 1984 UTM Zone 10N



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Speedway Energy

Figure 1.20  
Taxlots

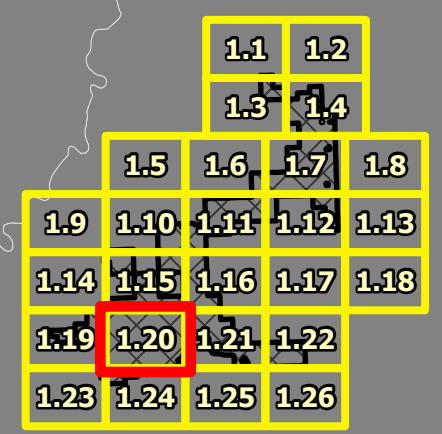
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



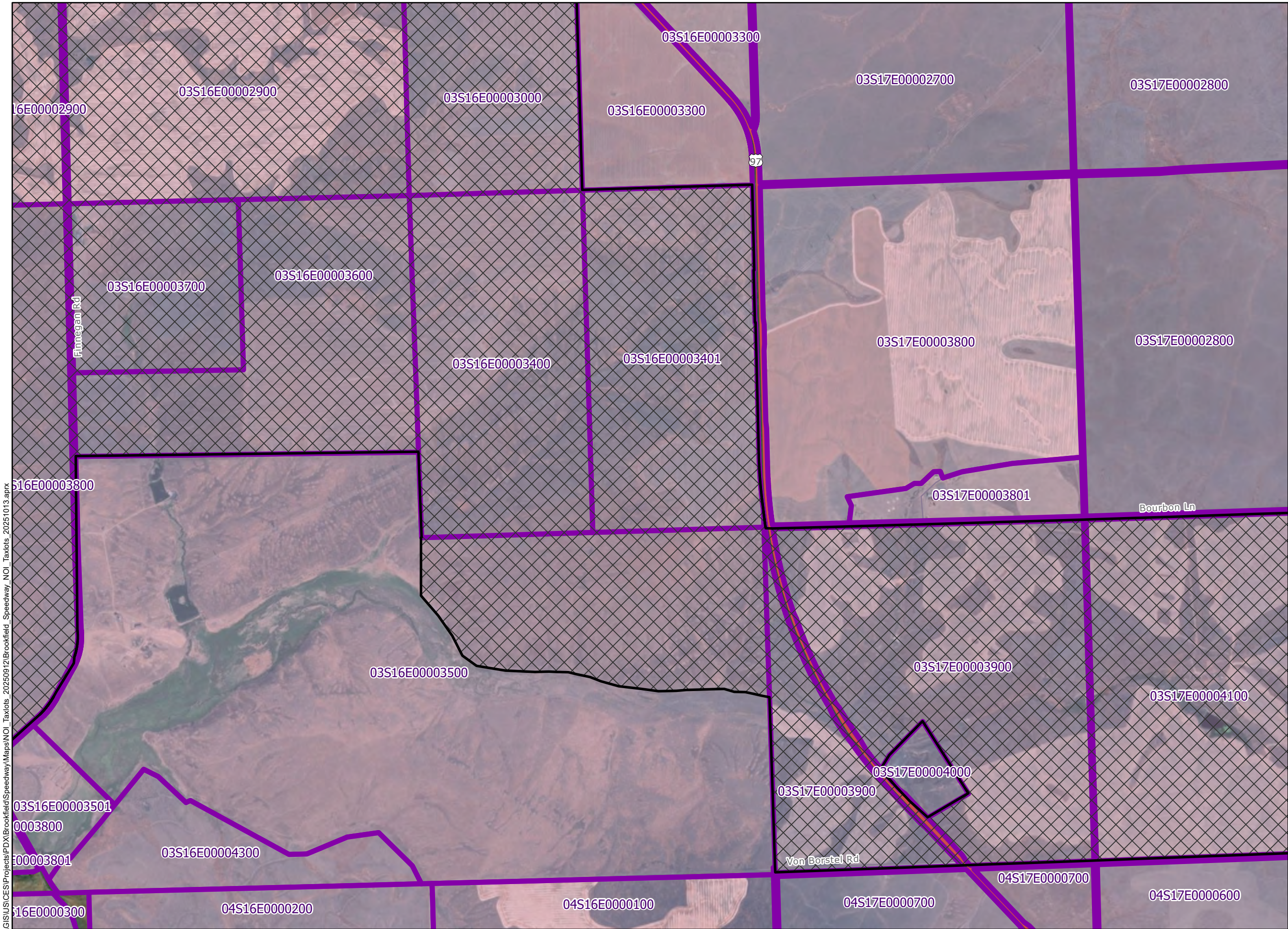
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WGS 1984 UTM Zone 10N

0 0.5 1 Miles

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**Speedway Energy**

**Figure 1.21  
Taxlots**

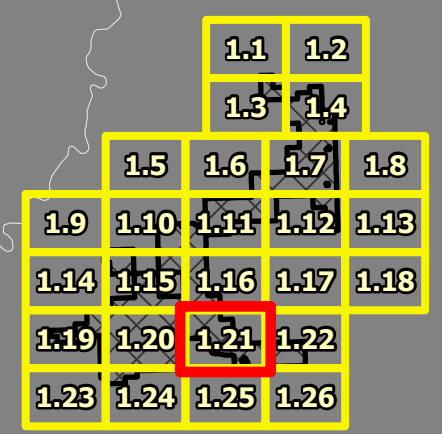
**SHERMAN COUNTY, OR**

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



**Reference Map**

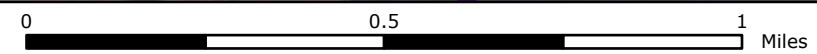


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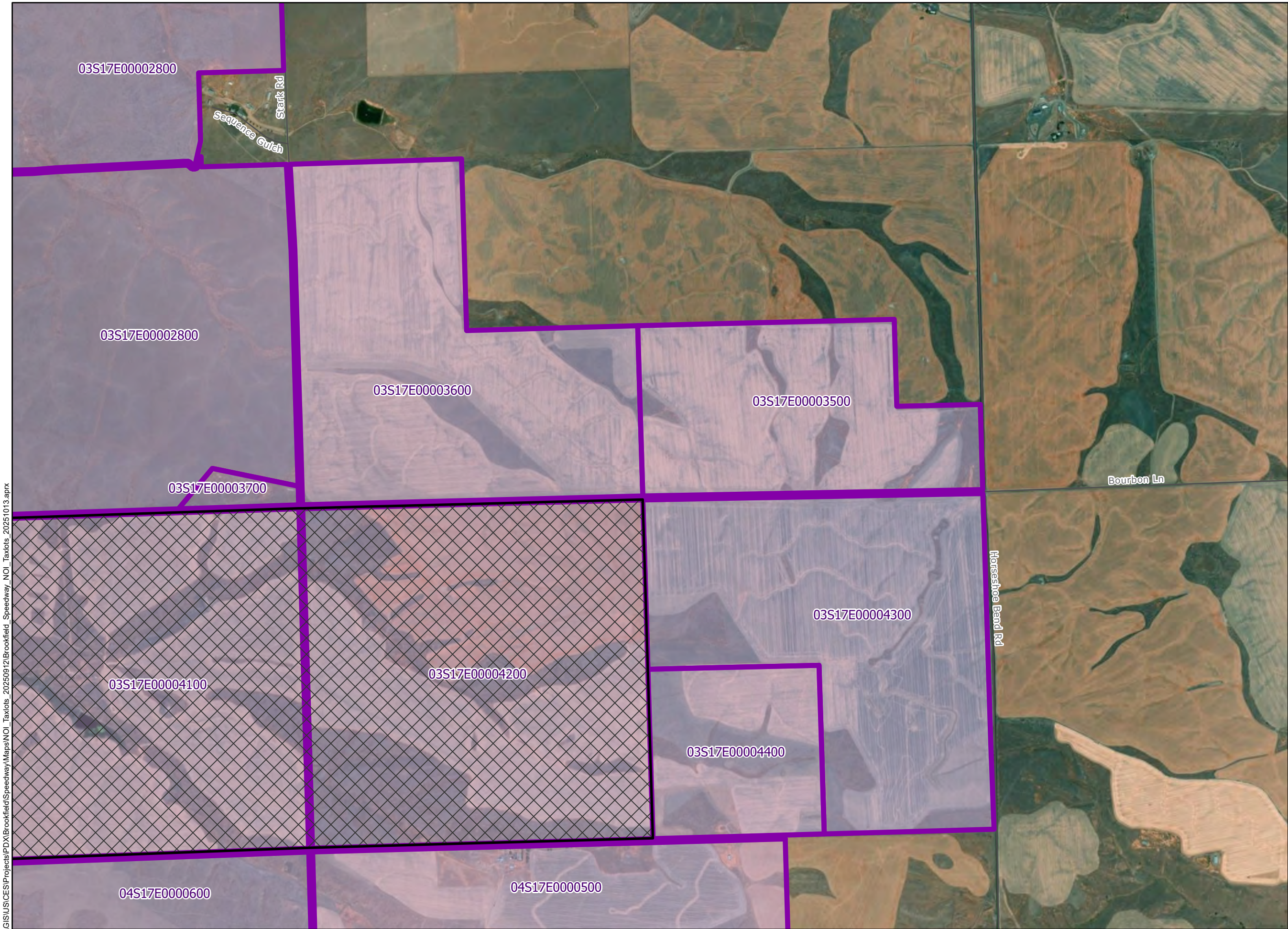
WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



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Speedway Energy

Figure 1.22  
Taxlots

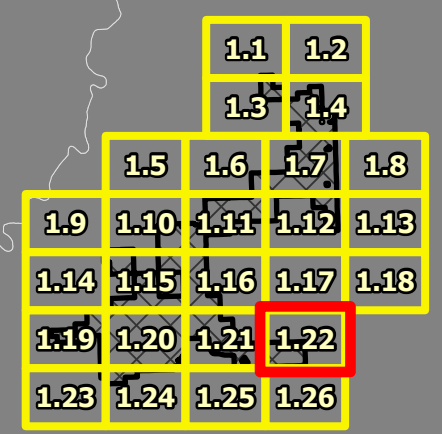
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

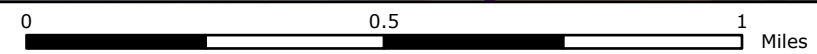


Reference Map



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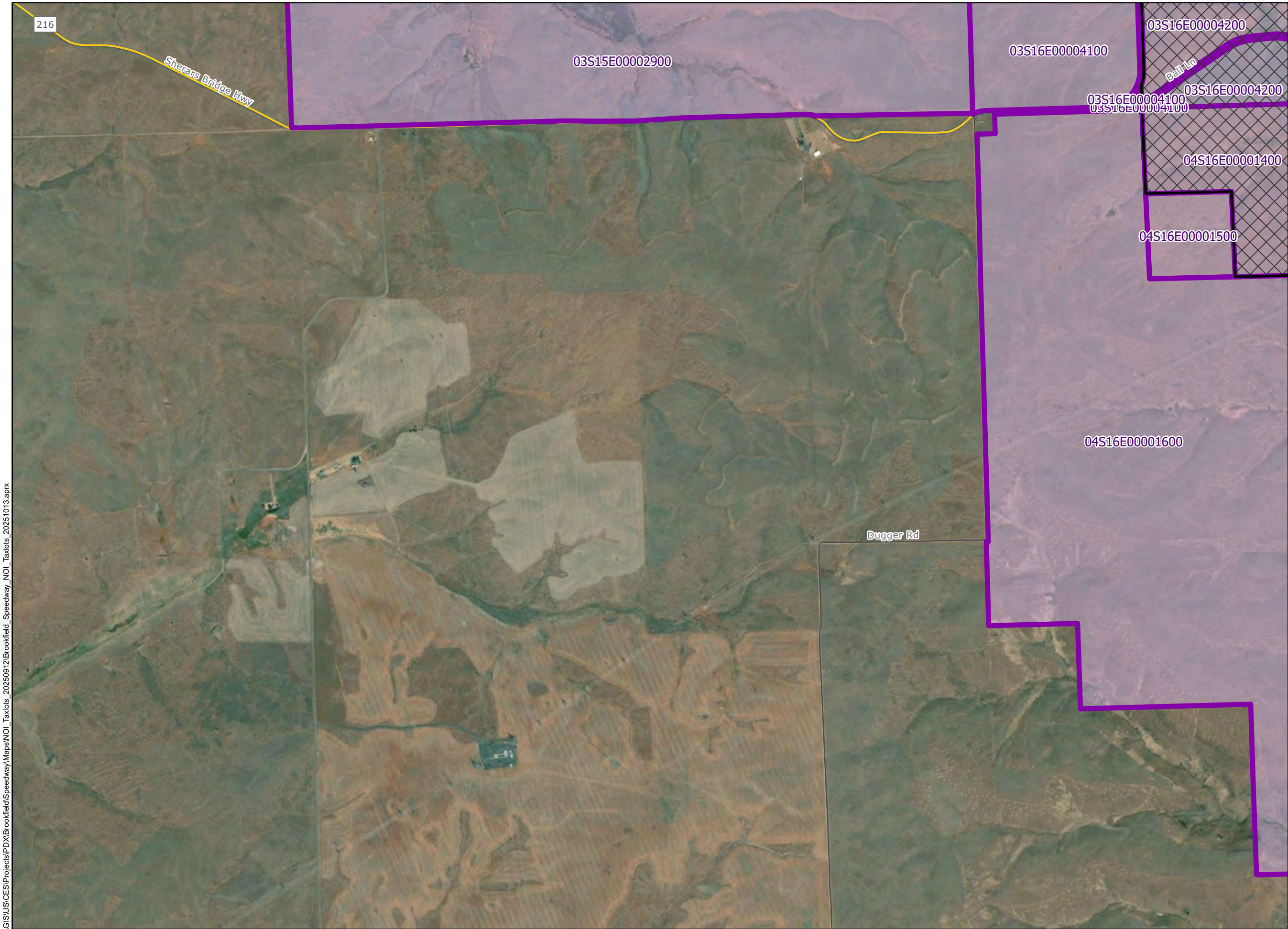
WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



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# Speedway Energy

**Figure 1.23  
Taxlots**

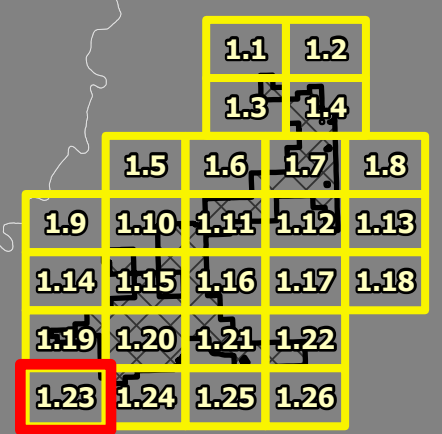
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

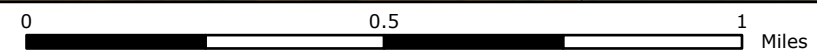


Reference Map



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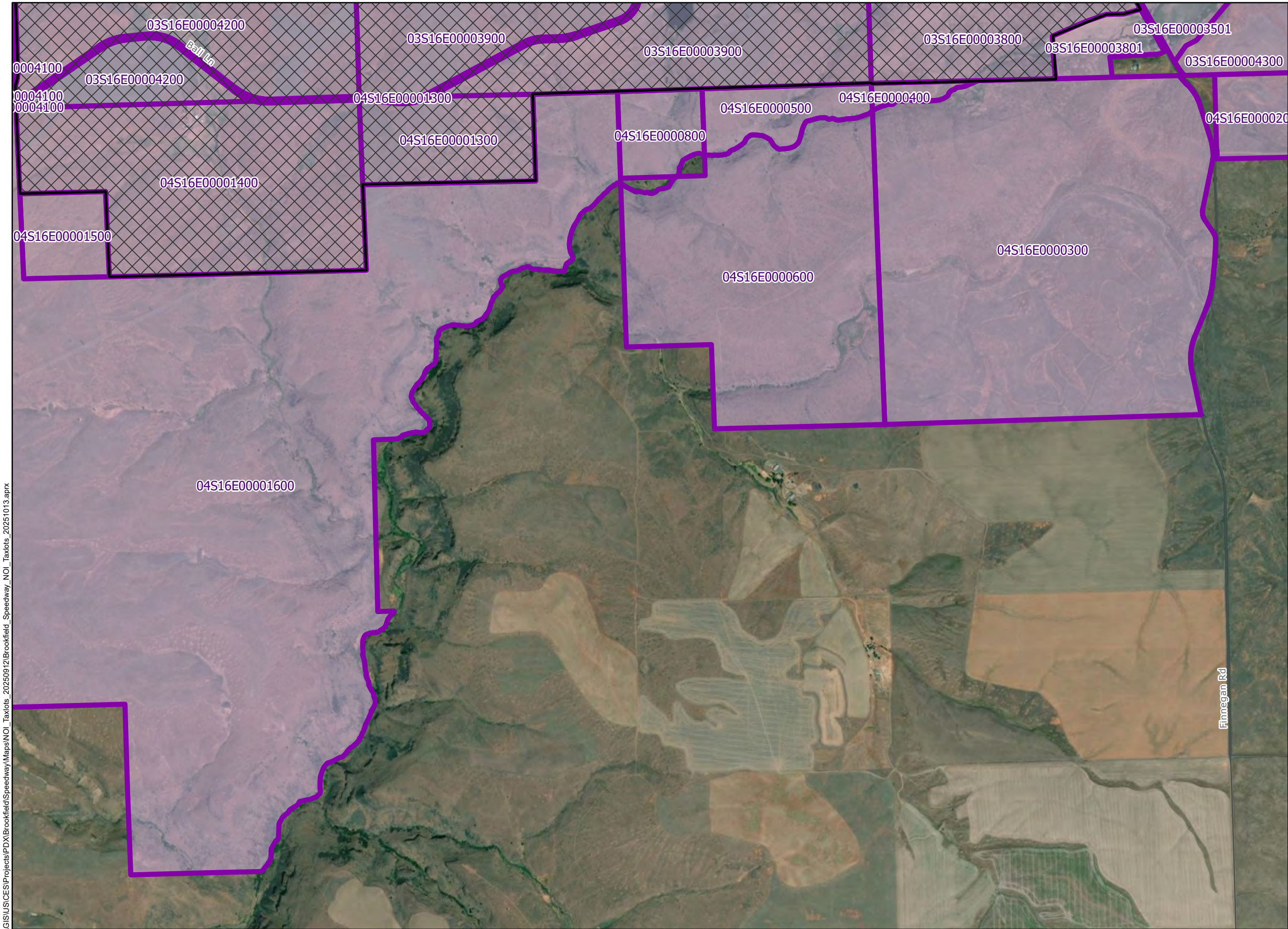
WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



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# Speedway Energy

**Figure 1.24  
Taxlots**

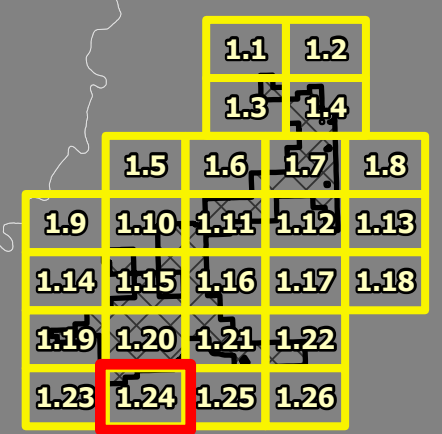
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- State Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

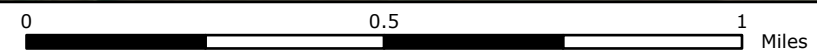


Reference Map



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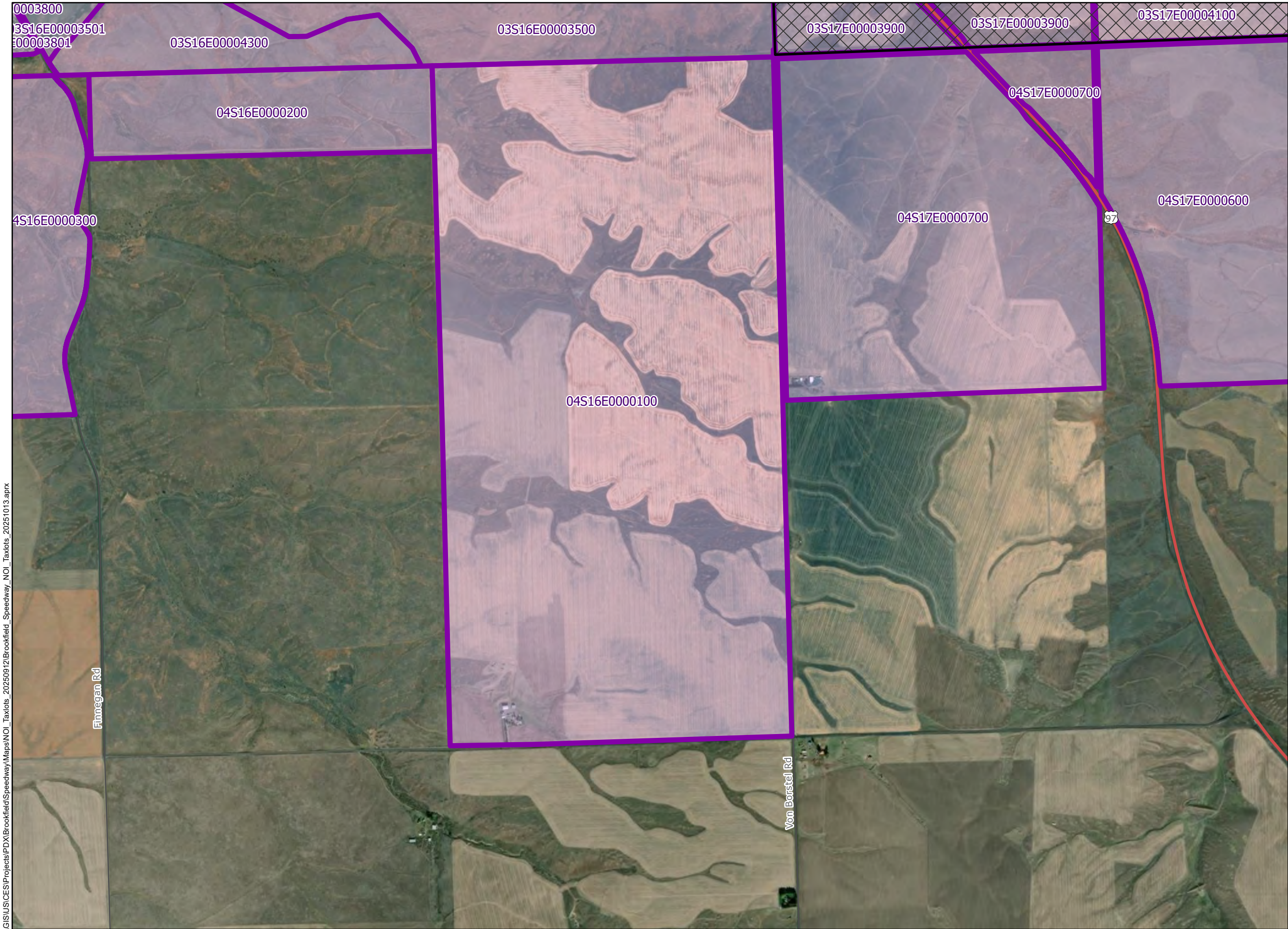
WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



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# Speedway Energy

**Figure 1.25  
Taxlots**

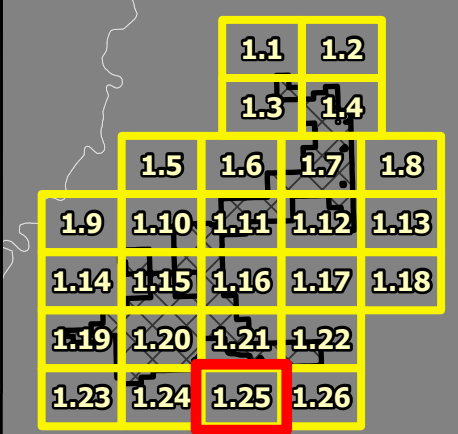
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025

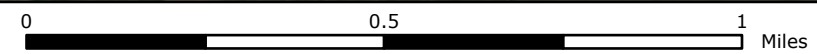


Reference Map



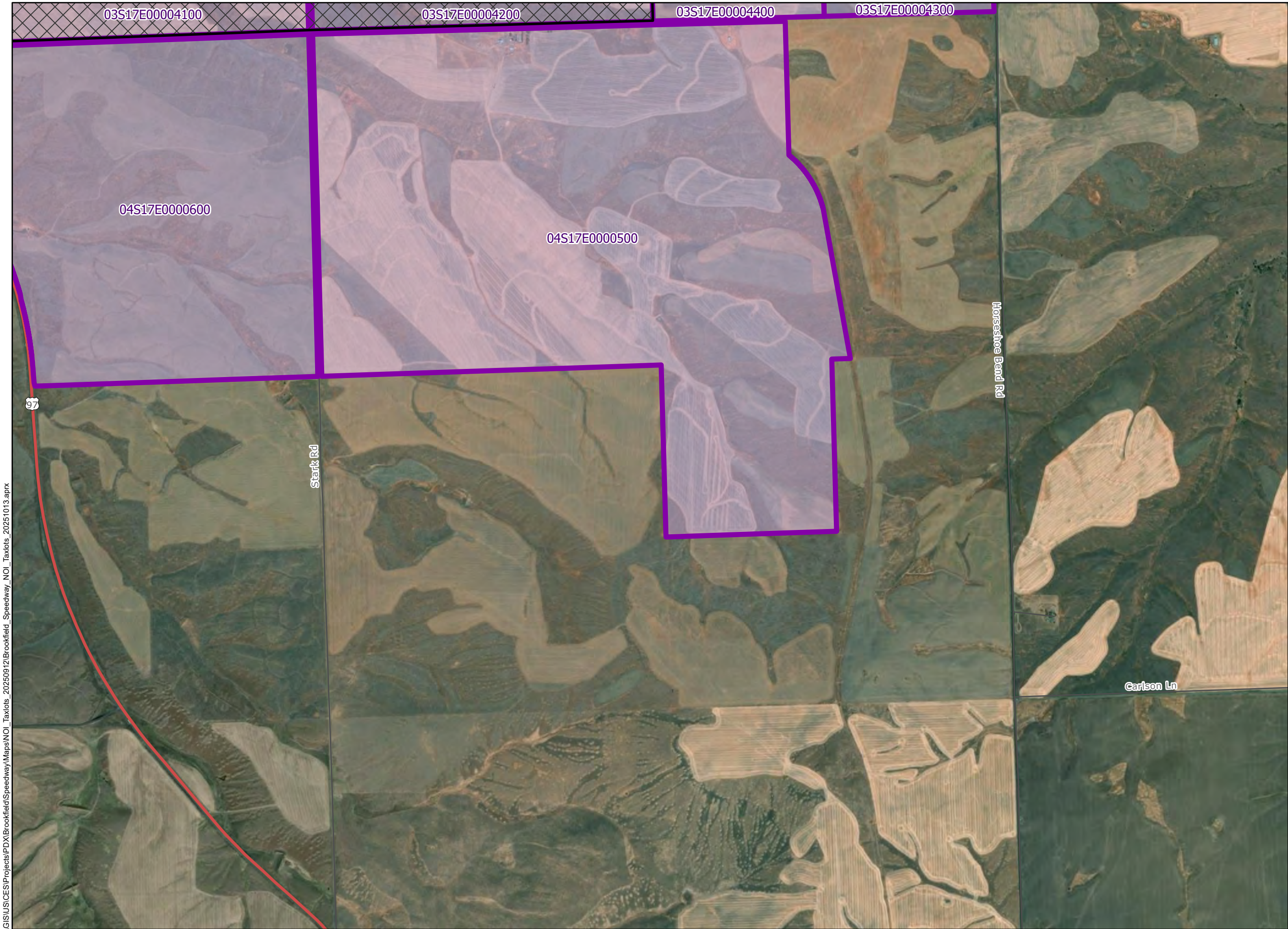
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION





Speedway Energy

Figure 1.26  
Taxlots

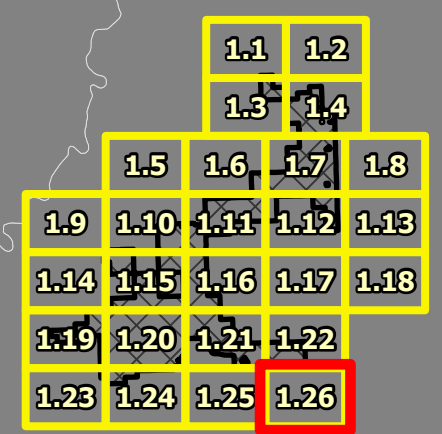
SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary<sup>1</sup>
- US Highway
- Local Roads

<sup>1</sup>Data received from Sherman County  
09/10/2025



Reference Map



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1:17,000

WGS 1984 UTM Zone 10N

0 0.5 1 Miles

NOT FOR CONSTRUCTION



## **Attachment 3. Correspondence with Legislative Commission on Indian Services**





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**Fw: Tribal Interest, new project**

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**From** Brigid Boyle <boyle@willamettecra.com>

**Date** Tue 9/16/2025 2:14 PM

**To** Andrews, Carrie <carrie.andrews@tetrattech.com>

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



---

**From:** Bullion Elissa <Elissa.Bullion@oregonlegislature.gov>

**Sent:** Tuesday, February 18, 2025 5:21 PM

**To:** Brigid Boyle <boyle@willamettecra.com>

**Subject:** RE: Tribal Interest, new project

Good afternoon Brigid,

Thanks for reaching out. KMZ's are good, although it is helpful for me to have Lat/Long or UTM's for quick reference as well 😊

For both the Gilliam Co. and Sherman projects, 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 \(oregonlegislature.gov\)](https://commissiononindianservices.archaeology.oregonlegislature.gov/).

Please let me know if you have any additional questions.

Cheers!

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](mailto:Elissa.Bullion@oregonlegislature.gov)



---

**From:** Brigid Boyle <[boyle@willamettecra.com](mailto:boyle@willamettecra.com)>  
**Sent:** Tuesday, February 18, 2025 2:36 PM  
**To:** Bullion Elissa <[Elissa.Bullion@oregonlegislature.gov](mailto:Elissa.Bullion@oregonlegislature.gov)>  
**Subject:** Tribal Interest, new project

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

You don't often get email from [boyle@willamettecra.com](mailto:boyle@willamettecra.com). [Learn why this is important](#)  
Hi Elissa,

I have two new projects on my docket. Could you send me a list of Tribes to contact for each? (And please let me know if the kmz file is not the most efficient for you, or what format would be best for these large 10k-acre projects.)

1. Big River, Gilliam County
2. Buck Hollow, Sherman County.

Thank you so much! I'll pull up contact info when you confirm, and have our client reach out to Tribes. We'll have an IDP ready to go, too.

Thank you!

Brigid

**Brigid Boyle, Ph.D.** (she/her)  
Architectural historian  
503-572-3488  
[boyle@willamettecra.com](mailto:boyle@willamettecra.com)





March 17, 2025

Diane Teeman, Culture and Heritage Director  
Burns Paiute Tribe  
100 Pasigo Street  
Burns, OR 97720

RE: Proposed Speedway and Buck Hollow Energy Facility

Ms. Teeman:

In 2024, Brookfield Renewable proposed a new solar facility east of Grass Valley, Oregon, known as Speedway Solar. Based on our findings, we have decided to expand the project's scope to include additional land to the southwest, referred to internally as Buck Hollow (see Figure 1). We have also decided to broaden the project's scope to incorporate both wind and solar energy generation. The combined projects now represent a 1,300 MWac development spanning 20,000 acres. Both projects will interconnect with the Ashe-Marion 500kV transmission line near Grass Valley, Oregon. The final project design will be refined based on survey results and detailed engineering assessments.

While there is no federal nexus, the proposed energy facility is subject to the Energy Facility Siting Council (EFSC) requirements, which include consultation with interested Tribes and the Oregon State Historic Preservation Office (SHPO).

Brookfield Renewable has engaged Tetra Tech, in partnership with Willamette Cultural Resources Associates, Ltd. (WillametteCRA), to conduct archaeological and historic built environment surveys for the project area. If you have comments, questions, or concerns regarding the project, or if you have information regarding the site's significance to the Confederated Tribes of the Umatilla Indian Reservation, please contact Brigid Boyle of WillametteCRA at [boyle@willamettecra.com](mailto:boyle@willamettecra.com).

Kind Regards,

Thomas Schorr  
Development Manager, Asset Development  
Brookfield Renewable, North America  
[Thomas.schorr@brookfieldrenewable.com](mailto:Thomas.schorr@brookfieldrenewable.com)  
432-296-0494

Cc: Brigid Boyle, [boyle@willamettecra.com](mailto:boyle@willamettecra.com)

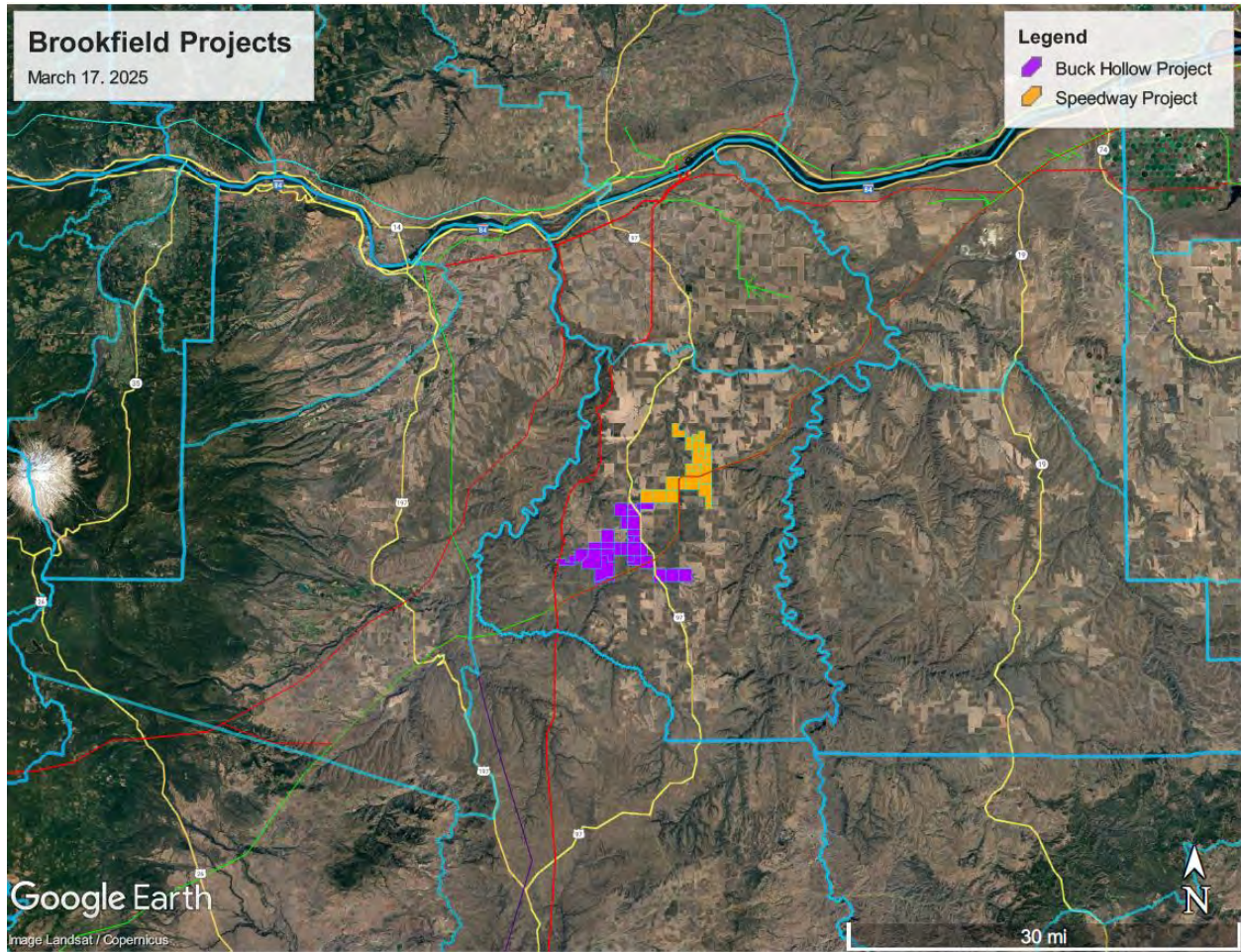


Figure 1: Speedway & Buck Hollow Project Area



March 17, 2025

Teara Farrow Ferman  
Cultural Resources Program Manager  
Confederated Tribes of the Umatilla Indian Reservation  
Dept. of Natural Resources  
46411 Timíne Way  
Pendleton, OR 97801

RE: Proposed Speedway and Buck Hollow Energy Facility

Ms. Farrow Ferman:

In 2024, Brookfield Renewable proposed a new solar facility east of Grass Valley, Oregon, known as Speedway Solar. Based on our findings, we have decided to expand the project's scope to include additional land to the southwest, referred to internally as Buck Hollow (see Figure 1). We have also decided to broaden the project's scope to incorporate both wind and solar energy generation. The combined projects now represent a 1,300 MWac development spanning 20,000 acres. Both projects will interconnect with the Ashe-Marion 500kV transmission line near Grass Valley, Oregon. The final project design will be refined based on survey results and detailed engineering assessments.

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Kind Regards,

Thomas Schorr  
Development Manager, Asset Development  
Brookfield Renewable, North America  
[Thomas.schorr@brookfieldrenewable.com](mailto:Thomas.schorr@brookfieldrenewable.com)  
432-296-0494

Cc: Brigid Boyle, [boyle@willamettecra.com](mailto:boyle@willamettecra.com)

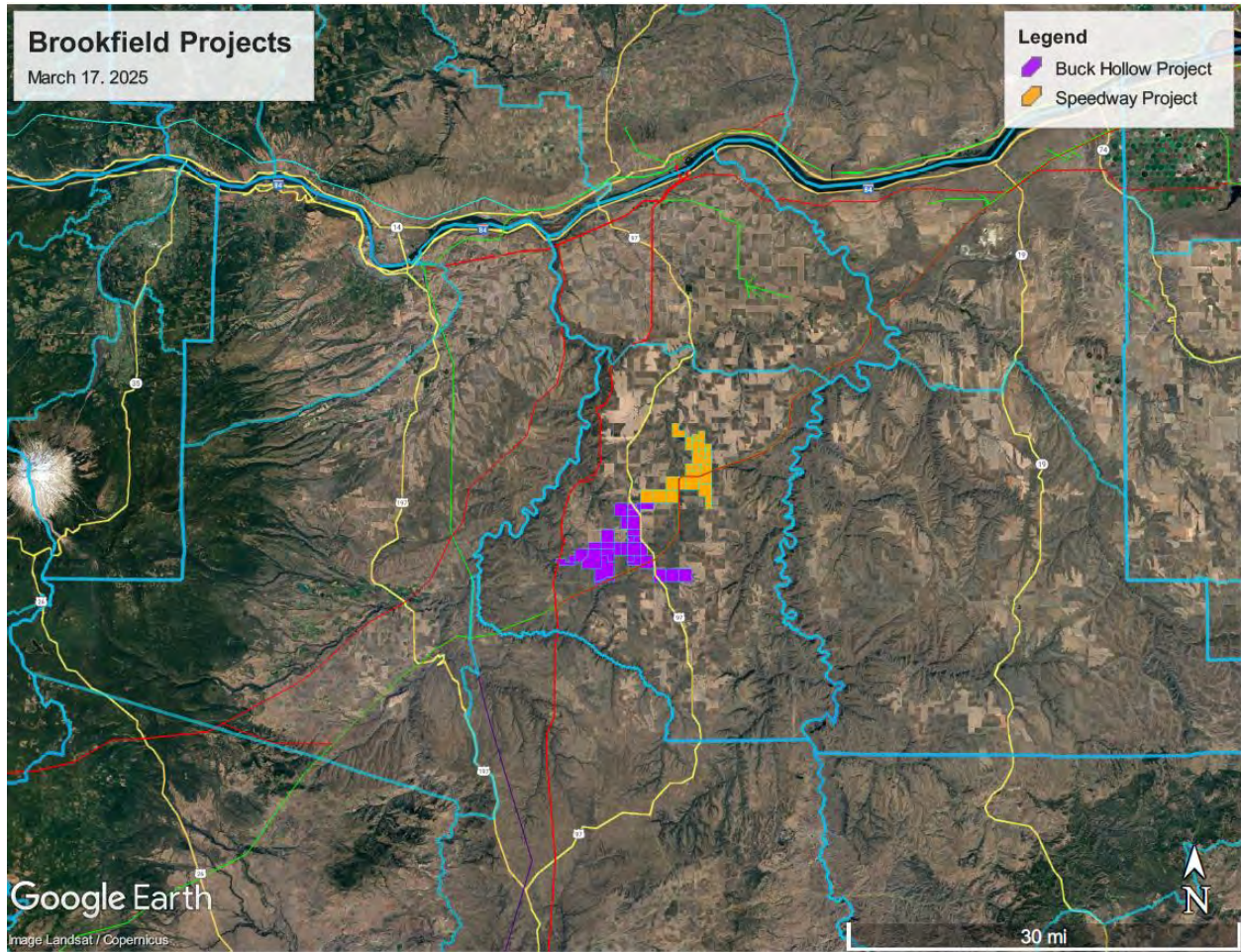


Figure 1: Speedway & Buck Hollow Project Area



March 17, 2025

Bobby Brunoe, THPO  
Confederated Tribes of the Warm Springs Reservation  
1233 Veterans Street  
PO Box C  
Warm Springs, OR 97761

RE: Proposed Speedway and Buck Hollow Energy Facility

Mr. Brunoe:

In 2024, Brookfield Renewable proposed a new solar facility east of Grass Valley, Oregon, known as Speedway Solar. Based on our findings, we have decided to expand the project's scope to include additional land to the southwest, referred to internally as Buck Hollow (see Figure 1). We have also decided to broaden the project's scope to incorporate both wind and solar energy generation. The combined projects now represent a 1,300 MWac development spanning 20,000 acres. Both projects will interconnect with the Ashe-Marion 500kV transmission line near Grass Valley, Oregon. The final project design will be refined based on survey results and detailed engineering assessments.

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Kind Regards,

Thomas Schorr  
Development Manager, Asset Development  
Brookfield Renewable, North America  
[Thomas.schorr@brookfieldrenewable.com](mailto:Thomas.schorr@brookfieldrenewable.com)  
432-296-0494

Cc: David E. Witt, GeoVisions, [dwitt@wsgeovisions.com](mailto:dwitt@wsgeovisions.com); Brigid Boyle, [boyle@willamettecra.com](mailto:boyle@willamettecra.com)

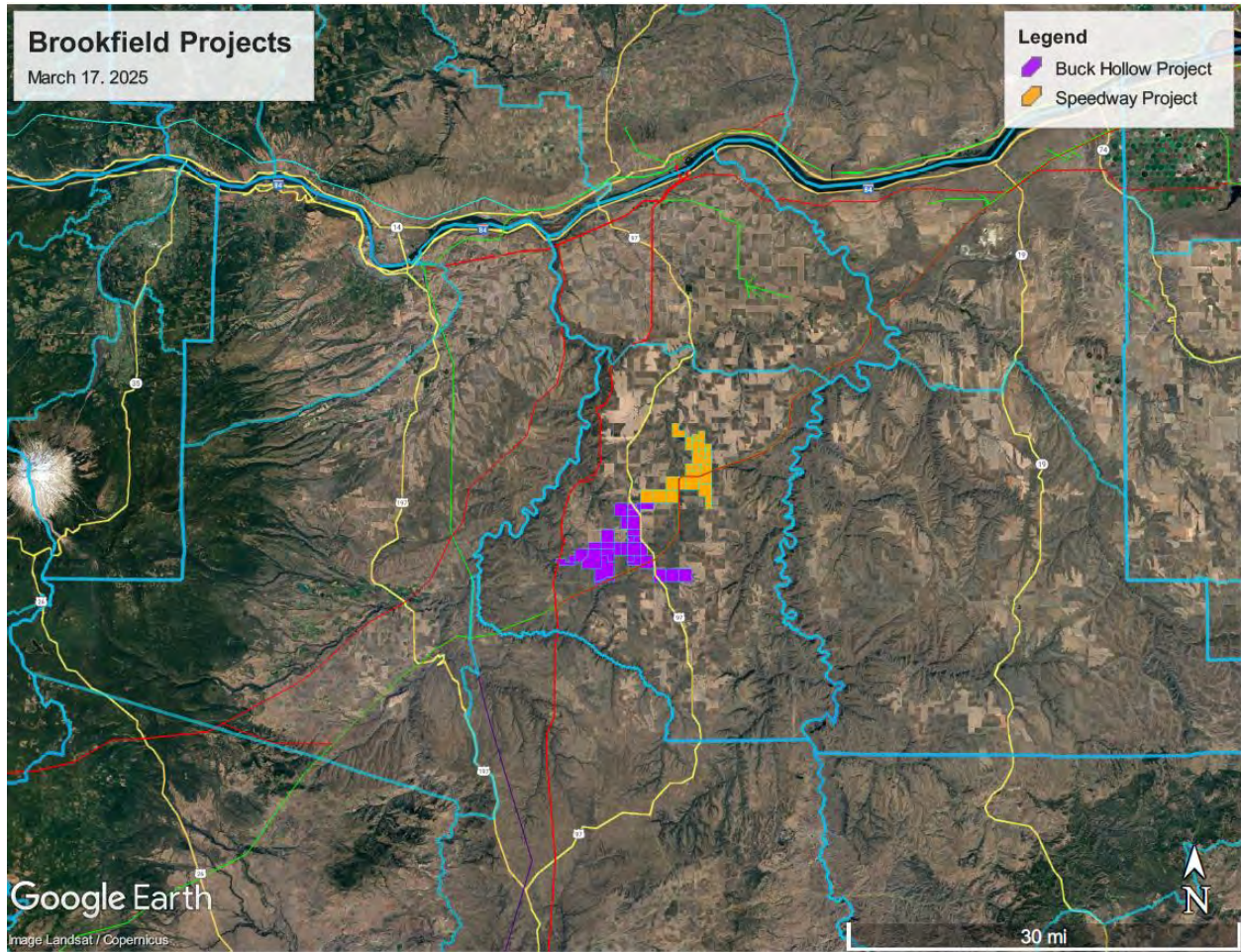


Figure 1: Speedway & Buck Hollow Project Area



March 17, 2025

Mr. Keith Baird  
Tribal Historic Preservation Officer  
Nez Perce Tribe  
PO Box 365  
Lapwai, ID 83540-0365

RE: Proposed Speedway and Buck Hollow Energy Facility

Mr. Baird and Mr. Williamson-Cloud:

In 2024, Brookfield Renewable proposed a new solar facility east of Grass Valley, Oregon, known as Speedway Solar. Based on our findings, we have decided to expand the project's scope to include additional land to the southwest, referred to internally as Buck Hollow (see Figure 1). We have also decided to broaden the project's scope to incorporate both wind and solar energy generation. The combined projects now represent a 1,300 MWac development spanning 20,000 acres. Both projects will interconnect with the Ashe-Marion 500kV transmission line near Grass Valley, Oregon. The final project design will be refined based on survey results and detailed engineering assessments.

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Kind Regards,

Thomas Schorr  
Development Manager, Asset Development  
Brookfield Renewable, North America  
[Thomas.schorr@brookfieldrenewable.com](mailto:Thomas.schorr@brookfieldrenewable.com)  
432-296-0494

Cc: Nakia Williamson-Cloud, Cultural Resource Program Manager, [Nakia@nezperce.org](mailto:Nakia@nezperce.org);  
Brigid Boyle, [boyle@willamettecra.com](mailto:boyle@willamettecra.com)

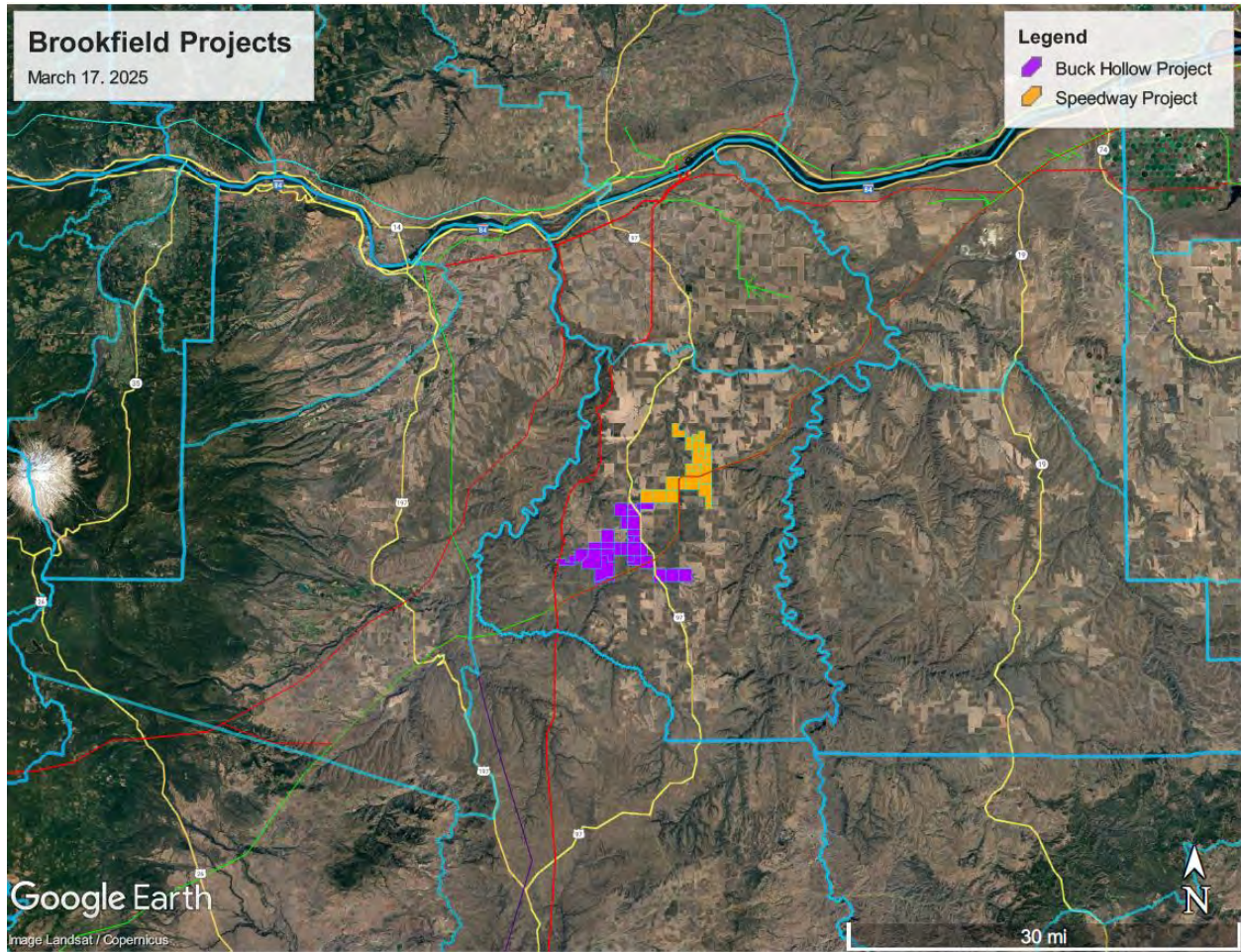


Figure 1: Speedway & Buck Hollow Project Area