Exhibit U

Availability of Public and Private Providers to Provide Services

Biglow Canyon Wind Farm
December 2025

Prepared for

Portland General Electric Company

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Acronyms and Abbreviations

AADT	average annual daily traffic
AC	alternating current
BCWF or Existing Facility	Biglow Canyon Wind Farm
BESS	battery energy storage system
BIGL or Project Developer	BIGL bn, LLC
Certificate Holder or PGE	Portland General Electric Company
CFR	Code of Federal Regulations
Council or EFSC	Oregon Energy Facility Siting Council
FAA	Federal Aviation Administration
I-84	Interstate 84
MW	megawatt
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODA	Oregon Department of Aviation
ODOE	Oregon Department of Energy
ODOT	Oregon Department of Transportation
OR-206	Oregon Route 206
RFA	Request for Amendment
RV	recreational vehicle
Site Certificate	Site Certificate on Amendment 3
Solar Components	photovoltaic solar energy generation and battery storage
US-97	United States Highway 97

1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) submits this Request for Amendment (RFA) 4 to the Site Certificate on Amendment 3, issued October 31, 2008 (Site Certificate), for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add photovoltaic solar energy generation and battery storage (Solar Components) to the operating BCWF.

BCWF, owned and operated by PGE, is located within an approved site boundary comprising approximately 25,000 acres, approximately 4.5 miles northeast of the town of Wasco in Sherman County, Oregon. The BCWF operates under the Site Certificate from the Oregon Energy Facility Siting Council (Council or EFSC) as administered by the Oregon Department of Energy (ODOE). BCWF currently consists of 217 wind turbines, with a maximum blade tip height of 445 feet, and a peak generating capacity of 450 megawatts (MW).

In RFA 4, PGE proposes to add up to 125 MW alternating current (AC) generating capacity from photovoltaic solar arrays and 125 MW in battery storage capacity (Solar Components) on approximately 1,445 acres of land (Solar Area) sited within the existing BCWF site boundary Solar Micrositing Area (RFA 4 Site Boundary[1]).

The Solar Micrositing Area is approximately 1,924 acres and provides a conservative estimate of the maximum area needed for development, micrositing, and temporary disturbances from the Solar Components during construction, rather than the anticipated temporary and permanent disturbance footprint. Within the Solar Micrositing Area, the Certificate Holder has identified a reduced footprint where Solar Components will be concentrated (Solar Area; 1,445 acres). Solar Components will include solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), a collector substation, approximately 600 feet of a new 230-kilovolt generation tie transmission line, medium voltage collector lines, operations and maintenance (O&M) structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The maximum generating capacity from the Solar Components will be 125 MW AC, and the infrastructure will be fenced within the Solar Micrositing Area and will cover up to 1,445 acres (Solar Area).

PGE will own and operate the Solar Components as a part of the BCWF (together, Amended Facility or Facility), which, to date, have been developed by BIGL bn, LLC (BIGL or Project Developer). BIGL, in its capacity as the project developer, supports PGE in this RFA 4 and may construct and temporarily operate the Solar Components on behalf of PGE under a Build-Transfer Agreement.

The Council previously found in the Final Order on RFA 3 that the BCWF complies with the Council's Public Services standard.[2] Exhibit U provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(u) in support of RFA 4. The information summarized

[1] Note, as described in further detail in Section 4.1.1.2 of the RFA 4 Division 27 document, the Solar Micrositing Area is the equivalent of the RFA 4 Site Boundary.
[2] Final Order on Request for Amendment 3, p. 36 (October 2008).

in this exhibit and described in RFA 4 demonstrate that the Facility, as proposed, can be designed, engineered, constructed, operated, and retired in a manner that satisfies the applicable Council standards. The proposed changes in RFA 4 do not alter the Certificate Holder's ability to comply with applicable Site Certificate Conditions and the approval standard in OAR 345-022-0080.

2.0 Applicable Rules and Standards

Under OAR 345-022-0110, the Council must find through appropriate study that:

> *(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.*

To demonstrate compliance with this standard, and in accordance with OAR 345-021-0010(1)(u), Exhibit U must include information about significant potential adverse impacts resulting from the construction and operation of the Solar Components on the ability of public and private providers in the analysis area to provide the services listed in the standard. Exhibit U demonstrates that the Council may conclude that the construction and operation of the Solar Components, as modified by RFA 4, considering proposed mitigation, is not likely to result in significant adverse impacts to the provision of the public services listed in OAR 345-022-0110.

3.0 Analysis Area

Consistent with OAR 345-027-0360(3), ODOE concurred with the Certificate Holder's use of a defined portion of the approved BCWF site boundary (i.e., Solar Micrositing Area/RFA 4 Site Boundary) to establish study area boundaries for RFA 4 under OAR 345-001-0010(35). The RFA 4 Site Boundary reflects the Solar Micrositing Area, and all study areas within the meaning of ORS 345-001-0010(35) are measured from the RFA 4 Site Boundary. In accordance with OAR 345-001-0010(35)(b), the analysis area for public services is the area within and extending 10 miles from the Solar Micrositing Area[3] (Figure U-1).

[3] ODOE concurred with excluding the remaining BCWF site boundary that does not overlap with the Solar Micrositing Area from analysis in RFA 4 because no changes are proposed to any BCWF components in the remaining BCWF site boundary as part of RFA 4.

4.0 Analysis

4.1 Methods

The following analysis incorporates information, analysis, and data from federal, state, and local government agencies, as well as updated information wherever available. Local public service providers were also contacted directly for data on potentially affected public services. The potential effects of the Solar Components were evaluated with respect to the ability of public and private providers within the analysis area to provide sewers and sewage treatment, water, stormwater drainage, solid waste management, housing, traffic safety, police and fire protection, health care, and schools.

4.2 Assumptions Used to Evaluate Potential Impacts – OAR 345-021-0010(1)(u)(A)

OAR 345-021-0010(1)(u) Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of public and private providers in the analysis area to provide the services listed in OAR 345-022-0110, providing evidence to support a finding by the Council as required by OAR 345-022-0110. The applicant must include:

OAR 345-021-0010(1)(u)(A) The important assumptions the applicant used to evaluate potential impacts;

Response: Exhibit U provides key assumptions and information used to evaluate potential impacts of the Solar Components on public and private providers.

Potential impacts were evaluated based on assumptions for the number of employees needed to construct and operate the Solar Components, population shifts, and use of transportation routes, as described in the following sections.

The analysis area includes Sherman County, a small portion of northwest Gilliam County in Oregon, and parts of southern Klickitat County in Washington (Figure U-1). Due to the location of the Solar Components, the Certificate Holder expects that most personnel will use public and private service providers in Sherman County (i.e., in Wasco or Moro). PGE expects some personnel to also use providers beyond the analysis area, including those in Klickitat County, Washington, and Gilliam, Wasco, and Hood River Counties, Oregon (e.g., housing in the Dalles or Hood River). This assumption is incorporated as applicable into the various public service provider analyses.

4.2.1 Construction

Construction of the Solar Components is expected to begin in Q4 of 2026 (mobilization) and continue through Q4 of 2027 for a duration of approximately 17 to 19 months. During construction, PGE expects a daily average of 165 workers on-site during the 17- to 19-month construction period, with a peak number of 350 workers while multiple disciplines of contractors complete their work simultaneously during periods of the highest activity (approximately 4 to 6 months during

construction). Most construction workers will be employees of construction and equipment manufacturing companies under contract to the Certificate Holder.

PGE anticipates that approximately 30 percent of the construction workforce will be local residents who normally reside within a 1-hour commuting distance/duration to the Solar Components. Very few, if any, of the non-local workers employed during the construction phase of the Facility will be expected to permanently relocate to the area. The percentage of the construction workforce hired locally will depend on the availability of workers with appropriate skills. The size of the skilled local workforce is continually growing as more solar farms are built in eastern Oregon, so the percentage of local construction workers may be higher than estimated.

Workers in some positions, such as construction foremen and inspectors, will be employed for the entire duration of construction, but many workers will be employed for 4 to 9 months and therefore will not be expected to bring families with them. The Certificate Holder assumes very few workers will relocate their families.

Because most construction workers will not be in the area for more than 4 to 9 months, the Certificate Holder assumes that housing for most construction workers will primarily be provided by hotels, motels, temporary housing, and recreational vehicle (RV) parks within a commutable distance to the Solar Components (1-hour duration).

4.2.2 Operations

The Certificate Holder expects that the Solar Components will require up to three personnel for daily maintenance activities during operations over its 40-year lifespan. The O&M staff will be hired locally, to the extent that skilled workers are available. Some outside contractors may be required from time to time for specialized maintenance tasks, such as solar array inspections or the repair of associated equipment. A household size of 3.0 is conservatively assumed per employee; thus, a total of nine new permanent residents could be added to the local population. It is assumed that these workers will live locally. The Certificate Holder may also rely on O&M staff from its operating portion of the Existing Facility to provide operational support for the Solar Components.

4.2.3 Decommissioning

Decommissioning employment will be temporary and similar to the construction of the Solar Components. Decommissioning is estimated to require a similar duration as construction, i.e., 17 to 19 months.

4.3 Affected Public and Private Service Providers – OAR 345-021-0010(1)(u)(B)

OAR 345-021-0010(1)(u)(B) Identification of the public and private providers in the analysis area that would likely be affected;

Response:

4.3.1 Affected Counties, Cities, and Communities

Table U-1 presents historical population estimates for communities in Sherman, Gilliam, and Klickitat counties within the analysis area. Communities within 10 miles of the Solar Components were analyzed. The nearest city to the Solar Components, Wasco, Oregon, had a 2022 American Community Survey (ACS) population estimate of 482 people, 25 percent of Sherman County's total population.

Table U-1. Historical Population of Counties and Communities within the Analysis Area

Location	Population		2010 -2022		
	Census 2010	Census 2020	ACS 2022	Absolute Change	Percent Change
OREGON	3,831,074	4,237,256	4,229,374	398,300	10.4
Sherman County	**1,765**	**1,870**	**1,900**	135	7.6
Wasco	410	417	482	72	17.6
Rufus	249	268	220	-29	-11.6
Gilliam County	**1,871**	**1,995**	**1,983**	**112**	**6.0**
WASHINGTON	6,724,540	7,705,281	7,785,786	1,061,246	15.8
Klickitat County	**20,318**	**22,735**	**22,798**	**2,480**	**12.2%**
Source: U.S. Census Bureau 2010; U.S. Census Bureau 2020a; U.S. Census Bureau 2022					

All communities within a commutable distance (1-hour duration) are considered in the housing analysis (see Sections 4.3.7 and 4.4.5). According to the most recent available U.S. Census Bureau (2020b) residence to workplace data for 2016 to 2020, nearly 74 percent of Sherman County resident commuters work within Sherman County (562 commuters per day). From within Oregon, Sherman County receives 12 commuters per day from Hood River County, 11 from Morrow County, and 160 from Wasco County. From Washington, Sherman County receives 68 commuters per day from Klickitat County and 4 commuters from Whitman County.

4.3.2 Public and Private Service Providers

Table U-2 identifies the public and private service providers in and near the analysis area that may be affected by construction of the Solar Components. The analysis area includes Sherman County, a

small portion of Gilliam County in Oregon and parts of southern Klickitat County in Washington. PGE does not expect any providers in the Gilliam County portion of the analysis area to be affected. PGE does expect that some providers in Wasco County in Oregon (outside of the analysis area) may be affected. An analysis of different services and providers necessary for construction and operation of the Solar Components are identified in the following sections.

Table U-2. Public and Private Service Providers

Service	Service Provider Detail	Location
Sewers and Sewage Treatment	Various licensed providers: portable toilets and sewage disposal	Sherman County, Wasco County, Gilliam County, Oregon
Water	City of Wasco	Wasco, Oregon
Stormwater Drainage	No service provider is required	N/A
Solid Waste Management	The Dalles Disposal	Sherman County, Oregon
	Wasco County Landfill: non-hazardous and some hazardous waste	The Dalles, Oregon
	Columbia Ridge Landfill: non-hazardous and some hazardous waste	Arlington, Oregon
Housing	More than 500 vacant rental units	Morrow County, Gilliam County, Sherman County, Wasco County, Oregon; Klickitat County, Yakima County, Washington
	Over 50 hotels, motels, and recreation vehicle parks	Morrow County, Gilliam County, Sherman County, Wasco County, Oregon; Klickitat County, Washington
Traffic	Oregon Department of Transportation	Salem, Oregon
	Sherman County Planning and Road Departments	Moro, Oregon
Police and Fire Protection	Sherman County Sheriff's Office (primary law enforcement provider for the Facility location)	Moro, Oregon
	Oregon State Police (secondary law enforcement provider for the Facility location)	The Dalles, Heppner, Hermiston, Oregon
	City of The Dalles Police Department, Gilliam County Sheriff's Office (backup law enforcement providers)	The Dalles, Condon, Oregon
	North Sherman County Rural Fire Protection District	Wasco, Oregon

Service	Service Provider Detail	Location
Health Care	Sherman County Medical Clinic (not Trauma rated)	Moro, Oregon
	Adventist Health Columbia Gorge Hospital (Level III Trauma Center)	The Dalles, Oregon
	Good Shepherd Medical Center (Level III Trauma Center)	Hermiston, Oregon
	Legacy Emanuel Medical Center (Level I Trauma Center)	Portland, Oregon
	Oregon Health and Science University Hospital (Level I Trauma Center)	Portland, Oregon
	Sherman County Ambulance (Emergency medical transport)	Moro, Oregon
Schools	Sherman County High School	Moro, Oregon
	Sherman Grade School	Moro, Oregon

4.3.3 Sewers and Sewage Treatment

In the rural area surrounding the Solar Components, no developed sewer systems will be impacted by construction or operation of the Solar Components. The nearest developed sewer systems are located approximately 2 miles away from the Solar Micrositing Area in the town of Wasco, Oregon; other cities' sewer systems are farther away. As explained in Exhibit W, portable toilets will be used during construction; these will be provided and serviced (including off-site disposal of waste) by a private sanitation service provider. During operation of the Solar Components, staff will make use of sanitary facilities at the proposed O&M buildings, which will drain into a new county-approved on-site septic systems; sanitary facilities will also be available at the existing O&M buildings/septic systems. During operations, if there are numerous workers at the Solar Components for multiple days in a row, a portable toilet may be temporarily installed.

4.3.4 Water

Water used during construction is anticipated to be obtained from an existing municipal water source with existing water rights, i.e., the City of Wasco. In the rural area surrounding the Solar Components, no other developed water systems will be impacted by construction or operation of the Solar Components.

Approximately 26 million gallons of water will be required for construction of the Solar Components. As discussed in Exhibit O, all non-potable water used for construction and operations is anticipated to be sourced from the City of Wasco (or other permitted source(s)). Potable water during construction may also be sourced from the Facility's existing well or bottled water. During

operation, water will be obtained from a new or existing on-site exempt well or purchased bottled water. PGE has provided a record of correspondence in Attachment U-1.

There is one irrigation water right within the Solar Micrositing Area (Oregon Certificate 57620; Scharf Water Right). The Certificate Holder is working with the participating landowner and exploring transferring the Scharf Water Right to industrial use for the life of the Solar Components. If successful, the transfer would allow Certificate Holder to use the available water for construction and operation activities, including fire suppression and panel washing, which would lower the need for water from the City of Wasco. For more information about water rights and other details, see Exhibit O of this RFA.

4.3.5 Stormwater Drainage

In the rural area surrounding the Solar Components, stormwater infrastructure is limited to minimal facilities associated with public roads maintained by Sherman County. Stormwater drainage basins will be incorporated into the Facility design and will be within the facility fence line. The nearest external developed stormwater drainage facilities in the vicinity of the Solar Components are located within the Wasco city limits; however, the Solar Micrositing Area is approximately 5 miles from Wasco and the Solar Components will not connect to or otherwise impact the city's stormwater system.

4.3.6 Solid Waste Management

Sherman County provides solid waste disposal services through agreements with a private provider, The Dalles Disposal. It is assumed that solid waste developed during construction, operation, and decommissioning of the Solar Components will be transported to landfills through agreements with local private disposal services. The closest landfills to the Solar Components are the Columbia Ridge Landfill (20 miles east of the Solar Micrositing Area) and the Wasco County Landfill (25 miles west of the Solar Micrositing Area; PGE will provide a record of correspondence in Attachment U-1 prior to the final RFA 4 being deemed complete). The Dalles Disposal manages the Sherman County Transfer Station on Welk Road near Biggs Junction, where non-hazardous municipal solid waste and recycling is unloaded from collection vehicles and briefly held while it is reloaded onto larger long-distance transport vehicles for shipment to landfills.

4.3.7 Housing

Construction of the Solar Components is anticipated to last approximately 17 to 19 months. Based on PGE's experience during construction of other energy projects in the area, PGE anticipates that much of the construction personnel will be permanent residents or temporary residents who commute from within Sherman County, from Wasco County into Sherman County, or from Klickitat County, Washington into Sherman County. It is assumed that temporary housing could be required for up to 245 new households during the peak construction period and about 116 new households on average during the construction period. This is assuming 70 percent of construction staff will

not be existing residents and will migrate to the area during construction. Additionally, permanent housing for up to three new households, including workers and their families, may be required during operations.

Various housing options are provided in incorporated and unincorporated communities within the analysis area, and within a commutable distance from the Solar Components (1-hour duration) outside of the analysis area. Typical housing options for temporary workers include short-term rental housing, hotels or motels, RV parks, and public or private campgrounds. Note that no RV usage is proposed at the Solar Components themselves but rather at existing RV parks and campgrounds.

The Certificate Holder assumes that most construction workers will be in the area for approximately 4 to 9 months, and that the housing for those workers will primarily be provided by hotels, short-term rentals, and RV parks.

Rental Housing

Table U-3 summarizes the rental housing stock for the reasonable commuting area (1-hour duration) for the Facility. The data in this table are drawn from the U.S. Census Bureau survey data but, particularly in small communities, have high margins of error and may not accurately reflect actual availability at the time of the survey, and do not precisely reflect current availability. Rental vacancy rates were relatively low in Sherman and Wasco Counties, 1.3 percent and 1.6 percent, respectively, compared to a statewide average of 3.7 percent. Rental housing units were, however, still vacant and available for rent in these counties, with an estimated 55 units available in Sherman County and more than 500 units available in Wasco County.

Rental housing options for non-local construction workers may also include other special living situations, such as Airbnb units and spare bedrooms in homes that residents would be willing to rent to construction workers. These types of potential housing opportunities are not included in the data presented in Table U-3.

Table U-3. Housing Supply in Counties and Communities within Commutable Distance/Duration

Geographic Area	Total Housing Units (Occupied or Vacant)	Vacant Housing Units	Of Occupied Housing, Percentage Occupied by Renter	Estimated Number of Vacant Rental Units	Rental Vacancy Percentage
OREGON	***1,818,599***	***137,799***	***36.8***	***50,710***	***3.7***
Morrow County	**4,724**	**523**	**30.2**	**158**	**3.7**
Boardman	1,182	63	46.7	29	4.4
Gilliam County	**1,081**	**219**	**25.4**	**56**	**5.2**
Arlington	252	22	33.9	7	0
Condon	461	83	19.6	16	14.0

Geographic Area	Total Housing Units (Occupied or Vacant)	Vacant Housing Units	Of Occupied Housing, Percentage Occupied by Renter	Estimated Number of Vacant Rental Units	Rental Vacancy Percentage
Lonerock	23	11	0	0	0.0
Sherman County	**953**	**183**	**30.0**	**55**	**1.3**
Biggs Junction	0	0	0.0	0	0.0
Grass Valley	116	24	46.7	11	0.0
Moro	171	34	42.3	14	0.0
Wasco	226	25	21.9	5	0.0
Wasco County	**12,038**	**1,550**	**34.9**	**541**	**1.6**
Antelope	40	18	40.9	7	0.0
Dufur	398	47	33.0	16	0
Maupin	310	147	23.9	35	0.0
Shaniko	19	10	22.2	2	0.0
The Dalles	6,695	354	40.0	142	1.4
Tygh Valley	65	32	60.6	19	0.0
WASHINGTON	***3,216,243***	***236,971***	***36.2***	***85,784***	***4.0***
Benton County	**80,421**	**4,912**	**31.9**	**1,567**	**5.0**
Klickitat County	**10,602**	**984**	**25.0**	**246**	**1.5**
Bickleton	49	6	11.6	1	0.0
Goldendale	1,733	137	49.1	67	0.0
Source: U.S. Census Bureau 2022					

Hotels/Motels

There are 33 hotels/motel accommodations within a commutable duration (1-hour duration) to the Facility (Table U-4 and U-5; STR 2024). Establishments are concentrated in The Dalles, Oregon (11 hotels) and in Boardman, Oregon (5 hotels/motels), ranging from 7 to 61 miles away from the Facility. There are 1,318 rooms in this area across the 33 included hotels and motels. Approximately 9 percent of the rooms are in Sherman County, while 60 percent of the rooms are in Wasco County.

Table U-4. Regional Hotel/Motels by City and County Within Commutable Distance/Duration

Location	Total Hotel/Motels	Total Hotel Rooms	Percent of Total Hotel Rooms	Vacant Rooms at Peak Occupancy
Morrow County, OR	**5**	**234**	**18**	**40**
Boardman	5	234	–	–
Gilliam County, OR	**3**	**69**	**5**	**12**
Condon	2	36	–	–
Arlington	1	33	–	–
Sherman County, OR	**5**	**114**	**9**	**20**
Rufus	1	20	–	–
Moro	1	11	–	–
Wasco	3	83	–	–
Wasco County, OR	**15**	**787**	**60**	**135**
Dufur	1	20	–	–
Maupin	3	48	–	–
The Dalles	11	719	–	–
Klickitat County, WA	**5**	**114**	**9**	**20**
Bingen	1	12	–	–
Lyle	1	10	–	–
White Salmon	1	16	–	–
Goldendale	2	76	–	–
Total	**33**	**1,318**	**100**	**227**

Source: STR 2024

Note: Numbers may not sum due to rounding.

Table U-5. Summary of Regional Hotels/Motels by Commuting by Duration

Drive Time to Facility	Number of Establishments	Number of Rooms
0 to 30 minutes	**5**	**114**
30 to 60 minutes	**28**	**1,204**
Total	**33**	**1,318**

Source: STR 2024, Google Earth 2024

Review of average monthly hotel/motel occupancy rates for 2016-2023 indicates lower demand in the winter months and higher demand in the summer months (Table U-6). In the calendar year from January to December 2023, the lowest occupancy was 41.5 percent in December and the high was 79.6 percent in August, with an average annual vacancy rate of 37.2 percent (STR 2024). At the most recent peak occupancy of 82.8 percent in August 2024, there were approximately 227 rooms

available within a commutable duration (1-hour duration) (STR 2024). Table U-6 shows occupancy rates from January to December 2023, along with the average monthly occupancy rates for 2016 through 2023 (STR 2024).

Table U-6. Monthly Hotel/Motel Occupancy Rates (percent)

Month	2023 Occupancy	2016-2023 Average Occupancy
January	45.6	44.1
February	52.0	52.6
March	57.7	57.8
April	64.9	63.4
May	69.8	67.0
June	78.4	77.7
July	79.6	81.4
August	75.2	80.3
September	75.2	75.1
October	63.2	66.7
November	50.5	52.1
December	41.5	44.4
Source: STR 2024		

RV Parks

In addition, at least 17 RV parks with an estimated 755 sites are located within a commutable distance (1-hour duration) of the Solar Components, predominately in Wasco County, Oregon and Klickitat County, Washington (Tables U-7 and U-8; Good Sam 2024, RV Life Campgrounds 2024).

Based on a review of online sources, five RV parks are within Sherman County with 188 sites: 80 in Rufus, 32 in Moro, 63 in Wasco, and 13 in Grass Valley. Those RV parks closest to the Facility have a higher percent of hookups than those farther away, though around 43 percent of all RV sites in the region offer a full hookup (Table U-8).

Table U-7. Regional RV Park and RV Sites Within Commutable Duration

Location	Total RV Parks	Total RV Sites
Gilliam County, OR	**1**	**11**
Arlington	1	11
Sherman County, OR	**5**	**188**
Rufus	2	80
Moro	1	32
Wasco	1	63
Grass Valley	1	13
Wasco County, OR	**4**	**221**
Tygh Valley	2	153
Maupin	1	25
The Dalles	1	43
Klickitat County, WA	**7**	**335**
Dallesport	2	60
White Salmon	1	35
Goldendale	4	240
Total	**17**	**755**

Source: Good Sam 2024, RV Life Campgrounds 2024
Note: Numbers may not sum due to rounding.

Table U-8. Regional RV Park Capacity and Amenities

Drive Time to Facility	Number of Sites	Percent of Sites with Full Hookups	Percent of Sites with Water and Electric Only
0 to 30 minutes	422	61	13
30 to 60 minutes	333	29	40
Total	**775**	**43**	**28**

Source: Good Sam 2024, RV Life Campgrounds 2024

4.3.8 Traffic

For this RFA 4, the primary and secondary transportation routes will be the same as previously approved for the Existing Facility. These routes will be used to bring in equipment, materials, and workers from outside of the analysis area to the Solar Components site and will include state, county, and private roadways. Roads within the primary transportation route are serviced by the Oregon Department of Transportation (ODOT; Interstate 84 [I-84], United States Highway 97 [US-97]) and the Sherman County Road Department.

4.3.8.1 Primary Transportation Route

The primary transportation route used for construction of the Solar Components will be the same as what was previously evaluated for the BCWF. This route will carry all construction-related, heavy-duty, and light-duty delivery vehicles, as well as some workforce traffic. The route will start from either the west or east on I-84 to south on US-97 (from Biggs, Oregon) to Wasco, then southeast on Oregon Route 206 (OR-206), east on either Klondike Road or the Old Wasco Heppner Highway, and then onto various County roads (Figure U-2).

4.3.8.2 Secondary Transportation Route

The secondary transportation route previously approved for strictly construction-related commuter traffic would route traffic originating from either east or west on I-84 to travel south on Scott Canyon Road to Herin Lane (Figure U-2). Due to the physical terrain around Scott Canyon Road being unsuitable for large oversize or overweight trucks, this route is not suitable for any construction-related material or equipment deliveries. All truck traffic will use the primary transportation route.

4.3.8.3 Traffic Volumes

Table U-9 provides traffic volumes for the expected transportation routes to the Solar Components. State highway volumes were published in the 2021 through 2024 Traffic Volume Tables (ODOT 2021, 2022, 2023, 2024a). Table U-9 shows the average annual daily traffic (AADT) volumes for the most recent 4 years of data available at various milepost locations along the transportation routes.

Table U-9. Transportation Route Average Annual Daily Traffic Volumes

Highway[1]	Location	Milepost	2021	2022	2023	2024	Average Percent Change 2021-2024
I-84							
I-84 (No. 2)	0.50 mile east of Rowena Interchange	77.15	25,518	24,970	25,160	24,747	-3%
I-84 (No. 2)	At Hostetler Way Overcrossing	82.62	23,660	23,112	23,419	23,073	-2%
I-84 (No. 2)	At Webber Street Undercrossing	83.68	23,524	23,004	24,050	23,822	1%
I-84 (No. 2)	0.24 mile west of Brewery Grade Interchange	85.27	25,239	24,749	25,797	25,603	1%
I-84 (No. 2)	0.30 mile east of Brewery Grade Interchange	85.81	24,421	23,944	24,696	24,560	1%
I-84 (No. 2)	0.30 mile east of The Dalles-California Highway (US197)	87.31	18,067	17,608	18,202	18,113	0%
I-84 (No. 2)	0.30 mile east of The Dalles Dam Interchange	89.13	17,772	17,317	17,966	17,884	1%

Highway[1]	Location	Milepost	2021	2022	2023	2024	Average Percent Change 2021-2024
I-84 (No. 2)	0.30 mile east of Celilo-Wasco Highway (OR206)	97.44	16,904	16,485	17,124	17,061	1%
I-84 (No. 2)	0.44 mile southwest of Rufus/John Day Dam Interchange	109.51	14,630	14,294	14,211	13,019	-11%
I-84 (No. 2)	0.30 mile east of Rufus Interchange	110.25	14,574	14,296	13,976	14,012	-4%
I-84 (No. 2)	0.32 mile east of West John Day Interchange, Sherman-Gilliam County Line	114.55	14,525	14,253	13,901	13,940	-4%
US-97							
OR-97 (No. 42)	0.02 mile south of Celilo-Wasco Highway Spur	0.05	3126	3,651	3709	3,683	18%
OR-97 (No. 42)	0.30 mile south of Wasco-Heppner Highway (OR206)	7.8	2,595	3,543	3,600	3,575	38%
OR-97 (No. 42)	0.40 mile south of Celilo-Wasco Highway (OR206)	9.22	2,565	3,208	3,259	3,236	26%
OR-97 (No. 42)	Wasco Automatic Traffic Recorder, Sta.28-001, 0.83 mile northeast of 1st Street	17.36	3,273	3,232	3,258	3,233	-1%
Celilo-Wasco Highway; OR-206 (No. 301)							
OR-206 (No. 301)	0.02 mile west of Van Gilder Road	12.45	498	578	587	583	17%
OR-206 (No. 301)	0.20 mile west of Sherman Highway (US97)	14.53	316	312	317	315	0%
OR-206 (No. 301)	0.26 mile west of Church Street (west of Wasco city limits)	15.07	487	421	428	425	-13%
OR-206 (No. 301)	0.02 mile west of Wasco-Heppner Highway (OR206)	15.55	523	465	472	469	-10%
Wasco-Heppner Highway; OR-206 (No. 300)							
OR-206 (No. 300)	East of Sherman Highway (US97) [0.30 miles]	-1.67	501	483	491	435	-13%
OR-206 (No. 300)	West of Clark Street [0.02 miles]	-0.28	548	528	536	461	-16%
OR-206 (No. 300)	North of CeliloWasco Highway (OR206) [0.02 miles]	-0.11	1124	1,084	1101	880	-22%
OR-206 (No. 300)	South of CeliloWasco Highway (OR206) [0.02 miles]	-0.07	1433	1,381	1403	1,214	-15%

Highway[1]	Location	Milepost	2021	2022	2023	2024	Average Percent Change 2021-2024
OR-206 (No. 300)	East of Clark Street [0.02 miles]	0.02	765	737	749	611	-20%
OR-206 (No. 300)	At east city limits of Wasco	0.58	590	569	578	460	-22%
OR-206 (No. 300)	SE of Klondike Road [0.02 miles]	0.88	517	498	506	425	-18%
OR-206 (No. 300)	At Hay Canyon Bridge	6.63	435	419	426	419	-4%
OR-206 (No. 300)	West of Fairview Road [0.02 miles]	9.4	370	357	363	309	-16%
OR-206 (No. 300)	East of Fairview Road [0.02 miles]	9.44	370	357	363	334	-10%

Source: ODOT 2021, 2022, 2023, 2024a
The number in parenthesis is the internal ODOT number designation for each state highway.

Table U-9 shows that, from 2021 to 2024, AADT volumes increased by up to 1 percent on I-84 but decreased in some sections as well. On US-97, AADT volumes have dramatically increased by as much as 38 percent around the OR-206 junction. For OR-206, road volumes have increased near Van Guilder Road by 17 percent but have decreased for all other segments anywhere from four to 22 percent lower than in 2021.

Due to the rural nature of the analysis area, recent traffic counts for county roads that are proposed as transportation routes are not available. County roadway volumes are assumed to be minimal, with some increase during the summer and early fall for harvest of various crops in the area.

4.3.8.4 Pavement Conditions

Pavement conditions can influence traffic safety issues. Poor pavement with potholes might cause vehicles to swerve, resulting in unsafe vehicle operation. ODOT's 2024 Pavement Condition data were reviewed for state highway transportation routes (ODOT 2024b). The conditions for state highways anticipated to be used as part of the transportation routes to the Solar Components range from fair to good along the entire haul route.

The majority of I-84 adjacent to Biggs, Oregon, is in good condition. There are some sections of US-97 directly off of I-84 that are in fair condition. A fair rating indicates minor or low severity pavement deficiencies that typically lead to treatment such as chip seal or light resurfacing (ODOT 2024b); however, fair conditions do not indicate a safety hazard. Around milepost 7, US-97 returns to good condition pavement. OR-206 is rated as good condition throughout the area being used by the project (ODOT 2024b).

The surface quality of Scott Canyon Road, Klondike Road, and Old Wasco-Heppner Highway are not assessed by ODOT because they are local roadways. All three are two-lane asphalt roadways with striping. In street level imagery dated August 2024, the road surface of Klondike Road and Old Wasco-Hepner Highway appeared to have recently been replaced, suggesting a good condition.

Scott Canyon Road as of imagery dated September 2025 appears to have been resurfaced recently as well, suggesting a good condition (Google Earth 2025).

4.3.8.5 Air Transportation

There is one aviation facility within the analysis area, considering both public and private airports: Wasco State Airport (public; approximately 4.4 miles southwest of the Solar Micrositing Area). There are no military facilities within the analysis area.

4.3.9 Police and Fire Protection

Police service in the analysis area is primarily provided by county police departments; some of the cities in the analysis area have a city police department that operates within their respective cities but do not cover the Facility. As necessary, PGE relies on assistance from the nearest Sherman County Sheriff's Office, located in Moro, Oregon. PGE will provide a record of correspondence in Attachment U-1 prior to the final RFA 4 being deemed complete (see Attachment U-1). Additional law enforcement service is available through the Oregon State Police, with offices in The Dalles, Heppner, and Hermiston, and through The Dalles Police Department. The small number of temporary construction workers and additional permanent-resident employees is not anticipated to place significant new demands on law enforcement agencies in the area.

Fire protection service in the analysis area is provided by the North Sherman County Rural Fire Protection District. The Certificate Holder will provide the fire department with construction plans, and locational information for Solar Components infrastructure, including access. PGE will provide a record of correspondence in Attachment U-1 prior to the final RFA 4 being deemed complete (see Attachment U-1).

4.3.10 Health Care

Because population density in the analysis area is relatively low, hospitals and health care services tend to be regional. The Sherman County Medical Clinic provides family medicine, urgent care, and minor surgery services, and is located approximately 10 miles from the Solar Components. There are two Level III Trauma centers within the vicinity of the Solar Components: Good Shepherd Medical Center (in Hermiston, Oregon) and Adventist Health Columbia Gorge Hospital (in The Dalles, Oregon; Oregon Health Authority 2024). The closest Level I Trauma centers are the Legacy Emanuel Medical Center and Oregon Health and Science University Hospital, both located in Portland, Oregon. Sherman County has one Ambulance Service Area, which is served by Sherman County Ambulance (Sherman County 2024).

4.3.11 Schools

The analysis area is within the Sherman County School District. The nearest schools within the district are located in the town of Moro, Oregon, and include Sherman Grade School and Sherman County High School (both approximately 12 miles from the Solar Components). Although the

analysis area (the area within and extending 10 miles from the Solar Micrositing Area) includes small portions of Gilliam County, Oregon and Klickitat County, Washington, no schools other than those within Sherman County School District are within the analysis area.

4.4 Potential Impacts on Public and Private Providers – OAR 345-021-0010(1)(u)(C)(D)

OAR 345-021-0010(1)(u)(C) A description of any likely adverse impact to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110;

OAR 345-021-0010(1)(u)(D) Evidence that adverse impacts described in (C) are not likely to be significant, taking into account any measures the applicant proposes to avoid, reduce or otherwise mitigate the impacts; and

Response: The Solar Components are not expected to have any significant adverse impact on any public or private service providers in the analysis area during construction or operation. The Council previously found that the BCWF was not likely to result in significant adverse impacts to public services within the analysis area,[4] and the amendments in RFA 4 do not alter that conclusion. No amendments to relevant conditions listed in the Third Amended Site Certificate to the Biglow Canyon Wind Farm are proposed.

4.4.1 Sewer and Sewage Treatment

No adverse impacts to sewer services are expected as a result of construction, as the only sewage services required for construction will be related to portable toilets. During operations, PGE's staff will use the sanitary facilities at the proposed O&M buildings or the existing O&M buildings, which are not, and will not be, connected to public sewage infrastructure. The sanitary facilities used will drain into a new county-approved on-site septic system. PGE will follow Site Certificate Conditions 82 and 83 in the Third Amended Site Certificate related to portable toilets and sewage management (Council 2008).

4.4.2 Water

PGE does not expect adverse impacts to water services. During construction and operation water will be sourced from City of Wasco municipal water (or other permitted source(s)), from a new or existing on-site exempt well, or purchased bottled water. As noted in the service letter provided by the City of Wasco (see Attachment U-1), the City has adequate water supplies to serve the Facility and is not expected to be adversely impacted by the Facility. No new water rights will be required (see Exhibit O). PGE will follow Site Certificate Conditions 74, 75, and 76 regarding water sourcing, and Site Certificate Conditions 83, 86, and 88 regarding wastewater discharges (Council 2008).

[4] Final Order on Request for Amendment 3, p. 36 (October 2008).

4.4.3 Stormwater Drainage

The Solar Components will not adversely impact public stormwater drainage facilities. Any construction-related stormwater will evaporate or infiltrate on site and no public stormwater facilities will be used. During construction, stormwater best management practices and monitoring will be implemented in accordance with the 1200-C National Pollutant Discharge Elimination System Storm Water Discharge General Permit and draft Erosion and Sediment Control Plan (see Exhibit I, Attachment I-1) (Site Certificate Condition 26). The Solar Components will be graded in a manner to encourage stormwater to infiltrate the ground to minimize the need for collection in stormwater swales or retention basins. During operation, PGE will monitor the area until soils are stabilized and evaluate whether construction-related impacts to soils are being adequately addressed by the mitigation procedures described in the draft Erosion and Sediment Control Plan and the Comprehensive Solar Revegetation and Soil Management Plan (Site Certificate Condition 29). Stormwater management infrastructure installed during construction will, as needed, be left in place to continue functioning during operation. Such features may include roadside ditches, infiltration swales, or retention basins. These facilities will be located on private land and will not affect the provision of stormwater management services by any public agency. PGE will also follow wastewater discharge practices listed in Site Certificate Conditions 83, 86, and 88 (Council 2008).

4.4.4 Solid Waste Management

Construction and operation activities will not adversely impact solid waste management services. Solid waste will be disposed of through contracts with local waste disposal providers and will comply with all local, state, and federal laws and regulations (Site Certificate Condition 80). The Solar Components will implement a waste management plan during construction and operation, in accordance with Site Certificate Conditions 84 and 87 (Council 2008). Exhibit W includes detailed information about types and quantities of solid waste and disposal.

PGE will contract with a private disposal service to transport any solid waste that is not recycled to an approved landfill. Columbia Ridge Landfill (20 miles east of the Solar Micrositing Area) and the Wasco County Landfill (25 miles west of the Solar Micrositing Area) will be the most likely recipients for solid waste for the Solar Components. PGE expects construction waste to be within the handling capacities of the aforementioned landfills (PGE will provide a record of correspondence in Attachment U-1 prior to the final RFA 4 being deemed complete, see Attachment U-1; see Exhibit W).

4.4.5 Housing

PGE does not expect adverse impacts to housing as a result of constructing or operating the Solar Components. Potential impacts on housing could result if there were an inadequate supply of housing in relation to the demand from the new temporary and permanent residents associated with the Solar Components; it is not yet known where the new temporary and permanent residents will settle and what type of housing they will select. However, based on the availability of housing

options outlined in Section 4.3.7, adequate supply is available to accommodate the construction and operations employees.

The number of skilled local workforce is continuously growing as more renewable energy projects are built in eastern Oregon. As discussed below, additional workers are likely to commute daily from communities outside the analysis area (within a 1-hour commutable duration), which will lessen impacts to housing associated with the in-migration of outside workers.

Based on the projected construction employment for the Solar Components, it is assumed that temporary housing could be required for up to 245 new households during the peak construction period and about 116 new households on average. However, this is based on the conservative assumption that just 30 percent of construction workers will be hired locally—and thus not require temporary housing—while the remainder will be from outside the 1-hour commuting duration. Additionally, it is assumed that most construction workers will be in the area for approximately 4 to 9 months as opposed to the full construction period. The actual number of temporary residents may be fewer if more locals are hired.

Workers temporarily relocating to the area during construction are likely to seek a range of temporary accommodations, including rental housing (houses, apartments, and mobile homes), hotel/motel rooms, and RV parks and campgrounds, as well as other special living situations such as Airbnb units and spare bedrooms. Housing demand by type is likely to be influenced by the type of housing available, the proximity of the housing to the Facility, duration of employment, and the project schedule, as well as worker preference.

As noted above, during peak construction an estimated 245 non-local workers could seek temporary accommodation near the Solar Components. Temporary accommodation would be available in the form of rental housing, with an estimated 55 units available in Sherman County and more than 500 units available in Wasco County (Table U-3). Rental housing options may also include other special living situations, such as Airbnb units and spare bedrooms in homes that residents would be willing to rent to construction workers. Temporary accommodation would also be available in the form of hotel/motel rooms and RV parks and campgrounds. An estimated 227 rooms within 1 hour would normally be vacant and available for rent during peak hotel occupancy (August), with additional rooms available at other times of the year (Table U-4). In addition, workers with trailers or RVs would likely seek housing at existing RV parks and campgrounds. At least 17 RV parks with an estimated 755 sites were identified within a 1-hour commute of the Solar Components (Table U-7). Consultation with cities will occur as necessary regarding temporary housing options prior to construction. Note that no RV usage is proposed at the Solar Components itself but rather at existing RV parks and campgrounds within a 1-hour commute distance/duration.

Even if all migrant (non-local) construction workers sought temporary housing within the 1-hour commutable distance/duration analysis area, there will be enough supply to meet that demand. Although it cannot be assumed that housing facilities will have vacancies at any given time, the above review indicates that adequate supplies are available within a commutable distance/duration in relation to the number of temporary workers. Additionally, experience with

energy facility construction, for example during the peak of wind power construction in 2009 and 2010 near the community of Arlington, Oregon, demonstrates that multiple facilities can be built in an area comparable to the analysis area without creating local housing issues. Therefore, no significant adverse housing impacts from construction of the Solar Components are anticipated.

Permanent housing for up to three new households (with up to 3.0 people per household) may be required starting at the beginning of operations. This potential demand for housing is not expected to result in significant adverse impacts on the ability of communities to provide housing.

4.4.6 Traffic

The Certificate Holder expects an average of up to 165 worker vehicle round trips generated per day during construction of the Solar Components, with a peak of 350 worker vehicle round trips per day, which is assumed to be the worst-case scenario. The Certificate Holder expects a peak of 54 trucks per day or 108 one-way truck trips per day by small and large trucks to deliver materials and equipment. Thus, during peak construction, it is possible the Solar Components could generate approximately 808 one-way trips per day. It is anticipated that up to three two-way vehicle trips per day will be required for maintenance personnel during operations. Transportation routes will be used to bring construction workers, equipment, and materials from outside of the analysis area to the Solar Components, and will include state and county roads. The primary and secondary transportation routes are depicted in Figure U-2.

Construction and operation of the Solar Components will temporarily increase the traffic volume within the primary transportation route. However, construction-related traffic typically occurs during off-peak hours. Construction workers generally start their days earlier than the surrounding residents and construction trucks typically use roads in the middle of the day during off-peak hours. The private vehicle traffic will also generally occur at different times than the truck traffic, as the workers report earlier and leave later than most of the truck traffic. The Certificate Holder will encourage carpooling for construction workers and include traffic safety as part of its safety training program.

As described in Section 4.3.8, I-84 carried an AADT volume of approximately 17,884 vehicles in 2024 on the road segments located east and west of US-97. Based on the above AADT estimates, for the construction period, construction vehicles could cause a peak increase to 18,692 if 100 percent of the average construction traffic uses this route, which is a total increase of about 4.5 percent. This increase is expected to be inconsequential.

Along US-97, just south of I-84, the 2024 AADT was found to be 3,683. With the addition of 100 percent of the peak construction traffic, this will increase the anticipated vehicles per day to 4,383. This equates to a total increase in traffic of 23 percent. This increase may cause some additional traffic delay, particularly during the AM and PM Peak Hour, but it is unlikely to cause significant disruption. Due to the increase in traffic, the Level of Service (LOS) of the roadway was determined by comparing the traffic volume anticipated to the capacity of the roadway as designated by the Highway Capacity Manual 7th Edition (National Academies of Science, Engineering, and Medicine

2022). An estimated 371 passenger cars would be using the road during peak hour without construction traffic. Peak construction traffic would add an additional 350 trips during the peak commuting hour. With an ideal capacity of 2,800 passenger cars per hour, this would give us a Volume to Capacity ratio (V/C Ratio) of 0.33. Considering the availability of Passing Zones, the terrain, and the design speed of 60 miles per hour, this equates to an LOS B, which means minimal delays will be generated by the increase in traffic.

OR-206 carried an AADT volume of approximately 583 vehicles in 2024. With the addition of 100 percent of the average worker construction traffic (165 round trips), this will increase the anticipated vehicles per day to 913. This equates to a total increase in traffic of 57 percent. OR-206 was further analyzed for the impact to LOS. With approximately 58 vehicles during the Peak AM and PM hour under existing conditions, the addition of 350 commuting workers during peak construction results in a V/C Ratio of 0.15. This equates to an LOS A, which means minimal delays will be generated by the increase in traffic.

The Certificate Holder will coordinate with ODOT and Sherman County on any potential road closures, impacts, and permits needed for construction or movement of equipment and materials. The Applicant will implement all traffic-related Site Certificate Conditions (Conditions 17, 27, 60, 77, 78, and 79; Council 2008), including those related to oversize/overweight delivery timing, parking, road wear and repair, and signage. A Construction Traffic Management Plan will be developed prior to construction, in accordance with Site Certificate Condition 79, that will include traffic minimization measures at transportation route roads, which would be implemented as needed, staggering shift start times to reduce vehicle trips through the westbound I-84 ramp terminal at Biggs Junction, installation of temporary traffic controls during peak construction, and other mitigation measures, as applicable. Also, the Certificate Holder will ensure that any wear or damage to county roads as a result of the Solar Components is repaired, and that roads are restored to pre-construction condition or better.

4.4.6.1 Traffic and Design Standards

Traffic Standards

State highways are designed and constructed to handle legal loads of 80,000 pounds without a permit. During construction, it may be necessary for trucks exceeding the legal load limit to access the site via state highways. These trucks will potentially be used to deliver the substation transformers or heavy construction equipment. Before construction, the transportation contractor will consult with the Sherman County Road Department and ODOT to determine whether any segments of roadways or bridges are restricted for travel, and to obtain any oversize/overweight permits required to allow transport of these loads (Site Certificate Conditions 15 and 77; Council 2008). There are no permanent restrictions on state highways proposed for transportation routes. Because the state highways are built to accommodate overweight vehicles with permits, impacts to safety or roadway pavement conditions are not expected. Vehicles up to 75 feet in length are allowed without special permitting on the construction transportation routes. There are requirements imposed by Sherman County and ODOT, such as the previously referenced

Construction Traffic Management Plan (Site Certificate Condition 79; Council 2008), to promote traffic safety and prevent cumulative damage to the pavement along the primary transportation routes identified in this exhibit.

Design Standards

County and local roadways are expected to safely accommodate Solar Components construction traffic. Note that no county or local roadways are anticipated to require improvement prior to construction. Note that road conditions could change, thus the Construction Traffic Management Plan will reflect what is actually needed at the time of preconstruction compliance for the Solar Components (Site Certificate Conditions 17 and 77; Council 2008). To ensure the integrity of local roads, the Certificate Holder will coordinate with local transportation officials to make improvements where necessary to accommodate Solar Components construction traffic, and improvements will be restricted to areas within the respective rights-of-way per Site Certificate Condition 17 (Council 2008).

The Certificate Holder will work with ODOT and the Sherman County Road Department to ensure that any unusual damage or wear to state or county roads that is caused by Solar Components construction is monitored and repaired by the Certificate Holder as consistent with Site Certificate Conditions 77 and 78. All county roads on the primary transportation route will be evaluated prior to and after construction of the Solar Components to determine what, if any, degradation has occurred. Inspections will include monitoring of roadway conditions after the completion of construction activities. Monitoring may include the use of video footage, photographs, and engineer field notes to document road conditions. During construction of the Solar Components, the contractor will obtain authorization from ODOT and Sherman County before proceeding with overweight loads on state- or county-maintained roadways. The Certificate Holder will strictly abide to travel conditions and transportation equipment requirements enforced by either ODOT or Sherman County. Upon completion of construction, the Certificate Holder will restore county roads to their pre-construction condition or better, to the satisfaction of the County Road Department. Regardless of existing pavement conditions, roadway segments will be reviewed prior to any added construction traffic, and a system for monitoring safety or degradation to pavement will be developed for the necessary roadways prior to construction (Site Certificate Condition 77; Council 2008). The Certificate Holder will ensure that the construction and operation of the Solar Components will maintain ODOT's and Sherman County's Road systems in as good or better quality than prior to the Solar Components' construction.

4.4.6.2 Air Transportation

There is one aviation facility within the analysis area, Wasco State Airport (35S), located 4.4 miles southwest of the Solar Micrositing Area; this airport does not meet the notice criteria based on Federal Aviation Administration (FAA)-identified impact areas (i.e., less than 3.8 miles from the Solar Micrositing Area), and therefore formal submission of a Form 7460-1 to the FAA under Code of Federal Regulations (CFR) Title 14 Part 77.9 (Safe, Efficient Use, and Preservation of the Navigable Airspace) is not required. To confirm that a formal FAA notification was not required for

the Amended BCWF, the FAA Notice Criteria Tool was used. The results indicated that notice is not required for the Solar Micrositing Area.

4.4.6.3 Glare Impacts

Solar arrays reflect light that can interfere with road and air travel. A glare analysis was completed for the Solar Components using a modeling/compliance analysis tool within the GlareGauge software application, as described in Exhibit R Section 5.3. Glare is categorized using three tiers of severity: red (glare predicted with a potential for permanent eye damage), yellow (glare predicted with a potential for temporary after-image), and green (glare predicted with a low potential for temporary after-image).

The results of this analysis indicate that no glare was predicted for the two 2-mile final approach paths for the Wasco State Airport. No instances of red glare are predicted for any glare analysis observation points or route segments. As described in Exhibit R Sections 5.3.1 and 5.3.2, minor amounts of green glare were predicted for select sections of Herin Lane (1) and Oehman Road, and minor amounts of yellow glare were predicted for select sections of Herin Lane (1) in November through February, with a duration ranging from less than 10 minutes to less than 120 minutes per day between 6:00 AM and 5:00 PM.

The Solar Components were predicted to result in an average annual amount of 168.4 hours of green and 128.2 hours of yellow glare. Based on 12 hours of daylight, this equates to green glare approximately 4 percent of the time and yellow glare approximately 3 percent of the time. This amount of green and yellow glare is considered insignificant. In addition, this is a conservative prediction, as the GlareGauge model does not account for varying ambient conditions (i.e., cloudy days, precipitation), atmospheric attenuation, screening due to existing vegetation or structures unless specified through obstruction modeling, and screening due to existing topography not located within the defined array layouts. As such, the predicted results are considered conservative and actual glare would likely be significantly lower than predicted.

4.4.7 Police and Fire Protection

The relatively small number of new temporary and permanent residents is not expected to create significant new demands on the police or fire protection services for the area. Any impacts to police and fire services will be intermittent and temporary during construction, with construction anticipated to last from 17 to 19 months.

During construction and operation of the Solar Components, the Certificate Holder will provide on-site security and maintain good communications between on-site security personnel and the Sherman County Sheriff's Office. During operation, the Certificate Holder will ensure that appropriate law enforcement agency personnel have an up-to-date list of the names and telephone numbers of Solar Components personnel available to respond on a 24-hour basis in case of an emergency on the site.

PGE has previously consulted with the Sherman County Sheriff's Office and the North Sherman County Rural Fire Protection District to address potential impacts and committed to coordinating with them regarding appropriate traffic safety measures. PGE will provide a record of correspondence specific to the Solar Components in Attachment U-1 prior to the final RFA 4 being deemed complete. PGE will provide the North Sherman County Rural Fire Protection District with construction plans, schedules, and locations prior to the start of construction. The Construction and Operations Wildfire Management Plans, which will be finalized in coordination with these providers, will establish the framework for training, communications, and response protocols. These Plans will address structural, BESS, and wildfire scenarios, and will include provider training on facility-specific hazards, established communication channels, site access, and firefighting resources. Ongoing coordination and refresher trainings will further ensure local providers are supported and prepared to respond safely and effectively.

Solar panels contain a number of safety features designed to provide increased fire protection. The BESS also introduces an element that could pose a fire hazard. Lithium-ion batteries must be kept in a temperature-controlled facility with individual battery modules isolated to prevent the spread of fire if it were to occur. The lithium-ion BESS will incorporate a fire response system as designed by the battery manufacturer. During the operational phase of the Solar Components, fire danger will be minimal.

The following measures could be implemented to minimize fire and safety risks:

- Conditions in Sections H and T of the Site Certificate (Public Health and Safety Standards for Wind Energy Facilities and Public Health and Safety, respectively) will be followed during construction and operation of the Solar Components, including conditions related to implementing fire safety plans and health and safety plans, mitigating fire risk, and coordinating with the North Sherman County Rural Fire Protection District (Site Certificate Conditions 96, 97, and 98; Council 2008).
- All electrical equipment will meet National Electrical Code and Institute of Electrical and Electronics Engineers standards.
- Adequate firefighting equipment and water supplies will be maintained and made available during operations that carry a high fire risk (e.g., metal cutting, welding, parking in high, dry grass).
- The solar array will have shielded electrical cabling to prevent electrical fires.
- The collector system and substation will have redundant surge arrestors to deactivate the Solar Components during unusual operational events that could start fires.
- Solar Components infrastructure will be spaced sufficiently (fire breaks) to prevent the spread of fire.
- A non-flammable gravel base will be installed around the solar inverters, substation, and BESS.

- Smoke/fire detectors, including wildfire detection cameras and other systems included in the PGE 2024 Wildfire Mitigation Plan (Attachment V-1), will be placed around the site that will be tied to the supervisory control and data acquisition system and will contact local firefighting services.
- Vehicles and equipment will drive and park on maintained graveled areas and roads to the extent practicable; roads will be established before accessing the site to keep vehicles away from grass (Site Certificate Conditions 97 and 98; Council 2008).
- Vehicles will avoid idling in grassy areas, and cutting torches and similar equipment will be kept away from grass (Site Certificate Conditions 95, 97, and 98; Council 2008).
- Diesel vehicles will be used whenever practicable to prevent potential ignition by catalytic converters.
- Roads will be sufficiently sized for emergency vehicle access.
- Fire prevention and response training will be administered annually to all on-site employees (Site Certificate Condition 97). Operations staff will be trained in the use of fire extinguishers for responding to incipient stage fires on site (Site Certificate Conditions 93 and 94; Council 2008).
- A Solar Components site plan will be submitted to fire protection officials including current contact information for personnel (Site Certificate Condition 96; Council 2008).
- Off-site, 24-hour monitoring of the BESS will be implemented and will include shutdown capabilities.
- The BESS will be stored in completely contained, leak-proof enclosures, and will be inspected regularly according to the manufacturer's recommendations.
- Transportation of lithium-ion batteries is subject to 49 CFR 173.185 – Department of Transportation Pipeline and Hazardous Material Administration. This regulation contains requirements for prevention of a dangerous evolution of heat; prevention of short circuits; prevention of damage to the terminals; and prevention of batteries coming into contact with other batteries or conductive materials. Adherence to the requirements and regulations, personnel training, safe interim storage, and segregation from other potential waste streams will minimize any public hazard related to transport, use, or disposal of batteries.
- Design of BESS will be in accordance with applicable Underwriters Laboratories (specifically, 1642, 1741, 1973, 9540A), National Electric Code, and National Fire Protection Association (specifically 855) standards, which require rigorous industry testing and certification related to fire safety and/or other regulatory requirements applicable to battery storage at the time of construction.
- The site will be mowed as needed for fire safety requirements and to keep vegetation from interfering with operation and maintenance activities, in accordance with the PGE 2024 Wildfire Mitigation Plan (Attachment V-1).

- Cyclical and routine vegetation inspections and maintenance will be carried out in accordance with the PGE 2024 Wildfire Mitigation Plan (Attachment V-1) to monitor for vegetation clearances, maintain fire breaks, as applicable, and monitor for wildfire hazards.
- The programs outlined in Exhibit V will be implemented to minimize fire risk during operations, including the PGE 2024 Wildfire Mitigation Plan (Attachment V-1).

4.4.8 Health Care

PGE does not expect construction or operation of the Solar Components to have adverse impacts on local and regional emergency health service providers, hospitals, or health clinics, considering the relatively small number of personnel that will be added for construction and operation of the Solar Components. Healthcare providers appear to have adequate capacity for potential patients associated with the Solar Components, and the need for healthcare services will be minimized through implementation of robust health and safety programs (Site Certificate Conditions 37 through 47 and 92 through 100; Council 2008). The Solar Components will also comply with all emergency planning and notification requirements of the Emergency Planning and Community Right-to-Know Act and will notify ODOE and Sherman County within 72 hours of any event that threatens public health and safety or the environment (Site Certificate Condition 37; Council 2008).

In an emergency, Sherman County Ambulance will likely provide emergency medical transportation to the Adventist Health Columbia Gorge Hospital, a Level III Trauma Center, in The Dalles, Oregon (Sherman County 2024). If more advanced treatment is needed, patients may be flown via helicopter or fixed-wing aircraft to Level I Trauma centers in Portland, Oregon. Construction workers are expected to adhere to contractor safety programs, which will prevent serious injuries and the need for ambulance or hospital services.

4.4.9 Schools

PGE does not expect construction or operation of the Solar Components to have adverse impacts on schools, considering the relatively small number of new students that will be enrolled. No schools are located within the Solar Micrositing Area or will be directly affected by the Solar Components construction or operations. During operations, up to three new permanent households (assuming a household size of 3.0) may require school services, which should not adversely impact school operations. Impacts on school services will depend on the housing choices of new residents with children, which cannot be predicted; however, given the number of schools in the locations in which new residents are likely to settle, and the small number of new school children expected, it is unlikely that any one school will receive more new students than it can accommodate. To the extent possible, PGE will coordinate the timing of oversized/overweight vehicles and equipment deliveries to avoid peak school traffic times and bus routes. Note that truck traffic (inclusive of large component or equipment deliveries) will generally not coincide with morning and evening peak hours; rather, truck traffic will be dispersed throughout the working day. School buses are

anticipated to be operational in the mornings and evenings, before and after schools are in session, and thus are not anticipated to coincide with the timing of construction truck traffic.

5.0 Proposed Monitoring Programs – OAR 345-021-0010(1)(u)(E)

OAR 345-021-0010(1)(u)(E) The applicant's proposed monitoring program, if any, for impacts to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110.

Response: Because PGE does not anticipate the construction and operation of the Solar Components to have long-term significant adverse impacts on the ability of service providers in the analysis area to provide services, PGE does not plan any monitoring programs other than the monitoring efforts required under the National Pollutant Discharge Elimination System and the Traffic Management Plan. PGE will continue to communicate with the Sherman County Planning Department and local service providers to keep them informed of major developments at the Solar Components that could potentially affect public services.

6.0 Conclusion

The evidence provided in this exhibit demonstrate that the Solar Components will not result in a significant adverse impact on the ability of public and private entities in the analysis area to provide the following services: sewers and sewage treatment, water, stormwater drainage, solid waste management, housing, transportation and traffic safety, police protection, fire protection and emergency response, health care, and schools.

7.0 References

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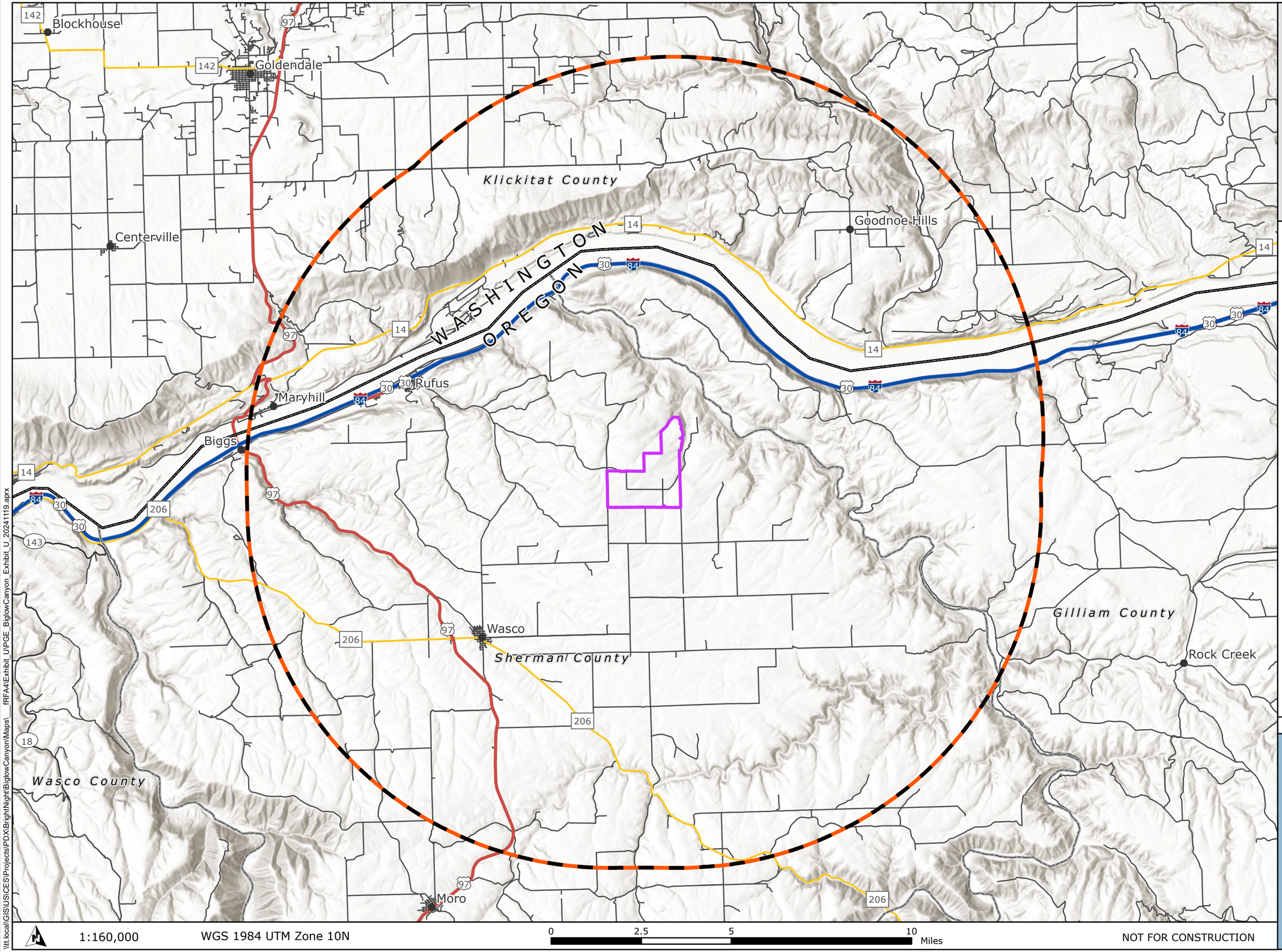
Figures

Biglow Canyon Wind Farm Request for Amendment #4

Figure U-1
Analysis Area and Primary Transportation Route

SHERMAN COUNTY, OR



- Solar Micrositing Area
- Analysis Area (10-mile Buffer)
- State Boundary
- County Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Local Roads

TETRA TECH

PGE

Reference Map

1:160,000 WGS 1984 UTM Zone 10N

0 2.5 5 10 Miles

NOT FOR CONSTRUCTION

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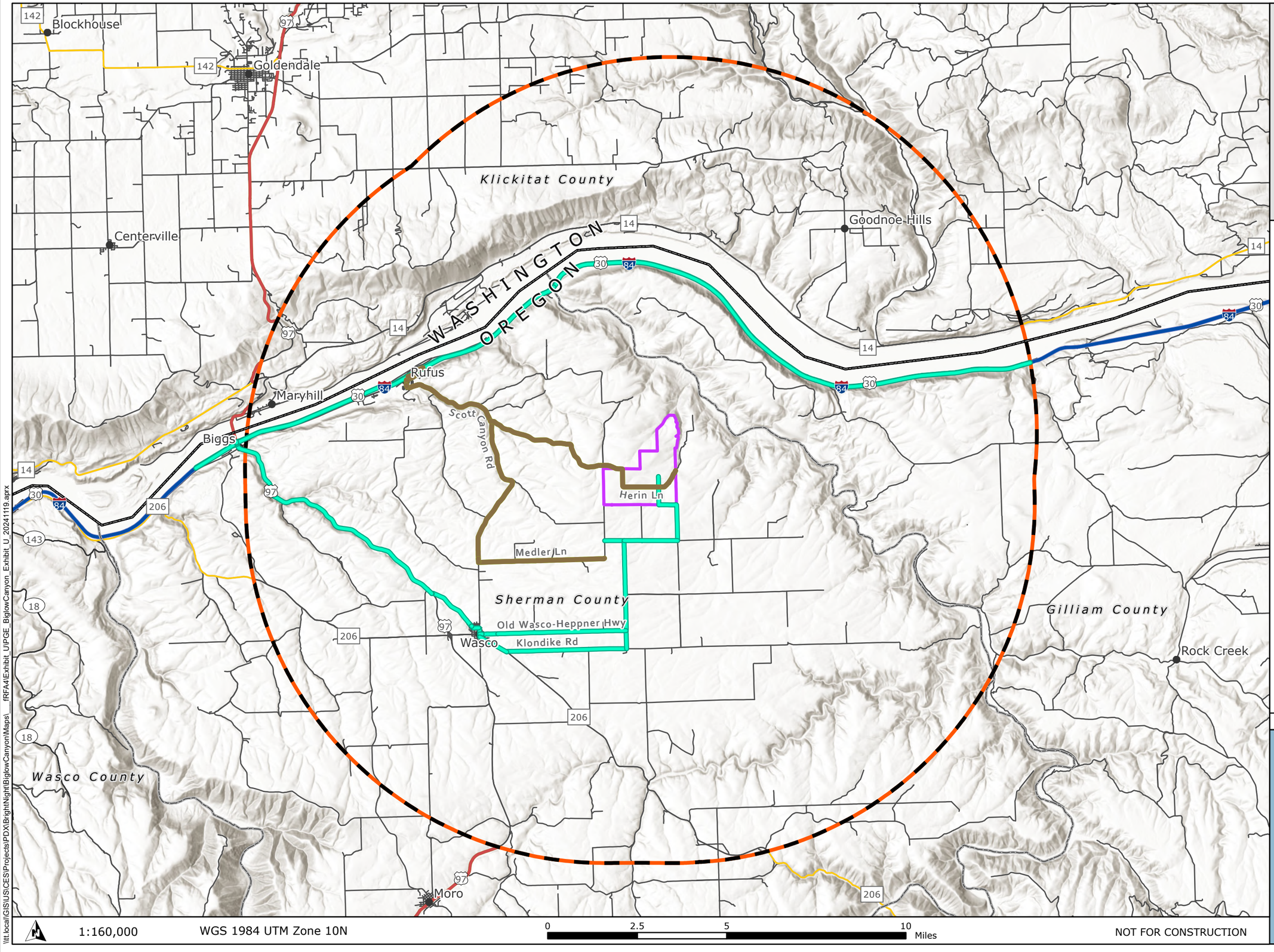
Biglow Canyon Wind Farm Request for Amendment #4

Figure U-2
Primary Construction Transportation Routes

SHERMAN COUNTY, OR



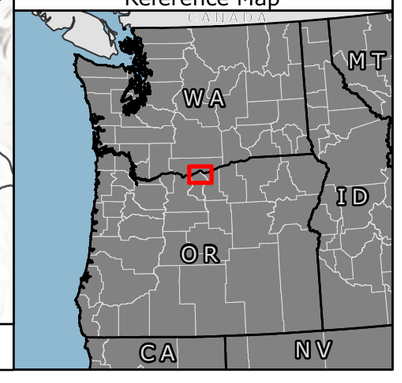
- Solar Micrositing Area
- Analysis Area (10-mile Buffer)
- State Boundary
- County Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Local Roads
- Primary Transportation Route
- Secondary Transportation Route*

* Construction related commuter traffic only. Not suitable for oversize / overweight traffic conditions.

TETRA TECH

PGE

Reference Map



1:160,000

WGS 1984 UTM Zone 10N

0 2.5 5 10 Miles

NOT FOR CONSTRUCTION

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Attachment U-1. Service Provider Letters

Outlook

Biglow Renewable Power Project

From Michael Binder <michael.binder@brightnightpower.com>
Date Thu 10/2/2025 2:14 PM
To nsrfpd@outlook.com <nsrfpd@outlook.com>; jacob.burbank@mcgregor.com <jacob.burbank@mcgregor.com>
Cc Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>

2 attachments (531 KB)
MOU for Ag Mitigation.pdf; Draft Community Investment Plan.pdf;

Chief Burbank,

I know it's been a few weeks now but wanted to reach out and thank you again for meeting with me to discuss the Biglow Renewable Power Project. We greatly appreciate your time, your insights, and the clear feedback you provided. As we move forward, it is important to us that the project supports the safety and resilience of the community, and that we incorporate your perspective into our planning.

To summarize our discussion and next steps:

- **Perimeter Access:** You emphasized the importance of sufficient access. The current design includes a 20-foot setback from the fence to any on-site structure and a 50-foot setback from the property line to the facility fence. While these areas are not planned as improved roads, they can serve as fire breaks and emergency access if needed.

- **Signage and Emergency Access:** We understand the need for clear signage to support emergency response. The facility will include signage to identify array locations, and we note that the site will consist of several fenced-in arrays, each with inverter access roads rather than a single perimeter fence. Additionally, your team would be provided with the training (inclusive of a site tour) and materials to support a confident and safe response at the project. Once the project is operational, we will facilitate an introduction to the local Operations and Maintenance lead to ensure ongoing collaboration.

- **Training Program:** We intend to provide annual training, and we will ensure Sherman County EMS is included, given their dispatch role. The training will cover response procedures, the risks associated with PV and BESS systems, and protocols for both fire and non-fire emergencies. Training will be provided by Coffman Engineers, our third-party safety consultant and the industry's leading experts on solar and BESS safety. This trusted resource is an unusual feature of our work but we feel that its critical our community partners have access to safety best practices.

- **Water Storage ("Tank Farms"):** You requested three water tank locations around the site, including one at the BESS yard, with 2 x 10,000-gallon tanks at each location. We are working with our utility partner to determine how we can incorporate this equipment into our project construction plans.

- **Equipment Requests:** We also heard the Board's request for the purchase of a tactical water tender (2,000-gallon capacity) and a Type 5 brush truck. We understand the importance of this equipment to local emergency response capacity. We are now turning our focus to building our direct benefits plan. This consists of philanthropic support for key initiatives around the community. Our focus is to ensure we're a contributing, valuable member of the community and thus sharing in the success of our project to facilitate important community work is our priority. Given the feedback from the community around the resources of

the volunteer fire department, we feel like this equipment support would be an excellent use of our direct benefit funds.

Lastly, I wanted to flag an important milestone for our project. Attached are the Community Investment Plan (CIP) and Memorandum of Understanding (MOU) that we submitted to the Oregon Department of Energy (ODOE) on Friday, September 19. These documents reflect the ideas, feedback, and expertise shared with us by community members, particularly the information around agricultural mitigation projects. As part of their review, ODOE may reach out to confirm the information we submitted, including the contributions you made to shaping the CIP. We wanted you to be aware of this possibility in advance.

We would greatly value the opportunity to meet with you again in the coming weeks to gather your feedback on our emergency response planning, direct benefits, and general project development matters so that we can be confident that our work aligns with community priorities, including fire safety needs.

Thank you again for your time. We look forward to continuing the conversation.

Michael Binder
VP, Project Delivery
E michael.binder@brightnightpower.com
P +1-541-980-2608
www.brightnightpower.com

Ziola, Kiana

From: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Sent: Thursday, August 21, 2025 12:05 PM
To: Ziola, Kiana
Subject: FW: Request for Meeting: Biglow Solar & BESS

FYI

Kathleen Campanella
Senior Director, Development
E kathleen.campanella@brightnightpower.com
P + 850-714-3094

From: Kathleen Campanella
Sent: Thursday, August 21, 2025 12:05 PM
To: nsrfpd@outlook.com
Cc: Michael Binder <michael.binder@brightnightpower.com>; Arturo Alvarez <arturo.alvarez@brightnightpower.com>
Subject: Request for Meeting: Biglow Solar & BESS

Hi Chief Burbank,

Thank you for taking the time to talk with me today. We enjoyed having the opportunity to present the Biglow Solar & Storage project to the Fire Board at last week's meeting. As I mentioned on our call this morning, we are very excited to discuss the project with you in more detail and continue collaborating to ensure that your feedback is being incorporated into our overall project design and maintenance plan. Per your request, here is our availability for a call next week with our project PM, and engineering lead: Monday 8-10 AM PST, Thursday 9:30-10:30 AM PST, and Friday 8-10 AM PST. I know you mentioned mornings were preferable, so if these times don't work, I'm happy to look for additional slots.

Thank you,
Kathleen

Kathleen Campanella
Senior Director, Development
E kathleen.campanella@brightnightpower.com
P + 850-714-3094

Ziola, Kiana

From: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Sent: Thursday, August 21, 2025 6:21 PM
To: Ziola, Kiana
Subject: Fw: Biglow Follow-up & Road Use Agreement

Get Outlook for iOS

From: Mark Coles <mcoles@co.sherman.or.us>
Sent: Thursday, August 21, 2025 4:41:26 PM
To: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Subject: RE: Biglow Follow-up & Road Use Agreement

Kathleen,
It was a good and productive meeting on the solar and storage project that you have upcoming. I believe that both parties understand what will be expected in the Road Use Agreement. At this time we will continue to work with the draft use agreement as some key resources have not been called out yet by specific contractors. No need to get ahead of ourselves. We will continue with the information that we have and add to it as we receive updates. I will again be available in a week or two to continue on this, just let me know "when."

Mark Coles
Sherman County Road Master

From: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Sent: Thursday, August 21, 2025 9:51 AM
To: Mark Coles <mcoles@co.sherman.or.us>
Cc: Michael Binder <michael.binder@brightnightpower.com>
Subject: Biglow Follow-up & Road Use Agreement

Hi Mark,

We really appreciate you taking the time to meet with us on Tuesday, August 12th to discuss our Biglow solar and storage project in Sherman County. Per our discussion, it is your preference to negotiate the Road Use Agreement as BrightNight gets closer to construction (anticipated in June 2026) and our further along in our design. In the meantime, we are working on providing a draft Road Use Agreement to you, as we understand that Sherman County does not have their own Road Use template. We look forward to ongoing discussions and collaboration over the coming weeks.

Thank you,
Kathleen

Kathleen Campanella
Senior Director, Development
E kathleen.campanella@brightnightpower.com
P + 850-714-3094

Ziola, Kiana

From: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Sent: Tuesday, July 1, 2025 10:25 AM
To: Peters, Jessica; Ziola, Kiana; Tamara Erickson
Subject: FW: Biglow Project & Thank You

See below.

Kathleen Campanella
Senior Director, Development
E kathleen.campanella@brightnightpower.com
P + 850-714-3094

From: James Burgett <jburgett@shermancountyor.gov>
Sent: Tuesday, July 1, 2025 10:22 AM
To: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Cc: Tamara Erickson <tamara@brightnightpower.com>; Michael Binder <michael.binder@brightnightpower.com>; maribeth <maribeth@enermatters.com>; Amy Berg Pickett <amy@sunstone.energy>
Subject: Re: Biglow Project & Thank You

Received and confirmed.

- James

James Burgett
Sherman County Sheriff
(541) 565-3622
Jburgett@shermancounty.net

From: Kathleen Campanella <Kathleen.Campanella@brightnightpower.com>
Sent: Tuesday, July 1, 2025 9:19:45 AM
To: James Burgett <jburgett@shermancountyor.gov>
Cc: Tamara Erickson <tamara@brightnightpower.com>; Michael Binder <michael.binder@brightnightpower.com>; maribeth <maribeth@enermatters.com>; Amy Berg Pickett <amy@sunstone.energy>
Subject: Biglow Project & Thank You

Dear Sheriff Burgett,
Thank you for taking the time to meet with us on Friday, June 20th. We appreciated the opportunity to discuss the Biglow Solar and Storage project with you. As part of the EFSC process, we are required to request your confirmation that the meeting took place. Based on your feedback when we met you did not express any specific concerns about the project's potential impacts on public safety, but you did

recommend that we reach out to Mark Coles, Sherman County Road Master, requesting a meeting to discuss potential traffic and road implications. The team has contacted the Road Master to solicit feedback and request a Road Use Agreement. As we follow up on your suggestions and continue to learn more about how we can be valuable local partners, we will keep you updated and share any information about upcoming meetings related to our work. We will also plan to update our project website with important dates and any new information. In the meantime, please let us know if there are any other thoughts you'd like to share on the project. Your confirmation and receipt of this email would be greatly appreciated.

https://brightnightpower.com/biglow/

Best,
Kathleen Campanella

BRIGHTNIG
Power when you need it

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