Exhibit V

Wildfire Prevention and Risk Mitigation

Yellow Rosebush Energy Center
September 2025

Prepared for
Yellow Rosebush Energy Center, LLC

Prepared by

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Acronyms and Abbreviations

°F	degrees Fahrenheit
Applicant	Yellow Rosebush Energy Center, LLC
Facility	Yellow Rosebush Energy Center
FM	Fuel Model
CWPP	Community Wildfire Protection Plan
MW	megawatt
OAR	Oregon Administrative Rules
WUI	Wildland-Urban Interface

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1.0 Introduction

Yellow Rosebush Energy Center, LLC (Applicant) seeks to develop the Yellow Rosebush Energy Center (Facility), a solar energy generation facility, battery energy storage system, and related or supporting facilities in Wasco and Sherman counties, Oregon.

Exhibit V was prepared to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(v), related to wildfire prevention and risk mitigation. Exhibit V demonstrates that the construction and operation of the Facility, taking into account mitigation, is not likely to result in significant adverse impacts to the provisions listed in OAR 345-022-0115.

> *OAR 345-021-0010(1)(v) Information about wildfire risk within the analysis area, providing evidence to support findings by the Council as required by OAR 345-022-0115, including but not limited to, a draft Wildfire Mitigation Plan that satisfies the requirements of OAR 345-022-0115(1)(b).*

2.0 Wildfire Risk – OAR 345-022-0115(1)(a)

OAR 345-022-0115 (1) To issue a site certificate, the Council must find that:

> *(a) The applicant has adequately characterized wildfire risk within the analysis area using current data from reputable sources, by identifying:*

In compliance with OAR 345-001-0010(35)(c), the wildfire analysis area includes the site boundary (8,075 acres) for the Facility and a 0.5-mile buffer area around the site boundary (wildfire analysis area; 18,382 acres) (Figure V-1). The site boundary is defined in detail in Exhibits B and C.

2.1 Baseline Fire Risk – OAR 345-022-0115(1)(a)(A)

> *OAR 345-022-0115 (1)(a)(A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but not limited to topography, vegetation, existing infrastructure, and climate;*

The baseline wildfire risk within the site boundary and wildfire analysis area is moderate, based on the existing vegetation, relatively flat overall topography with steep slopes along the northeast, existing infrastructure, and a semi-arid climate (Misachi 2017). The following subsections describe the risks of wildfire for the proposed site boundary and wildfire analysis area in further detail.

2.1.1 Topography

The site boundary is generally bounded by US-97 6 miles to the east, US-197 8 miles to the west, Bakeoven Road along the edge to the south, and OR-216 4 miles to the north. The site boundary is

located approximately 9 miles east of Maupin, Oregon, and approximately 6 miles west of Kent, in unincorporated portions of Wasco County and Sherman County, Oregon (See Exhibit C).

Elevations within the site boundary are primarily between 600 to 1,400 meters. The site boundary borders and crosses Bronx Canyon. In the canyon, elevations range from -12 meters to 600 meters. The majority (97 percent) of the site boundary has slopes that range from 0 to 25 degrees (Table V-1). In areas where the site boundary crosses the Bronx Canyon, slopes increase in range from 25 to 50 degrees (Figure V-1).

Table V-1. Slope

Slope (degrees)	Percent of Area	
	Wildfire Analysis Area	Site Boundary
0-25	92	97
25-50	8	3
50-75	0	0
Total	**100**	**100**

2.1.2 Vegetation

As discussed in Exhibit P, the Facility is located entirely within the Oregon Department of Fish and Wildlife Designated Mule Deer Winter Range, Category 2 habitat. The area within the Facility micrositing category is primarily composed of eastside grasslands (habitat type Upland Grassland, Shrub-Steppe and Shrubland; subtype Eastside Grasslands), shrub-steppe (habitat type Upland Grassland, Shrub-Steppe and Shrubland; subtype Shrub-Steppe), and planted grasslands (habitat type Agriculture, Pasture, and Mixed Environs; subtype Planted Grasslands) (see Exhibit P, Tables P-2 and P-3 for detailed descriptions of habitat found in the vicinity of the site boundary).

The broad fuel model groups (reflective of vegetation type) are derived from data from the Oregon Community Wildfire Protection Plan (CWPP) Planning Tool (Oregon Explorer 2018). Fuel model groups within the wildfire analysis area consist of grass, grass/shrub, non-burnable-other, and timber-understory. As shown on Figure V-2 and described below in Table V-2, the majority of the vegetation within the site boundary is Fuel Model (FM) 122 – moderate load, dry climate grass-shrub (65 percent) and FM 102 – low load, dry climate grasses (33 percent). Within the wildfire analysis area, the most prominent fuel models are also FM 122 (57 percent) and FM 102 (35 percent). A further discussion of Fuel Models is provided in Section 2.2.

Table V-2. Fuel Models

Fuel Model	Percent of Area	
	Wildfire Analysis Area	Site Boundary
91	0	0
93	4	1
99	2	1
101	0	0
102	35	33
121	0	0
122	57	65
142	0	0
161	1	0
162	0	0
165	0	0
182	0	0
183	0	0
185	0	0
Total	**100**	**100**

2.1.3 Existing Infrastructure

Existing infrastructure within the wildfire analysis area includes the Buckley Substation, sub-transmission lines, the 500-kilovolt Bonneville Power Administration John Day to Grizzly Transmission Line, farming operations, and various businesses such as a hunting preserve (Exhibit C, Figure C-2). There are four homesites within the surrounding area and one homesite within the Facility site boundary. The one homesite located within the Facility site boundary will be removed prior to construction. Portions of three energy facilities are located within the wildfire analysis area: the Bakeoven Solar Project, Daybreak Solar Project, and Sunset Solar Project.

Paved roads within the wildfire analysis area include Bakeoven Road, Wilson Road, and Hinton Road. There are several unnamed graveled roads within the vicinity of the site boundary as well. There is an existing gas transmission pipeline within 10 miles, south of the wildfire analysis area (NPMS 2023).

2.1.4 Climate

The area has a cooler, semi-arid climate. Due to the lack of precipitation data for Kent, climate data was used for Antelope, Oregon, which is located approximately 15 miles southeast of the site

boundary. Based on available monthly normals of climate data between 1991 to 2020 for Antelope, the driest months on average are July, August, and September (NOAA 2023a). These months have average monthly precipitation rates of 0.34 inches (July), 0.34 inches (August), and 0.50 inches (September). Overall, these months are also the hottest months of the year, with average temperatures of 87.3 degrees Fahrenheit (°F) (July), 86.5°F (August), and 78.2°F (September). The total average annual precipitation for Antelope is 14.54 inches per year (NOAA 2023a), which is indicative of a semi-arid climate (Misachi 2017). Additionally, Antelope receives approximately 6.6 inches of snow in the winter months, with the coldest month (December) having approximately 3.6 inches of snowfall, an average daily maximum temperature of 41.6°F, and an average daily minimum temperature of 23.7°F (Table V-3; NOAA 2023a)

Table V-3. Summary of Monthly Normal Temperature and Precipitation at Antelope, OR (1991 – 2020)

Month	Max Temp (°F)	Avg Temp (°F)	Precipitation (inch)
January	42.9	34.2	1.50
February	46.1	36.2	1.29
March	52.8	41.1	1.22
April	58.7	45.6	1.52
May	68.4	53.6	1.99
June	75.7	60.2	1.04
July	87.3	68.9	0.34
August	86.5	68.3	0.34
September	78.2	61.2	0.50
October	63.5	49.8	1.23
November	49.7	39.5	1.73
December	41.6	32.7	1.81
Source: NOAA 2023a.			

2.1.5 Burn Probability

Burn probability is the likelihood of a wildfire greater than 250 acres burning a given location based on wildfire simulation modeling. This is an annual burn probability, adjusted to be consistent with the historical annual area burned. The burn probability classes range from non-burnable (a majority of non-burnable fuel types such as water, agriculture, or urban) to very high burn probability, which indicates greater than a 1-in-50 chance of a wildfire greater than 250 acres in a single year.

As shown in Table V-4, 47 percent of the wildfire analysis area (8,397 acres) has a high (1-in-500 to 1-in-100) and high-very high (1-in-100 to 1-in-50) burn probability. Similarly, 62 percent of the site boundary (5006.5 acres) has a high (1-in-500 to 1-in-100) burn probability. The remaining acres of

the site boundary (38 percent) have a very high burn probability (1-in-100 to 1-in-50; 36 percent) or a burn probability of zero (2 percent).

Table V-4. Burn Probability

Burn Probability	Percent of Area	
	Wildfire Analysis Area	Site Boundary
0	7	2
0 - 0.0001 Low (<= 1-in-10,000)	0	0
0.0001 - 0.0002 Low - Moderate (1-in-10,000 to 1-in-5,000)	0	0
0.0002 - 0.001 Moderate (1-in-5,000 to 1-in-1,000)	0	0
0.001 - 0.002 Moderate - High (1-in-1,000 to 1-in-500)	0	0
0.002 - 0.01 High (1-in-500 to 1-in-100)	47	62
0.01 - 0.02 High – Very High (1-in-100 to 1-in-50)	46	36
0.02 - 0.04 Very High (1-in-50 to 1-in-25)	0	0
Total	**100**	**100**

2.2 Seasonal Fire Risk – OAR 345-022-0115(1)(a)(B)

OAR 345-022-0115 (1)(a)(B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content;

Seasonal wildfire risk was assessed based on factors that are anticipated to remain consistent for several months, but may vary throughout the year or over time. These factors include annual and monthly cumulative precipitation levels, weather advisories (including fuel moisture content data), and average flame length (the average length of flames expected during a fire given local fuel and weather conditions). The seasonal wildfire risk within the site boundary and wildfire analysis area is low for most of the year, but moderate in the summer months based on the cooler, semi-arid climate, lower average flame lengths, but also low average rainfall during the summer months.

2.2.1 Precipitation

Based on available climate data for the Antelope 6 SSW station (NOAA 2023a), approximately 15 miles southeast of the wildfire analysis area, the driest months on average (based on the monthly normals of precipitation) are July, August, and September. These average precipitation values range from 0.34 (July), 0.34 (August), and 0.50 (September) (see Table V-3). All other months have

between 1.04 to 1.99 inches of precipitation per month. These three summer months are also the hottest months with average daily max temperatures of 87.3°F (July), 86.5°F (August), and 78.2°F (September) (Table V-3). The total average annual precipitation for the area is 14.54 inches per year, which is indicative of a semi-arid climate (Misachi 2017).

2.2.2 Fuel Moisture Content

Fuel moisture content is a primary variable when observing wildfire behavior. Fuel moisture content "is a measure of the amount of water in a fuel (vegetation) available to a fire, and is expressed as a percent of the dry weight of that specific fuel" (NOAA 2023b). Fuel moisture content also changes with weather, both seasonally and during short periods. The higher the fuel moisture content, the more difficult it is for fires to ignite and propagate. Living plants and dead fuels respond differently to weather changes; the drying and wetting processes of dead fuels is such that the moisture content of these fuels is strongly affected by weather changes. These moisture contents are influenced by precipitation, air moisture, air and surface temperatures, wind, cloudiness, as well as by fuel factors such as surface to volume ratio, compactness, and arrangement. Fuel moisture content is dynamic throughout the year and throughout the day (USFS 1970). Therefore, fuel moisture content within the wildfire analysis area and site boundary is dependent on current weather conditions, fuel moisture data, and seasonal weather patterns.

Fuel moisture varies with vegetation type. For instance, annual grasses are highly flammable while broadleaf vegetation is less flammable (USFS 1970). Additionally, live evergreen trees and shrubs can burn despite having a moisture content of over 100 percent. Fuel model groups within the wildfire analysis area consist of grass, grass/shrub, non-burnable-other, and timber-understory. As shown on Figure V-2 and described in Table V-2, 65 percent of the vegetation within the site boundary is FM 122 and 33 percent of the site boundary is FM 102. Within the wildfire analysis area, the most prominent fuel models are also FM 122 (57 percent) and FM 102 (35 percent). The primary carrier of fire in FM 122 is grass and shrubs; they also have an overall high spread rate. The moisture of extinction for this fuel type is low. The primary carrier of fire in FM 102 is grass and small amounts of dead fuel. If there are shrubs present, they typically do not affect fire behavior (Scott et al. 2005).

2.2.3 Flame Length

Average flame length shows the average length of flames expected, given local fuel and weather conditions (Oregon Explorer 2018). Flame lengths have potential to exceed the mapped values shown, even under normal weather conditions. Flame length is commonly used as a direct visual indication of fire intensity and is a primary factor to consider for firefighter safety and for gauging potential impacts to resources and assets.

As shown in Table V-5 and Figure V-4, 97 percent (7,810 acres) of the proposed site boundary has an average flame length of 4-8 feet. This indicates that the rate of fire spread could potentially be quick within the site boundary. Within the wildfire analysis area, 16,304 acres (89 percent) is

anticipated to have 4-8 foot average flame lengths. Areas just outside of Bronx Canyon have average flame lengths of 8-11 feet (425 acres) and greater than 11 feet (92 acres) in some areas. A portion of the wildfire analysis area (7 percent; 1,242 acres) has an average flame length of 0 feet.

Slopes within the site boundary and wildfire analysis area primarily range from 0 to 25 degrees (Section 2.1.1; Figure V-1). This directly correlates to the average flame length pattern.

Table V-5. Average Flame Length

Average Flame Length	Percent of Area	
	Wildfire Analysis Area	Site Boundary
0	7	2
>0-4	2	1
4-8	89	97
8-11	2	1
>11	1	0
Total	**100**	**100**

2.3 Areas of Heightened Risk – OAR 345-022-0115(1)(a)(C)

OAR 345-022-0115 (1)(a)(C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;

Areas of heightened risk are described using the CWPP Planning Tool Hazard to Potential Structures analysis layer (Table V-6, Figure V-5; Oregon Explorer 2018). Risk to assets includes the likelihood and consequences of wildfire on mapped highly valued assets including critical infrastructure, developed recreation, housing unit density, seed orchards, sawmills, and historic structures (CBI 2020). People and property data take into account housing density based on Where People Live and U.S. Forest Service private inholdings. Infrastructure includes critical infrastructure, developed recreation, housing unit density, seed orchards, sawmills, and historic structures (Gilbertson et al. 2018). As discussed in Section 2.1.3, existing infrastructure within the site boundary includes the Buckley Substation, sub-transmission lines, 500-kilovolt Bonneville Power Administration John Day to Grizzly Transmission Line, farming operations, various businesses, residences, and paved roads. Fifty-three percent of the site boundary has a moderate hazard to potential structures, 32 percent has a high hazard to potential structures, and 1 percent has a very high impact. Outside the site boundary, but within the wildfire analysis area, 47 percent of the area has a moderate potential impact to structures, while 29 percent have a high potential impact to structures, and 2 percent are considered very high. As shown on Figure V-5, the areas that have a very high potential impact to structures are generally along Bakeoven Road and around the existing Buckley Substation.

Table V-6. Areas of Heightened Risk (Hazards to Potential Structures)

Potential Impact	Percent of Area	
	Wildfire Analysis Area	Site Boundary
Very High	2	1
High	29	32
Moderate	47	53
Low	21	14
Non-Burnable/Very Low	2	0
Total	**100**	**100**

2.4 High-Fire Consequence Areas – OAR 345-022-0115(1)(a)(D)

OAR 345-022-0115 (1)(a)(D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and fire-sensitive wildlife habitat; and

The CWPP data on overall wildfire risk (Figure V-6) is used to identify high-fire consequence areas (Oregon Explorer 2018). The Pacific Northwest Quantitative Wildfire Risk Assessment report's layer Descriptions and Values spreadsheet outlines overall wildfire risk, which is determined by combining the likelihood and impact of the fire on all significant resources and assets that have been mapped (Gilbertson et al. 2018). These resources include critical infrastructure, developed recreation sites, housing unit density, seed orchards, sawmills, historic structures, timber, municipal watersheds, vegetation condition, and habitats for terrestrial and aquatic wildlife (CBI 2020). Risk ratings range from low to very high; low indicates that wildfire risk is low to all mapped resources and assets combined: critical infrastructure, developed recreation, housing unit density, seed orchards, sawmills, historic structures, timber, municipal watersheds, vegetation condition, and terrestrial and aquatic wildlife habitat. Very high indicates that wildfire risk is very high to all mapped resources and assets as well.

Critical infrastructure located within the site boundary includes the existing 500-kilovolt Bonneville Power Administration John Day to Grizzly Transmission Line. This transmission line also serves as the point of interconnect for the Facility. No other critical infrastructure is located within the site boundary.

There are no timber resources located within the site boundary. As discussed in Exhibit K, the site boundary encompasses private land that is currently primarily used for agricultural use. Within the site boundary there are cattle ranching operations and limited dryland crop production. There are four homesites within the surrounding area and one homesite within the Facility site boundary. The one homesite located within the Facility site boundary will be removed prior to construction. Fire-sensitive wildlife habitat located within the site boundary includes cheatgrass, western juniper, sagebrush shrubsteppe, and eastside grasslands. Western juniper encroachment affects fire

dynamics. Juniper is fire-resistant and tends to seed well in post-burned ecosystems. Juniper increases fuel loads and can lead to more intense fires that are harmful to sagebrush ecosystems. After such fires, invasive species like cheatgrass (*bromus tectorum*; a common species at the Facility) can dominate, further degrading the habitat and making recovery more difficult. Cheatgrass is particularly problematic because it can create a cycle of frequent, intense fires that sagebrush cannot withstand. Once cheatgrass establishes, it can outcompete native plants and change the fire regime, leading to more frequent and severe fires.

Sagebrush shrubsteppe would constitute as a fire-sensitive wildlife habitat, since sagebrush is crucial for many species, including sage-grouse, mule deer, and various songbirds. Additionally, eastside grasslands are a fire-sensitive wildlife habitat since they are also sensitive to juniper encroachment (and therefore fire). The shade from juniper trees can suppress grass growth, reducing the habitat's suitability for grassland species. Lastly, the presence of juniper can increase fire risk, as these trees can create a ladder effect that allows fires to climb into the canopy, leading to more severe burns.

As discussed in Exhibit T, the Facility will have no significant indirect or direct adverse impacts on any important recreational opportunities in the analysis area. The single identified recreational resource, Sage Canyon Outfitters, was deemed not an important recreational opportunity for the purposes of this application and thus no associated impact assessment was conducted per OAR 345-021-0010(t)(B) and (C). Consequently, no mitigation measures are proposed to avoid, reduce, or otherwise mitigate significant adverse impacts.

The percent of the site boundary and the wildfire analysis area that falls into each Fire Risk Rating is identified in Table V-7 and displayed on Figure V-6, although the majority of the site boundary and wildfire analysis area do not have data available. The site boundary and wildfire analysis area have a 2 percent and 4 percent (respectively) very high overall fire risk rating. As shown on Figure V-6, the areas with very high risk ratings are where there is existing infrastructure, such as roads, buildings, transmission lines, and substations. Bronx Canyon in the wildfire analysis area has an overall fire risk rating that ranges from benefit (0 percent) to low benefit (2 percent).

Table V-7. Overall Fire Risk Rating

Overall Fire Risk Rating	Percent of Area	
	Wildfire Analysis Area	Site Boundary
Very High	4	2
High	1	1
Moderate	1	0
Low	0	0
Low Benefit	2	0
Benefit	0	0
No Data[1]	92	97
Total	**100**	**100**

Note: All quantities may not result in 100 percent due to rounding adjustments.

1. There are no highly valued resources or assets (such as critical infrastructure, developed recreation, or housing unit density) mapped in the area, or simulated wildfires did not burn the area due to low historical occurrence/absence of burnable fuel (G).

2.5 Wildfire Hazard

The Oregon Wildfire Risk Explorer identifies wildfire hazard which is the "potential for wildfire to damage a structure" and its calculations account for the ways in which climate, weather, topography, and vegetation interact and influence two things: (1) burn probability; and (2) fire intensity. Burn probability is the average annual likelihood that a wildfire will impact a specific location. Wildfire intensity is represented as flame lengths and illustrates the potential for wildfires to damage structures and resist suppression when they occur (Oregon Explorer 2025).

As shown on Figure V-7 the wildfire hazard within the site boundary is classified as very high. A small portion within the analysis area is considered low hazard, likely because the land is irrigated and has a low burn probability and wildfire intensity.

2.6 Wildland-Urban Interface Areas

The Wasco County Community Wildfire Prevention Plan (Wasco County CWPP) defines Wildland-Urban Interface (WUI) areas as "any area where the combination of human development and vegetation have a potential to result in negative impacts from wildfire on the community" (WCPD 2024). The WUI figure provided in the Wasco County CWPP shows the Facility site boundary is located almost entirely within vegetated uninhabited area. Some areas of the wildfire analysis area have intermix, which are areas where structures and wildland vegetation are interspersed. As discussed in Section 2.1.3, existing infrastructure within the wildfire analysis area includes the Buckley Substation, sub-transmission lines, the 500-kilovolt Bonneville Power Administration John Day to Grizzly Transmission Line, farming operations, and various businesses such as a hunting preserve (Exhibit C, Figure C-2). Residences and businesses are located outside of the site

boundary, but within the wildfire analysis area. The Certificate Holder has analyzed areas of heightened risk and high-fire consequence areas above. It has been determined that the wildfire analysis area has a moderate fire risk.

3.0 Methods – OAR 345-022-0115(1)(a)(E)

OAR 345-022-0115 (1)(a)(E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.

Data from the CWPP Planning Tool (Oregon Explorer 2018) was used for the analyses provided in response to OAR 345-022-0115(1)(a) in Sections 2.1 through 2.4 of this exhibit. The CWPP tool provides a range of data for fire behavior and effects to help communities assess wildfire risk in their area. Additionally, the Wildfire Risk Explorer is another tool that shows the burn probability data, average flame length, fire history, and active fires. This map shows the assigned risk classification (extreme, high, moderate, low and no risk) for every tax lot in the state. Currently, the Senate Bill 762 statewide wildfire risk map and homeowner risk reports are unavailable while the map is being updated. As of right now, data shown on the map is from the 2018 Quantitative Wildfire Risk explorer (Oregon Explorer 2018).

The following 2018 Oregon CWPP datasets were used throughout this analysis (Oregon Explorer 2018):

- Burn probability;
- Average flame length;
- Hazard to potential structures;
- Overall wildfire risk;
- Slope; and
- Fuel models.

4.0 Wildfire Mitigation – OAR 345-022-0115(1)(b)

OAR 345-022-0115 (1)(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:

(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;

(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;

(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;

(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and

(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.

The Applicant prepared the attached Draft Construction Wildfire Mitigation Plan (Attachment V-1) and Draft Operations Wildfire Mitigation Plan (Attachment V-2) to meet applicable standards under OAR 345-022-0115(1)(b).

OAR 345-022-0115 (2) The Council may issue a site certificate without making the findings under section (1) if it finds that the facility is subject to a Wildfire Protection Plan that has been approved in compliance with OAR chapter 860, division 300.

OAR 345-022-0115 (3) This Standard does not apply to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 on or before the effective date of this rule.

OAR 345-022-0115(2) and (3) do not apply to the Facility.

5.0 Conclusion

Per the data reviewed and presented here, wildfire risk and consequences of fire in the proposed site boundary are typical for the vegetation type and fire regime encountered in Wasco County and Sherman County. Within the site boundary and wildfire analysis area, assets that could currently be impacted include residential structures, agricultural areas and farming operations, roads, existing substation, and existing transmission lines. If a wildfire did ignite near those assets, they could be at risk. After construction of the Facility, the number of assets at risk such as the solar arrays and associated infrastructure within the site boundary and wildfire analysis area would increase. It is anticipated that due to hazards to potential structures, high to very high burn probability, moderate expected intensity as measured by average flame length, fuels, weather, and topography, that post construction overall fire risk would be moderate. Therefore, the Energy Facility Siting Council may conclude that the Facility will comply with OAR 345-022-0115.

6.0 Submittal Requirements

6.1 Submittal Requirements

Table V-8. Submittal Requirements Matrix

Requirement	Location
OAR 345-021-0010(1)(v) Information about wildfire risk within the analysis area, providing evidence to support findings by the Council as required by OAR 345-022-0115, including but not limited to, a draft Wildfire Mitigation Plan that satisfies the requirements of OAR 345-022-0115(1)(b).	Section 1.0 and Attachments V-1 and V-2

6.2 Approval Standards

Table V-9. Approval Standards

Requirement	Location
OAR 345-022-0115 Wildfire Prevention and Risk Mitigation	–
(1) To issue a site certificate, the Council must find that:	-
(a) The applicant has adequately characterized wildfire risk within the analysis area using current data from reputable sources, by identifying:	Section 2.0
(A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but not limited to topography, vegetation, existing infrastructure, and climate;	Section 2.1
(B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content;	Section 2.2
(C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;	Section 2.3
(D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and fire-sensitive wildlife habitat; and	Section 2.4
(E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.	Section 3.0
(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:	Section 4.0, and Attachments V-1 and V-2
(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;	Section 4.0, and Attachments V-1 and V-2
(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;	Section 4.0, and Attachments V-1 and V-2

Requirement	Location
(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;	Section 4.0, and Attachments V-1 and V-2
(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and	Section 4.0, and Attachments V-1 and V-2
(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.	Section 4.0, and Attachments V-1 and V-2
(2) The Council may issue a site certificate without making the findings under section (1) if it finds that the facility is subject to a Wildfire Protection Plan that has been approved in compliance with OAR chapter 860, division 300.	Section 1.0
(3) This Standard does not apply to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 on or before the effective date of this rule.	Section 1.0

7.0 References

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Figures

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Yellow Rosebush Energy Center

Figure V-1
Slope

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

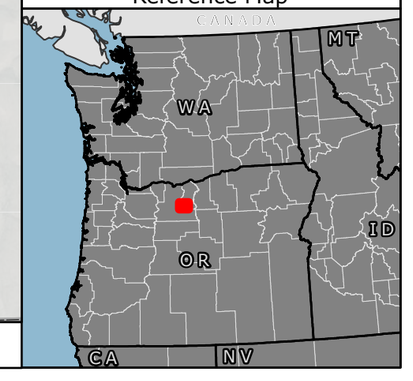
- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

Slope
- 0 - 25
- 25-50
- >50

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map



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WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

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Yellow Rosebush Energy Center

Figure V-2
Fuel Models

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

Fuel Models

- 91
- 93
- 98
- 99
- 101
- 102
- 103
- 121
- 122
- Fm141, SH1
- Fm142, SH2
- Fm143, SH3
- 161
- 162
- 165
- 182
- 183
- Fm184, TL4
- 185
- 186
- 188

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SAVION
A RENEWABLE ENERGY COMPANY

Reference Map

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WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

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Yellow Rosebush Energy Center

Figure V-3
Burn Probability

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

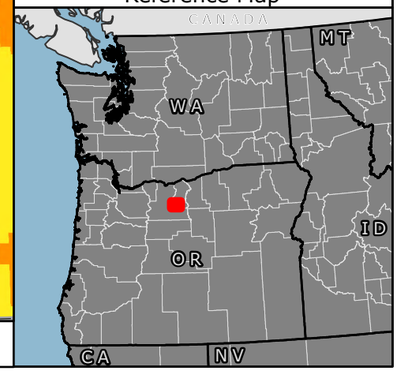
Burn Probability

- 0
- 0 - 0.0001 Low (<= 1-in-10,000)
- 0.0001 - 0.0002 Low (1-in-10,000 to 1-in-5,000)
- 0.0002 - 0.001 Moderate (1-in-5,000 to 1-in-1,000)
- 0.001 - 0.002 Moderate (1-in-1,000 to 1-in-500)
- 0.002 - 0.01 High (1-in-500 to 1-in-100)
- 0.01 - 0.02 High (1-in-100 to 1-in-50)

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map



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WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

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Yellow Rosebush Energy Center

Figure V-4
Average Flame Length

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

Average Flame Length (ft)

- 0
- >0 - 4
- 4 - 8
- 8 - 11
- > 11

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map

N

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WGS 1984 UTM Zone 10N

0 0.5 1 2
Miles

NOT FOR CONSTRUCTION

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Yellow Rosebush Energy Center

Figure V-5
Hazard to Potential Structures

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

Potential Impact to Structures

- Very High
- High
- Moderate
- Low
- Non-burnable/Very Low

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map

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WGS 1984 UTM Zone 10N

0 0.5 1 2
Miles

NOT FOR CONSTRUCTION

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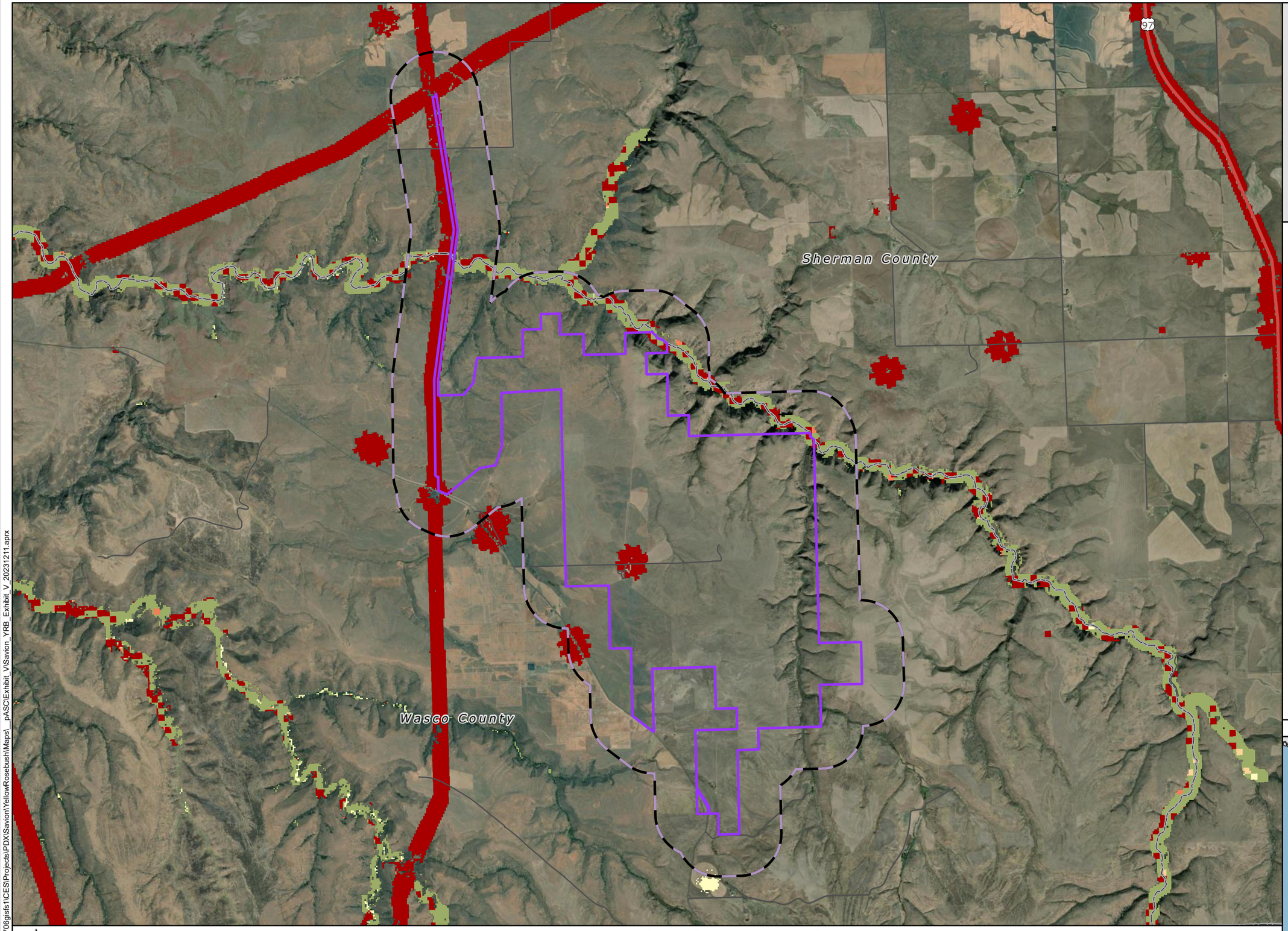
Yellow Rosebush Energy Center

Figure V-6
Overall Wildfire Risk

SHERMAN AND WASCO COUNTIES, OR



- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

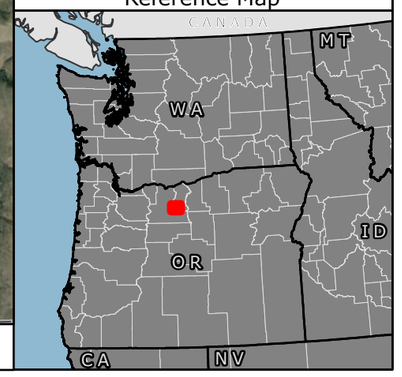
Overall Wildfire Risk

- Very high
- High
- Moderate
- Low
- Low benefit
- Benefit

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map



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WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

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Yellow Rosebush Energy Center

Figure V-7
Wildfire Hazard

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Analysis Area (0.5-mile Buffer)
- Facility Site Boundary
- US Highway
- Local Roads
- County Boundary

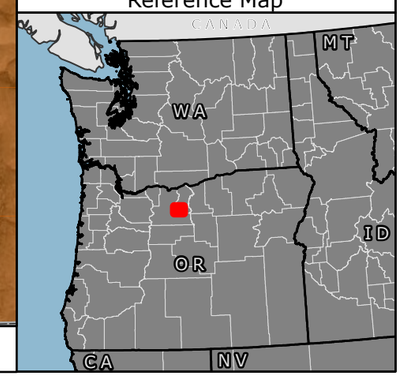
Wildfire Hazard

- Low Hazard
- Moderate Hazard
- High Hazard

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map



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WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

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Attachment V-1. Draft Construction Wildfire Mitigation Plan

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Contents

Draft Construction Wildfire Mitigation Plan

Prepared for the Yellow Rosebush Energy Center

Applicable EFSC Site Certificate Conditions

Wildfire Prevention and Risk Mitigation Condition 1 (PRE): Prior to construction of the facility or phase, as applicable, the certificate holder shall:

a. Finalize the Construction Wildfire Mitigation Plan, as provided in Attachment XX to the Final Order on ASC. The final Construction Wildfire Mitigation Plan shall be submitted to the Department for review and approval.
b. Complete pre-construction tasks and actions designated in the Construction Wildfire Mitigation Plan approved under sub a of PRE-WF-01.

[PRE-WF-01, Final Order on ASC]

Wildfire Prevention and Risk Mitigation Condition 2 (CON): During construction of the facility or phase, as applicable, the certificate holder shall:

a. Implement and require all onsite contractors and employees to adhere to, the Construction Wildfire Mitigation Plan required under PRE-WF-01.
b. After the first six months of construction; and then semi-annually during construction, review and update Construction Wildfire Mitigation Plan as designated in the Plan, and submit the results in the semi-annual construction report.
c. Updates to the Wildfire Mitigation Plan may be required if determined necessary by the certificate holder, certificate holder's contractor(s) or the Department to address wildfire hazard to public health and safety. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

[CON-WF-01, Final Order on ASC]

1.0 Finalizing Wildfire Mitigation Plan Prior to Construction (PRE)

1.1 Update Applicable Sections of WMP

To finalize this WMP prior to construction of the facility:

Update Section 3.1 with a summary of construction phasing including vegetation removal and grading based on areas of construction work or facility component.

Update Section 3.2 and include in this WMP the facility site maps described in Section 3.2.

Update Section 3.4 with fire department, certificate holder, and operational manager contact information and emergency response procedures. Update Section 3.4 with analysis area residence contact information and confirm analysis area residence contact letter sent to residences within site boundary and 0.5 miles from the facility.

Update section 3.7 to describe vegetation management and areas that will be managed to be vegetation-free, noncombustible space, or gravel surface.

2.0 Prior to Construction Task List (PRE)

Prior to construction of the facility, complete the activities in Sections 2.1 and 2.2.

2.1 Training (PRE):

Before beginning construction, the certificate holder will hold an on-site training for contractors and construction personnel, inviting specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency. The training will cover:

- Description of construction phasing;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of construction maintenance activities during Fire Season and Red Flag Warnings designated in this Plan;
    - Designation of individual(s) responsible for Fire Watch Service;
    - Designation of individual(s) responsible for checking fire danger/designations for the day.
- Rescue, Alarm, Contain and Extinguish RACE procedures including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and
    - Extinguish the incipient fire stage (if safe to do so).

- Provide information and encourage attendees to sign up for the County's emergency management notification system.

Training attendee list and training materials must be provided to the Department to demonstrate compliance.

The certificate holder will fill out and submit to the Department the template residence outreach letter provided as Attachment 1 of this WMP. Once Department confirms the letter to be sufficient, the certificate holder will mail to each residence within the 0.5 mile analysis area. Certificate holder will confirm mailing and submit to Department.

2.2 Facility Site Map(s) Submission (PRE):

Submit updated site maps from Section 3.2 concurrently to local fire department(s), County emergency management office, and the Department.

3.0 Construction Wildfire Mitigation Plan (CON)

3.1 Summary of Construction Phasing

The Applicant proposes to begin construction on or after June 2027 and to construct the Facility in phases. The Applicant requests flexibility to tailor the number of phases and the size and construction schedule for each phase to meet market demand. The entire Facility, including all phases, will be completed by 2035, unless the Applicant seeks an amendment to extend the construction deadline. The current phasing estimate is two phases of approximately three years each.

Information regarding phased vegetation removal and grading based on areas of construction work/facility component will be provided in a revised final Construction WMP prior to construction.

3.2 Facility Site Map(s):

This Construction WMP includes facility site maps. Figure 1 identifies the following:

- The location of facility access points as shown on Figure 1. The primary access point is located at Wilson Road at the western portion of the facility; and
- The perimeter and service roads within the solar array will be up to 20 feet wide with up to a 48-foot turning radius.

Figure 2 identifies the following:

- Wildfire risk at the site.

Figure 3 identifies the following:

- High-fire consequence areas/resources (includes existing infrastructure, residences, sensitive habitat, or cultural resources).

The following information will be verified and provided on a figure included in a revised final Construction WMP prior to construction:

- Location of vegetation free, noncombustible, defensible spaces;
- Location and dimensions of facility roads.
- A description and the location of emergency access procedures, including how emergency responders and/or adjacent landowners may access site for fire protection equipment or to extinguish an on-site fire when personnel will not be onsite (e.g. The facility will be gated and accessible by key available in a lock box or some other approved method at each entrance. Local fire departments and emergency officials will receive codes to access the facility in the event of a fire.);
- The type and location of fire protection equipment onsite;
- The location(s) of water source(s) that will be onsite during construction. (e.g. Water trucks onsite during construction will be staged at the O&M building and moved to locations where construction/hot work will be conducted); and
- The phasing for construction, including location of vegetation removal and grading, for Facility features and components.

3.3 Specifications for Fire Protection Equipment

The following fire suppression equipment will be carried in vehicles conducting maintenance activities and stored on-site at the O&M building at all times:

- Fire Extinguisher: Dry chemical. 2A:10BC (5 pound), properly mounted or secured;
- Pulaski;
- Hand Shovel: Round point. 26 to 28 in "D" Handle, blade - 12 inches long and 10 inches wide;
- Collapsible Pail or Backpack Pump: 5-gallon capacity; and
- Drip Can: 5-gallon capacity.

During fire season (as designated in this Plan) water truck(s)/water source, water buffalo, or tank with minimum 500-gallon capacity must be on site. The water truck or water supply shall include the following, unless approved by the Department:

- Pump should be maintained ready to operate and capable to provide a discharge of not less than 20 gallons per minute at 115 psi at pump level. Note: Volume pumps will not produce the necessary pressure to effectively attack a fire start. Pressure pumps are recommended.
- Provide enough hose (500 feet minimum) not less than 3/4" inside diameter to reach areas where power driven machinery has worked.
- Water supply, pump, and at least 250' of hose with nozzle must be maintained as a connected, operating unit ready for immediate use.

All internal combustion engines must be equipped with exhaust systems, mufflers and screens, or include an appropriate spark arrestor; and must be kept in good operating condition. All combustion engines (including but not limited to off road vehicles, chainsaws, and generators) will be equipped with a spark arrester that meets U.S. Forest Service Standard 5100-1.

All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.4 Facility Contact Information and Emergency Response Procedures

Smoke/fire detectors will be placed in the collector substation control room where the supervisory control and data acquisition (SCADA) system is located. Smoke/fire detectors are also integrated

components within each battery energy storage system (BESS) container. The detectors send a signal to the SCADA system which notifies both onsite staff and a Remote Operating Center (ROC), an off-site support center staffed 24/7, of the potential event. Onsite staff and staff at the ROC will confirm the accuracy of the incident to avoid potential false alarms and alert local firefighting services in the event of a fire of any size. There will be onsite Facility staff seven days a week during regular working hours. In the event an offsite fire is visible to Facility staff, they will notify the local fire department.

The O&M building will have basic firefighting equipment for use onsite during maintenance activities, such as shovels, beaters, portable water for hand sprayers, fire extinguishers, and other equipment.

Local fire department and county emergency management contact information:

- Bakeoven-Shaniko Rural Fire Protection Association
  - 541-910-0675 – BS-RFPA Chairperson
  - 9-1-1
- South Sherman Rural Fire Protection District
  - (541) 993-2929 - District Administrator
  - (541) 705-5211 - District Fire Chief
  - 9-1-1
- Shaniko Volunteer Fire Department
  - (503) 508-4688 – Scott Marrs (Fire Chief)
  - 9-1-1
- Maupin Volunteer Fire Department
  - (541) 993-4730 – Tom Troutman (Fire Chief)
  - 9-1-1

Fire department response times to the site:

- The Applicant will complete this information in coordination with the above listed fire responders prior to construction.

Certificate holder primary contact and contact of construction contractor manager(s):

- Jeffrey Watson, Development Manager
  - Savion, LLC
  - 422 Admiral Blvd, Kansas City, MO 64106
  - jwatson@savionenergy.com
  - (410) 349-7679
- Christopher Powers, Senior Director, Permitting & Environmental
  - Savion, LLC
  - 422 Admiral Blvd, Kansas City, MO 64106
  - cpowers@savionenergy.com
  - (760) 522-7563
- Construction contractor manager(s) contact information will be provided in the Final Construction WMP.

Provide list of residence addresses within the site boundary and 0.5 miles from the site boundary.

Map Tax Lot	Property Owner	Site Address
5S 15E 0 100	ASHLEY L STEVEN ET AL	PO BOX 158, Maupin OR 97037
5S 15E 0 1100	ASHLEY VICKI	90530 Bakeoven Rd, Maupin OR 97037
5S 16E 0 1201	ASHLEY VICKI	90530 Bakeoven Rd, Maupin OR 97037
5S 16E 0 2200	ASHLEY VICKI	90530 Bakeoven Rd, Maupin OR 97037
5S 16E 0 1300	CHRISMAN LEVI FAMILY LLC	62261 Deer Trial Rd, Bend OR 97701
5S 16E 0 600	CARVER FAMILY RANCHES LLC	91443 Hinton Rd, Maupin OR 97037
5S 16E 0 1000	PHILLIPS DON W ET AL	PO BOX 689, Beavercreek OR 97004-0689

Residence/landowner outreach letter is provided as Attachment 1 of this WMP. Use this letter to provide to new or updated residences with the analysis area as designated in Section 4.0, Plan Updates and Reporting Requirements.

Contact 911 in the event of:

- A fire or emergency on-site that cannot be addressed by personnel on-site and requires the assistance of fire or emergency medical personnel;
- A fire ignition on-site that spreads out of the fence line;
- Any fire off-site that does not have emergency responders on site.
    - To the extent that construction personnel can safely assist and/or provide equipment to help extinguish off-site fires until emergency responders are on site, it is encouraged to do so to assist in the spread of the fire, loss of life, property and damage to the environment.

3.5 Use of Vehicles and Power Driven Machinery at Site

The following best management practices (BMPs) to minimize fire risk from vehicle travel, equipment use, and fueling activities will be implemented at the site during construction:

- The movement of vehicles will be planned and managed to minimize fire risk.
- The contractor(s) will be responsible for identifying and marking paths for all off-road vehicle travel. All off-road vehicle travel will be required to stay on the identified paths. No off-road vehicle travel will be permitted while working alone. Travel off road or parking in vegetated areas will be restricted during fire season as designate din this Plan.
- Areas with grass that are as tall or taller than the exhaust system of a vehicle must be wetted before vehicles travel through it.
- Workers will be instructed to shut off the engine of any vehicle that gets stuck, and periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Stuck vehicles will be pulled out rather than “rocked” free and the area will be inspected again after the vehicle has been moved.
- The contractor(s) will designate a location for field fueling operations at the temporary construction yards. Any fueling of generators, pumps, etc. shall take place at this location only.

- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location alongside a county right-of-way. No fuel containers shall be in the vehicles that exit the right-of-way except the five-gallon container that is required for the water truck pump.
- All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.6 Fire Precaution Levels and Restrictions during Fire Season

Definitions:

Non-Fire Season – Approximately October - May

Fire Season – Approximately June-September, formally designated by the Oregon Department of Forestry (ODF). Under ORS 478.960 (4), a Fire Chief can establish Fire Season within a Fire District when ODF, under ORS 477.505, declares Fire Season. Begins seasonal restrictions for public and industry.

Fire Weather Watch - A fire weather watch is issued when there is a high potential for the development of a red flag event. A watch is issued 18 to 96 hours in advance of the expected onset of criteria. Intent of a fire weather watch is to alert forecast users at least a day in advance for the purposes of resource allocation and fire fighter safety. A watch means critical fire weather conditions are possible but not imminent or occurring.

Red Flag Weather Warning - A red flag warning is used to warn of impending or occurring red flag conditions. Its issuance denotes a high degree of confidence that weather and fuel conditions consistent with local red flag event criteria will occur in 48 hours or less. Specific Red Flag criteria differ for each situation and district in Oregon. Be extremely careful with open flames and other activities that emit sparks.

Hot Work - Any cutting, grinding, welding, or other activity that creates spark or open flame.

Fire Watch Service -

Fire watch shall:

- Be physically capable and experienced to operate firefighting equipment.
- Have facilities for transportation and communications to summon assistance.
- Observe portions of the facility where equipment activity occurred during the day.

Upon discovery of a fire, fire watch personnel must: First report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities; then, after determining a safety zone and an escape route that will not be cut off if the fire increases or changes direction, immediately proceed to control and extinguish the fire, consistent with firefighting training and safety.

Fire-Prevention Measures and Restrictions Associated with Fire Season:

Certificate holder shall maintain a log when construction activities are impacted by Fire Restrictions during Fire Season as designed in this Section. The log will include:

- The date;
- Fire Precaution Level;
- Description of actions taken, including if any measures were taken to reduce wildfire risk that are not identified in this Plan.

Non-Fire Season

- All hot work (must be conducted on roads or on non-combustible surfaces.
- Smoking in designated areas only.

Fire Season

- Before the start of each daily shift, at approximately 07:00 a.m. local time, a designated individual will check the fire danger posting by the National Weather Service for any Red Flag Warnings for that day.
- All hot work (any cutting, welding, or other activity that creates spark or open flame) must be conducted on roads or on non-combustible surfaces.
- Water source meeting specifications in this Plan will be on site during fire season.
- Following the completion of hot work, the Certificate Holder or contractor(s) must maintain a fire watch for 60 minutes to monitor for potential ignition.
- Fire watch shall be on duty during any breaks and for one hour after all power driven machinery used by the operator has been shut down for the day.
- Smoking in designated areas only.

Fire Weather Watch

- No hot work permitted.
- Driving and parking only permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power driven machinery used by the operator has been shut down for the day.
- No smoking on site.

Red Flag Weather Warning

- No hot work permitted.
- On-site personnel must be aware of Red Flag Warning.
- Driving and parking only permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power driven machinery used by the operator has been shut down for the day.
- No smoking on site.

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
Fire weather advisory	Not required	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins. On-site personnel must be aware of Red Flag Warning.
On-site water source	N/A	As specified in Section 3.2	As specified in Section 3.2 and 3.3.	As specified in Section 3.2 and 3.3.
Hot work	Only permitted on roads or on non-combustible surfaces.	Only permitted on roads or on non-combustible surfaces; fire watch required for 60 minutes after completion	Not Permitted	Not Permitted
Fire Watch Service	Not required	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.
Driving and Parking	As described in Section 3.5.	As described in Section 3.5.	Only permitted on roads or on non-combustible surfaces and Section 3.5.	Only permitted on roads or on non-combustible surfaces and Section 3.5.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

3.7 Vegetation Management

3.7.1 Vegetation-free, Noncombustible Space, and Vegetation Standards

Vegetation within the fence line and below the solar arrays will be maintained in accordance with the approved Revegetation and Reclamation Plan for the facility.

- Vegetation will be limited to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Vegetation near, at, or taller than the maximum height shall be removed or mowed.
- Mowing must be done in advance of fire season or accordance to any fire restrictions.
- At no point shall vegetation come in contact with electrical equipment.
- Vegetation buildup in the fence line(s), shall be removed.
- Any vegetation removed from the site will be disposed of and not stored onsite. Certificate holder and contractors will prevent the accumulation of combustible "burn piles" on site.

The following areas will be managed to be vegetation-free, noncombustible space, or gravel surface:

- 20-foot-wide service roads within solar fence line, composed of gravel, compacted aggregate base, or another commercially available suitable surface and able to support 75,000 pounds.
- Vegetation will be cleared by mowing and maintained along service roads to provide a vegetation clearance area for fire safety.
- The fenced areas around the collector substation, O&M building, and BESS will be graveled, with no vegetation present.

Vegetation in these areas will be managed by the following techniques:

- Low-height native vegetation planted and maintained inside the fenced area;
- Mowing; and
- Chemical (herbicide) application as directed by the Noxious Weed Control Plan.

3.8 Construction Training(s)

3.8.1 Safety Training

Once a year after construction begins, organize and hold an on-site training with certificate holder and construction personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency that covers:

- The location of electrical facility components and the fire safety measures associated with each component that have been constructed;
- Description of remaining construction phasing;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;

- Overview of smoking policy and locations;
- Overview of procedures and restrictions of construction activities during Fire Season, Fire Weather Watches, and Red Flag Warnings designated in this Plan;
    - Designation of individual(s) responsible for Fire Watch Service;
    - Designation of individual(s) responsible for checking fire danger/designations for the day.
- Rescue, Alarm, Contain and Extinguish (RACE) procedures including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and
    - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees County's emergency management notification system.

4.0 Plan Updates: Amendments and Reporting Requirements:

The following information must be provided to the Department in the semi-annual construction report required per OAR 345-026-0080:

- Section 3.1 and 3.2, any changes in wildfire risk at the site or changes in facility components or preventative features.
- Section 3.4, any changes in local fire protection agency personnel and operational managers.
- Section 3.4, any changes in analysis area residence/landowner addresses or contact information.
- A copy of the Fire Season Restriction Log identified in Section 3.6.

Information from the semi-annual construction reporting may be used to establish the performance of the WMP. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

This Plan may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council (EFSC) or ODOE, acting within its delegated authority of EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this Plan. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this Plan agreed to by ODOE.

Attachment 1: Residence/Landowner Outreach Letter

Yellow Rosebush Energy Center

Figure 1
Facility Layout

SHERMAN AND WASCO COUNTIES, OR

BUCKLEY SUBSTATION

MAUPIN SUBSTATION

BAKEOVEN SUBSTATION

BRICKOVEN SUBSTATION

Figure 1.1

Figure 1.2

Figure 1.3

3S 14E
3S 15E
3S 16E
3S 17E
4S 14E
4S 15E
4S 16E
4S 17E
5S 14E
5S 15E
5S 16E
6S 14E
6S 15E
6S 16E

216
97
197

Sherman County
Wasco County

- Facility Site Boundary
- Micrositing Corridor
- Map Grid
- County Boundary
- US Highway
- State Highway
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation
- Township/Range
- Section

- Solar Array
- Fence Lines
- Inverter
- Battery Energy Storage System Area
- O&M Area
- Collector Substation Area
- Temporary Construction Staging Area
- Underground Collector Line (34.5-kV)
- Access Roads
- Point of Interconnect
- Proposed BPA Switchyard
- Point of Interconnect (Alternate)
- Alternate Generation-tie Line (Up to 500 kV)

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map

1:85,000

WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

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Yellow Rosebush Energy Center

Figure 1.1
Facility Layout Details

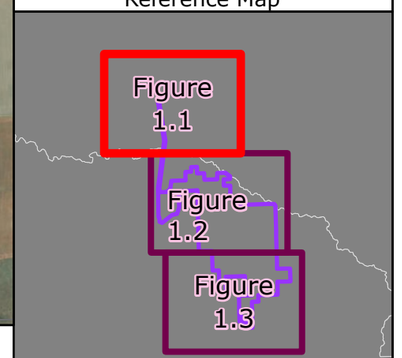
SHERMAN AND WASCO COUNTIES, OR

Proposed Facility Components
- Alternate Generation-tie Line (Up to 500 kV)
- Point of Interconnect (Alternate)
- Point of Interconnect

- Facility Site Boundary
- Micrositing Corridor
- County Boundary
- Section
- Township/Range
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map



BUCKLEY SUBSTATION
4S 15E
Dugger Rd
4S 16E
Sherman County
Wasco County

1:24,000 | WGS 1984 UTM Zone 10N | 1:24,000 1 inch = 2,000 feet | 0 0.5 1 Miles | NOT FOR CONSTRUCTION

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Yellow Rosebush Energy Center

Figure 1.2
Facility Layout Details

SHERMAN AND WASCO COUNTIES, OR

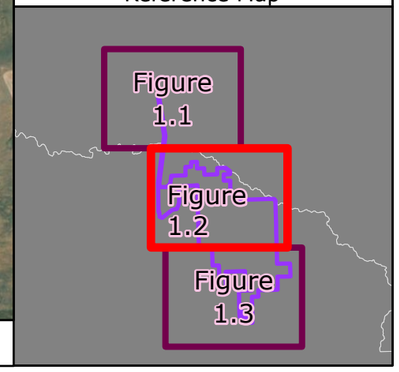
Sherman County
Wasco County
4S 15E
4S 16E
5S 15E
5S 16E
BAKEOVEN SUBSTATION
Wilson Rd

Proposed Facility Components
- Solar Array
- Fence Lines
- Inverter
- O&M Area
- Collector Substation Area
- Battery Energy Storage System Area
- Proposed BPA Switchyard
- Underground Collector Line (34.5-kV)
- Access Roads
- Access Roads
- Temporary Construction Staging Area
- Alternate Generation-tie Line (Up to 500 kV)
- Point of Interconnect (Alternate)
- Point of Interconnect

- Facility Site Boundary
- Micrositing Corridor
- County Boundary
- Section
- Township/Range
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map



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Yellow Rosebush Energy Center

Figure 1.3
Facility Layout Details

SHERMAN AND WASCO COUNTIES, OR

BRICKOVEN SUBSTATION

5S 16E

5S 15E

Hinton Rd

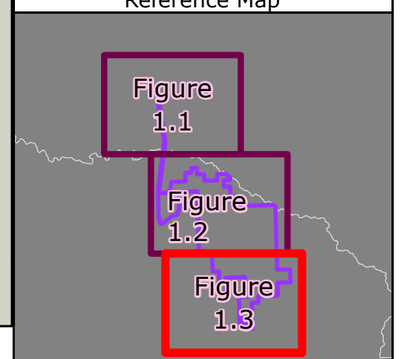
- Facility Site Boundary
- Micrositing Corridor
- County Boundary
- Section
- Township/Range
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation

Proposed Facility Components

- Solar Array
- Fence Lines
- Inverter
- Underground Collector Line (34.5-kV)
- Access Roads
- Access Roads
- Point of Interconnect (Alternate)
- Point of Interconnect

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map



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Yellow Rosebush Energy Center

Figure 2
Wildfire Hazard

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Analysis Area (0.5-mile Buffer)
- Facility Site Boundary
- US Highway
- Local Roads
- County Boundary

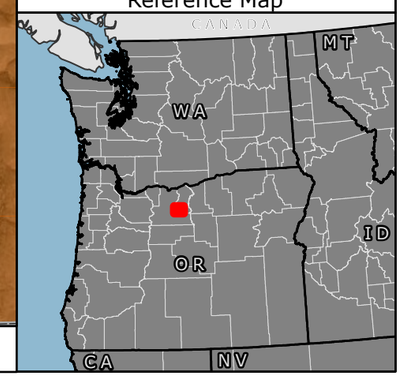
Wildfire Hazard

- Low Hazard
- Moderate Hazard
- High Hazard

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map



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WGS 1984 UTM Zone 10N

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Yellow Rosebush Energy Center

Figure 3
Hazard to Potential Structures

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

Potential Impact to Structures

- Very High
- High
- Moderate
- Low
- Non-burnable/Very Low

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map

1:69,000

WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

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Attachment V-2. Draft Operations Wildfire Mitigation Plan

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Contents

Draft Operational Wildfire Mitigation Plan

Yellow Rosebush Energy Center

Applicable EFSC Site Certificate Conditions

Wildfire Prevention and Risk Mitigation Condition 3 (PRO): Prior to operation of the facility or phase, as applicable, the certificate holder shall:

a. Finalize the Operational Wildfire Mitigation Plan, as provided in Attachment XX to the Final Order on ASC. The final Operational Wildfire Mitigation Plan shall be submitted to the Department for review and approval.
b. Complete pre-operational tasks and actions designated in the Operational Wildfire Mitigation Plan approved under sub a of PRO-WF-01.

[PRO-WF-01, Final Order on ASC]

Wildfire Prevention and Risk Mitigation Condition 4 (OPR): During operation, the certificate holder shall:

a. Implement the Operational Wildfire Mitigation Plan required under PRO-WF-01, included as Attachment XX to the Final Order on ASC.
b. After the first operational year, annually review and update Operational Wildfire Mitigation Plan as designated in the Plan, and submit the results in the annual report for that year.
c. Updates to the Wildfire Mitigation Plan may be required if determined necessary by the certificate holder or the Department to address wildfire hazard to public health and safety. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

[CON-WF-01, Final Order on ASC]

1.0 Finalizing Wildfire Mitigation Plan Prior to Operation (PRO)

1.1 Update Applicable Sections of WMP

To finalize this WMP prior to operation of the facility:

Update Section 3.1 based on final facility design including a brief description of the facility.

Update Section 3.2 and include in this WMP the facility site maps described in Section 3.2.

Update Section 3.4 with fire department, certificate holder, and operational manager contact information and emergency response procedures. Describe fire detection, fire suppression, and emergency shut off systems that will be activated in the event of a fire. Update Section 3.4 with analysis area residence contact information and confirm analysis area residence contact letter sent to residences within site boundary and 0.5 miles from the facility.

Update section 3.6 to describe vegetation management and areas that will be managed to be vegetation-free, noncombustible space, or gravel surface.

Update Section 3.7 and Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, based on manufacturer recommendations associated with each type of facility component and vegetation management consistent with this WMP and Revegetation Plan; and include an appendix with excerpts of manufacturer recommendations.

Update Section 3.10 with any additional details about facility monitoring.

Update Section 4.0 with any additional standards for future review and plan updates. Note that Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, will be used as a compliance checklist by the Department to establish the performance of the WMP. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation.

2.0 Prior to Operation Task list (PRO)

Prior to operation of the facility, complete the activities in Sections 2.1 and 2.2.

2.1 Training (PRO)

Before beginning operation, the certificate holder will hold an on-site training for operational personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency. The training will cover:

- The location of electrical facility components and the fire safety measures associated with each component;
- Battery-specific safety protocols, including how to appropriately address chemical fires, in the event of an emergency;
- The type, location, and proper use of fire protection equipment;

- Fire protection equipment maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of operational maintenance activities during Fire Season and Red Flag Warnings designated in this Plan;
    - Designation of individual(s) responsible for Fire Watch Service;
    - Designation of individual(s) responsible for checking fire danger/designations for the day.
- Overview of procedures for Rescue, Alarm, Contain and Extinguish (RACE) procedures, including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and
    - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to sign up for the County's emergency management notification system.

Training attendee list and training materials must be provided to the Department to demonstrate compliance.

The certificate holder will fill out and submit to the Department the template residence outreach letter provided as Attachment 1 of this WMP. Once Department confirms the letter to be sufficient, the certificate holder will mail to each residence within the 0.5 mile analysis area. Certificate holder will confirm mailing and submit to Department.

2.2 Facility Site Map(s) Submission (PRO):

Submit updated site maps from Section 3.2 concurrently to local fire department(s), County emergency management office, and the Department.

3.0 Operational Wildfire Mitigation Plan (OPR)

3.1 Summary of As-Built Facility Description with Design Features

The Facility consists of an up to 800-megawatts (MW) solar energy generation facility and an up to 800-MW battery energy storage system (BESS) and related or supporting facilities, within the 8,075-acre Facility site boundary in Wasco and Sherman counties, Oregon.

Facility Components:

- Solar Array Areas
- Collector Lines (overhead and underground)
- BESS
- Collector Substation
- Operations & Maintenance (O&M) Building
- Generation-tie Line (500 kV)
- Existing Road Improvements, New Site Access and Service Roads
- Perimeter Fence Line

3.2 Facility Site Map(s):

This Operational WMP includes facility site maps.

Figure 1 identifies the following:

- The location of facility access points as shown on Figure 1. The primary access point is located at Wilson Road at the western portion of the facility; and
- Location and dimensions of facility roads. The perimeter and service roads within the solar array will be up to 20 feet wide with up to a 48-foot turning radius.

Figure 2 identifies the following:

- Wildfire risk at the site;

Figure 3 identifies the following:

- High-fire consequence areas/resources (includes existing infrastructure, residences, sensitive habitat, or cultural resources).

The following information will be verified and provided in a revised final Operational WMP prior to construction:

- Location of vegetation free, noncombustible, defensible spaces;
- A description and the location of emergency access procedures, including how emergency responders and/or adjacent landowners may access site for fire protection equipment or to extinguish an onsite fire when personnel will not be onsite (e.g. The facility will be gated and accessible by key available in a lock box or some other approved method at each entrance. Local fire departments and emergency officials will receive codes to access the facility in the event of a fire.);
- The type and location of fire protection equipment onsite;
- The location(s) of water source(s) that will be onsite during construction. (e.g. Water trucks on site during construction will be staged at the O&M building and moved to locations where construction/hot work will be conducted); and
- The phasing for construction, including location of vegetation removal and grading, for facility features and components.

3.3 Specifications for Fire Protection Equipment

The following fire suppression equipment will be carried in vehicles conducting maintenance activities and stored on-site at the O&M building:

- Fire Extinguisher: Dry chemical. 2A:10BC (5 pounds), properly mounted or secured;
- Pulaski;
- Hand Shovel: Round point. 26 to 28 in "D" Handle, blade - 12 inches long and 10 inches wide;
- Collapsible Pail or Backpack Pump: 5-gallon capacity; and
- Drip Can: 5-gallon capacity.

During fire season (as designated in this Plan) water truck(s)/water source, water buffalo, or tank with minimum 500-gallon capacity must be on site. The water truck or water supply shall include the following, unless approved by the Department:

- Pump should be maintained ready to operate and capable of providing a discharge of not less than 20 gallons per minute at 115 psi at pump level. Note: Volume pumps will not produce the necessary pressure to effectively attack a fire start. Pressure pumps are recommended. Provide enough hose (500 feet minimum) not less than 3/4" inside diameter to reach areas where power driven machinery has worked.
- Water supply, pump, and at least 250' of hose with nozzle must be maintained as a connected, operating unit ready for immediate use.

All internal combustion engines must be equipped with exhaust systems, mufflers and screens, or include an appropriate spark arrestor; and must be kept in good operating condition.

All combustion engines (including but not limited to off road vehicles, chainsaws, and generators) will be equipped with a spark arrester that meets U.S. Forest Service Standard 5100-1.

All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.4 Facility Contact Information and Emergency Response Procedures

Smoke/fire detectors are located in the collector substation control room where the supervisory control and data acquisition (SCADA) system is located. Smoke/fire detectors are also integrated components within each BESS container. The detectors send a signal to the SCADA system, which notifies both onsite staff and a Remote Operating Center (ROC), an offsite support center staffed 24/7, of the potential event. Onsite staff and staff at the ROC will confirm the accuracy of the incident to avoid potential false alarms and alert local firefighting services in the event of a fire of any size. There will be onsite Facility staff seven days a week during regular working hours. In the event an offsite fire is visible to Facility staff, they will notify the local fire department.

The O&M building has basic firefighting equipment for use onsite during maintenance activities, such as shovels, beaters, portable water for hand sprayers, fire extinguishers, and other equipment.

Local fire department and county emergency management contact information:

- Bakeoven-Shaniko Rural Fire Protection Association
  - 541-910-0675 – BS-RFPA Chairperson
  - 9-1-1
- South Sherman Rural Fire Protection District
  - (541) 993-2929 - District Administrator
  - (541) 705-5211 - District Fire Chief
  - 9-1-1
- Shaniko Volunteer Fire Department
  - (503) 508-4688 – Scott Marrs (Fire Chief)
  - 9-1-1
- Maupin Volunteer Fire Department
  - (541) 993-4730 – Tom Troutman (Fire Chief)
  - 9-1-1

Fire department response times to the site:

- The Applicant will complete this information in coordination with the above listed fire responders prior to construction.

Certificate holder primary contact and contact of operational manager(s):

- Jeffrey Watson, Development Manager
  - Savion, LLC
  - 422 Admiral Blvd, Kansas City, MO 64106
  - jwatson@savionenergy.com
  - (410) 349-7679
- Christopher Powers, Senior Director, Permitting & Environmental
  - Savion, LLC
  - 422 Admiral Blvd, Kansas City, MO 64106
  - cpowers@savionenergy.com
  - (760) 522-7563
- Operational manager(s) contact information will be provided in the Final Operational WMP.

Provide list of residence addresses within the site boundary and 0.5 miles from the site boundary.

Map Tax Lot	Property Owner	Site Address
5S 15E 0 100	ASHLEY L STEVEN ET AL	PO BOX 158, Maupin OR 97037
5S 15E 0 1100	ASHLEY VICKI	90530 Bakeoven Rd, Maupin OR 97037
5S 16E 0 1201	ASHLEY VICKI	90530 Bakeoven Rd, Maupin OR 97037
5S 16E 0 2200	ASHLEY VICKI	90530 Bakeoven Rd, Maupin OR 97037
5S 16E 0 1300	CHRISMAN LEVI FAMILY LLC	62261 Deer Trial Rd, Bend OR 97701
5S 16E 0 600	CARVER FAMILY RANCHES LLC	91443 Hinton Rd, Maupin OR 97037
5S 16E 0 1000	PHILLIPS DON W ET AL	PO BOX 689, Beavercreek OR 97004-0689

Residence/landowner outreach letter is provided as Attachment 1 of this WMP. Use this letter to provide to new or updated residences with the analysis area as designated in Section 4.0, Plan Updates and Reporting Requirements.

Contact 911 in the event of:

- A fire or emergency on-site that cannot be addressed by personnel on-site and requires the assistance of fire or emergency medical personnel;
- A fire ignition on-site that spreads out of the fence line;
- Any fire off-site that does not have emergency responders on site.
  - To the extent that operational personnel can safely assist and/or provide equipment to help extinguish off-site fires until emergency responders are on site, it is encouraged to do so to assist in the spread of the fire, loss of life, property and damage to the environment.

3.5 Fire Precaution Levels and Restrictions during Fire Season

Definitions:

Non-Fire Season – Approximately October - May

Fire Season – Approximately June-September, formally designated by the Oregon Department of

Forestry (ODF). Under ORS 478.960 (4), a Fire Chief can establish Fire Season within a Fire District when ODF, under ORS 477.505, declares Fire Season. Begins seasonal restrictions for public and industry.

 **Fire Weather Watch** - A fire weather watch is issued when there is a high potential for the development of a red flag event. A watch is issued 18 to 96 hours in advance of the expected onset of criteria. Intent of a fire weather watch is to alert forecast users at least a day in advance for the purposes of resource allocation and fire fighter safety. A watch means critical fire weather conditions are possible but not imminent or occurring.

 **Red Flag Weather Warning** - A red flag warning is used to warn of impending or occurring red flag conditions. Its issuance denotes a high degree of confidence that weather and fuel conditions consistent with local red flag event criteria will occur in 48 hours or less. Specific Red Flag criteria differ for each situation and district in Oregon. Be extremely careful with open flames and other activities that emit sparks.

Hot Work -Any cutting, grinding, welding, or other activity that creates spark or open flame.

Fire Watch Service:

Fire watch shall:

- Be physically capable and experienced to operate firefighting equipment.
- Have facilities for transportation and communications to summon assistance.
- Observe portions of the operation on which activity occurred during the day.

Upon discovery of a fire, Firewatch personnel must: First report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities; then, after determining a safety zone and an escape route that will not be cut off if the fire increases or changes direction, immediately proceed to control and extinguish the fire, consistent with firefighting training and safety.

Fire-Prevention Measures and Restrictions Associated with Fire Season:

Certificate holder shall maintain a log when operational activities are impacted by Fire Restrictions during Fire Season as designed in this Section. The log will include:

- The date;
- Fire Precaution Level;
- Description of actions taken, including if any measures were taken to reduce wildfire risk that are not identified in this Plan.

Non-Fire Season

- All hot work must be conducted on roads or on non-combustible surfaces.
- Smoking in designated areas only.

 **Fire Season**

- Before the start of each daily shift, at approximately 07:00 a.m. local time, a designated

individual will check the fire danger posting by the National Weather Service for any Red Flag Warnings for that day.

- All hot work (any cutting, welding, or other activity that creates spark or open flame) must be conducted on roads or on non-combustible surfaces.
- Water source meeting specifications in this Plan will be on site during fire season.
- Following the completion of hot work, the Certificate Holder or contractor(s) must maintain a fire watch for 60 minutes to monitor for potential ignition.
- Fire watch shall be on duty during any breaks and for one hour after all power driven machinery used by the operator has been shut down for the day.
- Smoking in designated areas only.

Fire Weather Watch

- No hot work permitted.
- Driving and parking only permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power driven machinery used by the operator has been shut down for the day.
- No smoking on site.

Red Flag Weather Warning

- No hot work permitted.
- On-site personnel must be aware of Red Flag Warning.
- Driving and parking only permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power driven machinery used by the operator has been shut down for the day.
- No smoking on site.

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
Fire weather advisory	Not required	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins. On-site personnel must be aware of Red Flag Warning.
On-site water source	N/A	As specified in Section 3.2	As specified in Section 3.2 and 3.3.	As specified in Section 3.2 and 3.3.
Hot work	Only permitted on roads or on	Only permitted on roads or on	Not Permitted	Not Permitted

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
	non-combustible surfaces.	non-combustible surfaces; fire watch required for 60 minutes after completion		
Fire Watch Service	Not required	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.
Driving and Parking	As described in Section 3.9.	As described in Section 3.9.	Only permitted on roads or on non-combustible surfaces and Section 3.9.	Only permitted on roads or on non-combustible surfaces and Section 3.9.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

3.6 Vegetation Management

3.6.1 Vegetation-free, Noncombustible Space

The following areas will be managed to be vegetation-free, noncombustible space, or gravel surface:

- 20-foot-wide service roads within solar fence line, composed of gravel, compacted aggregate base, or another commercially available suitable surface and able to support 75,000 pounds.
- Vegetation will be cleared by mowing and maintained along service roads to provide a vegetation clearance area for fire safety.
- The fenced areas around the collector substation, O&M building, and BESS will be graveled, with no vegetation present.

Vegetation in these areas will be managed by the following techniques:.

- Low-height native vegetation planted and maintained inside the fenced area;
- Mowing; and
- Chemical (herbicide) application as directed by the Noxious Weed Control Plan.

3.6.2 Vegetation Standards, Surveys and Management

Vegetation within the fence line and below the solar arrays will be maintained in accordance with the approved Revegetation Plan, Soil Reclamation Plan and Noxious Weed Plan for the facility.

- Vegetation will be limited to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Vegetation near, at, or taller than the maximum height shall be removed or mowed.
- Mowing must be done in advance of fire season or accordance to any fire restrictions.
- At no point shall vegetation come in contact with electrical equipment.
- Vegetation buildup in the fence line(s), shall be removed.
- Any vegetation removed from the site will be disposed of and not stored onsite. Certificate holder and contractors will prevent the accumulation of combustible "burn piles" on site.

A vegetation assessment survey of the fenced area will be completed at least twice a year to monitor for vegetation clearances and maintenance of fire breaks, and wildfire hazards. One survey will occur before the fire season begins, in May or June. The second survey will occur in October or November. Additional vegetation surveys and management may be required throughout the year based on seasonally heightened fire risk, vegetation growth, or observations from operational maintenance staff.

The survey will be conducted by the a vegetation specialist and will be used to assess the frequency of upcoming vegetation maintenance and will assess and document the following:

- Location;
- Species;
- Height;
- Proximity to facility components;
- Estimated growth rate;
- Abundance;
- Clearance/setbacks; and
- Risk of fire hazard.

Results of surveys shall be provided in the annual updates to this WMP, designated in Section 4.0.

Vegetation control includes: (to be consistent with this WMP, Revegetation Plan, Soil Reclamation Plan and Noxious Weed Plan.)

- Low-height native vegetation planted and maintained inside the fenced area;
- Mowing; and
- Chemical (herbicide) application.

3.7 Inspections and Maintenance

Facility components will be inspected and maintained as designated in Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results* below. Update Table 2 based on manufacturer recommendations associated with each type of facility component and vegetation management consistent with this WMP and Revegetation Plan.

Table 2 includes an operational check list that will be filled out designating which personnel conducted inspections and maintenance, the dates of inspections and maintenance, and results. As

designated in Section 4.0, of this WMP, this table checklist will be submitted to demonstrate compliance with the WMP and used to determine if changes to the WMP are necessary. Other checklist may be provided prior to operation and in the annual review of the WMP, as approved by the Department.

Manufacturers' recommendations, or excerpts for inspections and maintenance are included as Appendix XX to plan. This appendix will be provided in a revised final Operational WMP prior to construction.

Lock Out/Tag Out Program:
During maintenance activities, electrical equipment is de-energized and physically locked or tagged in the de-energized positions to avoid inadvertent events that could result in arc flash.

- Ensure equipment is maintained to prevent and control sources of ignition.

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

A completed table will be provided in a revised final Operational WMP prior to construction.

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
System Protection	Protection Relays • Verify calibration and check functionality. Breaker Trip Testing • Verify the ability to trip breakers via coil.	X	Manufacturer's maintenance recommendations	Repair or replace once every 5 years	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
System Protection	System Protection Potential Transducers ("PTs") and Current Transducers ("CTs") • Verify calibration and check functionality.	X	Manufacturer's maintenance recommendations	Repair or replace once every 11 years	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Solar Inverter	• Visual inspection of inverter and surrounding area. • Verify torque specifications. • For alternating current (AC)/direct current (DC), perform inspection of communication and control power terminations. • Cycle AC/DC disconnects, inspect AC/DC contactors and cooling fans. • Perform infrared scan. Inverter Testing and Preventative Parts Replacement • Preventative maintenance replacement of inverter parts (e.g.: cooling system and power supplies that are operating effectively but scheduled for replacement per manufacturer's recommendations).		Spill Prevention, Control, and Countermeasures (SPCC) Plan[3] Manufacturer's maintenance recommendations	• Monthly SPCC Plan • Bi-annual Preventative Maintenance • Per manufacturer's recommendations	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Tracker System	• Perform visual inspection of tracking components; sync data with the Applicant's Operations Center. • Perform visual inspection of module clamps and rail fasteners for integrity. • Perform visual inspection of gear drives and shaft assemblies for alignment. • Grease gear boxes and/or drive shaft. • Verify wind stow functionality and lubricate slew ring.		Manufacturer's maintenance recommendations	• Per manufacturer's recommendations	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

A completed table will be provided in a revised final Operational WMP prior to construction.

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
Solar Array Structures	• Perform visual inspection of mounting structures, grounding, and cabling.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Solar Array Panels, Harnesses, and Combiner Boxes	At Applicant's sole discretion, to perform one of the following options: • Infra-red ("IR") Flyover a. IR scan of Site providing DC health of the Facility down to string level reporting; or • Physical DC Health Inspection a. Perform visual inspection of whips and wires connectors for damage or exposed conductors in gutters of harness combiner boxes. b. Measure and record current of each whip using clamp-on meter and identify low performing whips.		Applicant's discretion Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components	Vegetation: Vegetation under solar arrays will be maintained to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Methods include manual removal, mowing, or as designate din this Plan.	Vegetation: Twice a year, or more often, as designate din this Plan.	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Collector Substation	• Perform visual inspection of the grounding system. • Perform thermographic and visual inspection. • Perform uninterrupted power supply (UPS) inspection and maintenance.		Manufacturer's maintenance recommendations North American Electric Reliability Corporation (NERC)	Repair or replace annually	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon routine visual inspections.	Results: Notes:	Results: Notes:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

A completed table will be provided in a revised final Operational WMP prior to construction.

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
BESS	• Set battery maintenance (system check, cell balancing). • Battery cable, appearance, grounding, dust removal. • Inspect battery management system alarms. • Visual inspection of electrical terminations using thermal imager.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon routine visual inspections.	Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	• Check for correct operations of battery monitoring system and battery charging system. • Perform visual inspection of the battery room, mounting rack, batteries, and connections.		Manufacturer's maintenance recommendations	Repair or replace monthly	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	• Perform individual cell float charge and specific gravity checks.		Manufacturer's maintenance recommendations	Repair or replace quarterly	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	• Measure float cell voltage, pilot cell voltage, and electrolyte temperature of pilot cell.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Supervisory, Control and Data Acquisition (SCADA) & Network Equipment	• Plant equipment will be evaluated every 5 years to determine state of health and provide recommendations to Savion.		Manufacturer's maintenance recommendations	Upgrade, repair, or replace every 5 years	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Junction Box/ Auxiliary System/Miscellaneous	• Auxiliary equipment maintenance and inspection. • Enclosure dust removal. • Inspect cable entry, grounding, sealing, dust removal.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

A completed table will be provided in a revised final Operational WMP prior to construction.

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	• Critical sensor calibration check. • Maintenance report.				Results: Notes:	Results: Notes:
BESS Fire Safety System	• Fire alarm and detection system inspection. • Fire alarm and detection system maintenance. • Fire suppression System Inspection.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Thermal Management System	• Thermal management system inspection. • Thermal management system maintenance. • Motor Lubrication. • Clean Filters by rinsing with water. • Electric Heater - Dust accumulation on the coil, signs of overheating on the heater frame, traces of water or rust on the electric heater control box.		Manufacturer's maintenance recommendations	Repair or replace semi-annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Thermal Management System	• Coolant tester visual inspection.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS General	• System configuration check.		Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Medium Voltage (MV) and High Voltage (HV) Breaker	• Clean out dirt and debris. • Perform a manual operation test. • Perform an electrical test. • Perform a gas leakage test.		Manufacturer's maintenance recommendations NERC	Repair or replace per manufacturer's recommendations	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Generator Step-Up (GSU) Transformer	• Perform a visual inspection and check for proper operation of fan motor, oil pump motor, and breather. • Inspect and maintain substation transformer bushings		SPCC Plan[3]	Repair, overhaul, refurbish, or replace per manufacturer's recommendations	Date: Personnel:	Date: Personnel:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

A completed table will be provided in a revised final Operational WMP prior to construction.

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	and control panel. • Perform visual inspection of bushings for indications of local heating, oil leaks, proper oil level and indication of contaminants.		Manufacturer's maintenance recommendations		Results: Notes:	Results: Notes:
Inverter Step-up Transformer	• Perform infrared scans on low side of transformer when power is >80%. • Verify temperature and pressure sync with the contractor's Operations Center. • Perform visual inspection of the physical integrity of the enclosure and check for oil leakage. • Perform visual inspection for damage or discoloration of bushings. • Perform oil sample analysis on MV transformer(s). • Collect MV transformer oil sample(s) for 3rd party analysis. • Perform electrical test of transformer. • Verify integrity of surge arresters and check for proper tap position.		SPCC Plan[3] Manufacturer's maintenance recommendations	Replace or repair per manufacturer's recommendation	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Overhead electrical lines	Visual inspection of components, grounding and APLIC measures.		APLIC		Date: Personnel:	Date: Personnel:
	Vegetation: Visual inspection of vertical clearance distance between conductor and vegetation.		Vegetation: National Energy Reliability Corporation (NERC) - Vegetation maintenance standard FAC-003-0. Mow vegetation to achieve clearance requirements between conductor and ground.	Vegetation: Yearly, depending on vegetation condition.	Results: Notes:	Results: Notes:
1. The Operational SPCC Plan for the Facility will require these components to be inspected monthly for spills. During these inspections, Operational Staff will also visually inspect the component and surrounding area.						

3.8 Use of Vehicles and Power Driven Machinery at Site

The following best management practices (BMPs) to minimize fire risk from vehicle travel, equipment use, and fueling activities will be implemented at the site during operational activities:

- The movement of vehicles will be planned and managed to minimize fire risk.
- As necessary, contractor(s) or operational personnel will be responsible for identifying and marking paths for all off-road vehicle travel. All off-road vehicle travel will be required to stay on the identified paths. No off-road vehicle travel will be permitted while working alone. Travel off road or parking in vegetated areas will be restricted during fire season as designate din this Plan.
- Areas with grass that are as tall or taller than the exhaust system of a vehicle must be wetted before vehicles travel through it.
- Workers will be instructed to shut off the engine of any vehicle that gets stuck, and periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Stuck vehicles will be pulled out rather than "rocked" free and the area will be inspected again after the vehicle has been moved.
- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location alongside a county right-of-way. No fuel containers shall be in the vehicles that exit the right-of-way except the five-gallon container that is required for the water truck pump.
- All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.9 Operational Training(s)

3.9.1 Annual Safety Training

Organize and hold an on-site training with operational personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency, that covers:

- The location of electrical facility components and the fire safety measures associated with each component;
- Battery-specific safety protocols, including how to appropriately address chemical fires, in the event of an emergency;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of operational maintenance activities during Fire Season and Red Flag Warnings designated in this Plan; Rescue, Alarm, Contain and Extinguish (RACE) procedures, including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;

  - Contain the fire (if safe to do so); and
  - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to sign up for the County's emergency management notification system.

Training attendee list and training materials must be provided to the Department to demonstrate compliance.

3.9.2 Electrical Safety Program

All operational workers will be trained in electrical safety and the specific hazards of the facility. This training will address:

- Minimum experience requirements to work on different types of electrical components;
- Lockout/tagout procedures
- Electrical equipment testing and troubleshooting;
- Switching system;
- Provisions for entering high voltage areas (e.g., substation);
- Minimum approach distances; and
- Required personal protective equipment.

3.10 Facility Monitoring

Facility components that are monitored via the supervisory, control, and data acquisition (SCADA) system are the solar inverters, collector substation and battery energy storage system (BESS).

Facility components will be monitored remotely with the SCADA system 24 hours a day, 7 days a week.

Smoke/fire detectors will be placed in the collector substation control room where the SCADA system is located. Smoke/fire detectors are also integrated components within each BESS container. The detectors send a signal to the SCADA system, which notifies both onsite staff and a Remote Operating Center (ROC), an offsite support center staffed 24/7, of the potential event. Onsite staff and staff at the ROC will confirm the accuracy of the incident to avoid potential false alarms and alert local firefighting services in the event of a fire of any size. There will be onsite facility staff seven days a week during regular working hours. In the event an offsite fire is visible to facility staff, they will notify the local fire department.

Facility has remote shutdown capabilities at the inverter level and plant level, allowing facility electrical components to be disconnected in the event of electrical fault, fire, or other hazardous occurrences. This remote shutdown can be triggered manually or automatically by sensors within the SCADA system.

4.0 Plan Updates: Amendments and Reporting Requirements

The following information must be provided to the Department in the annual report required per OAR 345-026-0080::

- Section 3.1 and 3.2, any changes in wildfire risk at the site or changes in facility components or preventative features.

- Section 3.4, any changes in local fire protection agency personnel and operational managers.
- Section 3.4, any changes in analysis area residence/landowner addresses or contact information.
- Fill out Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, with the dates, personnel, and results of inspections and maintenance performed. A different form or checklist of operational inspection, vegetation management, and maintenance may be used if approved by the Department.
- A copy of the Fire Season Restriction Log identified in Section 3.5.

The certificate holder must review this WMP annually to determine if updates to the WMP are necessary. In its annual review, the certificate holder will evaluate changes in standards, policies, future technologies or best practices that could be implemented at the facility to address wildfire prevention or protection, including but not limited to those identified in Table 3, below.

Information from the annual reporting and from the certificate holder or Department review of sources in Table 3 may be used to establish the performance of the WMP. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

This Plan may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council (EFSC) or ODOE, acting within its delegated authority of EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this Plan. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this Plan agreed to by ODOE.

Table 3: Standards for Future Review

Reference	Description	Method
American Clean Power	Industry ground that establishes best practices for renewable energy projects.	The applicant is a member of ACP and participates in best practice development[1].
National Electric Reliability	National Energy Reliability Corporation develops electrical standards for large energy facilities.	The applicant will follow NERC Standard FAC-003-0 for its vegetation management program of transmission lines[2], or updates to this standard as approved by NERC.
Oregon Specialty Building Codes	Building codes applicable to inhabitable spaces, including the O&M building and the substation enclosure.	Remodeling to the O&M and enclosure structure that requires permits will follow any updates to the OSPC at that time.

Table 3: Standards for Future Review

Reference	Description	Method
Oregon Fire Code	The Oregon State Fire Marshal adopts the Oregon Fire Code, establishing minimum fire prevention and protection systems requirements applicable to certain structures, including but not limited to, energy systems.	The applicant will adhere to any applicable standards of the Oregon Fire Code and will incorporate features necessary to meet those standards into the design of the facility. Certificate holder will annually review and apply applicable standards that may apply to an operational facility.
NFPA Codes and Standards	The National Fire Protection Association publishes codes and standards intended to minimize the possibility and effects of fire and other risks/	The applicant will identify and adhere to any applicable codes and standards and will incorporate features necessary to meet those standards into the design of the facility. Certificate holder will annually review and apply applicable standards that may apply to an operational facility.
APLIC	Avian protection methods for electrical facility reduce fires related to bird/mammal nests on electrical equipment.	The applicant will follow APLIC guidelines on all overhead transmission infrastructure. An operational wildlife monitoring program will inspect for wildlife nesting on facilities that could cause fire, and take actions following applicable laws (e.g., MBTA).
ORS chapter 477, OAR chapter 629-043	Standards and rules for fire prevention in forest and range land administered by Oregon Department of Forestry	The applicant will be familiar with and operate consistently with the applicable standards, including any updates to rules or standards and will provide a summary of standards that are updated and implemented at the facility.
OAR chapter 860, division 024	Safety standards for transmission lines adopted by Oregon PUC	The applicant will maintain consistency with any applicable vegetation clearance requirements, pruning standards, and high fire risk zone safety standards and will provide a summary of standards that are updated and implemented at the facility.

1. Link to ACP Standards & Practices: https://cleanpower.org/resources/types/standards-and-practices/.
2. NERC FAC-003-0: https://www.nerc.com/pa/Stand/Reliability%20Standards/FAC-003-0.pdf.

Attachment 1: Residence/Landowner Outreach Letter

Yellow Rosebush Energy Center

Figure 1
Facility Layout

SHERMAN AND WASCO COUNTIES, OR

BUCKLEY SUBSTATION

MAUPIN SUBSTATION

BAKEOVEN SUBSTATION

BRICKOVEN SUBSTATION

Figure 1.1

Figure 1.2

Figure 1.3

3S 14E
3S 15E
3S 16E
3S 17E
4S 14E
4S 15E
4S 16E
4S 17E
5S 14E
5S 15E
5S 16E
6S 14E
6S 15E
6S 16E

216
97
197

Sherman County
Wasco County

- Facility Site Boundary
- Micrositing Corridor
- Map Grid
- County Boundary
- US Highway
- State Highway
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation
- Township/Range
- Section

- Solar Array
- Fence Lines
- Inverter
- Battery Energy Storage System Area
- O&M Area
- Collector Substation Area
- Temporary Construction Staging Area
- Underground Collector Line (34.5-kV)
- Access Roads
- Point of Interconnect
- Proposed BPA Switchyard
- Point of Interconnect (Alternate)
- Alternate Generation-tie Line (Up to 500 kV)

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map

1:85,000

WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

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Yellow Rosebush Energy Center

Figure 1.1
Facility Layout Details

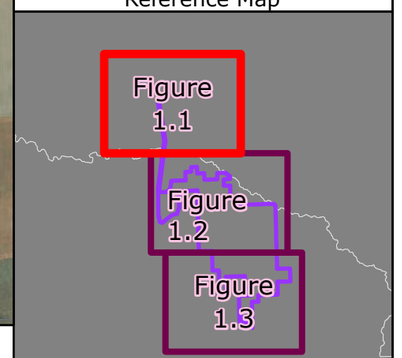
SHERMAN AND WASCO COUNTIES, OR

Proposed Facility Components
- Alternate Generation-tie Line (Up to 500 kV)
- Point of Interconnect (Alternate)
- Point of Interconnect

- Facility Site Boundary
- Micrositing Corridor
- County Boundary
- Section
- Township/Range
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map



BUCKLEY SUBSTATION
4S 15E
Dugger Rd
4S 16E
Sherman County
Wasco County

1:24,000 | WGS 1984 UTM Zone 10N | 1:24,000 1 inch = 2,000 feet | 0 0.5 1 Miles | NOT FOR CONSTRUCTION

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Yellow Rosebush Energy Center

Figure 1.2
Facility Layout Details

SHERMAN AND WASCO COUNTIES, OR

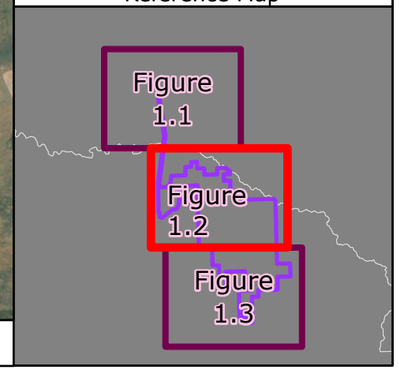
Sherman County
Wasco County
4S 15E
4S 16E
5S 15E
5S 16E
BAKEOVEN SUBSTATION
Wilson Rd

Proposed Facility Components
- Solar Array
- Fence Lines
- Inverter
- O&M Area
- Collector Substation Area
- Battery Energy Storage System Area
- Proposed BPA Switchyard
- Underground Collector Line (34.5-kV)
- Access Roads
- Access Roads
- Temporary Construction Staging Area
- Alternate Generation-tie Line (Up to 500 kV)
- Point of Interconnect (Alternate)
- Point of Interconnect

- Facility Site Boundary
- Micrositing Corridor
- County Boundary
- Section
- Township/Range
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map



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Yellow Rosebush Energy Center

Figure 1.3
Facility Layout Details

SHERMAN AND WASCO COUNTIES, OR

BRICKOVEN SUBSTATION

5S 16E

5S 15E

Hinton Rd

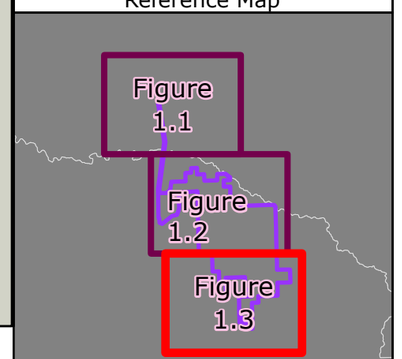
- Facility Site Boundary
- Micrositing Corridor
- County Boundary
- Section
- Township/Range
- Local Roads
- Exisiting Transmission Line 500-kV
- Existing Substation

Proposed Facility Components

- Solar Array
- Fence Lines
- Inverter
- Underground Collector Line (34.5-kV)
- Access Roads
- Access Roads
- Point of Interconnect (Alternate)
- Point of Interconnect

TETRA TECH SAVION A RENEWABLE ENERGY COMPANY

Reference Map



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Yellow Rosebush Energy Center

Figure 2
Wildfire Hazard

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Analysis Area (0.5-mile Buffer)
- Facility Site Boundary
- US Highway
- Local Roads
- County Boundary

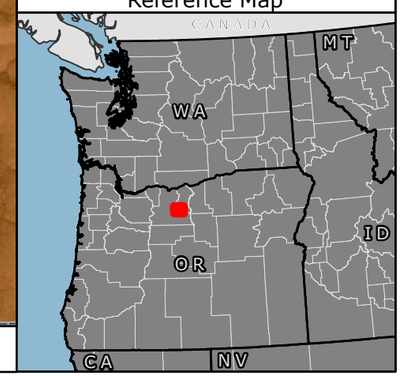
Wildfire Hazard

- Low Hazard
- Moderate Hazard
- High Hazard

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map



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Yellow Rosebush Energy Center

Figure 3
Hazard to Potential Structures

SHERMAN AND WASCO COUNTIES, OR

Sherman County

Wasco County

97

- Facility Site Boundary
- Analysis Area (0.5-mile Buffer)
- County Boundary
- US Highway
- Local Roads

Potential Impact to Structures

- Very High
- High
- Moderate
- Low
- Non-burnable/Very Low

TETRA TECH

SAVION
A RENEWABLE ENERGY COMPANY

Reference Map

1:69,000

WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

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